

January 5, 2022

Chair and Directors
Comox Valley Regional District

Re: Letter of Support - K'ómoks First Nation

Please find attached a draft letter of support to K'ómoks First Nation (K'ómoks) for their application to the Department of Fisheries and Oceans Canada to be selected as the pilot site for aquaculture area based management.

K'ómoks submitted their application in the middle of December with the deadline for submission being December 31. I understand that the ministry is agreeable to accepting letters of support, in the short term, for applications already submitted

Requested Action:

THAT the attached draft letter to the K'ómoks First Nation providing support for their aquaculture area based management application to Fisheries and Oceans Canada be approved; AND FURTHER THAT the Chair be authorized to sign the letter.

Sincerely,

D. Arbour

Daniel Arbour
Director

Enclosure: DRAFT letter of support for K'ómoks First Nation

Office of the Chair

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File: 400-70/KFN

January , 2022

Sent via email only: todd.boychuk@komoks.ca

Chief and Council
K'ómoks First Nation
3330 Comox Road
Courtenay, BC V9N 3P8

Dear Chief and Council:

Re: Letter of Support – Aquaculture Area Based Management Pilot Program

In 2018, the Minister of Fisheries and Oceans announced the launch of an aquaculture area-based management initiative in BC which could present a new approach to govern and manage aquaculture activities on the West Coast in a more integrative manner, with greater first nation leadership and participation in governance. An Indigenous and Multi-Stakeholder Advisory Body (IMAB) was created to investigate the potential of this initiative and other issues related to aquaculture, and a specific committee established to give shape to an area-based management approach for BC. Comox Valley Regional District (CVRD) Director Daniel Arbour, as appointed by the Union of BC Municipalities, participated in the steering committee which provided guidance to the creation of a framework for aquaculture area-based management adopted to the specific context of BC. This framework was later endorsed by the IMAB group, and ultimately received and endorsed by the Federal Minister.

In 2021, Fisheries and Oceans Canada (DFO) announced the launch of a pilot project to test area based management in one area of BC, to be selected through competitive process. By December 2021, the K'ómoks First Nation (K'ómoks) applied to be selected as the pilot site for the area of Baynes Sound, Lambert Channel, and off Cape Lazo. This letter of support by the CVRD is provided to the DFO as part of the area selection process.

Challenges and Opportunities for Baynes Sound, Lambert Channel, and the Cape Lazo marine area.

The southern marine area of the Comox Valley is home to the majority of farmed shellfish aquaculture production in British Columbia; to a major recreational marine hub anchored by the Comox and Deep Bay Marinas; to an active herring and prawn fishery; to a rich, contained ecosystem that is already feeling the leading edge of global warming; to two Islands that are part of the Islands Trust (Hornby and Denman); to a home base for over 50,000 people, and as a place that has served as the food basket for the Qualicum, Pentlatch, and K'ómoks for millennia's.

Asides from climate risks, one of the key challenges facing the local marine area is the colonial governance legacy which has fragmented decision-making, and initially facilitated extractive industries such as coal mining and sustained-yield based industrial forestry and fisheries activities. While in the last 40 years a transition has occurred to more sustainable and environmentally sound models of economic activity, the lack of integrated and disjointed planning and management in local waters is highlighted in a 2020 report by the World Wildlife Foundation, [Towards Integrated Management in Baynes Sound](#).

The report, supported by the Baynes Sound/Lambert Channel Ecosystem Forum (a multi-stakeholder collaborative whose purpose is to work for the ecological health of the marine environment) identifies 29 planning documents which currently guide and regulate the management of activities in the waters of the area. The key report's conclusion is as follow:

“The results of the analysis indicated that the management plans, as they currently operate, have all been developed independently, and are for the most part not integrated. However, several common management elements emerged and were discussed as opportunities for improving integrated management going forward. The most prevalent of these opportunities stems from a near universal interest in ecosystem-level health found in the plans. Many of the opportunity areas identified have strong management connections to each other, across sectors, spatial zones and species, further strengthening the foundation for improved integration. The results also highlighted challenges for the further integration of management in the region, including the complexities of governance, and the need for a shared vision for the region.” WWF, [Towards Integrated Management in Baynes Sound](#), page 44.

Moving forward, the CVRD believes that it is critical to transform the colonial governance and management model of these waters into something that will better support the marine ecosystem, be more holistic, and ensure that economic and social activities do not work at cross-purpose to ecological health. We believe that K’ómoks, the shellfish sector, and DFO can help lead this transformation in approach.

In our consideration of the K’ómoks application to DFO to be established as the first Aquaculture Area-Based Management site in British Columbia, we would like to highlight the following attributes which we believe makes our region a top candidate for launching a new approach to aquaculture governance and management in Coastal BC:

- 1) K’ómoks has excellent capacity to step into a co-governance and pioneer role in implementing area-based management with the Department of Fisheries and Oceans Canada, and will be supported by up to 40 organizations, including the CVRD, via the Baynes Sound Ecosystem Forum collaborative. K’ómoks is also an active industry participant in shellfish production.
- 2) The shellfish aquaculture industry is supportive of this effort, and sees good potential to enhance the sector’s success by collaborating towards cleaner waters and reduced risks to shellfish, and working collectively towards a blue economy that benefits from a strong social mandate.
- 3) Residents of the area value a healthy marine ecosystem; support reconciliation efforts; and yearn for better governance and management of these waters for the benefit of future generations. Both the CVRD and Islands Trust are enthused and supportive of this initiative.

Comox Valley Regional District Support

The CVRD is committed to support K’ómoks and DFO should the area be selected for a project. Our Planning and Engineering departments would be prepared to provide professional supports if requested and resourced.

In closing, we hope the reviewers will choose our region as the first aquaculture area-based management site in BC, and we look forward to assist with this promising initiative.

Sincerely,

Jesse Ketler
Chair

cc: Todd Boychuk, Director of Intergovernmental Relations, K’ómoks First Nation
Emily Shopland, Assistant Band Administrator, K’ómoks First Nation
Ronna-Rae Leonard, MLA, Courtenay-Comox
Josie Osborne, MLA, Mid-Island Pacific Rim
Rachel Blaney, MP, North Island-Powell River
Gord Johns, MP, Courtenay-Alberni
Union of BC Municipalities