



**Parks Canada Interim Management Guidelines**  
*Hul'qumi'num Treaty Group Park Advisory Committee Report and Recommendations  
on Consultation and Accommodation*

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## **Executive Summary**

This report is intended to facilitate consultation communications between Parks Canada, the Hul'qumi'num Treaty Group Park Advisory Committee and the Chiefs and Councils of the member First Nations of the HTG, regarding the Interim Management Guidelines being proposed for the Gulf Islands National Park Reserve. It is hoped that the Chiefs and Councils, with any advice required from their staff or their representative on the HTG Park Committee will consider the recommendations considered in this report and provide feedback directly to Parks Canada on their views.

Over the past year, Parks Canada has been actively seeking advice from the Hul'qumi'num Treaty Group Gulf Island National Park Advisory Committee (HTG Park Committee) on draft Interim Management Guidelines (IMGs) that will guide the development and management of the park over the next five years. The Committee has provided numerous verbal and written recommendations to Parks Canada on the management statements in the draft plan, and have provided some site-specific guidance through conducting an overview study of traditional land use. This advice has been provided in a without prejudice, non-consultation context as per Section 19 of the interim agreement between Parks Canada and HTG.

Overall much of the advice given prior to the release of the draft IMGs have been taken into account in the current IMG draft. However, a number of key issues have either been left unaddressed, or could be more clearly expressed in the final IMGs.

The outstanding recommendations of the HTG Park Committee on the May 2005 *Draft Interim Management Guidelines* are as follows:

*Park Vision Statement:*

Further input should be sought on HTG member First Nations visions for the future of the GINPR area and explicitly recognized as an element of the Vision Statement.

*Ecosystem Management and Ecological Integrity:*

Clear acknowledgement should be made by Parks Canada of a desire or intent to work with First Nations communities on inventory, monitoring, and heavy use assessment programs.

Explicit mention should be made in the IMGs of the further consultation work required to accommodate the exercise of aboriginal rights and cultural practices in association with islets and other ecologically sensitive places

Parks Canada must work with HTG Park Committee to refine language in IMGs around the exercise of aboriginal harvesting rights by First Nations people in the

context of ecosystems management and ecological integrity.

Parks Canada should include statements in the IMGs regarding the importance of coming to terms with contemporary and desired use and use locations of traditional resources through active community-based research.

Cultural Heritage Management:

Parks Canada should provide Culturally Sensitive Area designation for known cultural heritage sites in order to guarantee a conservative management regime in the short-term while the Park Reserve Management Plan is under development. As this zoning may be unorthodox given decades of secrecy practised by the Provincial Government around heritage sites, we recommend that further specific advice of Elders and knowledgeable community members be sought on this matter.

Traditional use activities in places identified in the *Final Report of the HTG Traditional Use Overview Study, 2003* as ‘Key GINPR Management Areas’ matters need to be taken into account in finalizing the IMGs.

The IMG statement on Human Remains needs to be redrafted by Parks Canada to reflect the high degree of probability that Human Remains will be encountered and the importance of management practices, respectful relationships and public awareness and understanding that these ancestral remains afford.

Visitor Activities Management:

Stronger language indicating that visitor activities must be compatible with the “protection and maintenance” of cultural heritage areas is a more appropriate commitment in the IMGs.

Clear and conservative strategies need to be expressed by Parks Canada in the IMGs (and in the related Area Plans) to address serious land use conflicts between visitor activity areas and the sensitive cultural heritage sites located at them.

Parks Canada need to provide opportunities for collaborative and capacity-enhancing relationships to First Nations through making explicit reference to inviting First Nations participation in environmental assessment work.

In IMGs, explicitly recognize the need for conservation-minded analysis of potential impacts of new Saturna Island campsite(s) on sensitive cultural heritage sites in the areas.

Public Awareness and Understanding:

Explicit acknowledgement should be made in the IMGs to guide Parks Canada staff in planning future public awareness activities due to the increased time and costs of more fully collaborative relationships with First Nations.

Zoning

CSA designations should be applied to archaeological sites to assist in providing a clear policy mechanism for managing visitor impact on sensitive First Nations cultural heritage sites, particularly ones which have the potential to contain human remains.

Parks Canada should in the IMGs commit to work with current aboriginal food harvesters to minimize conflict that may result from restrictive zoning in areas designated as Zone 1.

The IMG key management concepts regarding zone 1-special preservation should be restated clearly in a way that will in plain language describe the management intentions of this designation vis-à-vis the exercise of aboriginal harvesting rights and other practices integral to the distinctive culture of Coast Salish peoples. The HTG Park Committee recommends that an affirmative statement recognizing and affirming the right to practice aboriginal harvesting activities be made, subject to justifiable limitations for public health, safety and conservation, and only after adequate attempts at accommodating these rights.

The HTG Park Committee is hopeful that if the final IMGs take into account the significant changes suggested here, the interests, objectives, and rights of the Hul'qumi'num people may be largely consistent with the interim management regime being established for the new Gulf Islands National Park. The process and relationships established for these management discussions have created unique space for future Hul'qumi'num cooperative management efforts with Parks Canada in the Gulf Island National Park Reserve.

## Introduction

Over the past year, Parks Canada has been actively seeking advice from the Hul'qumi'num Treaty Group Parks Advisory Committee (HTG Park Committee) on draft Interim Management Guidelines (IMGs)<sup>1</sup> that will guide the development and management of the park over the next five years.

During this time, the Committee has provided numerous verbal and written recommendations to Parks Canada on the management statements in the draft plan, and have provided some site-specific guidance through conducting an overview study of traditional land use. This advice has been provided in a without prejudice, non-consultation context as per Section 19 of the interim agreement between Parks Canada and HTG.

Overall much of the advice given prior to the release of the draft IMGs have been taken into account in the current IMG draft. However, a number of key issues have either been left unaddressed, or could be more clearly expressed in the final IMGs.

The HTG Park Committee is hopeful that if the final IMGs take into account the significant changes suggested here, the interests, objectives, and rights of the Hul'qumi'num people may be largely consistent with the interim management regime being established for the new Gulf Islands National Park Reserve.

### *Purpose of this Report*

This report is intended to facilitate consultation communications between Parks Canada, the HTG Park Advisory Committee and the Chiefs and Councils of the member First Nations of the Hul'qumi'num Treaty Group, regarding the Interim Management Guidelines being proposed for the Gulf Islands National Park Reserve.

