

CIT Cultural Spatial Analysis Peer Review Comments from Jennifer Carpenter

Dear Robert and Bob,

I would like to give you some preliminary feedback on the [draft] Final CSA Report. First, I am alarmed by the findings of the forestry section (**Overlap of Total Feature Density and Woodsheds with Positive Timber Value** p.16). Principally: “These results demonstrate that areas to which cultural values are assigned by either Other Communities or First Nation communities are seldom areas containing timber stands yielding positive returns on investments in harvesting.” This may be an adequate statement with respect to “results” but at issue are seriously flawed assumptions, data, and CSA methodology that obtained these “results.”

To give a few examples:

Flawed assumptions:

- Only Known Places are Meaningful and hence Valued (p. 3: “People know about particular places because these places are meaningful to them.”)¹
 - a. There are untold numbers of features and places in Heiltsuk territory (which comprises most of the “Central Coast”) that are valuable and meaningful to Heiltsuk, which have not yet been located. Unknown locations of valuable cultural features are of utmost importance to Heiltsuk. They are our Time Capsules. They reconnect current generations to ancient history and previous generations’ lifestyles and values. They locate events and features preserved in oral traditions but not precisely located. The transfer of cultural and historical knowledge was impacted by epidemics and assimilationist strategies that deliberately separated children from parents and grandparents, and interrupted the inherent cultural flow of information from generation to generation. Yet to be discovered physical remains and cultural landscapes are all that is left to link present generations to specific places of historical and continuing meaning and value.
 - b. The B.C. Heritage Conservation Act assumes that “known” sites, i.e. ones recorded in the inventory maintained by the government, are but a fraction of what is out there and protected under the Act. Whether “known” or “unknown,” if they are of a certain type and age they are deemed meaningful and valuable. It is for this reason that Archaeological Impact Assessments (AIA’s) are required in areas being considered for development and likely to have unrecorded heritage features.
- “Pristine” is not defined. With the growing body of evidence of First Nation pre-contact resource enhancements and modifications, appearing in print by western scientists,² “pristine” is not necessarily “not modified” or “not enhanced.” “Pristine” to whom and using what criteria?

Flawed data, data gaps:

¹ Logic appears to be: “known about” = “meaningful” = “valued”

“not known about” = “not meaningful” = “not valued”

² Nancy Turner and others re plants, John Turner and others re clam gardens, etc.

- This is a big topic that applies across cultural and ecosystem categories. If you accept the proposition that you can't manage what you don't know, no mention is made of the fact that FN (First Nation) data is universally qualified by FN's, and acknowledged by Robert PA in data use agreements, as incomplete. Heiltsuk were quite precise—data we shared with the CIT for CSA represents only 89 of 750 Heiltsuk 18 years and older, or 11.8%. This disclaimer and deficiency is not reflected adequately in the CSA report, if at all.
- Heiltsuk shared data from the harvesting and cultural sites component of their Traditional Use Study strategy. This data is incomplete as a representative sample of use and occupancy³, and does not address places of value for protecting access, for example habitat requirements for species harvested outside of their total habitat needs. Given the importance of salmon for sustenance, ceremonial, and market (“economic” in the narrower sense) values, and the presence of the more vigorous and valuable stands of cedar prime salmon producing watersheds, common knowledge and sense would automatically question an assertion that there would be no correspondence between valuable/valued salmon watersheds and “areas containing timber stands yielding positive returns on investments in harvesting.”
- Failure to factor in unrecorded, but predicted, archaeological sites of prime importance to First Nations and protected under the BC Heritage Conservation Act is a significant data gap.
- Culturally modified trees, acknowledged by the Vancouver Forest District as potential evidence of an aboriginal right and also protected under the Heritage Conservation Act⁴ were once considered a rarity and assumed to be confined to within a short distance of ocean shoreline areas. More and more are being documented in Heiltsuk territory and are predicted to have a high likelihood of being found within 50 meters of any water body, including streams and lakes⁵ and along any traditional trails to trade, harvest, and travel from point A to B overland from watershed to watershed, for example. As we learn more (i.e. identify and consider the type and location of CMTs) the better able we are to predict where they might be found. Discovering traditional patterns of use and management of forestry resources is of high value to Heiltsuk, but cannot be fully mapped at this time.

Flawed CSA data collection and analysis methodology:

Re: “As a result of differences among methods used by First Nation communities, the only common denominator for all First Nation communities was a count of the number of identified features located in each third order watershed...Cultural values defined by First Nation communities included, but were not limited to, ceremonial sites, burial grounds, food gathering sites, historic villages, other archaeological sites, and various sacred sites.” (p. 6)

- What is a “third order watershed”?
- Habitat requirements which extend far outside access points (“food gathering” or harvesting sites) are inadequately addressed in this study. Granted, people could

³ Target sample for Heiltsuk is 560 or so, or 70% adult Heiltsuk. This is required to reflect complex patterns of use and to address infringement and cumulative impacts.

⁴ CMT Management Procedures, Vancouver Forest District, 1997.

⁵ Heiltsuk Archaeological Resource Overview Study, Millennia Research 1997 for the Heiltsuk Tribal Council and Archaeology Branch of the Ministry of Small Business, Tourism, and Culture.

indicate as meaningful and valuable these distant or larger areas, but the scope and time frame for data collection fell far short of what would be required to conduct a detailed Harvest Geography or Traditional Ecological Knowledge study that would provide the necessary context for considering cultural values.

- The Heiltsuk Map Biography Harvesting and other Cultural Sites is a baseline study which seeks to map 45 interview guide categories deemed necessary to adequately assess values integral and distinctive to Heiltsuk culture, and to link each point and polygon to Heiltsuk individuals within living memory. At 1:50,000 scale, portions or all of 39 map sheets are required to cover our study area, and our target sample is 70% adult Heiltsuk over 18, or 560 participants.
- We went beyond a “snowball sample” approach, the loop of which could close before all active harvesters, or family groups, would be adequately represented.
- It is really not clear how FN “feature counts” were arrived at for the purpose of feature density analyses.

Other (for now):

Could someone explain the following statement (p.3)?

“This rendered the maps and associated attributes comparable with what was produced for the Central Coast, but could have resulted in a greater number of features being assigned to delineated places than found on maps produced on the Central Coast. As a result, absolute measures of feature density cannot be reliably compared between the Central Coast and North Coast. Regardless, relative feature density measures are reliable.”

Re (p. 5):

“Only condition and threat attributes of places were included in the final analysis. They became the basis for rating the priority of protection or remediation needed for these features. The Other Community data collected for Haida Gwaii/QSI included only the identification and location of each valued feature.”

How were threat and condition assessments addressed from a First Nation perspective in the CSA, if at all? RPA wanted Heiltsuk to comment on “vulnerability” to “incompatible uses” but in our territory (thirty-nine 1:50,000 map sheets), this could only feasibly be addressed in a very general manner (as I have done re habitat requirements as a significant data gap) without providing some site specific alternate uses for Heiltsuk to consider from their perspective and traditional knowledge.