



3320 Comox Road, Courtenay BC V9N 3P8 Tel: (250) 339-4545 Fax: (250) 339-7053

February 20, 2024

Islands Trust Policy Statement Review Committee
mstorzer@islandstrust.bc.ca

Re: Islands Trust Policy Statement Draft 2

To whom it may concern,

Please find attached K'ómoks First Nation's review of Draft 2 of the Islands Trust Policy Statement.

Signed,

A handwritten signature in black ink, appearing to read "Sheriden Barnett".

Sheriden Barnett, Director of Intergovernmental Relations

Summary of KFN Feedback

KFN Staff Consulted:

Raini Bellacqua (Archaeology & Referrals)
Lia Tarle (Archaeology & Referrals)
Pamela Mitchell (Culture & Language)
Krissy Brown (Guardian Dept)

General Comments (entire document):

RB: When using the term *unique amenities and environment* change to Indigenous significance, unique amenities, and environment.

LT: There seems to be an overall sense that Indigenous Peoples have disappeared from/been forced out of the Islands Trust "object" (area). Suggest re-framing to indicate that Indigenous Peoples are very much still present and active stewards.

Also suggest re-framing references to Indigenous Peoples using the active voice, emphasizing their agency, resistance/resilience, vs. framing as passive victims of colonialism.

Section-Specific Comments:

LT: Part 1.1 The Islands Trust Object (p. 4)

Suggest "collaboration" vs. "cooperation" (also see p.7 "In Cooperation With...")

Residence of the Trust Area (p. 7)

Current wording: "*Coast Salish people have been residents and stewards of the region since time immemorial. Many Indigenous Peoples were forcibly removed from their homelands through colonization, but continue to have rights and responsibilities to their lands and waters, and many cultural, spiritual, and economic interests in the region. preservation and protection of the region is important to Indigenous Peoples.*"

LT: This phrasing sounds like Indigenous Peoples have disappeared from the area and only have distant 'interests' in the land. Suggest emphasizing Indigenous Peoples' active presence and agency in exercising their rights & title and stewardship responsibilities.

2.1.1 Acknowledge and Respect Indigenous Rights

LT: And Title

2.1.8 Foster Informed and Balanced Decision Making (p. 11)

Current wording: "To be informed by a broad range of sources in its decision making processes, including the best available science, Indigenous Knowledge, and local community knowledge"

RB: "including the best available Indigenous Knowledge, Institutional Knowledge, and local community knowledge"

2.3 Reconciliation Principles (p. 13)

RB: add 2.3.4 DRIPA, 2.3.5 Section 35 Rights

3.2.1 Indigenous Cultural Heritage Sites (p. 18)

Current wording: *Identify and protect Indigenous cultural heritage sites including, but not limited to, village sites, burial sites, middens, cairns, petroglyphs and pictographs, and known (registered), unregistered or newly discovered archaeological sites.*

RB: *Identify and protect Indigenous cultural heritage sites including, but not limited to, village sites, cemetery sites, camp sites, petroglyphs and pictographs, fish traps, clam gardens, culturally modified trees, and all known (registered), unregistered, or newly discovered archaeological sites.*

3.2.3 Other Culturally Significant Areas for Indigenous People (pg 18)

RB: *Identify and protect areas of importance for Indigenous cultural, spiritual, and ceremonial practices, including but not limited to, transformation sites, village sites, cemetery sites, camp sites, petroglyphs and pictographs, fish traps, clam gardens, culturally modified trees, and all known (registered), unregistered, or newly discovered archaeological sites.*

PM: Add cultural and medicinal gathering areas

3.3.3 Forest Ecosystems (pg 19)

RB: add Gary Oak ecosystem to list

3.4.2 Impacts to Development (pg 20)

RB: *"Consider the cultural heritage/impacts to Indigenous land use, aesthetic, environmental, and social impacts of development."*

3.4.17 Septic Fields (p. 23)

RB: *"Establish requirements for the location and siting of new septic fields **and tanks** to mitigate adverse impacts on the areas **Indigenous significance**, unique amenities and environment, including **impacts to Indigenous cultural heritage sites and Indigenous Peoples' food security in Indigenous marine harvesting areas.**"*

3.5.15 Soil and Fill from Middens and Foreshore Areas of Cultural Significance (pg 26)

"Prohibit alteration, removal or excavation of soil or fill from middens or foreshore areas identified as culturally significant."

RB: *"Prohibit alteration, removal or excavation of soil or fill from **all archaeological sites including midden, or foreshore areas identified as culturally significant.**"* This would be illegal anyways under the HCA unless proper permits were granted. Probably should be completely updated.

3.5.18 Soft Shoreline Protection (pg 26)

RB: Consider and foster soft shoreline approaches first such as those identified by the "Green Shores" program to set requirements for shoreline preservation and to mitigate erosion of shoreline and foreshore cultural heritage sites.

Definitions

Middens (pg 32)

RB: Decolonize the definition of middens to make explicit that ancestral remains are often found within them and they are more than merely "garbage heaps"

LT: Note that middens may be archaeological indicators of village and burial sites