



# Nuxalk Forestry Limited Partnership

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Ross Vennessland, Species Conservation Specialist  
Parks Canada  
300 - 300 West Georgia Street  
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**Re: Recovery Planning Under Federal Species at Risk Act for Northern Goshawk**

We received Parks Canada's letter of December 10, 2014 informing us of the progress of the federal Recovery Strategy for Northern Goshawk *laingi* subspecies in Canada. We appreciate the opportunity to comment on the proposed Recovery Strategy because it has the potential to rather significantly affect the economic viability of the Nuxalk Nation's Community Forest Agreement K3H on the Central Coast of British Columbia near Bella Coola, BC.

We do not have the resources or expertise to offer a thorough review of the Recovery Strategy and therefore appreciate that our forest manager (A&A Trading Limited) and neighbor (Bella Coola Community Forest Limited) provided a greater level of analysis. With that said we make the following observations:

1. Figure 1 of the "Recovery Strategy for the Northern Goshawk (April 2008)", the Parks Canada brochure entitled "*Laingi* Northern Goshawk" and Figure 1 in your December 10<sup>th</sup>, 2014 letter show that the Bella Coola area is on the extreme edge of the distribution of *Accipiter gentilis laingi*. We recommend DNA analysis to confirm the distribution the coastal *laingi* subspecies (versus the interior *atricapillus* subspecies) prior to a Recovery Strategy being implemented for the Bella Coola area.
2. Figure 1 in your December 10<sup>th</sup>, 2014 letter shows "Critical habitat locations for North Coastal British Columbia". The map shows ~9 habitat locations within the Bella Coola area and only 2 locations in the rest of the region; 10 of the 11 habitat locations in the North Coast Conservation Region are proximate to human modification (e.g. roads, 2<sup>nd</sup> growth forests, etc.). Prior to implementation of a Recovery Strategy for the North Coast Conservation Region we recommend a much more thorough analysis of the distribution of the Northern Goshawk to ensure that data is not skewed to just those locations near human modified infrastructure.
3. Approximately 48% of the Mid-Coast Timber Supply Area is in some form of protection from timber harvest (e.g. park, conservancy, wildlife management areas, etc.) and only 12% of the area contains commercially viable stands of timber:
  - a. The requirement for 2,521 hectares for each Critical Habitat north of 51° latitude seems severe when compared to the 9,700 hectares of Timber Harvesting Land Base on the Nuxalk Nation's Community Forest K3H and the 18,700 hectares of Productive Forest (Forsite, September 29, 2009).

Board Meeting

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- b. A Recovery Strategy for Northern Goshawk that requires 2,521 hectares for each and every area of Critical Habitat would effectively render the Nuxalk Nation's Community Forest as inoperable.
4. There is a lack of consensus on the science used to support the proposed Recovery Strategy for Northern Goshawk. We recommend that Parks Canada not cut the review process short if more time is needed for a scientifically defensible result – especially because of the potential for very large impacts to:
- a. Socio-Economic considerations, including viability of Nuxalk's forest tenures
  - b. First Nations Rights and Title considerations
  - c. Human Well-Being considerations, especially in the Mid-Coast / North-Coast areas.

The proposed Recovery Strategy for Northern Goshawk did not address these important topics which we believe to be ill-conceived.

We are committed to ensuring the long term survival of Northern Goshawk and believe a more site specific professional reliance management strategy can be developed. We are willing to participate with Parks Canada and other stakeholders to refine a management strategy that will not cause undue socio-economic hardship in Bella Coola while protecting Northern Goshawk habitat.

Sincerely,

**NUXALK FORESTRY LIMITED PARTNERSHIP**



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Megan Moody, Nuxalk Stewardship Office  
Hans Granander, Bella Coola Community Forest Ltd.  
Dave Marquis, A&A Trading Ltd.  
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Reg Moody, Chair, Central Coast Regional District  
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