It is hoped that the Chiefs and Councils, with any advice required from their staff or their representative on the HTG Park Committee will consider the recommendations considered in this report and provide feedback directly to Parks Canada on their views. Parks Canada has committed to making themselves available for further consultation, as required, with the HTG

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<sup>1</sup> Interim Management Guidelines are required by the Park Establishment Agreement between Canada and BC. The purposes of the IMGs are as follows: "IMGs are developed for new national parks and national park reserves that have critical operational issues requiring attention during the interim period following park establishment and before a Park Management Plan is approved. Generally, IMGs are designed with a five-year time horizon in mind. IMG focus on the requirement to protect ecological integrity and provide guidance for visitor use and communications. *In the case of GINPR, there is significant cultural heritage that requires management attention and direction, which the IMGs also address. [emphasis added]*" (Draft IMGs 2005:3).

leadership, communities and technical staff.

*Report Outline*

This report outlines the context and history of the advisory relationship between the HTG Park Committee and Parks Canada. In it is a summary and analysis of the draft IMGs and the advice given by the HTG Park Committee. Following from this summary and analysis is provided clear recommendations for accommodating the interests of the Hul'qumi'num communities that have been expressed. The report concludes with a discussion of the expressed desire to build on the relationships established in this process to exercise more fully cooperative management of the Gulf Islands National Park Reserve.

## **Parks Canada Interim Management Guidelines and the HTG Park Advisory Board**

The HTG Gulf Islands National Park Reserve Advisory Committee (HTG Parks Committee) was established on 20 January 2004 to provide an avenue for representatives of the six member Bands of the Hul'qumi'num Treaty Group to advise Parks Canada personnel on important aspects of the planning and management for the new Gulf Islands National Park Reserve.

Chief-appointed representatives from the Hul'qumi'num Treaty Group and the First Nations Program Manager from Parks Canada were involved in the process. The committee members are: Warren Johnny (Chemainus), Robert Sam (Penelakut), Ben Norris (Halalt), Veronica Kauwell (Lyackson), Chief Cyril Livingstone (Lake Cowichan) and Norbert Sylvester (Cowichan). The Committee has also drawn on the expert advice of elders Arvid Charlie, Angus Smith, Irene Harris, and Auggie and Laura Sylvester. HTG staff members have included Brian Thom and Eric McLay in roles as advisors and Bob Daniels, Lea Joe, Marlo Paige, and Clinton Charlie at various times in the role of Park Committee Coordinator.

The terms of reference for this advisory committee specify that it was to operate for one calendar year, with an extension possible upon agreement of both parties. It is important to note that this work takes place without prejudice to treaty negotiations that are currently underway involving the Hul'qumi'num Treaty Group (HTG). Both Parks Canada and the HTG recognize that the HTG has a significant role to play in the planning and management of the Gulf Islands National Park Reserve, and both have agreed that HTG's involvement in the Committee in no way prejudices any aspect of the treaty negotiations.

### *Shared Territory with Neighbouring First Nations*

The members of the HTG Park Committee have, in their work, always recognized and expressed a desire to respect the Saanich area First Nations views and interests in the area of the park. As one Committee member expressed, "*Saanich must not be left out. They are important to us and share a lot of our values. It's not our territory; it's not their territory. It is shared territory.*" Though Saanich area First Nations have chosen to remain, to date, outside the HTG process, most communities have recently begun engaging directly with Parks Canada.

## **The Consultation and Accommodation Process in National Park Reserve IMG Planning**

A key term of reference for the HTG Park Committee concerns its role in the development of Interim Management Guidelines for the Park. This role is defined as follows:

14. The Committee will be the interim venue through which the Committee, based on a consensus approach, will provide advice to the Superintendent on the... b) Hul'qumi'num Mustimuhw role in providing advice on interim management guidelines and management plans

The HTG Park Committee operated under the safeguard of being in a completely without prejudice context with respect to consultation on aboriginal title and rights issues. All advice given has been on a without prejudice basis. Under clause 15 of the Interim Agreement, the Committee acts as “the initial point of contact for consideration of advice”. Clause 17 affirms that this advice is “not intended to recognize, deny or amend any of the rights of Canada or the Hul'qumi'num Treaty Group”. Clause 18 clarifies that the Agreement that formed the Committee is “without prejudice to any positions any party may take in future negotiations and to any legal positions which have been taken or may be taken by any party in any court proceeding or process”.

The HTG members of the Committee have frequently discussed the IMGs, both at Committee meetings attended by Parks Canada and in a number of pre-meeting internal workshop sessions. A brief history of the activities of the Committee vis-à-vis the development and review of the IMGs is provided below:

- In April 2004, HTG was asked to respond on which issues arising from “List of Management Items Identified to Date” it would be involved in and what might be missing and what could be done (studies, etc).
- HTG Committee was provided an additional early view of the IMGs on 21-Sep-04 with the document “Working Draft Ecological Integrity Issues: Possible IMG Directions”
- HTG Committee provided formal written and oral ‘advice’ on June 8<sup>th</sup>, Sept 20<sup>th</sup>, Oct 29<sup>th</sup>, Nov 23<sup>rd</sup>, Apr 5<sup>th</sup>. Parks Canada provided formal written and oral ‘responses’ to the Committee’s advice in September and November 2004.
- Parks Canada invited bands to ‘Consult’ in letter on 30 July 04, with HTG sending a context letter describing the activities of Advisory Committee and requesting to be cc’ed on letters from Bands. On 10 Sep 04 Chemainus First Nation requested formal consultations. On 01 Oct 04, Parks Canada sent a letter indicating it would be willing. A second round of letters was sent 29-Apr-05 to each band from Parks Canada, inviting suggestions for a consultation process.
- On 01-Oct-04 HTG received \$5,000 to do a TUS overview study. A final report was delivered in December 2004.
- HTG Committee was presented with an early draft of the IMGs in March 2005, about a month prior to public release



- In May 2005, Parks Canada commissioned the Consultation Communications Project on GINPR IMG to inform HTG leadership and community members about the nature and scope of work to date. This document and the accompanying newsletter are the results of this communications project.

