

Prepared For:

Ministry of Forests, Lands, Natural Resource Operations and Rural Development

Government of BC

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1. EXECUTIVE SUMMARY

While this Executive Summary provides broad highlights of the input received regarding the Private Management Forest Land Program, the reader is encouraged to review the entire report to gain more understanding of the complexities of responses.

The Private Managed Forest Land (PMFL) Program (also called the Managed Forest Program) was established in 2003 under the <u>Private Managed Forest Land Act</u>. The goals of the program are to encourage private landowners to manage their lands for long-term forest production and encourage sustainable forest management practices, including protecting key public environmental values. Private land in B.C. accounts for only 5% (4.5 million hectares) of the province's land base, with approximately 818,000 hectares of land in the Managed Forest Program.

The Ministry of Forests, Lands, Natural Resource Operations and Rural Development (Ministry) is reviewing the Managed Forest Program and sought input from all citizens of B.C. between May 28 and July 22, 2019. This engagement was open to all British Columbians, and the Ministry will continue to engage with Indigenous Nations and local governments regarding the Managed Forest Program.

1.1 Methods Used to Obtain Public Input

British Columbians in all regions of the province were invited to participate in the PMFL program review engagement process. The Ministry provided background information on a public engagement website including how managed forest land is regulated, a history of the PMFL program, benefits of the program and information regarding the engagement process and methods to participate.

Participants had two ways to provide input regarding the program. They could complete an online questionnaire that was comprised of a combination of multiple choice questions and comment responses. They could also send a formal written submission of up to five pages. Many participants chose to do both.

To further communicate the engagement process, stimulate participation, and ensure stakeholders were equipped to provide well-informed input, the Ministry also held 27 information sessions with interested local governments and stakeholder groups.

1.2 Participation

The Ministry received 1,225 completed online questionnaires and 283 written submissions. Data was sent to Urban Systems, whose team of analysts tabulated all multiple choice responses and coded, themed and summarized 75 percent of written comments to develop this final What We Heard Report.

1.3 Key Themes

Online questionnaire

Of the 1,225 completed online questionnaires, 1,210 completed forms were analyzed. Fifteen responses were received from outside of BC and were not included in the data analysis. Responses were received from four broad regions of BC and included:

- Vancouver Island (57%)
- Kootenay Region (30.5%)
- Lower Mainland and Sunshine Coast (6%)
- Remainder of BC (6.4%)

Respondents were asked to identify with one or more affiliations. The most frequently identified affiliations included concerned citizens (48%) and those whose property is directly affected by PMFL (22%).





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- More than half of respondents (52%) agreed that the broad goals for the PMFL program are still relevant.
- Nearly two thirds of respondents (62%) disagreed that the key public environmental values specified in the PMFL are sufficient.
- The majority (70%) of respondents disagreed that the current regulatory framework is effective in supporting achievement of the management objectives specified in the PMFL Act.
- Agreement on whether the current benefits of being in the program are adequate to encourage new entrants was varied with 41% disagreeing, 30% agreeing and 29% of respondents being unsure.
- Agreement was again quite varied regarding whether the current benefits of being in the PMFL program are adequate to the continued participation (retention) of currently enrolled landowners with 37% of respondents being unsure, 35 % disagreeing and 28% agreeing.
- Agreement on whether the exit fee is an adequate way to persuade landowners to remain in the program and encourage long-term participation in the provincial forest section is also quite varied with 42% of respondents disagreeing, 30% being unsure and 28% agreeing.
- The majority of respondents (72%) reported they do not feel informed of forestry activities that may occur, or have occurred, on Private Managed Forest Land in their community, while 21% feel informed and 7% say this it is not a concern for them. Most respondents indicated they were not aware that the Ministry could assist them nor were they aware of the Managed Forest Council.
- For the 110 respondents who said they own private forest lands in BC, most (105) own small scale parcels (less than 500 hectares). Of the small scale owners, a small number (28) use their land for forest operations.
- For those who own private forest lands and are not currently in the PMFL program, many say they
 do not participate because their properties are too small, or they want to remain in control of their
 property.
- For those who own private forest lands and participate in the PMFL program, most feel that a better tax break would provide incentive to remain in the program. Factors that could encourage these land owners to leave the program would be a lack of financial incentives or stricter regulations.

Key Themes from Written Submissions

The Ministry received 283 written submissions. The written submissions were sorted into five categories: Local Governments, PMFL Owners, First Nations, Citizens and Special Interest Groups.

While this report provides significant detail on sentiments provided by submissions in each category, a high-level review indicates:

- Local Government: There is a high level of concern among local governments who responded
 that private managed forest land should be managed to consider cumulative effects and better
 protect community watersheds, as well as hold private forest land owners with forestry operations
 more accountable. They argue that local government should have greater authority to oversee
 forest operations that affect communities.
- **PMFL Owners:** There is general support for the current program and the need to continue being exempt from local government bylaws that may impede forestry operations.
- Indigenous Nations: Generally, Indigenous Nations are concerned that PMFL owners are not managing their lands to sustainable forest practices standards and they are frustrated with the lack of protection of their traditional use and spiritual sites.
- **Special Interest Groups:** Special interests included environmental, recreation and tourism organizations who advocated for regulations on private managed forest lands to align with those on public lands and the *Forest and Range Practices Act* including greater protection for wildlife, recreation and environmental values.
- **Citizens:** the 215 written submissions from individual citizens provided a wide range of sentiments and can be seen in more detail in Section 5 of this report.





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2. INTRODUCTION

2.1 Background

The Private Managed Forest Land (PMFL) Program (also called the Managed Forest Program) was established in 2003 under the *Private Managed Forest Land Act*. The goals of the program are to encourage private landowners to manage their lands for long-term forest production and encourage sustainable forest management practices, including protecting key public environmental values. Private land in B.C. accounts for only 5% (4.5 million hectares) of the province's land base, with approximately 818,000 hectares in the Managed Forest Land Program. Most of the Managed Forest Land is located in the Kootenay region and southeastern Vancouver Island.

The program is administered by the Managed Forest Council (MFC) who sets forest practice standards, enforces compliance, reviews landowner applications to enter the Managed Forest Program and carries out strategic planning, reporting and program administration. Instead of specifying rules for how land must be managed, the program provides management objectives. This allows landowners to develop and use management strategies that are the most appropriate to their geographic location.

This review is one of several policy reforms announced as part of the Coast Forest Sector Revitalization Initiative. One of the primary goals of the initiative is to restore public confidence in forest management within B.C. and, in conjunction with the review of the *Forest and Range Practices Act* (FRPA), the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (Ministry) is reviewing the *Private Managed Forest Land Act* and the Managed Forest Program.

Specific areas to be examined during the review include:

- 1. Program goals
- 2. Regulatory framework
- 3. Management objectives for key environmental values
 - a. Soil conservation
 - b. Critical wildlife habitat
 - c. Fish habitat
 - d. Drinking water quality
 - e. Reforestation
- 4. Incentives for participation in the program
- 5. Disincentives for exit from the program

2.2 Purpose and Scope of Engagement

The Ministry sought participation from all citizens of B.C. between May 28 and July 22, 2019. The information gathered from this engagement will be used to support a review of the *Private Managed Forest Land Act* and regulations.

Indigenous Nations were encouraged to submit responses to the online questionnaire through this current process, as well as provide written submissions if they wished. However, the frameworks for government to government information-sharing and dialogue are being developed and updated, and the Ministry will continue to engage with Indigenous Nations regarding the Managed Forest Program.





2.3 Project Team

The project team for the public engagement portion of the program review was led by staff from the Ministry's Forest Tenures Branch. They were supported by a consulting team from Urban Systems Ltd. who were contracted to provide engagement support, analysis of data and development of this What We Heard report.

2.4 Schedule

Public engagement was conducted between May 28 and July 22 2019, and included information sessions with local governments and community organizations, a public online questionnaire consisting of 30 questions organized into nine sections as well as an opportunity to provide written submissions. The written submissions were accepted until July 31.

2.5 About this Report

This report represents a summary of results from the engagement process. Some information from Indigenous Nations received as part of this engagement is included in this report, however, gathering additional input from Indigenous Nations is ongoing.

3. METHODOLOGY

3.1 Summary of Methodology

British Columbians in all regions of the province were invited to participate in the PMFL program review engagement process. The Ministry provided background information on a public engagement website including how managed forest land is regulated, a history of the PMFL program, benefits of the program and information regarding the engagement process and methods to participate. The website received approximately 5,608 site visits and over 111 people signed up to receive regular project updates on this topic.

The Ministry provided two ways to provide input regarding the program. Participants could complete an online questionnaire or send a formal written submission (many participants choose to do both).

To further communicate the engagement process, stimulate participation, and ensure stakeholders were equipped to provide well-informed input, the Ministry held 27 information sessions with interested local governments and stakeholder groups (a list of the information sessions and who attended is located in Section 3.2).

3.2 In-Person Information Sessions

Senior leaders from the Ministry and Urban Systems staff held 27 information sessions with local governments and organizations. The information sessions were intended to provide background on the existing program and the review process and to answer attendees' questions so they were better positioned to provide their input to the review.

The first 20 minutes of the 60-minute information sessions focused on presenting participants with information including:

- · Background on the PMFL program;
- The program goals, values and incentives;
- How the program functions and is managed; and
- How to provide input.





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The remaining 40 minutes were dedicated to answering participants' questions. Participants were invited to provide a formal submission to the review, and the Ministry followed-up directly with participants following the sessions on any questions that could not be answered at the meetings. **Table 1** lists the stakeholder organizations who arranged in-person information sessions with the Ministry, including the date and type of meeting.

Table 1: In-Person Information Sessions Schedule

3.3 Online Engagement

Participant/Organization	Information Session Format	Date
Sandy Hook Community Association (2 sessions)	Conference Call/Face-to-Face	June 24, 2019 and July 3, 2019
qathet Regional District	Face-to-face	June 24, 2019
City of Campbell River	Face-to-face	June 25, 2019
Comox Valley Regional District	Face-to-face	June 25, 2019
Village of Cumberland	Face-to-face	June 25, 2019
Municipality of North Cowichan	Face-to-face	June 26, 2019
Cowichan Water Board/ Friends of Cowichan River	Face-to-face	June 26, 2019
Cowichan Valley Regional District	Face-to-face	June 26, 2019
Regional District of Alberni-Clayoquot	Face-to-face	June 27, 2019
City of Port Alberni	Face-to-face	June 27, 2019
City of Powell River	Conference Call	June 28, 2019
Private Forest Landowners Association & Mosaic	Face-to-face	June 28, 2019
Regional District of Nanaimo	Face-to-face	June 28, 2019
Several Gulf Island Private Forest Owners	Face-to-face	June 28, 2019
Elphinstone Logging Focus	Face-to-face	July 3, 2019
District of Sechelt	Face-to-face	July 3, 2019
District of Sparwood	Face-to-face	July 9, 2019
Elk River Watershed Alliance	Face-to-face	July 9, 2019
Fernie Trails Alliance	Face-to-face	July 9, 2019
City of Fernie	Face-to-face	July 9, 2019
Concerned Citizens of Fernie	Face-to-face	July 9, 2019
wildsight	Face-to-face	July 10, 2019
City of Cranbrook	Face-to-face	July 10, 2019
Monticola Forest Ltd., Artco Wood Products	Face-to-face	July 11, 2019
City of Nelson	Face-to-face	July 11, 2019
Village of Salmo	Face-to-face	July 11, 2019





The primary method of input for the engagement was through an online questionnaire housed on the govTogetherBC website, which was active from May 28 through July 22. A total of 1,225 questionnaires were submitted by the closing date. The questionnaire was a combination of multiple-choice rating questions and fillable text boxes where respondents could provide written comments to either explain why they had selected their rating or to provide text-based input on identified topics. Respondents had up to 2,000 characters for their response in each text box. Respondents were also asked to answer questions that helped identify their regional location and affiliations. The questions are listed in **Table 2** below.

Table 2: Questionnaire Questions

Section	on A: Goals of Private Managed Forest Land Program
A1	What is your level of agreement with the following statement?
	The broad goals for the Private Managed Forest Land Program are still relevant.
A2	Please provide additional information for why you chose your answer.
Section	n B: Key Public Environmental Values
B1	What is your level of agreement with the following statement? The key public environmental values specified in the Private Managed Forest land Act are sufficient.
B2	Based on your answer above, please share what key public environmental values you feel are well protected under the Private Managed Forest Land Act and/or those that you feel could be better represented.
Section	n C: Regulatory Framework for Environment Values
C1	What is your level of agreement with the following statement? The current regulatory framework is effective in supporting achievement of the management objectives specified in the Private Managed Forest Land Act.
C2	Please provide additional information for why you chose your answer above.
Section	on D: Incentives for Participation in the Private Managed Forest Land Program
D1	What is your level of agreement with the following statement? The current benefits of being in the program are adequate to encourage new entrants into the program.
D2	Please share how you feel incentives within the Act are working well to encourage landowners to enrol in the program, or any additional incentives you would suggest.
D3	What is your level of agreement with the following statement? The current benefits of being in the program area adequate to the continued participation (retention) of currently enrolled landowners.
D4	Please share how you feel incentives within the Act are working well to retain landowners currently enrolled in the program, or any additional incentives you would suggest?
Section	on E: Disincentives for Exit from the Private Managed Forest Land Program
E1	What is your level of agreement with the following statement? The exit fee is an adequate way to persuade landowners to remain in the program and encourage long-term participation in the provincial forest sector.
E2	Please share how you feel the use of the current exit fee is working well, or potential new disincentives that could discourage exit from the program.
Section	n F: Communication
F1	What is your level of agreement with the following statement? I feel informed of forestry activities that may occur, or have occurred, on private managed forest land in your community.



