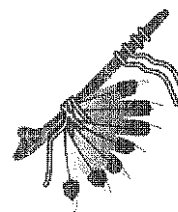


SIMPCW FIRST NATION

"People of the North Thompson River"



VIA EMAIL: FLNR.Minister@gov.bc.ca

January 14, 2014

Honourable Steve Thomson
PO Box 9049, STN PROV GOVT.
Victoria, BC
V8W 9E2

Dear Mr. Thomson,

Re: Decisions associated with the Proposed Transfer of Carrier Lumber FL A15429 and FL A15430 to McBride Community Forest and Valemount Community Forest

Further to our letter of October 21, 2013, Simpcw First Nation (SimpCW) is writing to express our ongoing concerns with the proposed transfer of Renewable Forest Licences (FL) A15429 and A15430 from Carrier Lumber to the McBride Community Forest Corporation (MCFC) and Valemount Community Forest Corporation (VCFC), respectively, and to re-iterate the need for the Province to fulfil its constitutional obligation to consult and accommodate Simpcw.

Based on our previous correspondence and meetings with you, the Province is well aware that Simpcw has a strong claim of Aboriginal rights and title to the areas that are part of FL A15429 and FL A15430. Physical evidence of our use and occupation of the lands includes unique archaeological features and networks of trails that we used for hunting, accessing plant and berry harvesting areas, travel between communities and trade. There is also archaeological evidence of our dome shaped, semi-subterranean houses with earthen roofing known as *kekulis*. These features are evident along the flats and lower slopes on either side of the Fraser from Tete Jaune Cache, around the McBride area, near the mouth of the Holmes River, and north as far as Crescent Island. This area of our territory also contains cache pits, twisted and blazed trees, and burial sites. Simpcw have always and continue to use this part of our territory for hunting, harvesting plants for food and medicinal purposes, berry picking, fishing, and camping. We continue to take both children and Elders out on the land to pick berries, roots, birch bark and to speak the names of places, plants and wildlife. We visit sacred places and we share stories and lessons about these areas of our territory.

Based on our review of the referral notice provided to Simpcw in March 2013, the Province is considering a number of decisions which have the potential to impact upon the exercise of our title and rights. These decisions include:

- 1) A proposed volume equalization of the Allowable Annual Cuts (AAC's) for FL A15429 from 186,428 m³/year to 130,723 m³/year and for FL A16430 from 75,018m³/year to 130,723 m³/year;
- 2) A proposal to transfer or sell FL A15429 from Carrier Lumber to MCFC and a proposal to transfer or sell FL A15430 from Carrier Lumber to VCFC;
- 3) A proposed apportionment decision to allow MCFC and VCFC to utilize the FLs to apply for conversion of the FLs into CFA's;

- 4) The determination of specific areas that would form the land base for each CFA application; and
- 5) The conversion of FL A15429 and FL A15430, which are volume based licences, into two area based Community Forest Agreements (CFAs) to be held by MCFC and VCFC respectively.

As we have previously stated in our letters to you on September 5, 2013 and October 2, 2013, as well as in meetings and telephone calls with you, Simpcw has serious concerns about the potential impacts of a transfer or sale of FL A15429 and FL A15430 to MCFC and VCFC, as well as the impacts which could result from an apportionment decision, the choosing of land areas for the CFA's, and the conversion of the FLs to CFAs. We outline our concerns below.

s.16

Page 3 redacted for the following reason:

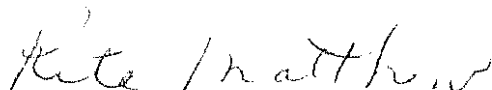
s.16

s.16

As the majority of the decisions require deep consultation between Simpcw and the Province, and given the intertwined nature of the proposed decisions, it is Simpcw's position that the Province must begin to meaningfully engage Simpcw now on all the decisions, which would include providing capacity support to identify Simpcw's interests that are in the area of the current FLs, the impacts of the decisions on Simpcw's interests, and identification of meaningful accommodation measures that would address the impacts to Simpcw from these proposed decisions.

Given the need for deep consultation to occur, myself and Council are requesting a meeting with you as soon as possible to begin to meaningfully engage and consult on these decisions. Please contact Steven Patterson, Natural Resource Manager and Title & Rights Coordinator to arrange a meeting time. He can be reached at (250) 672-9995 ext. 255 or via email at steven.patterson@simpcw.com

Kukstemc,

A handwritten signature in cursive script that reads "Rita Matthew".

Kúkpi7 Rita Matthew
Simpw First Nation

cc: Honourable John Rustad
Minister of Aboriginal Relations and Reconciliation

Honourable Shirley Bond
MLA Prince George - Valemount

Honourable Terry Lake
MLA Kamloops – North Thompson

John Huybers
District Manager, Prince George District
Ministry of Forests, Lands and Natural Resource Operations

Stacy Perkins
Advisor, First Nations Relations
Ministry of Forests, Lands and Natural Resource Operations



Ref: 204103

February 21, 2014

Chief Rita Matthew and Council
Simpw First Nation
P.O. Box 220
Barriere, British Columbia
V0E 1E0

Dear Chief Matthew and Council:

Thank you for your letter of January 14, 2014, regarding the proposed volume equalization of Carrier Lumber Ltd. Forest Licences (FL) A15429/A15430; transfer of these licences to the McBride Community Forest Corporation (MCFC) and the Valemount Community Forest Company Ltd (VCFC); and converting the volume associated with these licences to area based Community Forest Agreements (CFA). I am pleased to have this opportunity to provide you with a response.

I understand that Simpcw First Nation asserts a strong claim to aboriginal rights and title to the areas that are part of volume based FL A15429 and A15430. Ministry staff recently shared a preliminary "strength of claim" with you, based on currently available information. I hope you will be able to work with them to provide additional information to substantiate the areas of your claims.