Parks Canada recognizes that they have legal obligations to consult with First Nations about the approval by the Director General for National Parks of Interim Management Guidelines or the Minister for Management Plans for the GINPR. The consultation process is planned to occur as a result of the informed feedback from the HTG Parks Committee to the HTG community and leadership. Processes for engagement in that consultation are to be worked out between each Hul'qumi'num member First Nation Indian Band and Parks Canada. The current report and accompanying newsletter is intended to provide a full picture of the advice provided so that there is a solid foundation on which this consultation can occur.

## **HTG Park Committee ‘Advice’ on GINPR Interim Management Guidelines**

Over the past year, the the HTG Parks Committee has had frequent opportunity to comment both in writing and verbally on each of the management items identified in the IMGs. Below is a compilation summary of all of the comments, both from the documents tabled at the committee meetings and from the notes and minutes of the Committee meetings and the prep sessions had prior to the meetings.

Following these summary comments is an analysis of where the draft IMGs require further development to account for the comments and specific recommendations for those revisions.

These comments, analysis and recommendations are made in the context of the GINPR advisory committee relationship, where all parties acknowledge that the process we undertake is not to be considered consultation. The Committee had intended that these comments would provide groundwork for larger consultation processes.

The Interim Management Guidelines topics covered by these comments and analysis include (1) National Park Vision; (2) Ecosystems Management and Ecological Integrity; (3) Cultural Heritage Management; (4) Visitor Activities Management; (5) Public Awareness and Understanding; (6) Management of Public Safety; and (7) Interim Park Zoning. These topics track closely the substantive areas of the draft Interim Management Guide.

### **National Park Vision**

**Context:** The Vision Statement for the Gulf Island National Park Reserve was “guided by the Parks Canada mandate and included input from public consultations and the Park Advisory Board”. Though in the introduction to the vision statement, Parks Canada commits to developing “active working relationships and partnerships” with First Nations communities to “help protect the national park reserve and the broader ecosystem, as well as enhancing public awareness and visitor experiences” and seeking strong support “by those First Nations who have traditional ties to the area”, the long term vision statement itself does not make any particular mention of First Nations values, rights or visions of their distinctive long-term connection to these lands.

**Advice of HTG Park Committee:** The HTG Park Advisory Board did work to contribute to this Vision Statement in the spring of 2004.

**Analysis of Draft IMGs:** This work of the Committee is neither acknowledged or integrated into the plan.

**Recommendation:** Further input should be sought from First Nations on their vision being recognized as an element of the Vision Statement.

### **Ecosystems Management & Ecological Integrity**

**Context:** The Interim Management Guidelines outline as a priority the management of ecosystems and ecological integrity. The eleven key issues include: representation of the Straight of Georgia Lowlands natural region; assessing current level of ecological integrity; sensitive ecosystems and species of concern; management of introduced, invasive and hyper-abundant species; management of heavily used areas; fragmentation of the national park reserve land base; exploitation of natural resources; First Nations traditional uses; marine pollution; adjacent land uses; and management of large mammals and carnivores. Managing the lands and waters in the Park Reserve as an ecosystem, and maintaining and re-building ecological integrity are set out as the leading management concerns over the next five years.

**Advice of HTG Park Committee:** In moving from the framework of these issues into the specific management direction statements, the members of the HTG Park Committee provided substantive feedback. The feedback provided is summarized below:

- Committee members advise that, in determining the representativeness of the land assembly for the Straight of Georgia Lowlands natural region, context should also be provided for the diversity of ecosystems important to First Nations histories and cultures. This will provide a useful measure of representativeness, as First Nations have used a wide variety of ecosystems throughout this region.
- Assessment work is seen by the committee members as being essential to short or long-term management decisions, making the committee strongly recommend a major fieldwork component with First Nations involvement. It is essential to have community members ‘out there’ on the land with the ecologists and other parks workers so that knowledge and experiences about the land can be appropriately shared and exchanged, and that management decisions can be made based on *experience* (‘proof’), rather than hypothetical models.
- With respect to special management considerations for islets, special advice should be sought from the Elders and knowledgeable community members. These are very important areas culturally and need special First Nations consideration. The HTG interest paper on Islets now on loan to Parks Canada provides a useful starting point for understanding how these places are special.
- With respect to invasive (etc) species, the committee members echoed their earlier advice that first hand information be sought before decision making. It was recommended that inventories be done of these species, based on fieldwork which Hul’qumi’num people are involved in. There was a serious concern expressed about the hyper-abundance of sea mammals in the area, and the impact these were having on local sea resources.
- HTG Park Committee members recommend that the facilitation of the on-going harvesting of marine and terrestrial resources with an objective for *long-term use* (ie: forever) be a priority
- With respect to land use planning, the committee members advised that Parks Canada should consider and take into account the planning objectives outlined in the HTG

Strategic Land Use Plan for Hul'qumi'num Traditional Territory, which will become publically available in the near future.

- Marine pollution was a serious concern for the committee members. They requested that they be able to review all plans and proposals with respect to establishing no-dump zones and other tools used to meet marine pollution management objectives. The committee also wished to review any oil response plans being established by Parks Canada.
- With respect to management of recreation and commercial vessels, the committee felt that not enough information was provided to comment. More clear details of this planning objective needs to be shared between Parks Canada and the HTG committee.
- Finally, in terms of public awareness around large mammals, the committee members stressed the importance of Parks Canada developing information strategies that would reach Hul'qumi'num community members, considering the particular challenges in disseminating information to this important audience.

**Analysis of Draft IMGs:** Though many of the ecological integrity issues have been addressed in the draft IMGs, several concerns have yet to be addressed in response to the advice given by the HTG Park Committee. The specific areas of concern remaining are:

*Ecological Integrity:* HTG Park Committee members have asked that HTG First Nations be explicitly acknowledged as co-operative management partners in the inventory and research work planned to assess ecological integrity.

*Sensitive Ecosystems:* Islets are highlighted as an area for protection, but no recognition is given to the importance of these areas for traditional and cultural activities to Hul'qumi'num people. This issue was raised verbally and through the lending to Parks Canada of a confidential negotiations interest paper on the significance of islets to Hul'qumi'num people. There is potential conflict in the management action planned to protect these islets, particularly zoning, as discussed in detail below.