F2	Have you ever discussed proposed or completed forestry activities on private managed forest land within your community with the landowner responsible for these activities?
F3	Have you ever contacted the Ministry of Forests, Lands, Natural Resource Operations and Rural Development regarding forestry activities on private managed forest land within your community?
F4	Have you ever contacted the Managed Forest Council regarding forestry activities on private manage forest land within your community?
F5	Please share how you feel communication regarding forestry activities on private managed forest land in your community has been working well, or how it could be improved.
G: Pro	file of questionnaire participants
G1	Using the map below as a guide, in what region of B.C. do you normally live?
G2	Please indicate which of the following best describes your situation. Check all that apply.
G3	Please specify what type of business owner you are
	n H: Please complete the following questions if you are a private forest landowner (including vners who have land classified as managed forest).
H1	How long have you owned your property?
H2	What is your private forest land primarily used for? (check all that is apply)
Н3	How much private forest land do you own?
H4	If you have private forest land outside of the Private Managed Forest Land Program, what factors or conditions would encourage you to enrol your forested land in the program?
H5	If you have private forest land outside of the Private Managed Forest Land Program, what factors or conditions have prevented you from choosing to enrol your forested land in the program?
Н6	In what region of B.C. is your private forest land primarily located?
	n I: The following questions are to be completed by landowners who are within the Private ed Forest Land Program only.
I1	How long has your property been designated as private managed forest land?
12	What is your long-term plan for your private managed forest land?
13	What factors or conditions would encourage you to maintain your private forest land in the program for the long term?
14	What factors or conditions would cause you to remove your private forest land from the program?

In order to meaningfully report on what was heard from each participant, responses to each of the questions were analyzed separately. Responses to the multiple-choice questions were categorized under the six possible multiple-choice answers:

- Strongly Agree
- Agree
- Disagree
- Strongly Disagree
- Do not know

The data, including verbatim comments gathered through the online questionnaire, was sent to Urban Systems where a team of data analysts manually coded, themed and summarized the input. Of the multiple-choice answers received, 100 percent were included in the data analysis. Due to the large volume of written comments received (5,363), approximately 70 percent were randomly selected for coding and theming. The data coding team reviewed and coded more than 3,854 individual written comments. The issues and ideas that emerged through these comments are shown as main themes. This method allowed





the data analysis team to generate a list of the most frequently mentioned themes for each question, as well as to identify the region and affiliation most frequently associated with each main theme.

A small number of the completed online questionnaires (44) contained responses that used identical or nearly identical wording to answer the same questions. It was assumed that this was the result of a collaborative approach in order to emphasize particular viewpoints. The data from these duplicate submissions were treated separately from responses where the written sentiments were unique. These responses are referred to as "organized responses" in this report and were not included in the overall analysis of comments, but are included verbatim in the analysis of the question where they appeared.

Where a respondent used both duplicated text (organized response) and sentiments unique to them, their unique sentiments were included in the overall analysis of comments and the duplicate comments were grouped with the others accordingly.

Analysis of the responses from the online questionnaire can be found in Section 4.0.

3.4 Written Submissions

Interested local governments, community groups, organizations and individual citizens were also invited to submit written submissions. Submissions were to be limited to five, 8.5" by 11" size pages. The Ministry received 283 written submissions from various individuals and affiliations, including Indigenous Nations. All written submissions were analyzed by the Urban Systems team to identify the emergent themes. Section 5.0 provides detailed information regarding the results of the written submission themes. Appendix A provides a complete list of affiliations, individuals, and Indigenous Nations that provided written submissions.



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3.5 Participation by the Numbers

Figure 1 provides an overview of the participation in the engagement process.



Figure 1: Participation by the Numbers

4. WHAT WE HEARD FROM ONLINE QUESTIONNAIRES

4.1 Who Participated?

The province received 1,225 online questionnaires. Respondents represented various regions in the province and identified with various affiliations. In selecting their region, respondents had a choice of 30 regional selections including an "I live outside of B.C. (please specify)" option. **Table 3** identifies the number of questionnaires received by region while **Figure 2** provides the percent of survey respondents broken up into broad amalgamated regions within B.C.

Table 3: Participation by Region

Region	Number of Participants
East Kootenay	230
Central Kootenay	99
Kootenay-Boundary	40
Nanaimo	145
Alberni-Clayoquot	128
Capital	119
Comox Valley	101
Cowichan Valley	97
Strathcona	43
Mount Waddington	6
Islands Trust	42
Metro Vancouver	33
Fraser Valley	12
Sunshine Coast	28
Alberta	7
Qathet	9
Columbia Shuswap	17
Fraser-Fort George	9
North Okanagan	8
Bulkley-Nechako	7
Thompson-Nicola	7
Squamish-Lillooet	7
Central Okanagan	6
Okanagan-Similkameen	6
Cariboo	5
Peace River	2
Central Coast	2
Kitimat-Stikine	1
N/A	3
Ontario	2
Stikine Regional District (Unincorporated)	1
US	3
Grand Total	1,225



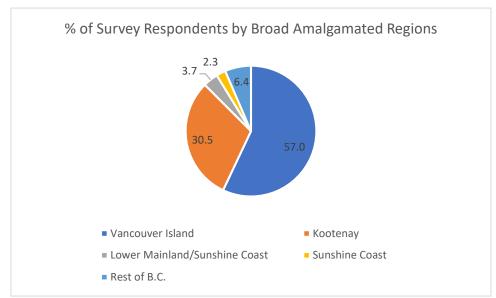
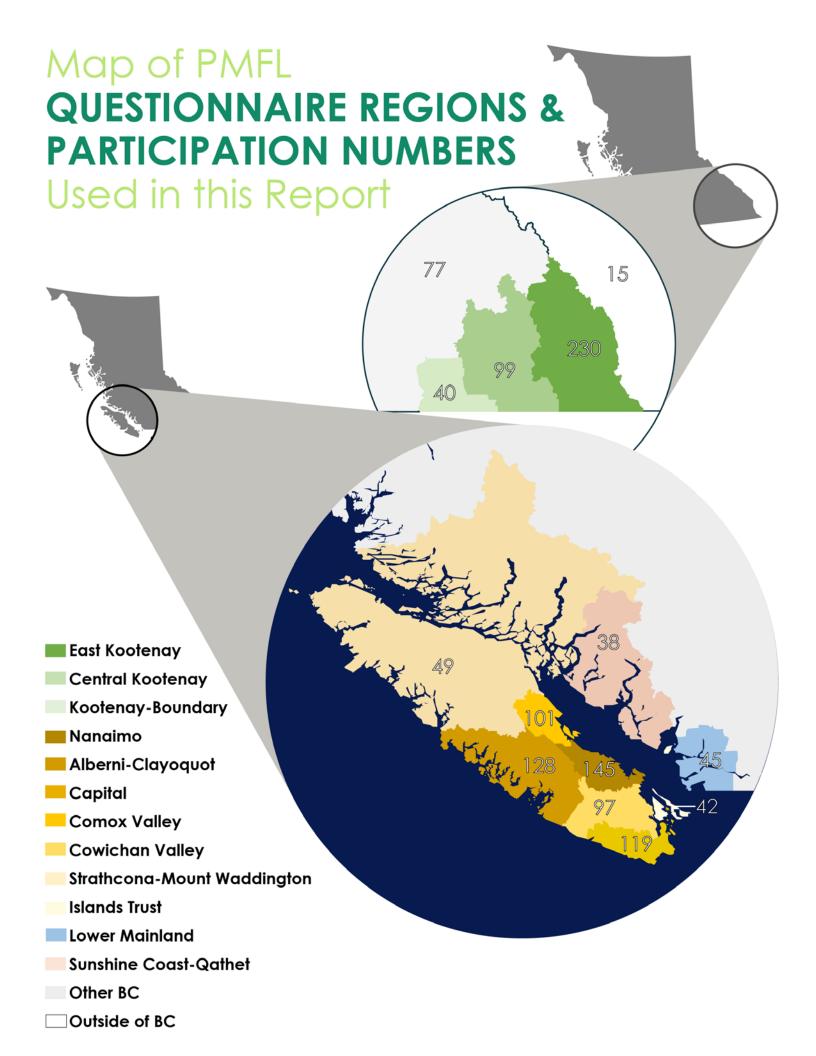


Figure 2: % of Survey Respondents by Broad Amalgamated Regions

The regions that were most frequently selected were the Kootenays and Vancouver Island. Since many regions had relatively few participants, some of the lower represented regions were combined into an "Other BC" category for ease of reporting. The amalgamated regions are shown in **Table 4** and are used throughout this report. A map depicting the amalgamated regions is shown on page 9.

Table 4: Amalgamated Regions

Region	Number of Participants
East Kootenay	230
Central Kootenay	99
Kootenay-Boundary	40
Nanaimo	145
Alberni-Clayoquot	128
Capital	119
Comox Valley	101
Cowichan Valley	97
Strathcona	49
Islands Trust	42
Lower Mainland	45
Sunshine Coast	38
Other BC	77
Outside of BC	15
Grand Total	1,225



Respondents had an opportunity to select whether they had specific affiliations with interest groups by selecting from a menu of 10 potential affiliations and including an "Other" option. The list of affiliations and the number of questionnaires received for each affiliation is listed in **Table 5**. Respondents were able to select more than one affiliation, and so the total number of questionnaires shown by affiliation is greater than the total number of participants. **Figure 3** indicates the percentage of questionnaires received by affiliation.

Table 5: Questionnaires Received by Affiliation

Affiliation	Number of Questionnaires Received
Concerned Citizen	876
Property is directly affected by PMFL	397
Business Owner	114
Landowner of non-managed private forest	112
Non-government organization	97
Owner of PMFL	90
Employed on PMFL	88
Local Government	44
Member of or representative for First Nation	22
Grand Total	1,840

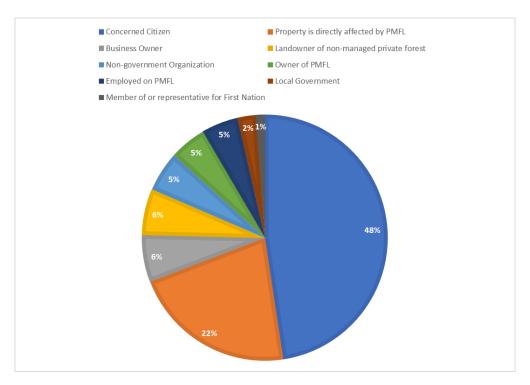


Figure 3: Percent of Questionnaires Received by Affiliation

Section A: Goals of Private Managed Forest Land Program 4.2

Question A1

What is your level of agreement with the following statement?

The broad goals for the Private Managed Forest Land Program are still relevant.

Question A1 generated more than 1,168 responses. Figure 4 below depicts the level of agreement for the questions, which reveals that 52% of participants agree or strongly agree that the program goals are still relevant, while 44% disagree or strongly disagree. Figures 5 and 6 show the level of agreement per region and affiliation, respectively.

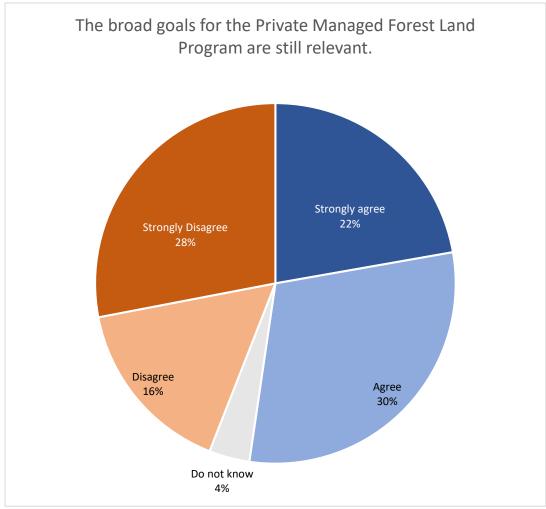


Figure 4: Level of Agreement for Question A1

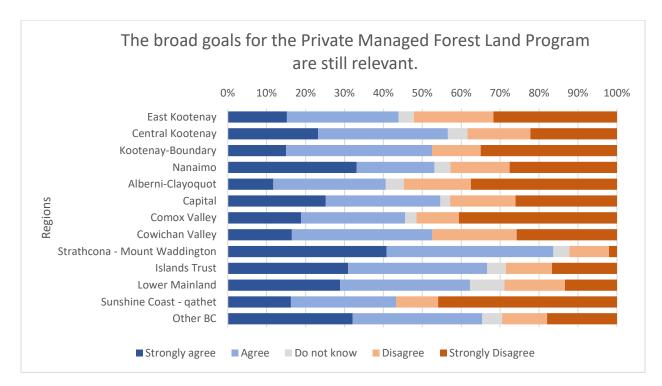


Figure 5: Level of Agreement by Region

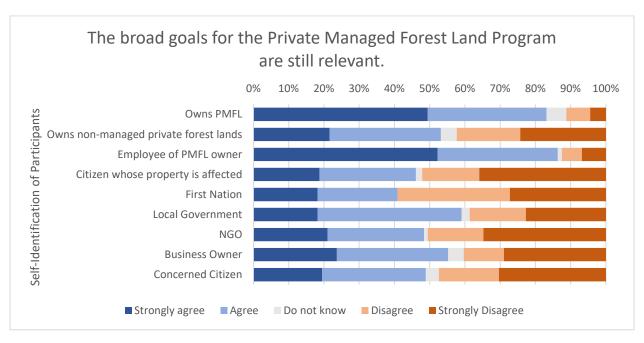


Figure 6: Level of Agreement by Affiliation

Question A2.

Please provide additional information for why you chose your answer above.

Question A2 generated 887 comments. Of those 887 comments, 622 of the comments were randomly selected for theming. Comments were categorized under main themes and the number of comments corresponding to each theme are listed in **Table 6**.

Table 6: Number of Comments by Themes

PMFL goals do not protect key environmental/ First Nation/community values	221
Government should be legislating forestry practices on private land	156
The goals do not encourage/result in sustainable forestry practices	91
PMFL goals encourage sustainable forestry practices	68
The goals of the PMFL do not consider climate change, floods, forest fires or droughts	68
Lack of long-term vision for forest production	46
PMFL goals encourage long-term forest production	35

Note that the total number of themes identified may not add up to the total number of comments selected for theming. This is due to some comments being not applicable to the question and some comments addressing multiple themes.

Several comments using the same text, referred to as organized comments, were received for question A2. **Table 7** on the next page provides an example of the verbatim text and the number of times it appears in the comments for this question.

