

1. Introduction

I support the concept and most of the application of the PMFL program. I would like to see more private land managed for forestry, and I support the objective of the PMFL program. However, my primary concern is the ease at which land owners can remove land for subdivision without penalty. Also, owners can enter the program but never actually perform forestry activities. To summarise, my two primary concerns are:

- PMFL program used to reduce taxes while waiting to rezone the land for residential development
- PMFL program used to reduce taxes with no actual intention to perform forestry activities on the land

I have a bias towards this program. I am currently employed in the forest industry and am a landowner in a small shared property on Galiano Island. I currently use some wood from my property in value added products and someday I would like to own private forest land on Galiano Island. It is frustrating seeing productive forest land, zoned for forestry, and taxed for forestry, not actually used for forestry.

This is a contentious issue on Galiano. A large portion of the island is privately owned forest land. Some of these lots are outside of the PMFL program, but many are within the program. However, several forested parcels have been subdivided and re-sold as residential properties over the last two decades. Some parcels were the subject of court cases in an attempt to rezone the land for residential development. With the 15 year classification now complete, there will be increasing pressure to develop these lands. I believe the program lacks the means to stop land owners taking advantage of the lower tax rates while never using their land for forestry.

2. Program Goals

I support the program goals of encouraging private landowners to manage their lands for long-term forest production and encouraging sustainable forest management practices, including protecting key public environmental values. Although there are areas for improvement in meeting these goals, I will address those areas later. Given the pressures on a declining timber supply in this province, encouraging forestry where possible is good. However, the program should explicitly support alternative economic activities, so long as forestry remains the primary objective.

3. Management Objectives

I support the stated management objectives of soil conservation, critical wildlife habitat, fish habitat, drinking water quality, and reforestation. I would suggest two additions: local economic benefit and locally identified values. My personal bias is showing in these two additions.

3.1. The importance of local economic benefit cannot be understated. In my situation in the Southern Gulf Islands, there is strong potential for high value products created from local timber. This includes custom timber for timber framed homes, custom furniture, and other such products. Although the act currently states the council is to encourage economical benefits, I believe this should be a management objective.

To support local economic benefit, the act or regulation should be amended to explicitly allow private forest owners to incorporate alternative sources of revenue such as seasonal recreation, eco-tourism, event hosting, camping, and etc. These could be included by expanding Schedule A of the regulation or as a new addition. From my perspective, this would encourage multiple economic activities to occur on one parcel of land, beyond agroforestry and silvopasture systems. For example, a private forest owner with a small parcel could convert a portion of their land for a seasonal campground while undertaking a winter selective harvest to move towards an uneven aged stand.

3.2 The allowance of alternative sources of revenue should not preclude the need for a publicly available and enforceable management plan as discussed in section 4. Owners must still demonstrate that forestry is the primary purpose of their land.

3.3 Locally identified values are an important part of any forest management plan. However, this must be balanced with the administrative burden for private landowners. Values could be identified by local FLNORD, Municipal, or Regional staff and approved by the Managed Forest Council. These values could then be incorporated in the management plans discussed in section 4.

4.1 Regulatory Framework for Environmental Values

In general I support the regulatory framework for environmental values. I support that the council reviews submitted plans and performs audits of private forest lands.

4.1 Management plans should be publicly available on the council's website. It can take great difficulty to find the true owner of a privately held forest if it's obscured behind a numbered corporation with a registered address of a law corporation. Publicly accessible plans would allow members of local communities to understand activities that may affect them.

4.2. Management plans submitted to the Managed Forest Council should be professionally prepared and include specific, measurable, and timely harvesting plans. Owners should be held accountable to their submitted plans in order to continue participation in the program. This will address concerns that owners have entered the program to receive tax benefits, but have no intent to perform actual forestry activities.

4.3 The Managed Forest Council should audit lands not actively being harvested, eg lands between rotations or not harvesting according to their submitted management plan. This will help identify private forest land benefiting from lower tax rates, but not actually performing forestry activities.

5.1 Incentives for Participation in program

I support the incentives for participation in the program. Actively supporting alternative management approaches would greatly benefit the Southern Gulf Islands as it would encourage more members to enter and remain in the program if they could easily supplement forestry income with alternative revenue streams.

6.1 Disincentives for Exit from the Program

I have concerns with the program exit disincentives. As stated before, my primary concerns are with gaps in the program that allow landowners to enter the program and receive reduced property taxes but never intend to actual conduct forestry operations on their land.

6.1 In forestry, 15 years is not a long length of time. This time frame needs to be extended. This would help address my primary concern of forest land leaving the program for residential development. Ideally, this time frame should last at least 2 full rotations.

6.2 There should be additional disincentives, with no time constraints, for land that leaves the program without significant forestry activities occurring. This should include land that was grandfathered into the original program and recently purchased forest land. These disincentives should be far greater than the difference in property taxes and property value.

6.3 There will likely be pushback from some owners for increasing disincentives for exiting the program. However, if they didn't want to practice forestry, why did they buy forest land in the first place? From my perspective, zoning is a social contract. A private forestry landowner agrees to abide by certain rules, that benefit the community, in exchange for lower taxes. If somebody:

- a) buys forest land
- b) at a price based on forestry uses
- c) agrees to manage their land for forestry
- d) pays reduced taxes in exchange for forest management

They should not be surprised when they're expected to uphold their end of the bargain. To that end, I will restate my two primary concerns with the program:

- PMFL program used to reduce taxes while waiting to rezone the land for residential development
- PMFL program used to reduce taxes with no actual intention to perform forestry activities on the land

Thank you for your time,
Name Withheld