This is a multi-decision process that will occur in two distinct stages. The first stage is the volume equalization and sale/transfer of replaceable licences FL A15429 and FL A15430 to the MCFC and VCFC. I will consider an apportionment decision to allow the MCFC and VCFC to utilize these forest licences to apply for a conversion of these licenses into CFAs. The second stage, subsequent to the approval of the above, is more operational would include the determination of the specific areas which could form the land base for the CFA applications. This stage would also include operational planning and permitting. The location of the areas will require consultation with your community.

I share your concerns with the results of the September 2013 Audit of the Forest Planning and Practices of the McBride Community Forest Corporation. It is my understanding that the MCFC has developed a response to the report including measures to improve performance on the CFA.

Page 1 of 2

Ministry of Forests, Lands and
Natural Resource Operations

Office of the Minister

Mailing Address:
PO BOX 9049 Stn Prov Govt
Victoria, BC V8W 9E2

Tel: (250) 387-6240
Fax: (250) 387-1040
Website: www.gov.bc.ca/for

Chief Matthew and Council

At this time, I am waiting for further information from the proponents and a complete staff review of implication before I make a decision. Included among these implications, I will be considering any impacts on our mutually beneficial revenue sharing agreements and our ongoing conversations regarding the Simpcw request for a tenure opportunity in the Robson Valley Timber Supply Area.

The province appreciates Simpcw First Nation's participation in the consultation process and hopes to build a strong relationship with your First Nation.

You have identified a number of operational issues that would be addressed in the implementation stage should I grant approval to the proponent's request. Please continue working with the Prince George Natural Resource District staff to come to a satisfactory solution.

I have asked John Huybers, District Manager of the Prince George Natural Resource District, to arrange a meeting with you on my behalf. He can be reached through Stacy Perkins, First Nations Advisor by phone at 250 614-7503 or by email at Stacy.Perkins@gov.bc.ca.

Thank you again for writing.

Sincerely,



Steve Thomson
Minister

pc: Honourable John Rustad, Minister of Aboriginal Relations and Reconciliation
Honourable Shirley Bond, MLA Prince George – Valemount
Honourable Terry Lake, MLA Kamloops – North Thompson
John Huybers, District Manager, Prince George Natural Resource District
Stacy Perkins, Advisor, First Nations Relations, Prince George Natural
Resource District

Stromberg-Jones, Norma FLNR:EX

From: s.22
Sent: Wednesday, February 13, 2013 1:13 PM
To: Stromberg-Jones, Norma FLNR:EX
Subject: RVTSA review

Categories: TSR

>
> Dear
> District Manager, PG District, MoF, L, and NRO and Director, Forest
> Analysis and Inventory Branch, MoF, L, and NRO
>
> C/o Norma Stromberg Jones
> Norma.StrombergJones@gov.bc.ca
>
> I wish to respond to the RVTSA Timber Supply Review from a citizen's point of view. I have little knowledge of forestry terms and acronyms.

Please consider reducing the annual allowable cut (AAC) in the RVTSA particularly in the McBride Community Forest Corporation (MCFC) footprint.

> My primary concern is the detrimental impact that McBride Community Forest Corporation (MCFC) has had on the community of McBride and those living in the footprint of MCFC.

> A reduction in the AAC for MCFC is important because of the thousands of acres of unregulated high grade harvesting that has taken place. A reduction in the AAC of MCFC would have a minor affect on the community as very little of the volume harvested is offered to or manufactured locally.

> Without input and guidance from those living in the footprint MCFC acts unilaterally to the detriment of the forest and the citizens.

>
> Far from being an exemplary community forest MCFC has divided the community. The corporation logs the forests without regard for community concerns, environmental issues, old growth management areas or other potential uses of the forest. The amount of wood left to rot in the logged area is enormous.

>
> I am aware of two significant charges brought against MCFC; one
> provincial (Min of Forests) and one federal (DFO). Neither of these
> has been dealt with by MCFC in a satisfactory manner. Now I
> understand, though I've not seen any official charges to date, that MCFC has logged in three OGMA's, if not more. In addition I understand there are at least 5 investigations by the Min of Forests for unacceptable logging practices. Certainly I have myself observed the many large solid trees in "junk" wood piles and the great number of apparently good trees fallen but not harvested in logging slashed areas.

>
> The fundamental problem of MCFC is its constitution. There is no
> franchised input from the people who live in the footprint of the
> MCFC. This has served to create an atmosphere of distrust. Many
> residents who live in the footprint of the forest feel that their neighbours, those living within the town limits, are stealing from them and destroying the forest. With no way to affect direction or change in MCFC policy, residents living s.22 do not trust the McBride town-only MCFC to manage the forest for the betterment of all.

>

> Recent challenges, court cases and investigations support the worries
> of many residents including myself.

> In writing to you as you review the timber supply in the RVTSA I trust
> you will consider my concerns and reduce the size of the MCFC
> footprint to ensure some limitation on the untenable constitution and
> forest practices of MCFC

>
> Most sincerely

>
>
> s.22
>
>

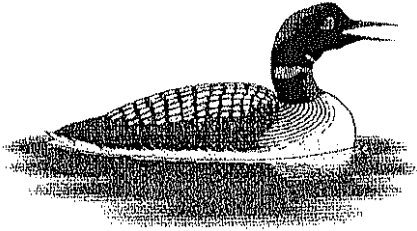
March 15, 2013

Dear Chief Forester,

Please find below my comments regarding the Robson Valley Timber Supply Review.