Table 7: Verbatim Text and Number of Organized Comments

The program's goals are generally good, but they should go beyond "encouraging" to "ensure" that landowners meet environmental and long-term forest management objectives.

Weak regulations have failed to protect key environmental and community values and ensure long term management on private managed forest in areas like Vancouver Island, the Sunshine Coast, the West Kootenay region, and the Elk Valley—so the Managed Forest Council isn't achieving its goals.

44

Table 8 represents the major themes by region.

Table 8: Themes by Region

	East Kootenay	Central Kootenay	Kootenay-Boundary	Nanaimo	Alberni-Clayoquot	Capital	Comox Valley	Cowichan Valley	Strathcona	Islands Trust	Lower Mainland	Sunshine Coast	Other BC	All Responses
PMFL goals do not protect key environmental/ First Nation/community values	34	21	5	29	29	26	24	16	7	3	7	8	12	221
Government should be legislating forestry practices on private land	41	19	9	11	20	12	11	11	3	2	7	5	5	156
The goals do not encourage/result in sustainable forestry practices	21	7	2	8	13	7	7	9	3	2	1	4	7	91
PMFL goals encourages sustainable forestry practices	7	2		6	6	14	7	2	5	3	1	5	10	68
The goals of the PMFL do not consider climate change, floods, forest fires or droughts	3	11	3	11	4	6	5	10	3	5		4	3	68
Lack of long-term vision for forest production	9	2	1	7	6	4	3	3	5	3	1	2		46
PMFL goals encourage long-term forest production	6		1	5	4	2	4	3	2	3	1	1	3	35



Figure 7 below shows the comment themes by affiliation. In summary, NGO's and citizens feel that the PMFL goals do not protect key environmental/First Nation/community values while PMFL owners and employees feel that PMFL goals encourage sustainable forestry practices.

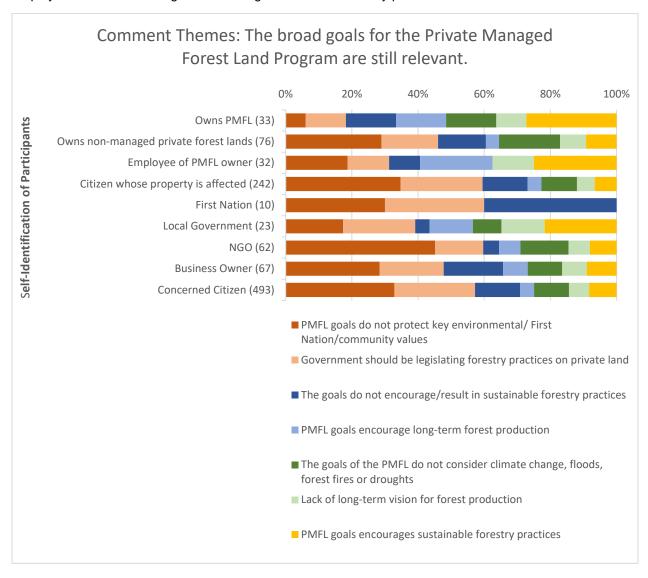


Figure 7: Comment Themes in Relation to Affiliation

4.3 Section B: Key Public Environmental Values

Question B1.

What is your level of agreement with the following statement?

The key public environmental values specified in the Private Managed Forest Land
Act are sufficient

Question B1 generated more than 1,168 responses. The 14 responses that were received from outside of B.C. were removed. **Figure 8** shows that a strong majority of participants (62%) disagree or strongly disagree that the key public environmental values are sufficient. **Figures 9 and 10** show the level of agreement per region and affiliation, respectively.

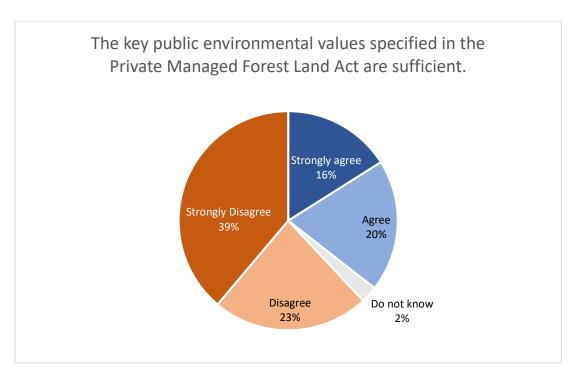


Figure 8: Level of Agreement for Question B1

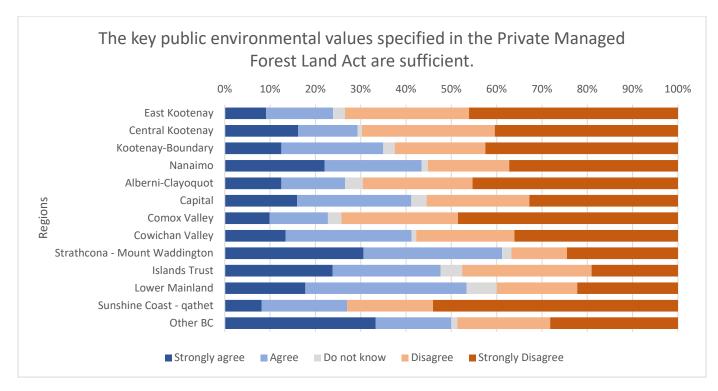


Figure 9: Number of Comments by Region

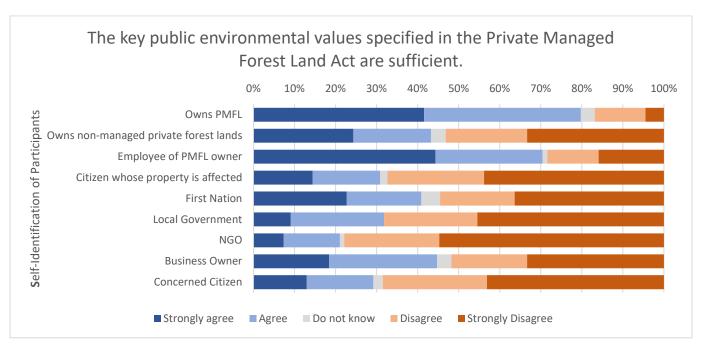


Figure 10: Number Comments by Affiliation

Question B2.

Based on your answer above, please share what key public environmental values you feel are well protected under the Private Managed Forest Land Act and/or those that you feel could be better represented.

Question B2 generated more than 908 comments. Of those 908 comments 635 were selected for theming.

Out of all the questions within the PMFL questionnaire, question B2 produced the highest diversity of answers, resulting in 25 themes being generated. The number of comments per theme are shown below in **Table 9** while **Table 10** groups themes by region.

Table 9: Number of Comments by Theme

	All Responses
Regulations/practices do not protect the environmental values	213
Community values need to be considered	68
Watersheds should be better protected	67
Climate change adaptation should be a value	36
Protecting old growth should be a value	35
Current values adequately protect forest areas	33
General wildlife habitat should be protected	26
Biodiversity should be a value	26
Wildfire management/prevention needs to be better represented	24
Critical wildlife habitats are not being protected	20
Wildlife corridors should be a value	19
Drinking water quality is not protected	16
Slope stability should be a value	15
Critical fish habitats are not being protected	15
Carbon sequestration should be added	14
Reforestation is not keeping up with logging	13
Values should align with those on crown land	11
Dust impacts, air quality and logging noise need to be addressed	9
Soil is not being conserved	9
Include cumulative effects land management	8
Reforestation is keeping up with logging	6
Critical fish habitats are being protected	4
Drinking water quality is protected	4
Critical wildlife habitats are being protected	2
Soil is conserved	1



Note that the total number of themes identified may not add up to the total number of comments selected for theming. This is due to some comments being not applicable to the question and some comments addressing multiple themes.

Table 10: Number of Comments Per Theme by Region

	East Kootenay	Central Kootenay	Kootenay-Boundary	Nanaimo	Alberni-Clayoquot	Capital	Comox Valley	Cowichan Valley	Strathcona - Mount Waddington	Islands Trust	Lower Mainland	Sunshine Coast - Qathet	Other BC	All Responses
Regulations/practic es do not protect the environmental values	48	28	12	20	21	19	16	18	4	10	1	9	7	213
Community values need to be considered	16	3	2	10	9	9	6	4	3		1	3	2	68
Watersheds should be better protected	9	8	3	13	13	4	8	4	2		1		2	67
Climate change adaptation should be a value	4	2	2	6	4	5	7	3		2			1	36
Protecting old growth should be a value	3	3	1	5	3	9	4	1	1	2	1	1	1	35
Current values adequately protect forest areas			2	5	3	5	4	3	2	1	2	1	5	33
Biodiversity should be a value	3	3	1	7	2	3	5	1					1	26
General wildlife habitat should be protected	8	5			2	5	1				2	2	1	26
Wildfire management/preve ntion needs to be better represented	5	5	3	5	1	2					1		2	24
Critical wildlife habitats are not being protected	3		1	1	1	4	3	5			1		1	20
Wildlife corridors should be a value	6	3	1	3	3	1	1	1						19



	East Kootenay	Central Kootenay	Kootenay-Boundary	Nanaimo	Alberni-Clayoquot	Capital	Comox Valley	Cowichan Valley	Strathcona - Mount Waddington	Islands Trust	Lower Mainland	Sunshine Coast - Qathet	Other BC	All Responses
Drinking water quality is not protected	4	1		1	1	1	4		1	1	1		1	16
Critical fish habitats are not being protected	1	1	1	2	2	2	2	1	1				2	15
Slope stability should be a value	3	1	1		2	1	1	2		1		1	2	15
Carbon sequestration should be added		1		1	1	3	2	3	2	1				14
Reforestation is not keeping up with logging	1	2		1	1	2	4				1		1	13
Values should align with those on crown land	3	1			3		1		1		1	1		11
Dust impacts, air quality and logging noise need to be addressed	3	1			1	1	3							9
Soil is not being conserved	2	2	1				1	2		1				9
Include cumulative effects land management	1	2		2								1	2	8
Reforestation is keeping up with logging			1	2	1			1					1	6
Drinking water quality is protected				1	1		1	1						4
Critical fish habitats are being protected					1	1	1	1						4
Critical wildlife habitats are being protected						1							1	2
Soil is conserved					1									1



Several comments using the same text, referred to as organized comments, were received for question B2. **Table 11** below provides an example of the verbatim text and the number of times it appears in the comments for this question.

Table 11: Verbatim Text and Number of Organized Comments

Current environmental values must be updated to include clear and meaningful language, strong objectives, and new environmental values, including: Protection of wildlife habitat. There is no objective to protect general wildlife habitat, a major regulatory gap for managed forest in areas like the Elk Valley and Vancouver Island, where much of the region is owned and managed by Managed Forest landowners and wildlife populations are dependent on the health and function of private managed forest land.

Protection of Water. Water quality protections should be applied broadly to water quality and not just drinking water. Water quality, stream and riparian health should be included as an objective that applies to all streams, lakes, and wetlands regardless of whether they are fish bearing or used for human consumption. Cumulative Effects Land Management. As the demand for natural resources grows, we must consistently and effectively assess the combined effects that logging activities have on BC's environmental, social and economic values so that we make sound decisions for our future. We can't manage private forests in a vacuum. We must consult with First Nations.

44

Due to limited space, only the top 10 themes per affiliation are shown in **Figure 11** on the following page.



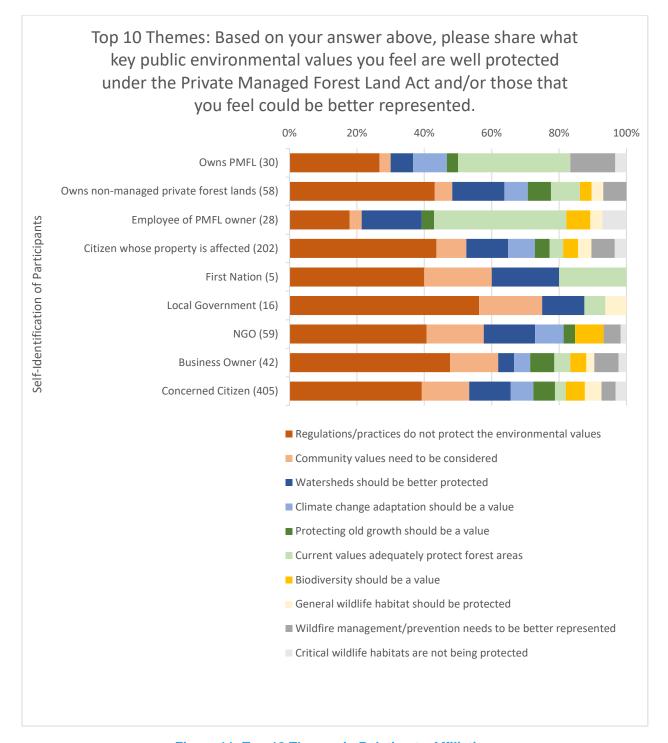


Figure 11: Top 10 Themes in Relation to Affiliation



4.4 Section C: Regulatory Framework for Environmental Values

Question C1.

What is your level of agreement with the following statement?

The current regulatory framework is effective in supporting achievement of the management objectives specified in the Private Managed Forest Land Act.

Question C1 generated more than 1,168 responses. There were 15 responses removed because they were submitted from out of BC. In summary, most participants (70%) do not agree that the current regulatory framework is effective is supporting of the management objective of the Act as shown in **Figure 12**. **Figures 13 and 14** show the level of agreement by region and affiliation, respectively.