*Heavily Used Areas:* HTG Park Committee members have asked that HTG First Nations be explicitly acknowledged as co-operative management partners in research.

*Exploitation of Natural Resources:* The draft IMGs state that the “extraction of natural resources” will be permitted for traditional purposes “through consensus with First Nations”. The consensus process is not clear in the guidelines, nor is the relationship of this permitting process to any restrictive zoning contemplated for ecological integrity.

*First Nations Traditional Uses:* A central approach suggested in the draft IMGs for managing traditional uses in the Park Reserve is to “determine what oral histories and traditional use studies exist and what additional information is needed”, working to “ensure that traditional use information is treated confidentially”. The HTG Park Committee has expressed its reservations about sharing such information with the federal government, given the very poor track record of

other agencies (esp. DFO). However, if arrangements are reached on the sharing of this information, there is a clear, but unexpressed need to collect information on the *contemporary and desired use of traditional resources and resource sites*. An example would be to work confidentially with the HTG Aboriginal Communal Licence holders (ACL) for shellfish to document the beaches used for this harvest and potential conflict with restrictive Park Reserve management practices.

**Recommendations:** Clear acknowledgement should be made by Parks Canada of a desire or intent to work with First Nations communities on inventory, monitoring, and heavy use assessment programs.

Explicit mention should be made in the IMGs of the further consultation work required to accommodate the exercise of aboriginal rights and cultural practices in association with islets and other ecologically sensitive places

Parks Canada, in cooperation with HTG Park Committee, needs to refine the language in IMGs around the exercise of aboriginal harvesting rights by First Nations people in the context of ecosystems management and ecological integrity.

Statements need to be inserted into the IMGs regarding the importance of coming to terms with contemporary and desired use and use locations of traditional resources through active community-based research.

### **Cultural Heritage Management**

**Context:** A second major management consideration identified in the Interim Management Guidelines outline concerns cultural heritage management. Eight key issues have been identified, including: protection of cultural heritage features; protection and management of known First Nations cultural sites; human remains; land use conflicts affecting cultural heritage; increasing awareness regarding cultural heritage; and liaising with the Chinese community regarding the heritage of D'Arcy Island. The emphasis of the management actions suggested are towards protection of heritage values and increasing public understanding about the cultural heritage of the area.

**Advice of the Park Committee:** Advice regarding cultural heritage management has been by-in-large the focus of the HTG Park Committee since its inception. The work done in this area has included: several brief field visits to key sites; reburial of disturbed human remains; initial negotiations on establishing a protocol for dealing with human remains uncovered in the Park Reserve; detailed exchange of background information on recorded heritage sites; and discussions about the management actions proposed in the IMGs.

In addition to these measures and prior to the formation of the Committee, the HTG Elders Advisory Board gave strong and clear management directives concerning heritage conservation.

In a letter dated November 24, 2003, the HTG EAB instructed Parks Canada to “strategically plan to ensure that the future placement of any park facility developments avoid the immediate vicinity of marked and unmarked First Nation burial site locations”. The EAB further directed that any plans identifying “any archaeological resources in conflict with proposed park facility developments” including “recreational camping site grounds, toilets, picnic tables, buildings, roads and trails and any other public use facilities that may directly or indirectly impact our heritage sites” be redesigned. This important letter and direction from the HTG Elders Advisory Board has formed much of the basis of the continued advice and recommendations of the HTG Park Committee.

Having been provided a listing of strategic management issues on cultural heritage management from Parks Canada, the members of the HTG Park Committee provided substantive feedback. The feedback provided is summarized below:

- committee members felt that an *inventory* of cultural resources was a priority, as the existing inventories were cursory in nature and did not take into account Hul’qumi’num histories, practices or traditions. In a great many other aspects of the interim management planning process, the committee felt that the land use planning activities which would be informed by this kind of inventory work would be central to informing and guiding all parties (HTG and Parks Canada). To re-emphasize, this inventory work is a *priority*.
- On the issues of management, conflicts, and protection of cultural sites committee members will want to be in charge of work involved, as there are culturally sensitive issues which will need the guidance of Elders or chiefs and councils, depending on the situation. We will need to evaluate management issues on a case-by-case basis to see what process to follow. Each potential decision should come to the Advisory Board. Any particular issue may get referred to Elders (cultural guidance) or Chiefs and Councils (political guidance) on a case-by-case basis.
- The Committee wants to develop processes to involve harvesters in discussing on-going traditional use activities. The committee recommends that involving some of these people will help create ownership of the interim management planning initiatives in the communities.
- The Committee is concerned about process for accounting for FN traditional use in park zoning. Four types of inventory work need to be prioritized in order to inform park management:
  - 1) basic archaeology site inventory;
  - 2) oral history in relation to park lands to understand importance of areas;
  - 3) traditional use information in relation to park lands; and
  - 4) management information to coordinate Parks Canada and HTG needs for lands.
- Traditional use studies have been done in the past, but these have not focussed on park lands nor have they dealt with parks related issues such as visitor use impacts. Some of this has been provided to Parks Canada during Park Establishment Agreement

negotiations. In addition, Arvid Charlie stated that the Cowichan TUS study for Federal Environmental Assessment Office of the proposed GSX project may have relevant information, but there are information sharing concerns associated with it.

- Strong emphasis was made by the committee (Veronica, Warren & Bob) that on-going traditional uses should be accounted for in the IMGs, so that the park would be inclusive of future generations of Hul'qumi'num people. They wanted assurances that any closures that may be now necessary are in the future open to amendment.
- The IMGs must be clear about how access to species for food, social and ceremonial use, particularly in intertidal areas, will be accounted for through the management goals practices, and that no undue infringements on aboriginal harvest rights are made as a result of the IMGs.