- Protection of globally unique old growth forests is required. I support the movement towards further protection of the ICH in the Robson Valley TSR, particularly anything at or over 140yrs. Please refer to the 2008 Report from the Forest Practices Board titled "Biodiversity in the Interior Cedar Hemlock Forest near Dome Creek". Research from UNBC has also concluded the increasing value of tourism (economic growth) related to old growth forests and recreation. Knowledge about the globally unique ecosystem is growing, as is support for a World Heritage Site designation for the ancient cedar forests.
- Small town economies need to expand beyond traditional forestry. A growth in tourism, ecotourism and the protection of more habitat through lowland corridors and an increase in provincial parks in the area must be seriously considered. The potential for long term employment is very real, but not if the land base is further eroded by logging. Habitat destruction has led to species decline overall, more logging will increase this loss, including species already in peril such as Mountain Caribou and Grizzly.
- Replace 'guidance' OGMAs and OGMAs with something that accomplishes the protection we assume is the objective. An example is Crescent Spur Hardwoods who logged in OGMAs on the Morkill FSR, and further inquiries determined it was within their legal right. Something here is definitely NOT working.
- Community Forests are increasing in numbers and potentially in size (eg: McBride Community Forest Corp.). Their AAC must be incorporated into the overall AAC for the area. From my personal observations, they lack enforcement oversight and operate under minimal restrictions and need to be incorporated under a stronger enforcement and management model if sustainable practices are indeed an objective.
- Efforts to find markets for species currently considered 'waste wood' such as birch and hemlock appears a desperate attempt to employ few people in an unsustainable forestry. Stop this. 'Waste wood' only exists in the forest industry lexicon.
- Protection of the forested land base at all elevations is required.
- Visual quality objectives should be adhered to, as stated in the Robson Valley LRMP. This has NOT been adhered to, to date, as anyone who drives Highway 16 between Dome Creek and McBride can see.
- Recognize climate change: keep trees alive and standing for carbon sequestration.

In conclusion, reduce the AAC for the Robson Valley TSA and protect the unique biodiversity of the area. The political pressures you face in the north are for short term jobs that fit with political life spans and I hope you are able to see past that reality and into the future. Please plan for a long term, sustainable forestry only.



RECEIVED

MAR 15 2013

PRINCE GEORGE
FOREST DISTRICT

s.22

March 12, 2013

Ministry of Forests, Lands and Natural Resource Operations
McBride Field Office
300 Robson Centre, Box 40, McBride, BC, V0J 2E0
Attention: Norms Stromberg-Jones, RPF

Dear Ms Stromberg-Jones,

After studying the Robson Valley Timber Supply Review IV, we'd like to make the following comments:

As you may know, our primary concern is with the Inland Rainforest, particularly the ICH ^{s.22} We believe all old growth areas worthy of protection must be **spatially defined** or the most valuable remaining stands will be lost. Also "draft OGMA's must be finalized. Beyond that, slightly younger areas (250 years old) should be preserved as they may be required in the event that older stands fall victim to unforeseen disasters. Also both sorts of stands must be appropriately buffered. Logging in the ICH is wasteful, unprofitable and unsustainable. Besides their innate value to the vast variety of species living within these forests, they are fascinating to visitors so provide livings to those who cater to tourists.

Even though this review does not cover the McBride Community Forest, we urge you to work to prevent them getting any tenure extensions or tenure renewal when that may be reviewed. Such a forest ought to be **local** to McBride itself. Here in Crescent Spur-Loos, we receive very little employment from McBride's "Community Forest" and many, many stumps. We were not consulted when McBride was given our back yard to plunder and have never benefited from it. As well, our concerns as to how it is managed have been ignored.

In the district as a whole, there are places where logging has been accomplished with minimal soil disturbance and by leaving young trees on the blocks as well as sufficient course woody debris. However, there are others where viewscapes in important areas have been negatively affected. The main reason people stay, return and move into this area is the environment including water and air quality, forest and mountain recreation and fabulous views. Scaring the landscape effects water, terrain stability, hillside regeneration success in the short term, and over multiple rotations.

Given the new data on bull trout numbers and the extent of their migrations, we urge you to establish the Goat River Bull Trout wildlife habitat area as well as close the entire upper Goat River to all logging. Also "terrain hazard" data should be upgraded before more permits are allowed on steep areas. Beyond that, no logging should be allowed on areas that are not economically viable. Now that other industries are advertising far and wide for workers, the excuse of subsidizing local forest industry jobs makes no sense. While in other places the "inclusion of more fibre" (p.1) and the "potential of marginally economic forest types to contribute to fibre supply" (p.1) may make sense, it should be out of the question in the Robson Valley.

Some questions and specific comments:

- Page 2 – Does the population figure given as 1,877 apply to the entire RVFD or just to McBride and Valcmount? Also, the smaller communities ought to have been listed as it is their back yards that are most affected by forestry activities.
- Page 19 - Cedar like Hemlock ought to be 100% reduced as it can not be sustainably harvested (i.e. every 300 years or so) and cedars leave visitors agog.
- Pages 20-23 -Table 10 -- Recreational sites: Where are the LaSalle Lakes?

Also Table 9 under "Caribou habitat type": Is everything not listed as "high" medium?

- Page 25 -- Stream widths should be ground truthed and data updated from 2004. Recent research suggests that S4 streams should have wider buffers.(This I got from PG PAG but was too bleary to get the reference - sorry) After all, small streams do grow into mighty rivers.
- Page 27 - Elk are now included as species for which habitat should be maintained! These bullies are recent arrivals and take care of themselves!
- Page 31 - Table 20 -- What is the significance of the last number -- the total- total number?
- Page 33 -- Does "Genetic Gain" refer to resistance to bugs or pathogens, faster growing or to wood quality? I feel this is a dangerous path given climate change and other environmental unknowns. We need all the genetic diversity we can find. This is too great an experiment.
- Page 38 - Water Licences: 100 metre buffers around what? intakes or streams that flow into intakes?
- Page 39 and 40 "Caribou corridors" are far too narrow and too young as are forests designated "caribou medium." Also listed under "caribou medium," where are Boulder Mountain, Zig-Zag Ridge and the Upper Morkill calving area? Maybe I missed something there?