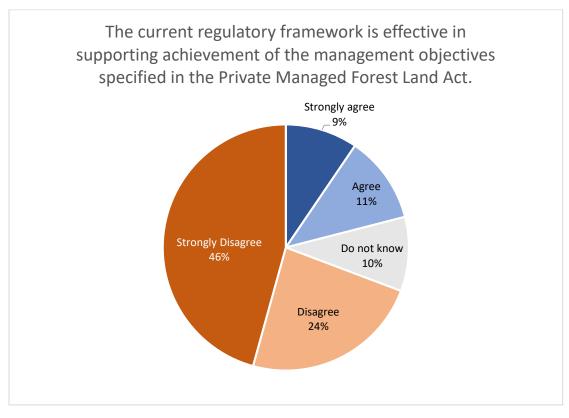


Figure 12: Level of Agreement for Question C1



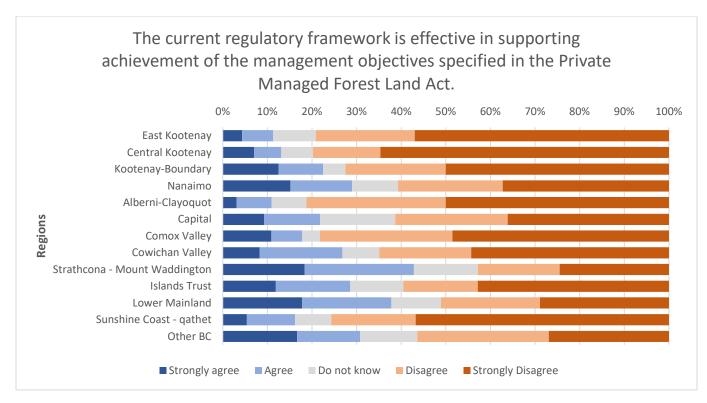


Figure 13: Level of Agreement by Region

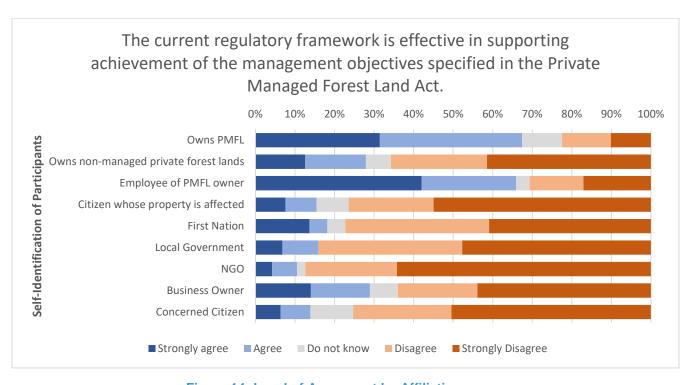


Figure 14: Level of Agreement by Affiliation





Question C2.

Please provide additional information for why you chose your answer above

Question C2 generated approximately 772 comments. Of those comments, 527 were selected for theming. **Table 12** shows the themes broken down per region while **Table 14** groups themes by region.

Table 12: Number of Comments by Theme

Important non-timber values are not being protected	112
Regulations ineffective	105
Regulations are not adequately enforced	83
Regulations are not stringent enough	38
Governance is effective	36
PMFL regulations should align with those on Crown land	20
Regulations are industry biased	19
Expand governance authority	15
Lack of transparency	14
Regulations too limiting to PMFL owners	9

Note that the total number of themes identified may not add up to the total number of comments selected for theming. This is due to some comments being not applicable to the question and some comments addressing multiple themes.

Several comments using the same text, referred to as organized comments, were received for question C2. **Table 13** below provides an example of the verbatim text and the number of times it appears in the comments for this question.

Table 13: Verbatim Text and Number of Organized Comments

The current regulatory framework is not effective to protect environmental or community values on large managed forests.	
With two of five of the Private Managed Forest Council members from the industry and the third member jointly appointed by government and industry, the Council is dominated by industry interests. The Council is supposed to be an independent public regulatory and enforcement agency, but the significant presence of industry represents a major conflict of interest and makes the Council an ineffective regulator.	44
An independent body such as FLNRORD or the B.C. Forest Practices Board should be responsible for overseeing compliance and enforcement on large-scale managed forest operations.	



Table 14: Themes by Region

	East Kootenay	Central Kootenay	Kootenay-Boundary	Nanaimo	Alberni-Clayoquot	Capital	Comox Valley	Cowichan Valley	Strathcona - Mount Waddington	Islands Trust	Lower Mainland	Sunshine Coast - athet	Other BC	All Responses
Important non-timber values are not being protected	22	9	2	15	19	11	10	6	4	3	1	4	6	112
Regulations ineffective	21	16	4	13	11	9	7	8	5	3	2	2	4	105
Regulations are not adequately enforced	12	9	4	11	8	9	10	8	2	3	3	3	1	83
Regulations are not stringent enough	9	3	1	6	3	2	5	2		1		2	4	38
Governance is effective	1	2	2	5	1	8	3	5	3	1	3		2	36
PMFL regulations should align with those on Crown land	7	2	1		3		3		1	1	2			20
Regulations are industry biased	2	4	1	1	2	5	2			1		1		19
Expand governance authority	1	1	2	4		3	3	1						15
Lack of transparency	3			1	2	1	3	2			1		1	14
Regulations too limiting to PMFL owners		2				1		1		3	1		1	9

Figure 15 on the following page indicates that PMFL owners and employees believe that the current regulatory framework is effective in supporting achievement of the management objectives, whereas the remaining affiliations feel that the regulations are ineffective and important non-timber values are not being protected.

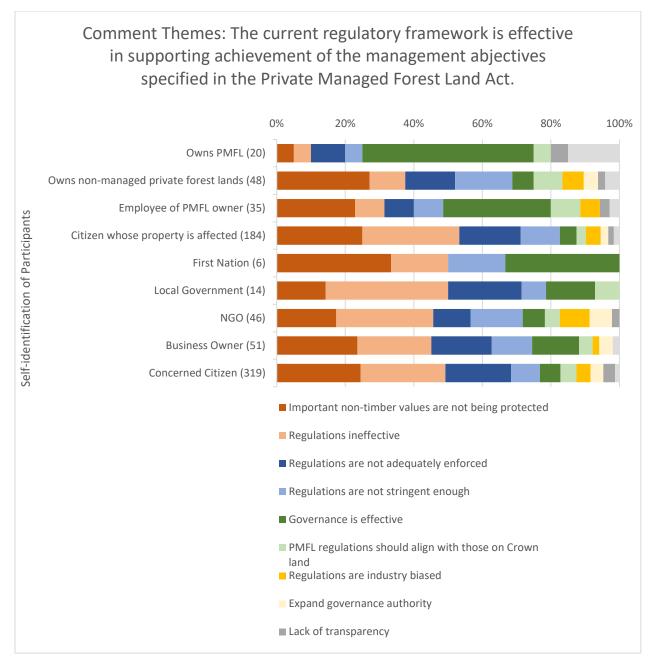


Figure 15: Themes in Relation to Affiliation

4.5 Section D: Incentives for Participation in the Private Managed Forest **Land Program**

Question D1.

What is your level of agreement with the following statement?

The current benefits of being in the program are adequate to encourage new entrants into the program

Question D1 generated 1,168 responses. Fifteen (15) responses were removed because they were submitted from outside of BC. Figure 16 shows that 43% of participants do not agree that the current benefits of being in the program are adequate to encourage new entrants while 29% do not know. Figures 17 and 18 show the level of agreement per region and affiliation, respectively.

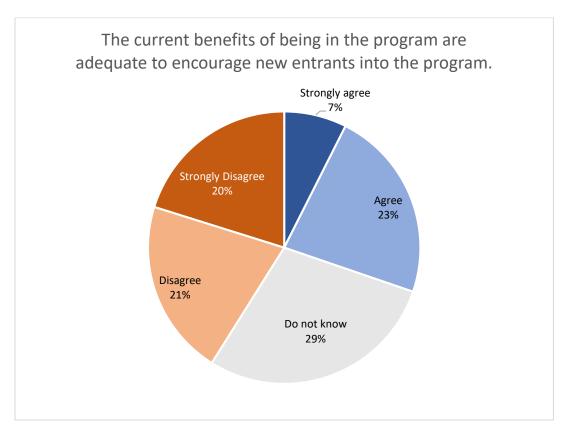


Figure 16: Level of Agreement for Question D1

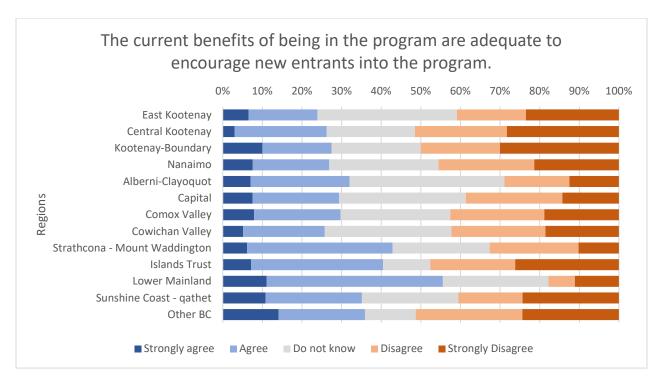


Figure 17: Level of Agreement by Region

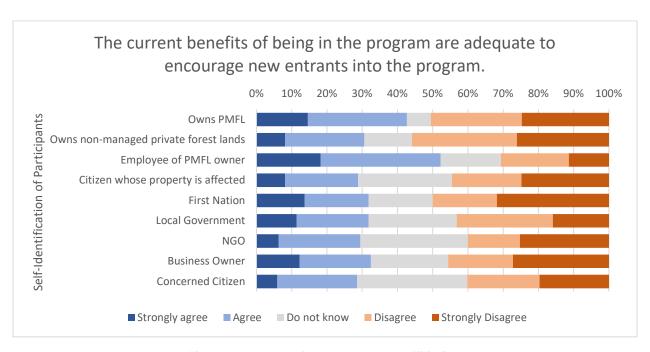


Figure 18: Level of Agreement by Affiliation

Question D2.

Please share how you feel incentives within the Act are working well to encourage landowners to enrol in the program, or any additional incentives you would suggest.

Question D2 generated 659 comments. Of those 659 comments, 462 were selected for theming. The most frequently mentioned theme from this question is regarding support for mandatory enrolment. The next most frequently mentioned theme indicates that strong/more incentives are needed. See **Table 15** for a list of all themes generated. **Table 17** shows the themes by region while **Figure 19** shows themes by affiliation.

Table 15: Number of Comments by Themes

	All Responses
Enrolment should be mandatory	64
Stronger/more incentives needed	58
Tax advantages offset the requirements of the program	38
Program does not deliver adequate results	33
Provide incentives for protecting other values	27
Preserve wildlife habitats	21
Program provides incentives for mismanagement	19
Tax advantages do not offset the requirements of the program	17
Private and public forest lands should be managed the same	14
Program is too bureaucratic	7
Provide more professional/technical support for PMFL owners to meet requirements	7
Program provides accountability and is encouraging enrolment	3

Note that the total number of themes identified may not add up to the total number of comments selected for theming. This is due to some comments being not applicable to the question and some comments addressing multiple themes.

Several comments using the same text, referred to as organized comments, were received for question D2. **Table 16** below provides an example of the verbatim text and the number of times it appears in the comments for this question.

Table 16: Verbatim Text and Number of Organized Comments

Current incentives for large landowners are very clear and in some cases too generous. For
landowners with thousands of hectares of land the tax incentives are significant. However,
the benefit to the public are becoming less clear as the public often suffers from impacts to
water, recreation, tourism and community visuals.

Incentivising landowners to reserve ecologically valuable parts of their properties as wildlife habitat areas or conservation lands would help the program meet its environmental objectives and reduce the cumulative impacts of private land logging.

44

Table 17: Number of Themes by Region

	East Kootenay	Central Kootenay	Kootenay- Boundary	Nanaimo	Alberni-Clayoquot	Capital	Comox Valley	Cowichan Valley	Strathcona - Mount Waddington	Islands Trust	Lower Mainland	Sunshine Coast - Qathet	Other BC	All Responses
Enrolment should be mandatory	13	14	2	5	5	6	8	4		4		1	2	64
Stronger/more incentives needed	4	8	4	3	2	9	3	3	2	6	4		10	58
Tax advantages offset the requirements of the program	5	3	2	4	6	4	4	1	1	2	4		2	38
Program does not deliver adequate results	7	5	2	4	3	2	5	2	1			1	1	33
Provide incentives for protecting other values	3	5		6		1	3	3	1	1	1	1	2	27
Preserve wildlife habitats	1	4		2	2	2	1	4	1	1		3		21
Program provides incentives for mismanagement	4	5		2	1	1	1			1		2	2	19
Tax advantages do not offset the requirements of the program	1	1		3		1	3		4	2		1	1	17
Private and public forest lands should be managed the same	4	1	1	2	1			3			1	1		14
Program is too bureaucratic	2			1	1		2				1			7
Provide more professional/technical support for PMFL owners to meet requirements		1		2			2			2				7
Program provides accountability and is encouraging enrolment						1	1		_				1	3



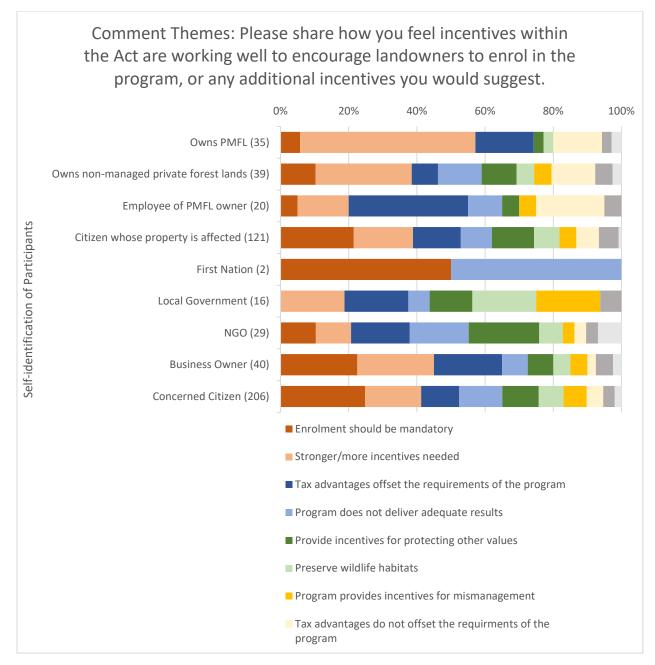


Figure 19: Themes in Relation to Affiliation

Question D3.

What is your level of agreement with the following statement?