**Analysis of Draft IMGs:** Parks Canada has provided significant leadership and effort in partnership in addressing cultural heritage management issues, and as managers, have departed significantly from the poor practices of BC Parks, from whom much of the lands and significant cultural heritage sites were inherited. There has been urgent and immediate action taken in several instances to move toilets BC Parks had placed on burial sites and to re-bury uncovered ancestral remains. However, there has not yet been any extensive inventory work done and status-quo management to date has left numerous significant cultural heritage sites open to impact from public use of park facilities. The Interim Management Guidelines go some distance in planning to address these issues. Significantly, the IMGs establish a hierarchy to resolve land use conflicts where ecological integrity trumps cultural resource protection and both of which trumping visitor use, in land use conflict decisions. However, several concerns identified through the advice of the HTG Park Committee have yet to be addressed. The specific areas of concern remaining are:

*Protection and Management of known First Nations cultural sites:* The draft IMGs suggest that archaeological sites in the GINPR have “high regional significance” and will be managed “in the spirit of a Culturally Sensitive Area (CSA) designation”. Parks Canada policy defines this as a restrictive designation that can be applied in any area of zoning to provide special management or recognition not provided by the zoning. It is not at all clear in the IMGs why these sites are not *actually* given a CSA designation, particularly following the strong and clear direction of the elders and the recommendations of the HTG Park Committee. Such designation would provide a clear policy basis by which to constrain disruptive visitor activity in these areas, and to respect principles of Coast Salish culture expressed to Parks Canada directly by the Elders and through the sharing of HTG policy papers on the cultural significance of the dead.<sup>2</sup>

It is recognized that making explicit zoning information for heritage sites such as shell middens

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<sup>2</sup> McLay, Eric *et al* (2003) 'A 'lhut tu tet Sullween: Respecting the Ancestors, Report of the Hul'qumi'num Heritage Law Case Study, <http://www.law.ualberta.ca/research/aboriginalculturalheritage/researchpapers.htm>.

may be problematic, as it defines and publicizes the location of heritage sites. There has long been concerns expressed archaeologists, resource managers and First Nations that the public will vandalize and loot these places, whether out of curiosity or malice, if know about. However, in the work done with community members and Elders, there have been repeated concerns for park visitors ‘trampling’ over burial sites. The concerns is primarily an issue of physical public access to respect these sites. Parks Canada has the capacity for public education and enforcement of legislation in the GINPR. Specifically, we highlight the provisions 3.5.1.5 and 3.5.1.6 of the Parks Canada Cultural Resource Management Policy. Using these legislative, zoning and policy tools, Parks Canada can provide a model for heritage conservation and public education in the Gulf Islands that may play a significant factor in increasing the overall respect and understanding for these special places in the Gulf Islands, while so many others face intense development pressures. We believe that explicit zoning of heritage site information will encourage public trust and actualize Coast Salish heritage as an integral part of Canadian heritage in the GINPR.

Additionally, seven key traditional use site locations were identified and highlighted in the *Final Report of the HTG Traditional Use Overview Study, 2004*, for various combinations of values for hunting, fishing, beaches, plants, settlement and sacred qualities. These areas are Sidney Spit, Portland Island, Roseland/Roe Lake, Beaumont, Prior Centennial, Winter Cove and Narvaez Bay. There is a serious concern expressed by community members in this report that there will be a “loss of access to their traditional foods due to the influx of park visitors to these lands” and that specific measures need to be developed in the IMGs “to address these aboriginal rights and interests of the Hul’qumi’num community” (McLay *et al* 2004:11). In the current IMGs, these areas are all identified as potential foci for visitor use, confirming the fears of community members interviewed.

*Human Remains:* The draft IMGs state that “occasionally human remains may be found on parklands”. In the cultural tradition of the Coast Salish people, extending back over 5,000 years, human remains have frequently been interred in shell middens. There are at least 40 separate shell midden sites documented within the boundaries of the GINPR, many of which have high or demonstrated potential to be the resting place of Coast Salish ancestors. While the HTG Park Committee has supported the notion of entering into a protocol arrangement regarding Human Remains, we believe it is too dramatic an understatement to claim that finding such remains is “occasional”. Indeed, the Committee and the HTG EAB have viewed this as a central management concern.

**Recommendations:** Parks Canada should provide Culturally Sensitive Area designation for known cultural heritage sites in order to guarantee a conservative management regime in the short-term while the Park Reserve Management Plan is under development. As this zoning may be unorthodox given decades of secrecy practised by the Provincial Government around heritage sites, we recommend that further specific advice of Elders and knowledgeable community members be sought on this matter.



Traditional use activities in places identified in the *Final Report of the HTG Traditional Use Overview Study, 2003* as ‘Key GINPR Management Areas’ matters need to be taken into account in finalizing the IMGs.

The IMG statement on Human Remains needs to be revised to reflect the *high degree of probability* that Human Remains will be encountered and the importance of management practices, respectful relationships and public awareness and understanding that these ancestral remains afford.

### **Visitor Activities Management**

**Context:** A third major management consideration identified in the Interim Management Guidelines outline concerns visitor activities management. Nine key issues have been identified, including: park experience and interim visitor use areas, camping, trails, access and parking, boating, garbage and water, scuba diving, and recapitalization of existing visitor facilities. The draft IMGs seek to “ensure that visitor experiences and activities are provided in ways that are appropriate and compatible with maintaining ecological integrity” and “managing cultural heritage areas”.

**Advice of the Park Committee:** Having been provided a listing of strategic management issues on visitor activities management from Parks Canada, the members of the HTG Park Committee provided substantive feedback. The feedback provided is summarized below:

- For many of the issues with respect to visitor experience, the committee sees that land use planning activities will be key. The areas where this will be a central issue are:
  - appropriate/inappropriate activities
  - interim visitor use nodes
  - interim camping strategy
  - interim train plan
  - kayaker facilities
  - recapitalising existing facilities
  - cycling in the park
- For the consideration of mooring vs. free anchoring, the HTG Park Committee sees the establishment of no dumping zones. The Committee would like to review Parks Canada’s plans for mooring/anchoring sites and the related no dumping zones as they are being established.
- Regarding the monitoring of visitor experience and marketing, the committee would like to be involved in all aspects on feedback on First Nations issues and in how First Nations are promoted in the park material.
- The HTG Park Committee leaves in the hands of Parks Canada several issues mentioned in the IMGs that not of central concern:
  - services for visitors
  - business licensing

- park facility operators
- community services
- Inventory work is required for HTG to determine best course for minimizing conflicts in areas on the ground
- While Parks Canada emphasized that IMGs are largely for ‘critical issues’ with ‘status quo’ for existing facilities, HTG argued that assuming things like campgrounds are properly located now may be false assumptions. Early research is required in order to assess if facilities should be moved or not
- On visitor experience and marketing, HTG members expressed a desire for HTG communities to speak for themselves
- All proposals on visitor experience and marketing should be made available for advance review by the Committee
- Emphasis was made by the Committee following the 24-Nov-03 letter to Parks Canada from the HTG Elders Advisory Board that no facilities be established where burial sites may be found, and that current facilities should be re-evaluated if found on potential burial sites. The committee emphasized the need for detailed on-the-ground inventory work to have a baseline of information to work from in planning.
- Coast Salish-specific imagery in print and on-line publications was stressed as appropriate for Visitor awareness and understanding.