Finally, we wish to commend you on the careful work that has gone into this timber supply review and the deletions in the harvesting land base that have already been made. While we don't believe forestry in the Robson Valley is sustainable, and the BC government fails to recognize the important changes in focus that have occurred and continue to occur in our valley, things have improved since the first checkerboard clear cut appeared on a mountainside in the early seventies.

Sincerely,

s.22

Ps – fyi (since I am a very slow reader), I found the following typos:

- P. 13 – middle bullet under 5.1.1 – probably you want to omit the initial “a.”
- P.23 – 5.7.1 middle bullet: are Lower Morkill and Cushing separate Landscape Units or one combined? or was a comma missing?
- P.38 – 6.8.1 comma missing in list of watersheds
- P. 45 – 7.3 “whichmay”- 2 words

(I'm sure I have many more in this letter)

s.22

Appleton, Natalie MTIC:EX

From: s.22
Sent: Monday, February 3, 2014 12:33 AM
To: Stromberg-Jones, Norma FLNR:EX
Subject: about Public input

Hello Norma,

s.22

I have listened and questioned others on their viewpoints. I have been to Community Forest Meetings. There is no public input.

For years now, people have tried to get their opinions heard on the management of the community forest.

The recent audit for MCFC was, I think, the WORST in British Columbia. I have no problem seeing the Valemount Community Forest, which I believe was the best audit or the Dunster Community Forest have their area to log.

The forests belong to us, the people of BC.

I know the Village of McBride say they are the sole shareholder of the McBride Community Forest. This should never have been allowed to take place.

It was a bureaucratic mistake. However, the mayor and the councilors are the board of the community forest. They are appointed.

This is not a popularity contest, or about maintaining ownership of the community forest. This is about the stewardship of our forests.

The directors a few years ago had to sign confidentiality papers or get released from their elected position. So, how can the public make enquiries?

I will tell you.

They must go to a community forest meeting, I think it is scaled back to twice a year now, and we must submit our questions on paper, then at half time a group of the manager, and directors and the village administrator get together and decide how best to answer the question. Then, they answer it and it is over. No chance for rebuttal or questions further to clarify anything.

By the way, twice now I know of, no financial statement was available at the time of the meetings.

If the forests are not being managed properly, then I think the government has to step in and take ownership until such time as there is a new manager and an elected board of directors are put in place to ensure the forest comes first, not the village.

NO ONE applied for the position of director on the MCFC board that was in the paper. Wonder why? They must live under a gag order.

I think there should be a forensic audit so that the people of the province can see what our forests have been paying for. I am saddened by what I feel is such a big loss and waste of our resources. I just hate to see more of it. Sometimes things have to get worse to get better.

I would like to know if an OGMA was violated in the footprint of the McBride Community Forest or if an immature forest was logged in the footprint of the McBride Community Forest. I would like to know by a Forestry personel, one that is not involved in local McBride politics.

You cannot stand cut trees back up-there is no way of fixing that. You cannot bring fish or animals back to life once they are dead.

I think Shirley Bond should remove herself from issues of the McBride Community Forest because I feel she is in conflict of interest.

s.22

s.22

If that is correct, how about a conflict of interest there? He does or has worked for the McBride Community Forest. BC is full of RPF's. Surely to goodness, someone else should have been hired???? I am not saying he would be swayed by the possibility of employment for the community forest but who hired him? Why would he be put in that position in the first place?

We have NO say in our local community forest. So, this is my way of having my say.

This is the Forestry Departments business and I think the authority of dealing with these issues should be left up to them and not politicians.

This is my personal rant and before you send it in to publication, I would like to speak with you and ask if any of this is relevant or if I should revamp it before final submission. We get so tired of hearing "my hands are tied,,it's too political" Get the politicians out of the mix. That's the problem.

s.22 if you could have a chat with me at your convenience
before I make a final submission, I would appreciate it. We should be home by noon.

Sincerely, s.22

Submission Re: Robson Valley Timber Supply Review

2014-02-03

To: Chief Forester

Please consider the following:

Before considering setting the AAC for the Robson Valley, it is imperative that a comprehensive on the ground inventory of the timber left, be conducted for the following reason:

The recent Forest Practices Board Audit for the McBride Community Forest which indicated serious concerns over the absence of mapped logging activity, covered only a 2 yr window. MCFC had a SNRFL for years and logged within the entire TSA, i.e. outside of the CF footprint, without mapping where they had logged. Just one example of the outcome of this practice was noted when an area proposed to set aside for the new Dunster Community Forest footprint, was found to have been already logged under MCFC's SNRFL. There are thousands of hectares that were logged (clarification: creamed) and not mapped and recorded, throughout the TSA, over ten years of MCFC operation. The FPB only covered 2 years. The community in the footprint of the CF has made a request to the District Manager for ground-based Audit, however, the issue has serious impact on the consideration of future AAC. While it is appreciated that a SNRFL was supposed to be for Salvage, that is not at all what occurred.

Also puzzling and somewhat perplexing is the request for public input on the TSA when it is proposed and being considered that the Carrier license quota be turned over to the CFs as Area-based tenure with Tabular Stumpage, basically eliminating the Robson TSA.

It is evident from practices over 10 years that MCFC cannot manage an expansion of their Area under this Management. This is backed by the Forest Practices Board Audit, serious DFO Fisheries Charges (not part of the Audit) and current compliance issues with C & E. The Robson TSA deserves special attention here as we were shuffled from the PG region, to Kamloops Region and now back to Prince George for years, basically devoiding us of adequate government oversight.