The current benefits of being in the program are adequate to the continued participation (retention) of currently enrolled landowners.

Question D3 generated more than 1,168 responses. Fifteen (15) responses were removed because were submitted from out of BC. As shown in **Figure 20**, the majority of the participants do not know if the benefits of being in the program are adequate to retain landowners. **Figures 21 and 22** depict the level of agreement by region and affiliation, respectively.

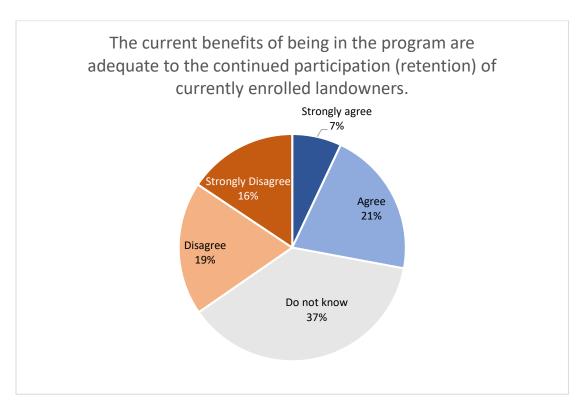


Figure 20: Level of Agreement for Question D3



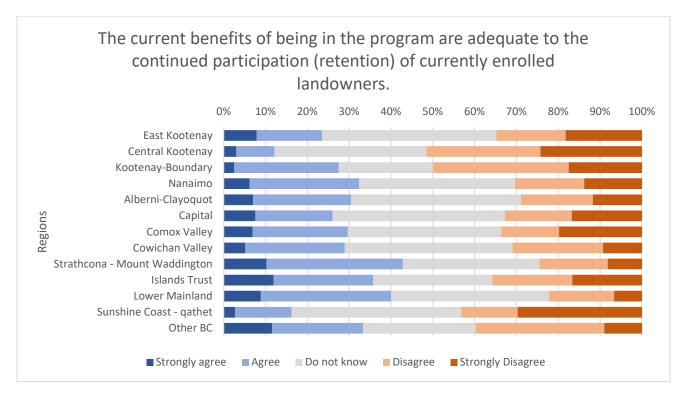


Figure 21: Level of Agreement by Region

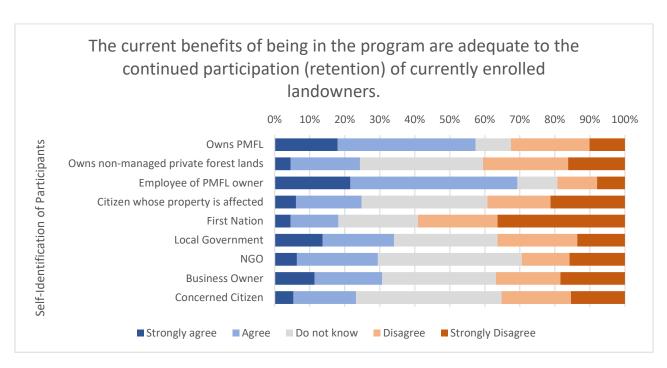


Figure 22: Level of Agreement by Affiliation





Question D4.

Please share how you feel incentives within the Act are working well to retain landowners currently enrolled in the program, or any additional incentives you would suggest.

Question D4 generated more than 517 comments. Of those 517 comments 390 were selected for theming. **Table 18** shows the number one theme was that the PMFL incentives do not protect key environmental or community values. This is followed up by tax breaks are providing a good incentive. **Table 20** show the themes by region and **Figure 23** shows the themes by affiliation.

Table 18: Number of Comments by Themes

	All Responses
PMFL incentives do not protect key environmental/community values	38
Tax break is a good incentive	37
More incentives are needed	35
Government should be legislating forestry practices	23
Regulations and incentives are ineffective	22
Enforcement of the Act is needed	21
Program should not allow land to be removed from large holdings	17
Benefits of program include few rules to constrict or limit activities	13
Program does not work well on small holdings	11
The goals of the PMFL do not consider climate change, floods, forest fires or droughts	10
Incentives for good forest stewards should be implemented	10
Program provides incentives for mismanagement	8
Tax break is not a good incentive	7
Tax laws need to consider beneficial transfer of land to next generation	3

Note that the total number of themes identified may not add up to the total number of comments selected for theming. This is due to some comments being not applicable to the question and some comments addressing multiple themes.

Several comments using the same text, referred to as organized comments, were received for question D4. **Table 19** below provides an example of the verbatim text and the number of times it appears in the comments for this question.

Table 19: Verbatim Text and Number of Organized Comments

For large landowners, the program should generally not allow land to be removed from private forest for development. The Forests Land Reserve Act (FLRA) should be reinstated to ensure privately managed forests remain managed forests rather than being sold for urban development.

44

For smaller landowners the incentives are not quite as clear. The MFC administrative fee was more than doubled this year and smaller landowners are increasingly seeing less of an incentive to stay within the program as incentives for rural farm tax status may be better.

Table 20: Themes by Region

	East Kootenay	Central Kootenay	Kootenay-Boundary	Nanaimo	Alberni-Clayoquot	Capital	Comox Valley	Cowichan Valley	Strathcona-Mt Waddington	Islands Trust	Lower Mainland	Sunshine Coast - Qathet	Other BC	All Responses
PMFL goals do not protect key environmental/community values	4	3	1	8	3	3	7	1	2	1	1	2	2	38
Tax break is a good incentive	6	1	3	3	9	1		2		3	4	1	4	37
More incentives are needed	1	6	2	1	2	5	4	4	2	2	2		4	35
Government should be legislating forestry practices	5	2	1	2	2	4	2	1		1	2	1		23
Regulations and incentives are ineffective	3	3	1	4	2	1	4			2	1		1	22
Enforcement of the Act is needed	3	3	1	2	4	2	3	1				1	1	21
Program should not allow land to be removed from large holdings		3			1	4	2	1	1	1	1	1	2	17
Benefits of program include few rules to constrict or limit activities	4		2	3	1			2				1		13
Program does not work well on small holdings		1		4		2				2			2	11
The goals of the PMFL do not consider climate change, floods, forest fires or droughts	2			3	1	1				1	2			10
Incentives for good forest stewards should be implemented	1	2	2	1	1	1		1	1					10
Program provides incentives for mismanagement	2	1			1	2		1	1					8
Tax break is not a good incentive	1			3		1			2					7
Tax laws need to consider beneficial transfer of land to next generation				1	1	1								3





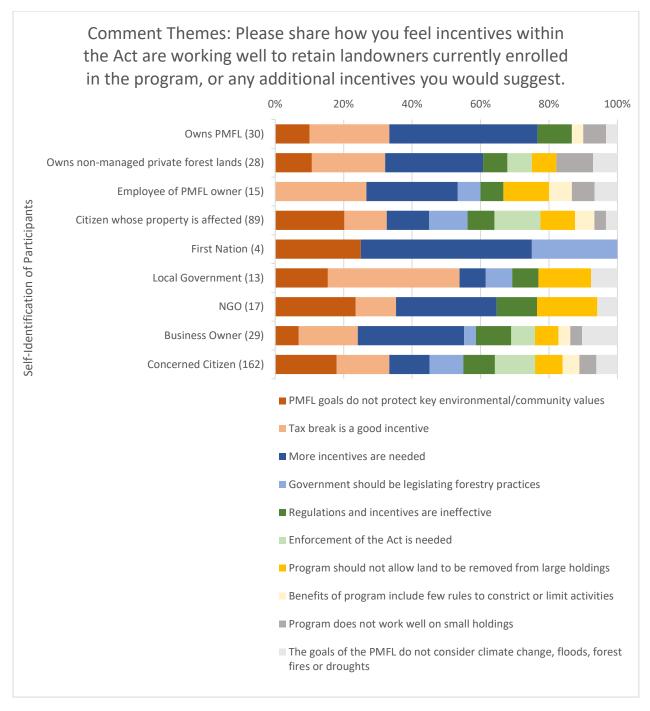


Figure 23: Themes in Relation to Affiliation

4.6 Section E: Disincentives for Exit from the Private Managed Forest **Land Program**

Question E1.

What is your level of agreement with the following statement?

The exit fee is an adequate way to persuade landowners to remain in the program and encourage long-term participation in the provincial forest sector.

Question E1 generated more than 1,168 responses. Fifteen (15) responses were removed because they were submitted from out of BC. Over half the responses indicated that the exit fee was inadequate for persuading landowners to remain in the program (Figure 24). Figures 25 and 26 depict the level of agreement by region and affiliation, respectively.

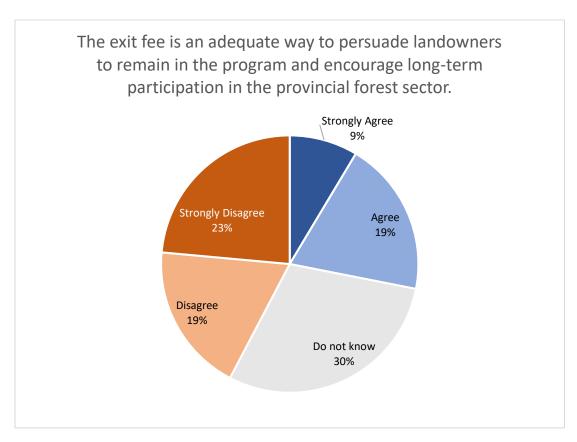


Figure 24: Level of Agreement for Question E1

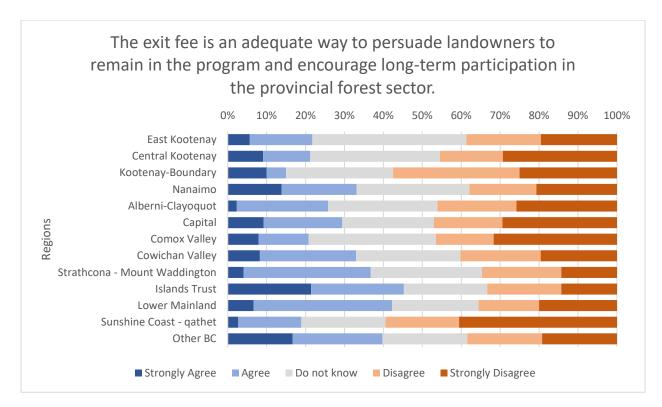


Figure 25: Themes by Region

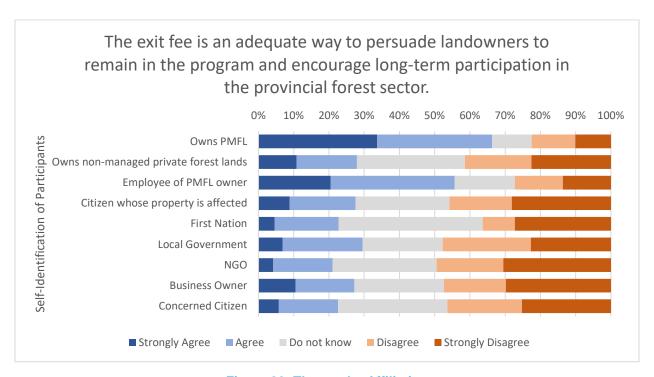


Figure 26: Themes by Affiliation





Question E2.

Please share how you feel the use of the current exit fee is working well, or potential new disincentives that could discourage exit from the program.

Question D2 generated more than 586 comments. Of those 586 comments 411 were selected for theming. Longer mandatory participation time and higher taxes/ penalties were the leading themes emerging from analysis of the comments. The number of comments by theme is indicated in **Table 21**. The number of themes by region is indicated in **Table 23**.

Table 21: Number of Comments by Theme

	All Responses
Longer mandatory participation time	80
Higher taxes and penalties are needed for landowners to encourage long-term participation	64
The entire program should be mandatory and regulated by the government	36
The exit fee does persuade landowners to remain in the program	29
Need better incentives to stay in program	17
To discourage exiting the program, landowners cannot rezone lands prior to exiting the program	9
The exit fee is too large and should be reduced	8
The exit fee should be a percentage of the profit made from selling the land	3

Note that the total number of themes identified may not add up to the total number of comments selected for theming. This is due to some comments being not applicable to the question and some comments addressing multiple themes.

Several comments using the same text, referred to as organized comments, were received for question E2. **Table 22** below provides an example of the verbatim text and the number of times it appears in the comments for this question.

Table 22: Verbatim Text and Number of Organized Comments

been in the program for more than management is a long-term practice	nd in the program as it does not apply on land that has 15 years and is insufficient in other cases. Forest and 15 years allows owners to profit from logging and it environmental benefit or long-term contribution to the	44
The Forests Land Reserve Act (FLF forests are not sold for urban develop	(A) should be reinstated to ensure privately managed ment.	



Table 23: Number of Themes by Region

	East Kootenay	Central Kootenay	Kootenay-Boundary	Nanaimo	Alberni-Clayoquot	Capital	Comox Valley	Cowichan Valley	Strathcona - Mount Waddington	Islands Trust	Lower Mainland	Sunshine Coast - Qathet	Other BC	All Responses
Longer mandatory participation time	10	8	1	12	7	13	7	4	3	5	4	2	4	80
Higher taxes and penalties are needed for landowners to encourage long-term participation	8	5	4	7	6	7	6	9		4	2	5	1	64
The entire program should be mandatory and regulated by the government	8	7	1	4	5	5	4	1					1	36
The exit fee does persuade landowners to remain in the program	3	4		2	3	5	1	4	2	1	3	1		29
Need better incentives to stay in program	2	1	1	1		4	2	2		2			2	17
To discourage exiting the program, landowners cannot rezone lands prior to exiting the program	1	2				2	3			1				9
The exit fee is too large and should be reduced				2	1	1		2					2	8
The exit fee should be a percentage of the profit made from selling the land				1	1			1						3

Figure 27 on the following page depicts the themes in relation to affiliation. PMFL owners believe that the current exit fee persuades landowners to stay in the program, however they feel there could be better incentives to stay in the program. There was strong support from most affiliations to increase the mandatory participation time in the program. First Nation respondents feel there should be higher taxes and penalties for landowners to encourage long-term participation in the program.



