



Private Managed Forest Land Program - BLBCA Introduction

The Backcountry Lodges of British Columbia Association (BLBCA) represents 31 remotely located, privately owned, lodge operations who provide self-propelled, guided and self-guided activities for visitors from BC, Canada and around the world. BLBCA member lodges are based in rural BC, are economic drivers in their regions while providing valuable employment opportunities and significant tourism revenue.

BLBCA members annually generate over \$13 million in revenue, create approximately 300 full-time jobs each year, and host over 14,000 visitors. As well, our operators purchase over 63% of goods and services within 50kms of their base, offering significant support to local businesses in rural British Columbia.

While we depend on a well-managed forest sector for the sustainability of our business and the health of BC's natural environment, forest management related issues have been the main challenge to the continued viability of our business. The current Private Managed Forest Land Program legislation is largely biased in favour of timber harvesting to the detriment of any other social and economic activity on the land base.

From our perspective BC's forests need to be managed, not administered as they currently are. One step toward that process should be the development of a broad and updated vision for the utilization of our forests that goes beyond supplying fibre for dimensional lumber and strand board. This vision would include a more diverse and integrated economy that leads to a healthier socio-economic climate for rural British Columbia.

General Observations

BLBCA members annually deliver a world-class wilderness experience to visitors in many rural areas of British Columbia. Our businesses depend on being able to deliver "Super, Natural BC as it is so well marketed by the BC Government and Destination BC.

At times visitors to BC have experienced visible devastation, in part by witnessing less than stellar forest harvesting processes on crown land and on private property. The result of this process can, and has affected rural communities by damaging vegetation, water quality, wildlife habitat and trail networks.

The issues facing the PMFL are the same as those on publicly managed forest lands. However, the solutions for private lands are likely to be more varied. The primary problem with the PMFL Act and governance model is its lack of rigour in several key areas including: public consultation, species and habitat protection, environmental management, and loss of public recreation access.

One of the other concerns regarding logging on private lands, is the lack of recourse when our BLBCA member operations are directly or indirectly impacted by these actions. What's more, affected businesses and communities have no means by which to mitigate the impact, stop the destruction, or even communicate their concerns to the private land holder.



Public and privately managed forests are the lifeblood of our entire eco-system as a primary source for clean water oxygen and food, as well as habitat for wildlife and other foliage aside from trees. It is incumbent on all stakeholders to address this integral ecological footprint in British Columbia to ensure long-term sustainability on all fronts (environmental, social, cultural, economic), especially in the context of climate change, usage and reconciliation with Indigenous peoples.

The BLBCA suggests the following regarding the Privately Managed Forest Land Program (PMFL)

PMFL ACT and Governance:

In order to improve and upgrade the PMFL Act, the BLBCA recommends greater requirements for legal visual quality obligations being identified and adhered to. The Province may wish to fund an inventory of tourism features for areas affected by privately managed forest lands. Managing these areas is critical to the ongoing viability of other users.

Working with other Ministries, such as MECC, MFLNRORD should identify and designate critical wildlife habitat on PMFL lands and introduce legal objectives for management of these lands, this shouldn't be left as a voluntary activity.

MFLNRORD many want to utilize environmental provisions in FRPA while adjusting long-term forest health of adjacent lands. A significant portion of old growth forest resides on private lands, government should consider setting legal targets for old growth retention on these lands as part of the forest health objective.

Consultation:

Indigenous, public, and community consultation on harvesting and access plans needs to be a legal requirement under the Act. The consultation process needs to be conducting in a timely, meaningful manner. This should increase transparency, avoid surprises and reduce conflicts, and be standard practice.

We recognize that these new requirements will add costs to the landowner's use of the land. However, given the deteriorating state of the natural environment, the proximity to communities and other economic interests, we believe greater value needs to be returned to the taxpayer for the tax relief benefits they receive under the PMFL Act.

PMFL Tax Break & Bylaw Exemption:

Property and forest product values have risen significantly on both public and private lands since the original legislation was introduced. At the same time taxes have increased substantially, along with restrictions and requirements on land use both municipally and provincially. While the PMFL Act has undergone some amendments, it has not kept pace with societal changes and expectations.

The value proposition on tax relief needs to be reviewed and re-balanced so that communities and other industries realize some benefits environmentally, socially, and materially from privately managed forest lands. In other words, government needs to



reassess the practice of giving landowners of private forests both a tax break and exemption from municipal by laws.

The penalty exemption component of the Act is particularly problematic. It's inconceivable that a private landowner under the guise of the Private Forest Managed Lands Program, could conceivably harvest trees for 15 years and receive annual tax breaks, then pull out of the program with no consequences. What is the benefit to the Province, or in particular, the local community in view of a decimated landscape?

Perhaps a better strategy might be to apply a covenant to all privately managed forest lands over 50 hectares that sets a higher standard whereby landowners benefit if their land is held to that standard. Only then do landowners receive a tax break after a prescribed period.

Points for Consideration

- A. The BLBCA favours greater requirements for legal visual quality obligations being identified and adhered to. In this regard, the Province should fund a tourism features inventory for areas affected by privately managed forest lands.
- B. The Province needs to access, identify and designate critical wildlife habitat on PMFL lands and set legal obligations for management of these lands;
- C. Indigenous, public, and community consultation on harvesting and access plans needs to be a legal requirement under the Act:
- D. The Province and landowners need to identify and agree on the public's right to access private lands for recreation, and make allowances as part of the PMFL agreement on a specific property;
- E. The Province needs to reassess the practice of giving landowners of private forests both a tax break and exemption from municipal bylaws;
- F. The Province should consider a covenant that compels landowners to commit to a higher standard for managing their properties, and being subsequently rewarded for adhering to that standard over the long term.

Summary

The BLBCA and its members look forward to working together with the Provincial government in order to support your efforts to modernize the Private Managed Forest Land Program.

We value ecosystems that a healthy forest and progressive, inclusive forest harvesting practices will support. If there is anything that the BLBCA or its members can do to help move this initiative forward, please let us know. We look forward to hearing from you.

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