**Analysis of Draft IMGs:** While many of the concerns and issues raised by the HTG Park Committee have been addressed in the draft IMGs, there are two themes which remain outstanding. The first concerns the need to express a strong commitment to working collaboratively with Coast Salish communities. The second and more serious concern surrounds conflict in areas of current primary visitor use with sensitive cultural heritage sites.

*Objectives for Visitor Activities Management:* In the stated objectives for visitor activities management, being “compatible” with “managing” cultural heritage areas is a weak commitment. Any visitor activity could be compatible with management, depending on how the management is defined.

*Park experience and interim visitor use areas:* As explained during the HTG Park Committee meetings, during field trips with Elders and in the *Final Report of the HTG Traditional Use Overview Study, 2004*, there is a high potential for conflict with cultural heritage values in several of the areas where Parks Canada intends to “focus park experience efforts”. The specific areas outlined in the draft IMGs include:

- (1) hiking trails and all 3 campsites on Portland Island;
- (2) boat access and picnic ground areas on Russel Island;
- (3) campground on Prevost Island;
- (4) hiking trail on Roe Islet at Roseland on North Pender Island;
- (5) campground and hiking trails at Beaumont on South Pender Island;
- (6) hiking trail, picnic ground and potential new campsite at Winter Cove, Saturna Island;

- (7) boat launch, trail and potential new campsite at Narvaez Bay on Saturna Island;
- (8) trail and boat access area on Tumbo Island;
- (9) campsite on Cabbage Island; and
- (10) trail (and possibly the parking facility) at Bennett Bay on Mayne Island.

Additionally, in any environmental assessment planned for these areas, HTG Park Committee members have expressed a clear desire to have First Nations community members involved in on-the-ground aspects of the work.

*Camping:* As stated above, the expansion of campsites on Narvaez Bay and/or Winter Cove on Saturna Island poses conflicts in the high potential for visitor impact on sensitive cultural heritage sites in these areas.

**Recommendations:** Stronger language indicating that visitor activities must be compatible with the “protection and maintenance” of cultural heritage areas is a more appropriate commitment in the IMGs.

Clear and conservative strategies need to be expressed in the IMGs and the subsequent area plans to address serious land use conflicts between focussed visitor activity areas and the sensitive cultural heritage sites located at them.

Parks Canada needs to provide opportunities for collaborative and capacity-enhancing relationships to First Nations through making explicit reference to inviting First Nations participation in environmental assessment work.

In the IMGs, Parks Canada should explicitly recognize the need for conservation-minded analysis of potential impacts of new Saturna Island campsite(s) on sensitive cultural heritage sites in the areas.

### **Public Awareness and Understanding**

**Context:** A fourth major management consideration identified in the Interim Management Guidelines outline concerns public awareness and understanding. The two key issues that have been identified are communications and public information, and monitoring effectiveness of communications.

**Advice of the Park Committee:** Extensive comments directly from community members were provided to Parks Canada about the issue of Public Awareness as a result of the Traditional Use Overview Study. Concerns were raised by that “government never tells the whole truth about First Nations issues”, while others expressed an optimism that raising public awareness may result in increased respect for First Nations history, knowledge, sacred sites and hunting/fishing territories.

Having been provided a listing of strategic management issues on public awareness and understanding from Parks Canada, the members of the HTG Park Committee provided substantive feedback. The feedback provided is summarized below:

- The committee would like there to be concerted effort into the development of First Nations interpretive ‘themes’ which contain messages important and strategic for the Hul’qumi’num people. Parks are seen as important places to develop cross-cultural understanding which can bring down social barriers in other areas of life, as well as to educate the Hul’qumi’num young people.
- On the cultural education opportunities provided by First Nations people, the committee would like to participate in developing economic and training opportunities. There are also sensitivities as to what gets said and where, which should be reviewed by Elders. The committee would like to facilitate these kinds of reviews.
- Regarding cultural education opportunities, the committee feels it is key to have them facilitate the vetting of images for appropriateness. Images of masked dancers, for instance, would not be appropriate.
- As above, monitoring of effectiveness and communications with respect to First Nations should be reviewed by the committee

**Analysis of Draft IMGs:** The draft IMGs largely take into account the concerns and advice provided by the HTG Park Committee. There are substantial opportunities through the strategic management actions planned in the GINPR to build a greater public understanding of Hul’qumi’num history, culture, language and relationships to land. The committee is optimistic that by working collaboratively with Parks Canada, important Hul’qumi’num stories, histories, worldviews and experiences can reach a broader public while strengthening their presence within the Hul’qumi’num community itself.

**Recommendations:** While the strategic management actions set out in the draft IMGs are positive, the practices to date have not yet met the expectations of the HTG Park Committee in terms of collaboration. While the place names and cultural story projects for the 2005 visitor guide were successful endeavours, the HTG Park Committee requests greater involvement in reviewing draft materials (text and images) which concern Hul’qumi’num culture, language and history before they are made public. Such collaborative relationships, as discussed in the 2001 Parks Canada policy on cooperative management, frequently take more time and cost more money than would otherwise be experienced if Parks Canada operated on their own. Explicit acknowledgement of these factors in the IMGs will guide Parks Canada staff in planning future public awareness and understanding activities.

### **Management of Public Safety**

**Context:** A fifth major management consideration identified in the Interim Management Guidelines outline concerns the management of public safety. The three key issues that have been identified are hazard assessments and mitigation, fire management, and other emergency

services.