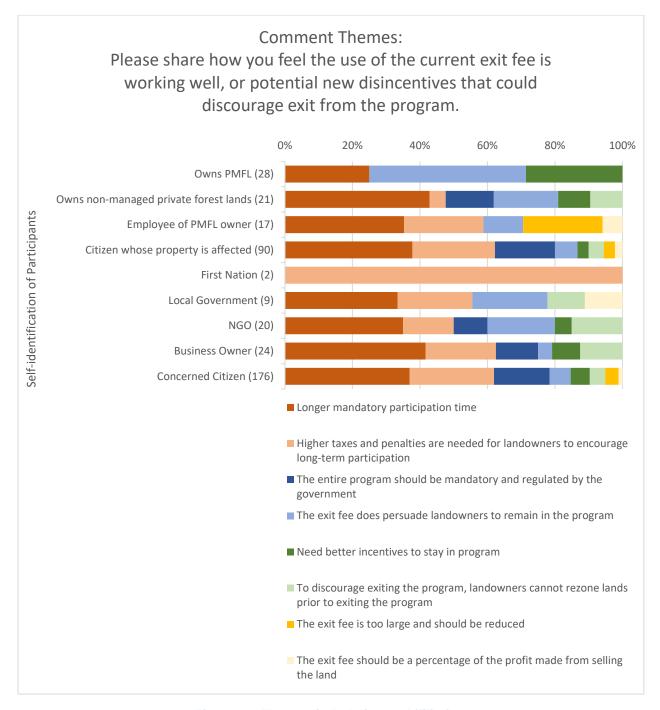


Figure 27: Themes in Relation to Affiliation



4.7 Section F: Communication

Question F1.

What is your level of agreement with the following statement?

I feel informed of forestry activities that may occur, or have occurred, on private managed forest land in your community

Question F1 generated 1,210 responses. Fifteen (15) responses that were submitted from outside of B.C. were removed. As outlined in **Figure 28**, over 70% of respondents do not feel informed of forestry activities that may or have occurred on private managed forest land in their communities.

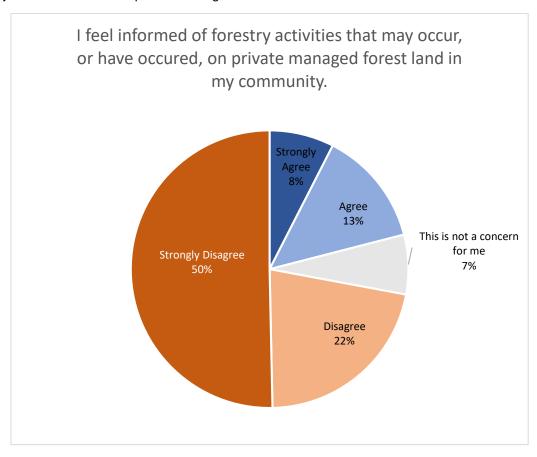


Figure 28: Level of Agreement for Question F1

Question F2.

Have you ever discussed proposed or completed forestry activities on private managed forest land within your community with the landowner responsible for these activities?

Question F3.

Have you ever contacted the Ministry of Forests, Lands, Natural Resource Operations and Rural Development regarding forestry activities on private managed forest land within your community?

Question F4.

Have you ever contacted the Managed Forest Council regarding forestry activities on private managed forest land within your community?

Questions F2 through F4 results are provided in **Figure 29**. For Question F2, most of the respondents indicated they had contacted the PMFL owner. However, for questions F3 and F4, most of the respondents indicated they were not aware that the Ministry could assist them nor were they aware of the Managed Forest Council (MFC).

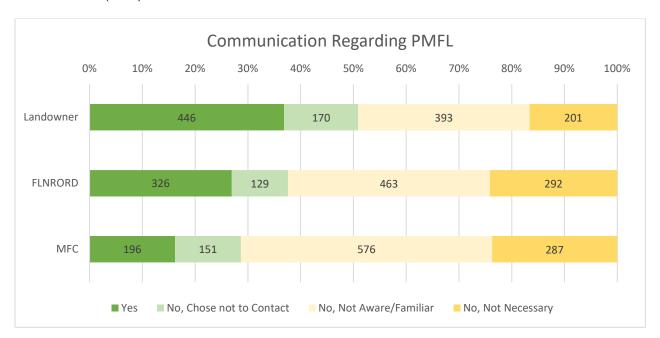


Figure 29: Communication regarding PMFL



Question F5.

Please share how you feel communication regarding forestry activities on private managed forest land in your community has been working well, or how it could be improved.

Question F5 generated 726 comments. Of those 726 comments 499 were selected for theming.

Table 24 indicates that, based on the number of comments by theme, a lack of communication from PMFL owners was most frequently cited by respondents.

Table 24: Number of Comments by Themes

	All Responses
Lack of communication from PMFL owners	122
Communication to the public and First Nations about planned forestry activities should be mandatory	74
PMFL owners do not give adequate time to provide a response prior to logging and/or are not willing to compromise on plans and address issues	68
PMFL owners should be required to hold community consultations and include the public in decision-making processes	50
Improve transparency and communication from Managed Forest Council and/or FLNRO with the public	48
Ensure communication is widely disseminated through radio, print, social media, and/or websites	31
Communication does not need improvement	18
PMFL companies engage public and local government and are responsive to requests for information	18
Government-funded assistance for PMFL	2

Note that the total number of themes identified may not add up to the total number of comments selected for theming. This is due to some comments being not applicable to the question and some comments addressing multiple themes.

Table 25 on the following page outlines the themes by region. **Figure 30** on page 61 outlines themes in relation to affiliation.

Table 25: Themes by Region

	East Kootenay	Central Kootenay	Kootenay-Boundary	Nanaimo	Alberni-Clayoquot	Capital	Comox Valley	Cowichan Valley	Strathcona-Mount Waddington	Islands Trust	Lower Mainland	Sunshine Coast -	Other BC	All Responses
Lack of communication from PMFL owners	23	13	6	15	16	10	8	14	4	4	2	2	5	122
Communication to the public and First Nations about planned forestry activities should be mandatory	14	13	7	7	7	6	8	4		2	1	3	2	74
PMFL owners do not give adequate time to provide a response prior to logging and/or are not willing to compromise on plans and address issues	23	10	1	7	9	2	6	2	4			3	1	68
PMFL owners should be required to hold community consultations and include the public in decision-making processes	11	8	1	6	6	7	3	4		1		1	2	50
Improve transparency and communication from Managed Forest Council and/or FLNRO with the public	7	6	1	6	4	6	3	2	3	4	1	2	3	48
Ensure communication is widely disseminated through radio, print, social media, and/or websites	4	2		2	3	6	3	5	3	1			2	31
Communication does not need improvement	3	2		4	1	1		3	1	2			1	18
PMFL companies engage public and local government and are responsive to requests for information	4	1	1	2		3	2	1	1			1	2	18
Government-funded assistance for PMFC					1						1			2



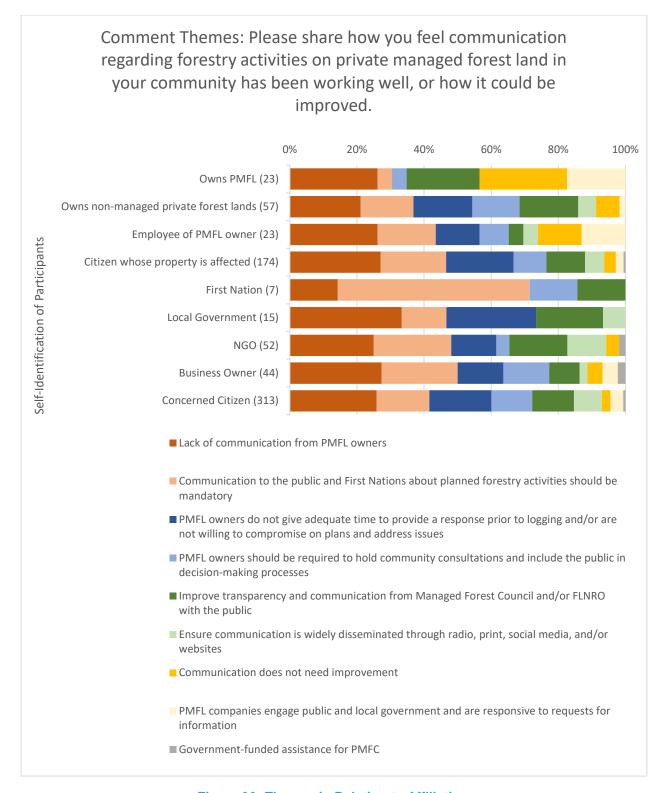


Figure 30: Themes in Relation to Affiliation

4.8 Section H: Private forest landowner Section (including landowners who have land classified as managed forest)

Question H1.

How long have you owned your property?

Question H1 generated 109 responses from respondents who indicated they are private forest landowners. **Figure 31** indicates the number of years that respondents have owned their property.



Figure 31: PMFL Ownership Time

Question H2.

What is your private forest land primarily used for? (check all that apply).

Question H2 generated 110 responses from respondents who indicated they are private forest landowners. **Figure 32** depicts that these respondents primarily use their land for recreation, closely followed by other (conservation, residential, investment), farming and finally forest harvest operations.

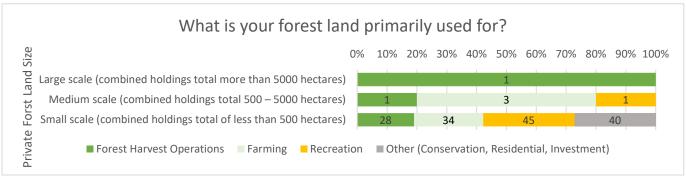


Figure 32: Primary Use of Land

Question H3.

How much private forest land do you own?

Question H3 generated more than 153 responses from respondents who indicated they are private forest land owners. **Figure 33** shows that the majority of the participants are small scale landowners with combined holdings of less than 500 ha.



Figure 33: PMFL Ownership Size

Question H4.

If you have private forest land outside of the Private Managed Forest Land Program, what factors or conditions would encourage you to enrol your forested land in the program?

Question H4 generated 86 comments from respondents who indicate they are private forest land owners not currently in the PMFL program, All comments were analyzed. **Table 26** indicates the number of comments by theme. Better management/ incentives to ensure the protection of key environment values was the top theme that respondents felt would encourage enrolment into the program. This was followed by better tax break incentives and allowing smaller lots to participate in the program. **Table 27** shows the themes per region, while **Figure 34** compares the themes by affiliation. There were no Indigenous Nation PMFL owner comments to this question.

Table 26: Number of Comments by Theme

	All Responses
Better management/incentives to ensure the protection of key environmental values	16
Better tax break incentives	13
Allow smaller lots to participate in the program or allow portions of a larger property	11
Monetary incentives for retention of forests	6

The landowner should have control over their own property and whether they can harvest or not	5
Mandatory enrollment in the PMFL	4
Protecting public and community values	4
Encouragement of sustainable logging practices	3
Must consider, prevent and mitigate for natural disasters and climate change	3
Different regulatory body	3
Insurance and protection that regulations won't devalue land	1
Free professional expert advice	1

Note that the total number of themes identified may not add up to the total number of comments selected for theming. This is due to some comments being not applicable to the question and some comments addressing multiple themes.

Table 27: Themes by Region

	East Kootenay	Central Kootenay	Kootenay-Boundary	Nanaimo	Alberni-Clayoquot	Capital	Comox Valley	Cowichan Valley	Strathcona - Mount Waddington	Islands Trust	Lower Mainland	Sunshine Coast - Qathet	Other BC	All Responses
Better management/incentives to ensure the protection of key environmental values	1	4	1	1	1	1	1	1	1	3			1	16
Better tax break incentives		2		4		1	1			1			4	13
Allow smaller lots to participate in the program or allow portions of a larger property	1	1		2	3			1	1		1		2	11
Monetary incentives for retention of forests			1	1			1	1	1		1			6
The landowner should have control over their own property and whether they can harvest or not		2	1	1						1				5
Mandatory enrollment in the PMFL	1					1							2	4
Protecting public and community values		1		1	1			1						4
Encouragement of sustainable logging practices		2											1	3
Must consider, prevent and mitigate for natural disasters and climate change		1				1				1				3
Different regulatory body		1		1			1							3



Insurance and protection that regulations won't devalue land	1						1
Free professional expert advice	1						1

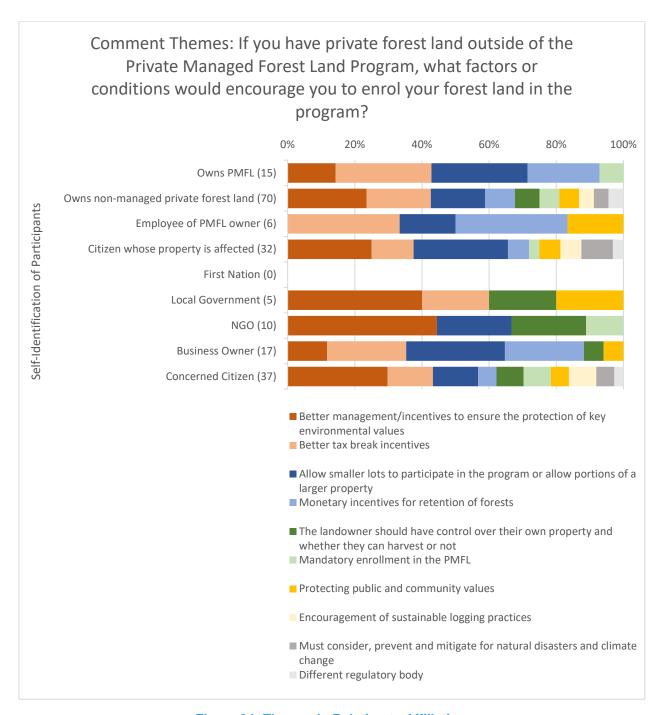


Figure 34: Themes in Relation to Affiliation

Question H5

If you have private forest land outside of the Private Managed Forest Land Program, what factors or conditions have prevented you from choosing to enrol your forested land in the program?