Please consider my input.

s.22

I am extremely upset that wood harvested illegally from OGMFAs, riparian zones, wildlife tree patches etc... along with green fir and spruce logged illegally as Salvage under the SNRRL from the Robson TSA has gone to market as Certified lumber.

s.22

Stromberg-Jones, Norma FLNR:EX

From: s.22
Sent: Monday, February 3, 2014 10:40 AM
To: Stromberg-Jones, Norma FLNR:EX
Subject: Submission to the Robson Valley TSA Timber Supply Analysis
Attachments: Submission to The Robson Valley TSA Timber Supply Analysis.pdf
Categories: TSR

Please find attached my submission to the Robson Valley TSA Timber Supply Analysis Public Input.

s.22

SUBMISSION TO THE ROBSON VALLEY TSA TIMBER SUPPLY ANALYSIS

I wish to make two recommendations regarding the Robson Valley TSA Timber Supply Analysis as follows:

- 1.** I recommend that the harvest rates of forest in the northwestern interior Cedar-Hemlock zone be significantly curtailed or eliminated. This recommendation is made due to the following:
 - a.** The uniqueness on a global perspective of this ecosystem type.
 - b.** The limited natural extent of this ecosystem type.
 - c.** The value of this ecosystem type as wildlife habitat, especially as ungulate winter range including for mountain caribou.
 - d.** The presence of rare and endemic species.
 - e.** The extent to which this ecosystem type has already been removed by road, rail and transmission line construction, clearing for agriculture, fire caused by human agency and, not least, by timber harvesting.
 - f.** Everywhere in Robson Valley where I have seen harvesting of cedar-hemlock stands, which in recent times has been by the McBride Community Forest Corporation (MCFC), the extent of the waste produced and the state in which the forest has been left has been alarming. I believe that the short term economic benefits in no way justify the damage caused and concomitant loss of benefits in perpetuity to the biosphere and to recreational and other values to human wellbeing.

- 2.** I recommend that the Carrier Lumber tenure is not transferred to McBride Community Forest Corporation until the following conditions are met:
 - a.** The MCFC constitution is amended such that all board members are democratically elected from within the footprint of the MCFC forest tenure.
 - At present the board is appointed by the McBride Village Council and the residents of the community forest per se, who outnumber the McBride village residents approximately four to one, have no representation on the board.

- b.** The MCFC constitution is amended such that the corporation becomes a transparent and accountable organisation that will benefit all residents of the community forest footprint.
 - At present board members are sworn to total non-disclosure on appointment. Meetings are invariably held in camera. At mandated public meetings only written questions can be submitted and substantive answers are never given.
- c.** A forensic audit is conducted of MCFC affairs to date.
- d.** All pending or underway investigations of MCFC employees by the Association of BC Forest Professionals are satisfactorily concluded.

I believe that if all board members were democratically elected from within the entire footprint of the MCFC forest tenure, instead of being appointed by the McBride Village Council, that such a democratically elected board would quickly resolve all of the other issues listed above. I also believe that forest practices by the MCFC would be greatly improved and the appalling audits by the Forest Practices Board, such as the one recently conducted, would not occur in the future.

Robson Valley
3 February 2014

Stromberg-Jones, Norma FLNR:EX

From: s.22
Sent: Monday, February 3, 2014 9:12 PM
To: Stromberg-Jones, Norma FLNR:EX
Subject: Robson Valley Timber Supply Analysis- public input
Categories: TSR

I am in favour of minimal timber harvest in the Robson Valley. Based on the most recent data I have seen, most of the timber harvested in the Robson Valley (even by the community forests) is exported from the valley, and as such creates minimal local economic value. Until we are able to derive more local economic value from our local timber resources, I suggest we let those trees simply grow. If and when local processors need more wood, we can then contemplate increasing the annual cut. In the mean time, I believe the valley will derive more value from our forests when left in their natural state - watershed values, recreation, tourism, hunting, etc.

I am in favour of a greater amount of local forest being part of the community forests. In reality I believe that 100% of timber (within areas that will be harvested) should be part of local community forests. That said, those community forests must be well managed for the benefit of area residents, and with respect for local values and for the concerns of area residents. The McBride Community Forest has suffered from poor/controversial management for some years.

I am strongly opposed to timber harvest for the sole purpose of biofuel. A few years ago the McBride community forest had an agreement to do just that. Using logging or mill waste for biofuel (assuming that that waste would be burned anyway) is an excellent idea. Harvesting just to burn is wrong.

Sincerely,

s.22
McBride, B.C.

Stromberg-Jones, Norma FLNR:EX

From: s.22
Sent: Monday, February 3, 2014 5:00 PM
To: Stromberg-Jones, Norma FLNR:EX
Subject: AAC reply
Categories: TSR

I believe that a through on the ground inventory is needed before an accurate AAC can be set. McBride community forest logged outside their footprint and the Forest practices board identified that their record keeping inside the footprint was not accurate, I believe their logging outside was also not properly documented. One only needs to walk the forests in the area and one will see trees down and logging that has never been accounted for in a AAC.

s.22

From: Norma.StrombergJones@gov.bc.ca

To: s.22
Date: Mon, 3 Feb 2014 13:36:59 -0800
Subject: Reply to voice mail

Hi s.22

I received your voice mail. My email is Norma.StrombergJones@gov.bc.ca.

Norma Stromberg-Jones, R.P.F.
Stewardship Forester
Ministry of Forests, Lands and Natural Resource Operations
Prince George Natural Resource District - McBride Field Office
300 Robson Centre, Box 40, McBride, B.C. V0J 2E0
Tel: 250- 569-3788 Fax: 250-569-3755

Email: Norma.StrombergJones@gov.bc.ca



Canim Lake Band
PO Box 1030
100 Mile House BC
VOK-2E0

April 10, 2013

Dear Regional Manager

Re: Carrier Lumber, Valemount CFOR and McBride CFOR proposal.

Thank you for your letter dated March 11, 2013. The proposal to covert more than 250,000 m3 of AAC from a volume based licence into two dramatically expanded Community Forests is very significant. It requires deep consultation and accommodation.

This plan will be brought before Canim's Chief and Council in May. We will also be seeking legal advice and will be contacting other affected First Nations to discuss it more fully.