**Advice of the Park Committee:** Having been provided a listing of strategic management issues on management of public safety from Parks Canada, the members of the HTG Park Committee provided substantive feedback. The feedback provided is summarized below:

- The committee leaves in the hands of Parks Canada several issues not of central concern to them:
  - hazard assessments;
  - fire management;
  - enforcement of new regulations; and
  - road standards.
- With respect to coordination of emergency response, there should be regional stakeholder meetings so that all First Nations organizations who have activities in the area can be coordinated and in-touch with Parks Canada services in emergency situations.
- With respect to First Nations hunting (and other harvesting activities), the committee is concerned that there needs to be a concerted effort in consulting the Hul'qumi'num 'public' to make sure people are informed about these issues. Suggested mechanisms include presentations at annual general assemblies, notices in community newsletters, holding open or invited focus group meetings of hunters and harvesters.

**Analysis of Draft IMGs:** The draft IMGs largely take into account the concerns and advice provided by the HTG Park Committee. There are substantial commitments by Parks Canada to work with First Nations neighbours to coordinate, cooperate and facilitate the delivery of public safety where and when necessary.

**Recommendations:** The HTG Park Committee makes no further recommendations concerning public safety issues.

### **Interim Park Zoning**

**Context:** Parks Canada uses a zoning system to classify land and water areas according to the views of the need for resource protection and the ability of an area to sustain use. The five-zone system includes (from most to least protective): zone 1-special preservation; zone 2-wilderness; zone 3-natural environment; zone 4-outdoor recreation; and zone 5-park services. Parks Canada has additional designation of Environmentally Sensitive Areas (ESA) or Culturally Sensitive Areas (CSA) for site-specific protection, while potentially allowing for controlled visitor activities through operational plans. There are no ESA or CSA areas proposed in the draft IMGs.

### **Advice of the Park Committee:**

A conceptual discussion of zoning practices was had early in the process (April 2004), but no specific advice on zoning was sought until the draft IMGs were released. HTG Park Committee

members have asked question about how zones were arrived at, and how they were designed to reflect First Nations interests and practices of community members at these places. A full discussion of the zoning proposals in the draft IMGs *has yet to take place* with the HTG Park Committee.

**Analysis of Draft IMGs:** There was initial concern that Zone 4 (intensive outdoor recreation) areas would be placed in sites of direct conflict with archaeological or traditional use sites. The only Zone 4 areas indicated on the map provided are McDonald Park in Sidney, Prior Centennial on Pender Is., and a portion of Winter Cove Park on Saturna Is. No archaeological site conflicts have been identified in these areas.

The next most intensive use zoning in the Gulf Islands National Park Reserve is Zone 3, designated “Natural Environment”, on which opportunities are provided for “visitors to experience the park’s natural and cultural heritage values through outdoor recreation activities requiring minimal services and rustic facilities.”<sup>3</sup> While all marine areas have been given this designation, several land areas where more intensive use such as camping is expected have also been given this zoning. The following areas of land overlap with known archaeological sites, and have been designated Zone 3:

- Campbell Point (and beach);
- Winter Cove;
- Roe Islet (Zone 2, but adjacent to South Otter Bay, Zone 3); and
- Sidney Spit

There are likely to be serious site-specific management problems with the ancestral remains of the Coast Salish people in these areas. Given the strong sentiment of the Elders in the November 2003 letter to Parks Canada outlining the importance of not having visitor facilities (including camping and picnic areas on top of these areas of ancestral remains), there will need to be site-specific protection provided for these archaeological sites.

The most extensive areas for potential conflict in zoning arise from the restrictive “Zone 1: Special Preservation” areas. These areas “are closed to access and use for preservation purposes” based on their ecological values. This restrictive zoning has the potential to infringe on the exercise of aboriginal rights, including harvesting shellfish or plants, fishing, hunting, and practising other activities integral to the distinctive Coast Salish cultures of the region. A GIS analysis of the information provided to Parks Canada in the “Final Report of the HTG Traditional Use Overview Study” (2004) with the Zone 1 areas have revealed the areas of conflict shown in the table below.

The last row of the table was produced with information from discussions with former Cowichan Tribes fisheries staff, who were among the people from that community who expressed serious

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<sup>3</sup> GINPR Draft IMG 2005:27.

concerns about the location of the GINPR during the Park Establishment process. These areas will likely be sites of high conflict if they are closed to harvesting, particularly as Cowichan Tribes has few other places to gather shellfish resources since the closure of Cowichan Bay and the majority of the beaches in the vicinity of their Indian Reserves. The other activities represented in the table are based in historic harvesting practice.

<b>Traditional Use Activity Identified to Parks Canada</b>	<b>Area of Potential Conflict with Restrictive Zone 1 designation</b>
harvesting camp	Brackman Island; Hawkins Island; Imrie Island; Islets in Beaumont Marine; Red & Bright Islets; Sidney Spit; Tumbo & Cabbage Island
cultural site (mythic)	Boiling Reef (East Point); Little Group Islands
cultural site	Belle Chain Islets; Channel Islands; Georgeson Island; Grieg Islet; Hood Islet; Imrie Island; Islets in Beaumont Marine; Tumbo Channel
spiritual site	Sidney Island
fishing site	Belle Chain Islets; Blunden Islet; Boiling Reef; Georgeson Island; Hawkins Island; Isabella Island; Islets in Beaumont Marine; Java Islet; Red & Bright Islets; Sallas Rocks; Sidney Spit; Tumbo & Cabbage Island
gathering seaweed	Boiling Reef; Georgeson island; Islets in Beaumont Marine; Islets west of Tumbo Island
food/material plant gathering	Grieg Islet; Hawkins Island; Imrie Island; Reay Islet; Red & Bright Islets; Sidney Spit
medicinal plant gathering	Belle Chain Islets
hunting	Belle Chain Islets; Hawkins Island; Islets in Beaumont Marine; Java Islet; Red & Bright Islets; Sidney Island; Tumbo & Cabbage Island
shellfish harvesting	Brackman Island; Channel Islands; Dock Island; Greig Island; Hawkins Island; Imrie Island; Isabella Island; Islets in Beaumont Marine; Little Group Island; Reay Island; Red & Bright Islets; Sallas Rocks; Sidney Spit; Tumbo Island
current aboriginal commercial fishery	Java Islets (green urchin); Boiling Reef (green urchin); Isabella Island (desired aquaculture or commercial shellfish harvest); Prevost Island (northwest bays for deepwater aquaculture or commercial shellfish harvest); Mayne Island (marine plant harvest); Winter harbour (manilla & littleneck clam harvest); Tumbo Island (western cove for shellfish harvest); throughout the area individuals with Aboriginal Communal Licences (ACLs) for clam harvest utilize small beaches as part of their catch. We have no systematic data on these locations; more study required.