Question H5 generated more than 82 comments from respondents who indicated they are private forest land owners but not in the PMFL program. All of the comments were analyzed. **Table 28** indicates the number of comments by theme, which shows that the greatest factor preventing respondents from joining the program has been that their property is too small. **Table 29** shows the comments per theme by region. **Figure 35** shows the themes in relation to the 9 different affiliations. There were no Indigenous Nation PMFL owner comments to this question.

Table 28: Number of Comments by Theme

	All Responses
Property is too small to join program	18
The landowner should have control over their own property and whether they can harvest or not	13
Lack of education about the program	12
No measurable benefit to joining the program	11
Failure to demonstrate responsible forest management	9
High cost, no benefit to tax saving	7
Too many regulations/policies	3

Note that the total number of themes identified may not add up to the total number of comments selected for theming. This is due to some comments being not applicable to the question and some comments addressing multiple themes.

Table 29: Themes by Region

	East Kootenay	Central Kootenay	Kootenay-Boundary	Nanaimo	Alberni-Clayoquot	Capital	Comox Valley	Cowichan Valley	Strathcona - Mount Waddington	Islands Trust	Lower Mainland	Sunshine Coast - Qathet	Other BC	All Responses
Property is too small to join program	3	2	1	2	3	1	1	2	1	1			1	18
The landowner should have control over their own property and whether they can harvest or not		5				1	1	1		3			2	13
Lack of education about the program		5		2				1		2			2	12
No measurable benefit to joining the program		3	1	1		1	2		1		1		1	11
Failure to demonstrate responsible forest management	1	5	1					1					1	9
High cost, no benefit to tax saving		1		2	1		1						2	7
Too many regulations/policies				1			1						1	3



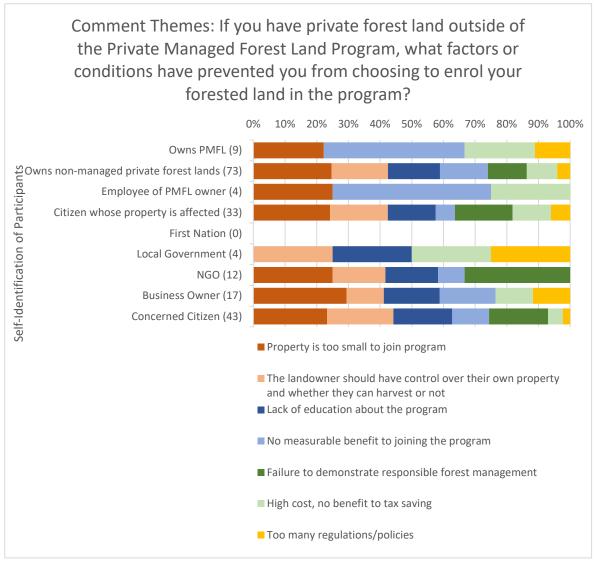


Figure 35: Themes in Relation to Affiliation

Question H6

In what region of B.C. is your private forest land primarily located?

Question H6 generated 111 responses from respondents who indicated they are private managed forest land owners. All responses were analyzed. As depicted in **Figure 36**, PMFL owners are primarily located in the central Kootenay region, followed by "other BC" and the Island Trust.

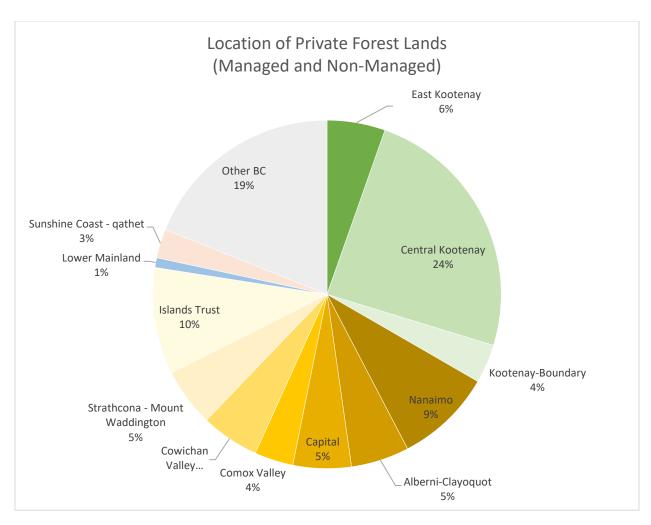


Figure 36: Location of Private Forest Lands Participants (Managed and Non-Managed)

4.9 Section I: Private Managed Forest Land Program Landowners

Question I1.

How long has your property been designated as private managed forest land?

Question I1 generated 90 responses from those who indicated they are private managed forest land owners. All responses were analyzed. The results are provided in **Figure 37**, which shows that most of the PMFL properties have been designated as private managed forest land for more than 15 years.

Question I2.

What is your long-term plan for your private managed forest land?

Question I2 generated 90 comments from those who indicated they are private managed forest land owners. All comments were analyzed. Most of the participants plan to maintain their property as private managed forest land **Figure 37** shows long terms plans for managed forest land.



Figure 37: Long-term Plan for PMFL

Question I3.

What factors or conditions would encourage you to maintain your private forest land in the program for the long term?

Question I3 generated 69 comments from respondents who indicate they are private managed forest land owners. All comments were themed. **Table 30** indicates the number of comments by theme. The highest number of respondents felt the greatest factor or condition to remaining in the program would be better tax break incentives. **Table 31** indicates the themes by region. Figure 37 shows the number of themes in relation to affiliation.

Table 30: Number of Comments by Theme

	All Responses
Better tax break incentives	34
Not changing anything	11
Greater engagement with forest and wildlife safety management practices	8
Protection from local government or Island Trust legislation	4
Legislation to properly support residential use	4
Relaxing regulations	3
Able to transfer land to beneficiaries without current property transfer tax	3
Continued demand for logs and profitable harvest environment	3

Note that the total number of themes identified may not add up to the total number of comments selected for theming. This is due to some comments being not applicable to the question and some comments addressing multiple themes.

Table 31: Themes by Region

	East Kootenay	Central Kootenay	Kootenay- Boundary	Nanaimo	Alberni-Clayoquot	Capital	Comox Valley	Cowichan Valley	Strathcona - Mount Waddington	Islands Trust	Lower Mainland	Sunshine Coast - Qathet	Other BC	All Responses
Better tax break incentives	1	2	1			3	4	2	4	6	3		8	34
Not changing anything			1			4		2	1	1	1		1	11
Greater engagement with forest and wildlife safety management practices				1	1	2		1		1	1			8
Protection from local government or Island Trust legislation				1		2					1			4
Legislation to properly support residential use						1				2	1			4
Relaxing regulations							1						2	3
Able to transfer land to beneficiaries without current property transfer tax		1							1			1		3
Continued demand for logs and profitable harvest environment				1				1		1				3

Figure 38 shows that 8 out of 9 affiliations think that a better tax break would be a good incentive to remain in the PMFL program for the long term. There were no Indigenous Nation PMFL owner comments to this question.



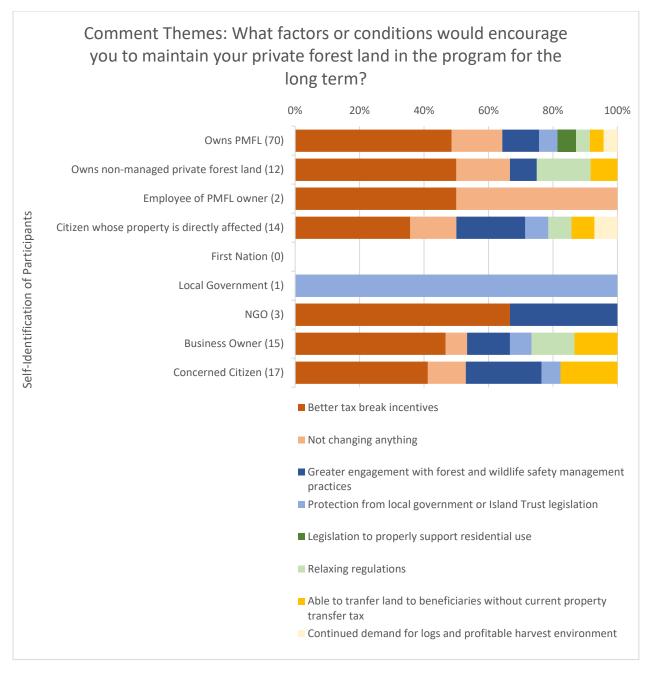


Figure 38: Themes in Relation to Affiliation

Question I4.

What factors or conditions would cause you to remove your private forest land from the program?

Question I4 generated 71 comments from respondents who indicated they are private managed forest land owners. All comments were themed. **Table 32** shows that the primary factor that respondents felt would cause someone to remove their land from the PMFL program is a lack of financial incentive, followed by additional regulations or restrictions being implemented. **Table 33** shows the themes by region. **Figure 39** shows the themes by affiliation. There were no Indigenous Nation PMFL owner comments to this question.

Table 32: Number of Comments by Themes

	All Responses
No Financial Incentive	19
More regulation and restrictions	13
If local government or Island Trust is given authority to enforce legislation over PMFL	13
Increasing taxes	10
Not allow to build dwellings on the property	5
Undervaluing property	3
Not able to transfer land to beneficiaries without current property transfer tax	2

Note that the total number of themes identified may not add up to the total number of comments selected for theming. This is due to some comments being not applicable to the question and some comments addressing multiple themes.

Table 33: Number of Themes by Region

	East Kootenay	Central Kootenay	Kootenay-Boundary	Nanaimo	Alberni-Clayoquot	Capital	Comox Valley	Cowichan Valley	Strathcona - Mount	Islands Trust	Lower Mainland	Sunshine Coast - Qathet	Other BC	All Responses
No Financial Incentive	1			2	1		3	2	1	2	4		3	19
More regulation and restrictions		1	1			1	3	3	3				1	13
If local government or Island Trust is given authority to enforce legislation over PMFL		1		1		3		2		4	1		1	13
Increasing taxes						3	2	1	1	2			1	10
Not allow to build dwellings on the property								1		1	2		1	5
Undervaluing property						1							2	3
Not able to transfer land to beneficiaries without current property transfer tax						2								2



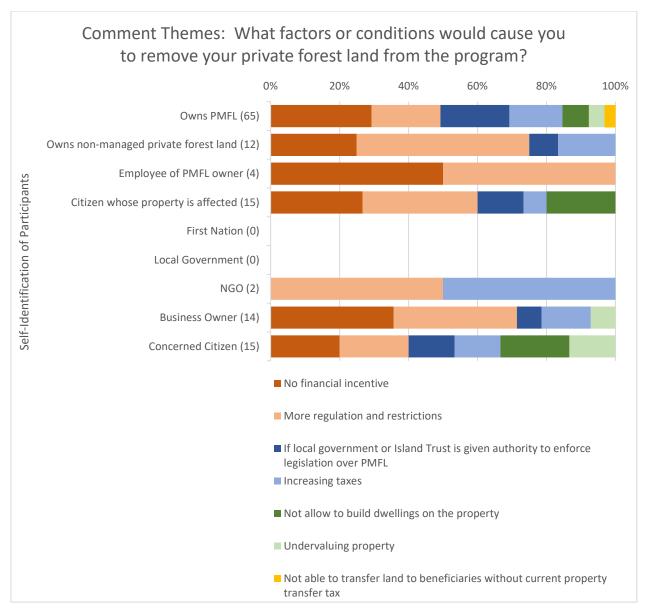


Figure 39: Themes in Relation to Affiliation

5.0 WHAT WE HEARD FROM WRITTEN SUBMISSIONS

The Ministry received 283 written submissions. The written submissions were sorted into five categories: Local Governments, PMFL Owners, Indigenous Nations, Citizens and Special Interest Groups. As per the submission guidelines, some respondents requested that their submissions be kept confidential. Although these submissions were included in the total count and analysis, they will not be made available and the names of the respondents have been replaced with "Confidential Submission" in the lists provided.

5.1 Emerging Themes from Local Governments

The Ministry received 18 written submissions from local governments in B.C., with the majority representing Vancouver Island communities or Regional Districts as shown in **Table 34**.

Table 34: Local Government Written Submissions

Local Government	
Alberni-Clayoquot Regional District	Gambier Island Local Trust Committee
City of Port Alberni	Islands Trust Council
City of Powell River	Municipality of North Cowichan
Comox Valley Regional District	Office of Scott Fraser, MLA
Corporation of the Village of Cumberland	qathet Regional District
Cowichan Valley Regional District	Regional District of Central Kootenay
Cowichan Watershed Board	Regional District of Nanaimo (Ian Thorpe)
District of Sechelt	Regional District of Nanaimo (Maureen Young)
District of Sparwood	Union of BC Municipalities

In general, there was consensus around concern for the current state of private managed forest land in B.C. The following is a summary of the main concerns and solutions/ideas offered by local governments:

- Cumulative effects and watershed function/integrity (water retention, water quantity and water quality) are important values
- Better protection of community watersheds is needed (in some cases almost the entire community watershed is located on private land outside of municipal boundaries)
- PMFL owners should be required to be transparent and share information with local governments and First Nations (FNs) (e.g. formal data sharing agreements)
- PMFL owners should engage the public, local governments and FNs, and be willing to consult on forestry plans and address issues
- Expand PMFL governance authority to include local government representation
- PMFL regulations must align with those on public land (including using professional reliance)
- Climate change adaption and strategies for long-term resilience is needed
- Riparian zones around all streams should be preserved (not just around fish-bearing streams)
- Cultural, social and community values need to be part of the program goals
- Third-party environmental audits should be conducted (issues cited with the Managed Forest Council)





5.2 Emerging Themes from PMFL Owners

The Ministry received 21 written submissions from PMFL owners located across B.C. as shown in **Table 35**.