Some of our concerns include:

s.16

Yours truly,

Chief Mike Archie, Canim Lake Band.



File: 10450 – 50 – Canim Lake First Nation

March 11, 2013

Canim Lake First Nation
Chief Michael Archie, Council and Don Dixon
Attention: Don Dixon, Natural Resources Coordinator
PO Box 1030
100 Mile House, BC, V0K 2E0

Dear Chief Michael Archie, Council and Don Dixon:

This letter is to inform you that the Province of British Columbia has recently received a request from Carrier Lumber Ltd. (Carrier), Valemount Community Forest Company Ltd.(VCFC) and McBride Community Forest Corporation (MCFC) and is initiating consultation on the following proposals:

1. Carrier is the holder of two replaceable forest licences in the Robson Valley Timber Supply Area (TSA) and has proposed a volume equalization of the Allowable Annual Cuts (AACs) of these licences. FL A15429 has a current AAC of 186,428 m³/year and FL A15430 has a current AAC of 75,018 m³/year. The equalization of the AACs would amount to each licence equally containing an AAC of 130,723 m³/year.
2. The proposed transfer/sale of FL A15429 from Carrier to MCFC and the proposed transfer/sale of FL A15430 from Carrier to the VCFC.
3. Following the proposed transfer/sale of the licences, the conversion of each volume based licence into two Community Forest Agreements (CFAs) held respectively by the MCFC and VCFC.

It could be viewed that this multi decision process will occur in two distinct stages. The first stage is the volume equalization and sale/transfer of replaceable licences FL A15429 and FL A15430 to the MCFC and VCFC. At this point the Minister would consider an apportionment decision to allow the MCFC and VCFC to utilize these forest licences to apply for conversion of these forest licenses into CFAs. The second stage, subsequent to the approval of the above would be the determination of the specific areas which could form the land base for the CFA applications. The location of the areas will require consultation with your community.

Your review and response is requested by May 11, 2013 so that your interests can be fully considered in the decision making process.

Page 1 of 2

Ministry of Forests, Lands and
Natural Resource Operations

Oriskany Region

Location:
Prince George District
2000 South Ospika Boulevard
Prince George BC

Mailing Address:
2000 South Ospika Boulevard
Prince George BC V2N 4W5
Tel: (250) 614-7400
Fax: (250) 614-7433

The Province recognizes that your First Nation has asserted aboriginal interests in the proposed area, and is interested in understanding further the nature of these aboriginal interests and how they may be impacted. We invite your input on how the proposal may impact any aboriginal interests you may have in the areas in an effort to better inform our decision-making process.

In addition to any information you may provide during this consultation process, the Province will be relying on the following information to understand how the proposed activity may impact your aboriginal interests in the area. The information may also be used to inform the development of potential measures to mitigate or avoid impacts to your interests:

- Aboriginal interests identified by your First Nation through previous consultations include hunting, fishing, gathering sustenance and medicinal plants and other cultural practices.

Please review this information and advise me should you have any questions or concerns, or wish to provide input regarding how your Aboriginal interests may be affected. I am available to meet with you, at your office and at your convenience, to discuss any questions or concerns regarding the proposals presented. Please contact me at (250) 614-7503 or Stacy.Perkins@gov.bc.ca if you have any further questions or concerns.

Thank you in advance for your consideration in this matter.

Yours truly,

Stacy Perkins, RPF
Advisor, First Nations Relations
Ministry of Forests, Lands and Natural Resource Operations
Prince George District



May 14, 2013

Ministry of Forests, Lands and Natural Resource Operations
Prince George District
2000 South Ospika Boulevard
Prince George, BC V2N 4W5
Email: Stacy.Perkins@gov.bc.ca

Dear Stacy:

RE: CARRIER LUMBER LTD. – TRANSFER/SALE

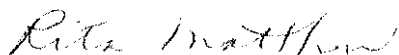
Simpcw First Nation acknowledges the receipt of the letter dated March 11, 2013 proposing transfer/sale of FLA15429/FLA15430 and conversion to Community Forest Agreements (CFAs).

Consider this letter a request from the Simpcw First Nation to meet with John Huybers, District Manager on May 31, 2013 at the Prince George office to discuss the following concerns:

s.16

Simpcw First Nation looks forward to meeting with MFLNRO to start discussions concerning the transfer/sale and potential conversion of FLA15429/FLA15430; and this letter shall have no bearing whatsoever on the obligation of MFLNRO to consult and accommodate the Simpcw First Nation with respect to this issue. If there are any questions or concerns, please direct them to Kerri Jo Fortier, Natural Resource Manager at (250) 672-9995 ext. 247 or KerriJo.Fortier@simpcw.com.

Sincerely,

A handwritten signature in cursive script that reads "Rita Matthew".

Chief Rita Matthew,
Simpcw First Nation

cc: John Huybers, District Manager

Perkins, Stacy FLNR:EX

From: Perkins, Stacy FLNR:EX
Sent: August-29-13 1:53 PM
To: 'Don Dixon'
Subject: FW: Email and Meeting with Canim Lake

Hi Don,

Thank you for getting back to me. I'm glad you have time to meet with us. The days John Huybers and I are available in September are the 4th, 5th, 9th-13th and the 16th. Can you let me know by August 26th? If we can't confirm a meeting by then our intention is to proceed with preparing the decision package, based on the information available, for the Minister who may then continue with the decision making process. Please note the timeframe in which a decision is made is within the discretion of the Minister.