**Recommendations:** As mentioned in the section on Cultural Heritage Management, CSA designations should be applied to archaeological sites to assist in providing a clear policy mechanism for managing visitor impact on sensitive First Nations cultural heritage sites, particularly ones which have the potential to contain human remains.

Parks Canada should in the IMGs commit to work with current aboriginal food harvesters to minimize conflict that may result from restrictive zoning in areas designated as Zone 1.

The IMG key management concepts regarding zone 1-special preservation should be restated clearly in a way that will in plain language describe the management intentions of this



designation vis-à-vis the exercise of aboriginal harvesting rights and other practices integral to the distinctive culture of Coast Salish peoples. The HTG Park Committee recommends that an affirmative statement recognizing and affirming the right to practice aboriginal harvesting activities be made, subject to justifiable limitations for public health, safety and conservation, and only after adequate attempts at accommodating these rights.

## Conclusions & Recommendations: Raising the Threshold of Cooperative Management

There is a firm and continued assertion by Hul'qumi'num leadership and community members that the lands in the GINPR are unceded aboriginal title lands. Flowing from this, Hul'qumi'num people assert that they should not be merely providing 'advice' to the Director General for National Parks for their management, but must be involved in substantive Government-to-Government relationships of cooperative management decision-making about their ancestral lands. The consultation and accommodation process that Parks Canada is engaged in with Hul'qumi'num member First Nation communities provides an opportunity for this kind of cooperative management. The recommendations made by the committee, and those by the Chiefs and Councils must be given considerable weight as aboriginal title and rights are at stake.

Warren Johnny has illustrated this point:

Co-management is actively participating. We want to actually participate. We want to be fully involved in management. We need to be involved in how federal regulations will interact with our constitutionally protected food, social and ceremonial fishing rights. We should have the base data available to us as First Nations managers, including statistics and surveys, in order to be involved with the management of the park. These issues need to be conveyed back to the communities. Any kind of closure though zoning or otherwise, is a serious concern to them.

Warren carried on, expressing a concern about the overall 'advisory' process, preferring instead more stable Government-to-Government decision-making relationships.

I feel from the draft Interim Management Guidelines like a checkmark, that's how First Nations people are a part of the Guidelines. In the long term, First Nations need to be considered as another level of Government. In the short term, we are being respected by what is put in the guidelines. That's appreciated. In the future, we need to be at the same level as other regulatory agencies when Parks Canada establishes Guidelines for management of sensitive sites.

The Parks Canada 'Management Context Statement' for the Gulf Islands National Park reserve currently focusses on the Agency's obligations under the *Parks Act*, and the commitments made in the Park Establishment Agreement between Canada and British Columbia. The HTG Park Committee strongly assert that this is only a partial view of the management context. Cooperative management commitments have been made between the Government of Canada and the HTG in the completed draft Agreement-in-Principle chapter negotiated in 2003. The principles in this chapter gave rise to the "Interim Agreement on an Advisory Role Concerning the Planning and Management of the Gulf Islands National Park Reserve" out of which the HTG Park Committee was created. This pre-treaty interim agreement is a critically important aspect of the overall management context and needs to be recognized as such. The HTG Park Committee is optimistic that the potential future expansion of the relationship established in this

interim one-year agreement will develop into a more fully cooperative management role for the Hul'qumi'num people.

Goal six (of nine) for the GINPR is focussed on developing “cooperative relationships” and “working arrangements” with First Nations to “ensure their interests are reflected in the management of the national park reserve, to respect their unique history and current use, and to ensure that activities that they may carry out in the national park reserve are managed in a cooperative fashion”. This is a key goal of developing cooperative relationships for management set out for this Park Reserve.

Such relationships have significant implications under the 2001 “Parks Canada Guide to Management Planning”, where such bodies, if developed with Aboriginal people, “are intended to have considerable influence” (Parks Canada 2001:64). This policy states that the legal document which establishes the cooperative management should state “Aboriginal peoples’ rights in a park” and must be an “important planning management consideration”. This approach is also consistent with the draft HTG Agreement-in-Principle chapter on National Parks, where it is envisioned that Hul'qumi'num Government will, after working cooperatively in the development of planning mechanisms such as an IMG, that the plan will be recommended to the Director General. In a pre-treaty context, Hul'qumi'num Member First Nations communities should feel confident that Parks Canada intends to take consultations and recommendations regarding these plans seriously and will act on them in developing the final plan recommendation to the Director General.

The distinctive practices, cultures and world views of the Coast Salish people would result in a different management regime than one espoused by Government managers alone. Such worldviews are the same ones that have developed the ecosystems in the Coast Salish world for the past 10,000 or more years. For instance, Robert Sam has said “Our First Nations never over-harvested. They only took what they needed to eat and trade. We’ve always been good managers, because each family has their own site. That is part of the key.” Warren Johnny stressed that “traditional knowledge” and “scientific knowledge” should be used together in the co-management of the park. To facilitate this Park Canada will need to involve community members (including harvesters) in planning activities where there are issues that relate directly to them, on a case-by-case basis, and to take a more active role in engaging Hul'qumi'num people *in-situ* in the park environs. Norbert Sylvester also suggested that Hul'qumi'num governance capacity could be built through cooperatively engaging these activities, saying that “our Fisheries Guardians and technicians need to get into the Park areas to see how they are going to be run.” Warren agreed, suggesting that “the AFS program could work with Parks Canada on enforcement issues, complimenting the work of the Parks Wardens.”

Through taking the advice of the current committee, by making changes in Government-to-Government relationships and in taking ‘traditional knowledge’ into account in a more active context, the HTG Park Committee is optimistic that cooperative management will benefit the

Gulf Islands National Park Reserve for years to come.

## **Appendices**

Copy of “Final Report of the HTG Traditional Use Overview Study, December 2004”, including mapping

Copy of “Interim Agreement on an Advisory Role Concerning the Planning and Management of the GINPR, January 2004”

Copy of the “Diamond Management Consulting Report on the Gulf Islands National Park Reserve Committee Process Review, January 2005”

Copy of the “GINPR Interim Management Guidelines Draft for Public Review, May 2005”