Table 35: PMFL Owner Written Submissions

PMFL Owners	
Bowie Keefer	Private Forest Landowners Association
Canadian Association of Forest Owners	Rainer Muenter
Clint Parcher	Richard and Deborah Friesen, Catherine and
David Haley	Lawrence Whitehead
Dick Varney	Robert Preston
Hancock Forest Management	Roc-Star Enterprises Ltd.
Jon Spalding	Sam Turk
Joy Brown and Murray Price	Vicki and Pitman Potter
Michael and Lynn Charles	4 Confidential Submissions
Mosaic Forest Management	

There is general support for the current program and written submissions emphasized the need to continue being exempt from local government bylaws that may impede forestry operations. The main themes that emerged from the PMFL owner submissions include:

- Different standards and goals are needed depending on the size of operator. It was felt that some smaller PMFL owners are struggling to meet the costs of the program as the current incentives are marginal for them but provide greater incentives for large landowners.
- Increase FLNRO's oversight of the program to provide additional support to members as well as
 act as a bridge between PMFL owners and local governments. Submissions concluded that this
 can be achieved through communication and education about the program, developing
 partnerships and resolving issues.
- In some regions, local governments restrict forest management opportunities. For example, landowners on the Gulf Islands say they are particularly challenged with issues associated with Islands Trust bylaws, which are viewed as competing with the PMFL program. Specifically, landowners are unhappy with not being able to construct a dwelling on their property.
- The majority of current PMFL owners are happy with the program and do not want any further regulations imposed on them. This includes any requirement to share information.
- Submissions indicated an opposition to further regulations or infringement on private property rights (including sharing of information, mandatory consultation, etc.)
- Submissions indicated that a new value could be related to fuel load management to reduce forest fire risk.
- Many of the current owners believe the current goals and values of the program encourage sustainable forestry practices.

5.3 Emerging Themes from Indigenous Nations

The Ministry received three written submissions from Indigenous Nations which are listed in **Table 36**. The Ministry has invited all affected Indigenous Nations to continue to provide input on the PMFL program through ongoing consultation.







Table 36: Indigenous Nation Written Submissions

First Nations	
Hul'qumi'num Treaty Group Hupacasath First Nation	Namgis First Nation

Generally, Indigenous Nations are concerned that PMFL owners are not managing their lands to sustainable forest practices standards and they are frustrated with the lack of protection of their traditional use sites and spiritual sites. Indigenous Nations written submissions also indicated:

- The need to broaden existing environmental values to include biodiversity, visual quality and sustainable harvesting practices
- The need to include new social and cultural values to protect Indigenous interests and values.
- The need for recognition that a majority of PMFLs are comprised of unceded Indigenous traditional territories with constitutionally protected title and rights.
- An emphasis that cultural heritage resources should be protected.
- That new forest land reserves should be established in partnership with Indigenous Nations.
- A need to replace the PMF Act with a new statutory framework that includes collaborative governance with impacted Indigenous Nations (includes participation in decision-making and enforcement).
- An annual allowable cut limit should be created and the shape and size of cut-blocks should be regulated.
- Water quantity and quality should be a priority in forest management

5.4 Emerging Themes from Special Interest Groups

The Ministry received 26 written submissions from special interest groups located across B.C. as shown in Table 37.

Table 37: Special Interest Groups Written Submissions

Special Interest Groups	
Adventure Tourism Coalition	Koksilah Watershed Working Group
Association of BC Forest Professionals	Quad Riders ATV Association of British Columbia
Backcountry Lodges of BC Association	Qualicum Beach Streamkeepers Society
Canada West Foundation	Sandy Hook Community Association
Comox Valley Conservation Partnership	Sustainable Forestry Initiative
Comox Valley Project Watershed Society	Tourism Industry Association of British Columbia
Cowichan Lake & River Stewardship Society	Tsolum River Restoration Society
Ducks Unlimited Canada	United Steelworkers Local 1-1937
Elk River Alliance	Valhalla Wilderness Society
Elk Valley Bighorn Outfitters	Wilderness Tourism Association of BC
Elphinstone Logging Focus (Eartha Muirhead)	wildsight
ENGO Joint Submission	Yellow Point Ecological Society
Federation of Mountain Clubs of BC	Confidential Submission



Ministry of Forests, Lands, Natural

Resource Operations and Rural Development

The following is a summary of the sentiments contained in special interest group written submissions:

- Values should align with those on crown land and the Forest and Range Practices Act.
- Include cultural, aesthetic and recreational values.
- The exit fee is an ineffective disincentive for leaving the program and the current 15-year penalty cut-off is too short.
- General wildlife habitat protection is required (not just critical wildlife habitat protection).
- There should be different rules/regulations for large vs small property owners.
- Perception that larger PMFL holders should be held to higher standards including:
 - Maintenance of long-term fibre supply
 - Reduce harvest rate and implement a minimum harvest age
 - Wildfire prevention within proximity to communities
- Ensure public access for recreational use, First Nations traditional use, and Provincial parks.
- Implement climate change resiliency and mitigation measures.
- Increase public consultation and information sharing regarding forest operations that impact local government and public interests.
- Expand PMFL governance authority to include local governments.
- PMFL program should be mandatory not voluntary.

5.5 Emerging Themes from Citizens

In total 215 submissions were made by individual citizens. Out of those 215 submissions, 188 were generated through the Wilderness Committee website. Although some submissions used text cut and pasted from the website, all had some level of original text by the submitter and so were not considered to be a letter writing campaign. A full list of citizen names who provided written submissions is listed in Appendix A.

Table 38 shows the Top 10 themes that emerged from the citizen written submissions.

The general sentiment from citizens was that the current regulatory regime for PMFL does not encourage sustainable forestry practices which in turn does not protect key environmental, community or Indigenous Nation values. There is a common sentiment that the PMFL program is a "free for all" and that the landowners "strip and flip" the land for profit. Overall, communication issues were viewed as a large problem between PMFL owners and the citizens. Many felt that the PMFL program requires more effective government oversight.

Table 38: Number of Citizen Comments per Top 10 Themes

Em	nerging Themes	Number of Comments per Theme
1	The goals of PMFL do not result in sustainable forestry practices	125

2	Key environmental/ First Nation/community values are not protected in PMFL	115
3	Improve protection for old growth forests on PMFL	98
4	Prioritize Indigenous rights	96
5	Lack of protection/regulations for watersheds (community watersheds)	93
6	PMFL goals/ incentives do not promote long-term forest production/ PMFL lacking measures to ensure long-term sustainability	77
7	Lack of protection/regulations for local economies (other industries, log exports)	65
8	Communication/ information sharing about logging activities on PMFL is inadequate	65
9	PMFL requires effective government oversight	42
10	PMFL goals need to consider climate change	39
	Total Number of Themed Comments	815

5.6 Organized Written Submission

Of note was 1,053 identical written submissions that were received containing a letter that was generated from the "wildsite" website at https://secure.wildsight.ca/privateclearcuts and sent to the review through a form available on that website. Some of these submissions originated from outside of British Columbia and some respondents submitted the email more than once. The submissions often contained little to no information that indicated the writer's region or affiliation, and so analysis along these lines was not possible. As well, these 1,053 emails messages did not follow the PMFL Program Review Formal Submission Guideline that submissions "not appear to be spam-like messaging, a repeat posting or a template letter writing campaign."

The duplicated core text of the email messages was considered as part of the overall citizen response to the engagement.

6.0 CLOSING SUMMARY

This What We Heard summary report reflects the feedback received through 1,500 responses from British Columbians as part of the government's review of the *Private Managed Forest Land Act* and Program. The review is one of several policy reforms announced as part of the Coast Forest Sector Revitalization Initiative. One of the primary goals of the initiative is to restore public confidence in forest management. In particular, the public engagement provided an opportunity for British Columbians to offer feedback on various areas within the PFML program including:

- Program goals;
- Regulatory framework;
- · Management objectives for key environmental values;
- Incentives for participation in the program; and,
- Disincentives for exit from the program

The feedback provided by British Columbians through this engagement will help to inform the government's consideration of future policy options.







Appendix A: Written Submission Affiliations

Local Alberni-Clayoquot Regional District

Government City of Port Alberni City of Powell River

Comox Valley Regional District

Corporation of the Village of Cumberland

Cowichan Valley Regional District Cowichan Watershed Board

District of Sechelt District of Sparwood

Gambier Island Local Trust Committee

Islands Trust Council

Municipality of North Cowichan

qathet Regional District

Regional District of Central Kootenay Regional District of Nanaimo (Ian Thorpe) Regional District of Nanaimo (Maureen Young)

Office of Scott Fraser, MLA Union of B.C. Municipalities

PMFL Bowie Keefer

Owners Canadian Association of Forest Owners

Clint Parcher David Haley Dick Varney

Hancock Forest Management

Jon Spalding

Joy Brown and Murray Price Michael and Lynn Charles Mosaic Forest Management

Private Forest Landowners Association

Rainer Muenter

Richard and Deborah Friesen, Catherine and Lawrence Whitehead

Robert Preston
Roc-Star Enterprises

Sam Turk

Vicki and Pitman Potter 4 Confidential Submissions

First Nation Hul'qumi'num Treaty Group

Hupacasath First Nation Namais First Nation

Special Adventure Tourism Coalition

Interest Association of BC Forest Professionals

Backcountry Lodges of BC Canada West Foundation

Comox Valley Conservation Partnership Comox Valley Project Watershed Society Cowichan Lake & River Stewardship Society

Ducks Unlimited Canada

Elk River Alliance

Elk Valley Bighorn Outfitters

Elphinstone Logging Focus (Eartha Muirhead)

ENGO Joint Submission

Federation of Mountain Clubs of BC Koksilah Watershed Working Group Quad Riders ATV Association of BC







Qualicum Beach Streamkeepers Society

Sandy Hook Community Association

Sustainable Forestry Initiative

Tourism Industry Association of BC

Tsolum River Restoration Society United Steelworkers Local 1-1937

Valhalla Wilderness Society

Wilderness Tourism Association

wildsight

Yellow Point Ecological Society

Confidential Submission

Citizens

Glenda Thornton Aaron Hill

Adrian Hough

Allen Szafer

Amanda Papailhau

Andreas Hobyan Andrew LaFrance

Animae Chi

Anne Cameron

Anne MacLean

Anne Miles

Anneliese Schultz

Anonymous

Bernie Dobovicnik

Bill Appledorf

Bill Holcombe

Bob Boase

Brenda Brisson

Brenda Fitzpatrick

Brian Day

Brian Turner

Bridgit Meagher

Bruce Elkin

Bruce Ellingsen

Bruce Reid

Carole Nash

Carole Tootill

Caroline Crossley

Catherine Slater

Cecil Bosher

Charley Miller

Charlotte Bell

Cher Clarke

Cheryl Holden

Chervl Marion

Cheryl Newton

Christine Turner

Christopher Crowther

Clare Kenny

Clare Samuel

Claudia Kobayashi

Crowd-Sourced

Questionnaire Response

Damion Dooley

Dan Blake

Gloria Prescott Gwen Curry Hadas Levy

Hal Trufan Heinz N W Nussbaumer

Helena Kreowska

Hendrik de Pagter

Herman Bakker

Hilary Jones

Hillary Reid

Hisao Ichikawa

I Sarama

Ian McPherson

Ian Soutar

J Barnard Gilmore

J Ocean Dennie

James Alexander

Jan Fenby

Janine Wolfe

Jason Nelson Jason Stanley

Jay Brown

Jay Van Oostdam

Jean Lawrence

Jennifer Devries

Jennifer Dyck

Jennifer I Sullivan

Jennifer Nichol

Jennifer-Beth Fulton

Jessica Snider

Jim Culp

Joan Russow

Joanne Acompora

JoAnne Jarvis

Joanne McKechnie

John Barclay

John Hamilton

John Jeglum

Jonathan Boyne

Judi Stevenson Judith Harper

June Ross

Jytte Ebbesen

Michelle Gibson

Michael Friedmann

Michael Heavyside

Mike Christy

Monica Hofer

Nat Chambers

Natalie Easson

Nick Drake

Norman Gillies

Pat Gibbs

Pat Jacobson

Patricia Willis

Patrick Smolski

Patti George

Paul Griffiths and Carol

Ramsev

Paul Logan

Penny Oyama

Philip Pedini

Raleigh Koritz

Ray Travers

Renee Titterton

Richard Switzer

Rick James

Robert Hornsey

Robert Johnson

Roberta Olenick

Rov Trickey

Roz Isaac

Ruth Ann Darnall

Ruth Campbell

Ryan Moase

Ryan Schiebout

S Jitreun

Sandra Tonn

Sarah MacAuley

Sarah Valentine

Sarein Basi-Primeau

Shannon LeBlanc

Shanon Roy

Sharon Hughes Shauna Johnson

Sheila Anderson Sheila Paul

Daniel Tourgny Kate Vincent Siglind Tinsley Daphne M Taylor Kathleen Kyle Stephen Archibald David and Dorothy Steve Coffin Katy Thompson **Torontow** Kirk Buhne Steven Rowat **David Bouvier** Laurel Circle Stuart Philips David Shipway Laurie de Jong Susan Angel **David Stewart** Laurie Embree Susan Stout Denise Olson Lee Porteous Ted Burns Dennis Lucarelli Leigh Buchanan Terry Hale Derrick Grimmer Leslie Stanick Terry Sevold Derrick Grimmer Levi Nelitz Thea Honeyman Theresa Hood Diana Mongeau Lin Marcotte Diana van Eyk Linda Heese Thomas G Pater Diane Van Oostdam Lisa Hanning Tim Readman Dorothy Field Lynn Taylor **Toby Dent** Dorothy Nelson Mairy Beam Todd Golumbia E Hubert Margarita Pinillos Tom Roonev Eartha Muirhead Margie Korrison Toni Stanick Marianna Vanderklift Tony Brumell Elizabeth Borek Marielle Audet Evelyn Hunter Tracy Lyster Fenn Stewart Marilyn Suddaby Trish Chung Finn Kreischer Marion Berevin Trudy Beaton Fran Dietz Marquis Diment wildsight Online Email Frances Litman Mary Mitchell Submissions (1,053) Frank Young Mary Vane-Hunt William Heidrick Maureen Matthew Fred Hall Willow Kaukanon Maureen Moore Gaye Gardiner Yvonne Adalian Gerry Naito Melissa Tolsma Zoe Oppenheim Gillian and Frank Anderson Michael Coon Confidential Submission