If you would like to meet in 100 Mile or Williams Lake John and I would like to take you, John, Mel and Mike to lunch.

~~~~~  
*Stacy Perkins, RPF*  
*Advisor, First Nations Relations*  
*Ministry of Forests, Lands and Natural Resource Operations*  
*Prince George Natural Resource District*  
*Phone: 250-614-7503*  
*[Mailto:Stacy.Perkins@gov.bc.ca](mailto:Stacy.Perkins@gov.bc.ca)*

---

**From:** Don Dixon [<mailto:canimnr@canimlakeband.com>]  
**Sent:** Thursday, August 8, 2013 10:27 AM  
**To:** Perkins, Stacy FLNR:EX  
**Cc:** 'Dallas Ingvarsen'  
**Subject:** RE: Email and Meeting with Canim Lake

Hello  
Please see comments in blue font below.  
Don Dixon

---

**From:** Perkins, Stacy FLNR:EX [<mailto:Stacy.Perkins@gov.bc.ca>]  
**Sent:** Tuesday, July 30, 2013 12:49 PM  
**To:** John Kalmokoff; Don Dixon  
**Subject:** FW: Email and Meeting with Canim Lake

Hello John and Don,

John Huybers, the Prince George Resource District Manager and I had hoped to have met with you by now to discuss the issues you brought forward in your letter dated April 10, 2013. In your last correspondence, June 28, 2013, Don planned to meet with Simpcw First Nation prior to our meeting. Has this occurred? We have signed an MOU to work together with the Simpcw First Nation. We are continuing to work with Simpcw on this file. It is a very busy time of year, and it is going slowly.

From our perspective consultation is incomplete, the consultation level is deep, please see the Canim Crown FCRSA. We also would like clarification on how Carrier acquired the license in the Robson Valley?

Because we have not met yet, I have prepared the following response to address the concerns noted in your letter, and to determine potential impact and infringement of rights and title to Canim Lake:

s.16

We continue to be interested in meeting with you to further discuss the proposal and the process. Please contact me to arrange a convenient time to meet.

Again, this is the busiest time of the year for us. We must have the time we need to complete consultation.

Lets try for a September xx date.....

~~~~~  
Stacy Perkins, RPF
Advisor, First Nations Relations
Ministry of Forests, Lands and Natural Resource Operations
Prince George Natural Resource District
Phone: 250-614-7503
[Mailto:Stacy.Perkins@gov.bc.ca](mailto:Stacy.Perkins@gov.bc.ca)

From: John Kalmokoff [<mailto:clbforestry@canimlakeband.com>]
Sent: Friday, June 28, 2013 3:38 PM
To: Perkins, Stacy FLNR:EX
Subject: RE: meeting

As far as I know we have not yet met with Simpcw but are discussing dates. Don will know better.

From: Perkins, Stacy FLNR:EX [<mailto:Stacy.Perkins@gov.bc.ca>]
Sent: June 28, 2013 9:36 AM
To: John Kalmokoff
Cc: Don Dixon
Subject: RE: meeting

Hi John and Don,

Have you been able to discuss with Simpcw yet? John Huybers and I would like to meet with you. Can you send me some dates? Thank you.

~~~~~  
*Stacy Perkins, RPF*  
*Advisor, First Nations Relations*  
*Ministry of Forests, Lands and Natural Resource Operations*  
*Prince George Natural Resource District*  
*Phone: 250-614-7503*  
*[Mailto:Stacy.Perkins@gov.bc.ca](mailto:Stacy.Perkins@gov.bc.ca)*

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**From:** John Kalmokoff [<mailto:clbforestry@canimlakeband.com>]  
**Sent:** Monday, June 17, 2013 1:53 PM  
**To:** Perkins, Stacy FLNR:EX  
**Cc:** 'Don Dixon'  
**Subject:** RE: meeting

Yes, but Don will deal with the timeline. I think we indicated in our first response that the consultation level would be deep, and that we would need to meet with other First Nations on this issue. I believe that Don is going to meet with Simpcw on it in the near future.

Thanks;John.

**From:** Perkins, Stacy FLNR:EX [<mailto:Stacy.Perkins@gov.bc.ca>]  
**Sent:** June 17, 2013 11:02 AM  
**To:** Don Dixon; John Kalmokoff  
**Subject:** RE: meeting

Hello Don and John,

Do you still want to meet about the Carrier/Valemount/McBride proposal?

We met with KerriJo and Sam Phillips two weeks ago.

~~~~~  
Stacy Perkins, RPF
Advisor, First Nations Relations
Ministry of Forests, Lands and Natural Resource Operations
Prince George Natural Resource District
Phone: 250-614-7503
[Mailto:Stacy.Perkins@gov.bc.ca](mailto:Stacy.Perkins@gov.bc.ca)

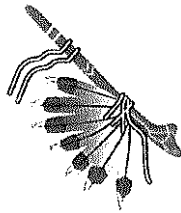
From: Don Dixon [<mailto:canimnr@canimlakeband.com>]
Sent: Friday, June 14, 2013 2:44 PM
To: Perkins, Stacy FLNR:EX
Cc: KerriJo.Fortier@simpcw.com; 'John Kalmokoff'
Subject: meeting

Hello

The Canim Lake Band Chief and Council has met with the Simpcw Chief and Council today.

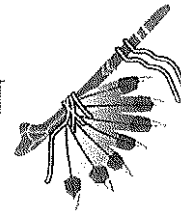
Both parties have signed a Memorandum of Understanding to work together on shared areas of traditional territory, so with that being said the Canim Lake Band will work with Simpcw on the interests within the Robson Valley.

Don Dixon



SIMPCW FIRST NATION

"People of the North Thompson River"



September 5, 2013

Ministry of Forests, Lands and Natural Resource Operations
Prince George District
2000 South Ospika Boulevard
Prince George, BC V2N 4W5
Email: Stacy.Perkins@gov.bc.ca

Dear Stacy:

RE: CARRIER LUMBER LTD. SALE AND CONVERSION

SimpCW First Nation would like to provide official comment on the proposed transfer/sale and conversion of FL A15429/ FL A15430 and conversion to Community Forest Agreements (CFAs). SimpCW First Nation will not support the sale/ transfer due to the outstanding issues relating to Consultation and Accommodation within SimpCW's Traditional Territory.

s.16

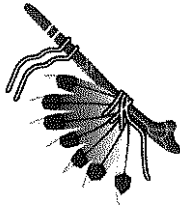
s.16

SimpCW First Nation looks forward to meeting with MFLNRO to begin meaningful discussions concerns the transfer/sale and potential conversion of FL A15429/ FL A15430 and the requirements to accommodate SimpCW for this and past forest tenure decisions made by crown.

Should you have questions or concerns, please direct them to Kerri Jo Fortier, Administrator. She can be reached at (250) 672-9995 ext. 247 or via email at kerrijo.fortier@simpcw.com

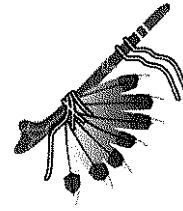
Kukstemc,

Kúkpi7 Rita Matthew



SIMPCW FIRST NATION

"People of the North Thompson River"



Ministry of Forests, Lands and Natural Resource Operations
Prince George District
2000 South Ospika Boulevard
Prince George, BC
V2N 4W5
John.Huybers@gov.bc.ca

October 21, 2013

Dear Mr. Huybers,

RE: CARRIER LUMBER LTD. SALE AND CONVERSION

Further to our letter dated September 5, 2013 addressed to Stacey Perkins, Simpcw First Nation (SFN) would like to follow-up on the proposed Carrier Lumber FL sale and transfer in the Robson Valley TSA. This decision has significant impacts to SFN as detailed in previous communications.

In addition to our previously noted concerns, it has come to our attention that the recent Forest Practices Board "Audit of Forest Planning and Practices" for the MCFC, released September 2013, identified four cases of significant non-compliance with respect to operational planning, road construction and silviculture, as well as an additional area requiring improvement. It is our understanding that the MCFC is now under investigation by the Federal Department of Fisheries and Oceans as well as the Provincial Compliance and Enforcement Branch. We feel the crown must not allow the sale and transfer of Carrier's FLs to MCFC and their partner with such significant outstanding concerns.

When considering the significant impacts to SFN outlined previously and the recent Forest Practices Board Report, SFN feels the decision to allow the sale and transfer of the Carrier Lumbers FLs and their conversion to CFAs is not in the best interest of SFN or the Province. SFN would request that this proposal be denied as the MCFC has proven unable to properly manage their current community forest license.

Should you have questions or concerns, please direct them to Steven Patterson, Natural Resource Manager and Title & Rights Coordinator. He can be reached at (250) 672-9995 ext. 255 or via email at steven.patterson@simpcw.com

Kuksternc,

Kúkpi7 Rita Matthew

Meeting Agenda Simpchw First Nation & Prince George Resource District (MFLNRO)

Date: November 26, 2013

Location: Kamloops, BC

Attendees: Steve Patterson, James Foster (Simpchw) and Stacy Perkins and Matt Scarr (FLNRO)

Carrier Volume Transfer and conversion into two Community Forest Agreements

Update on the proposal

- The Province has initiated consultation on two potential forest decisions
 - An equalization of timber volume between two forest licenses (FL15429/15430)
 - Creation of two new Community Forest Agreement (CFA) in the Robson Valley
- The Province is awaiting further information from Carrier lumber

Proponents' information sharing with Simpcw FN?

- Simpcw expressed that no information has been provided by the proponent on the proposal
- Simpcw was a member of the Valmont CFA board however information on this proposal was withheld from Simpcw. As a result of this Simpcw has stepped down from the board.
- Simpcw expressed an interest in developing a business relationship with Carrier however this request was denied.

Simpchw FN FCRSA – focus on consultation process, level of consultation, revenue sharing

- Appendix B of the FCRSA signed between Simpcw and the Province sets out consultation levels and timelines for forestry decisions.

Page 34 redacted for the following reason:

s.16

s.16

- Public Discussion Paper (PDP) on TSR will be released soon
- PDP will contain several potential forecasts

s.16

Perkins, Stacy FLNR:EX

From: Pousette, John G FLNR:EX
Sent: March-14-14 12:17 PM
To: 'Carli Pierrot'
Cc: Perkins, Stacy FLNR:EX
Subject: RE: Meeting With SIMpcw First Nation

Thanks Carli!

Thanks also for the opportunity to meet with you! I'm sure we'll be back after the AAC is released when we start to think about the apportionment.

We look forward to the letter.

Cheers
John

John Pousette, RPF

Tenures Officer - Prince George Natural Resource District
BC Forests, Lands and Natural Resource Operations
ph. (250) 614-7423
John.G.Pousette@gov.bc.ca

From: Carli Pierrot [<mailto:referrals@simpcw.com>]
Sent: Friday, March 14, 2014 8:36 AM
To: Nicholls, Diane R FLNR:EX
Cc: Perkins, Stacy FLNR:EX; Steven Patterson; XT:Foster, James FLNR:IN; Pousette, John G FLNR:EX
Subject: Meeting With SIMpcw First Nation

Dear Ms. Nicholls,

Simpcw First Nation recently met with FLNRO staff in order to discuss the public discussion paper relating to the Robson Valley TSA, pursuant to the AAC currently being prepared. Several important points were mentioned, and we intend to address these points in detail in a letter to be drafted and forwarded to your attention in the near future. In the meantime, we would like to introduce these points, so that you are familiar with the general ideas we intend to broach in our upcoming correspondence. Specifically, these are our concerns:

s.16

We thank you for your attention to these matters, and look forward to speaking with you in the future about them.

Carli Pierrot

Referrals and Archaeology Coordinator

referrals@simpcw.com



SIMPCW FIRST NATION

SimpCW First Nation
500 Dunn Lake Road
P.O. Box 220
Barriere, BC V0E 1E0
Phone 250.672.9995
Toll Free 800.678.1129
<http://www.simpcw.com>

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