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To Private Managed Forest Lands Program Review;

**RE: Public Submission** 

#### **CITY OF PORT ALBERNI**

The City of Port Alberni is located within the Alberni Valley on Vancouver Island, somewhat encircled by large parcel private managed forest lands, much of it owned by one corporation. The way that these lands are managed is tremendously impactful on the City of Port Alberni and surrounding areas.

Changes in the use of large tract Private Managed Forest lands have resulted in negative impacts not unlike those experienced during the industrial revolution. Where once the land supported local communities and it was in the best interest of land owners to maintain that relationship in order to access a reliable labour force and maximize returns from the land, current practices have excluded the people from the land, and separated the economic well-being of the land owner from that of the community.

This is not a submission requesting a return to gone by glory years. It is a fact that in years past forest lands in and around the Alberni Valley were managed in a way that contributed to the local community in a far greater way than we are experiencing today. We believe that owners of large tracts of land have a social obligation to manage those lands with an eye for the future of those lands and the future wellbeing of nearby communities. Because that social obligation is not being fulfilled by the land owners, the City of Port Alberni calls upon the Province of British Columbia to enact legislation that will ensure that the monopoly of land ownership in and around the Alberni Valley does not prevent our community and citizens from prospering.

Recognizing that some of the comments that are to follow are outside the scope of your review, the City of Port Alberni submits the following specific concerns and recommendations.

#### Develop Tiered Regulations Based on the Size of Private Managed Forest Lands

The system doesn't appear broken where small acreage Private Managed Forest lands are concerned. There are good land management practices there, and management of those lands for forestry contributes to the local community.

Recommendation: look for opportunities to break up large tracts of PMFL or develop regulations for those large parcel lands that reflect regulations governing logging of publicly-owned lands.

#### Challenges partnering with the owners of PMFL for economic development purposes

11 years ago, the City identified several parcels of PMFL within the Alberni Valley but outside the City's boundaries that were considered key to economic diversification efforts. The City then met with the owners of these parcels, identified the proposed developments for each and offered to partner to achieve the developments. The City was advised all parcels were "off the table". A couple of years later, the City was advised that a resort proposal (originally suggested by the City) for one of those properties had become the highest priority of the real estate arm of that PMFL company. For several years in a row, this highest priority was asserted in meetings however no progress was ever made. Different proposals for other parcels have been denied or ignored despite the City's offers to ensure the land and timber values were compensated for.

Recommendation: Require PMFL owners to negotiate on interest-based principles for parcels of land where a community's economic diversification efforts are affected.

#### Rotation cycle of crops

The rotation of crops (harvest cycle) on large tract Private Managed Forest Lands is shorter than in previous years and perhaps shorter than on small parcel Private Managed Forest Lands and crown lands. While this cycle may maximize economic return to the land owner the shorter cycle impacts the local communities negatively in the following ways:

- Reduces the inactive time between harvest cycles, limiting opportunities for recreational and other uses.
- Small logs are not easily utilized in the coastal processing industry, resulting in mass export of raw logs.
- Machine processing of small logs results in fewer jobs.
- Considerations should be given to the sustainability of current harvest rates.

Recommendation: Require PMFL owners to move to longer cycles of growth before harvest, and meet new definitions for sustainability.

#### Lack of local processing of logs

A kind of Catch 22 situation has developed with PMFL companies sending their logs to markets where they get higher revenue and the owners of local sawmills and the paper mill seeing no value in reinvesting in those facilities because they cannot access fibre at a reasonable cost.

Recommendation: Look to other jurisdictions where the separation of ownership of the logs and processing facilities have nevertheless resulted in continuous and appropriate investment in processing facilities.

#### Fibre left behind

Several years ago, we began to focus on residual fibre opportunities because the owners of the paper mill and local sawmills were concerned about their access to fibre. In spite of several proposals to access this fibre, the PMFL companies continue to stack residual fibre and burn it with huge impacts on our air quality.

Recommendation: Apply Coast Revitalization Strategy disincentives to PMFL and create incentive measures as well.

#### Lack of employment connection

We have observed PMFL companies tend to use contractors who do not live in the Alberni Valley thus diminishing the connection between where the wood comes from and where the benefits are realized.

Recommendation: Require PMFL companies to participate in the municipal social procurement process.

### Differentiation between small parcels and large tracts

As mentioned earlier, the owners of small tracts of land seem to voluntarily care more about environmental and social values of their trees and harvesting processes than large PMFL owners. This is in spite of the fact that our BC Investment Management Corporation is heavily invested in the latter.

Recommendation: Require PMFL owners to evaluate their social and environmental practises against those utilized by other forest companies, and best practices used in similar industries.

## Institute a requirement for maintenance of local social license for land use practices

The Premier has spoken often about the need for social license in this industry as well he should since so little remains of it.

Recommendation: Require PMFL owners to evaluate their social licence against that held by other forest companies. Regulations should be developed to require baseline local engagement.

## Negative impacts (truck traffic) without economic benefit

Dozens of logging trucks pound City streets on a daily basis leading to ruts in road surfaces and faster deterioration of our asphalt. None of this is compensated for as, mentioned above, many drivers are contractors living outside the Alberni Valley. In addition, some of the favoured routes go through the uptown commercial area and other routes go through residential areas; the noise of the heavily powered and loaded trucks is hard on hearing and generally annoying and the obscuring of vision for pedestrians and other drivers has created many near misses.

Recommendation: Return a percentage of log export fees to municipalities to offset industry costs otherwise being borne by local taxpayers.

#### **Watershed Concerns**

PMFL surrounds the City's watersheds. Our requests for greater setbacks, more sensitive harvesting techniques as well as better road construction and maintenance practices seem to be paid lip service. The City is also continuously required to upgrade water treatment, sometimes as a result of impacts from logging practises on PMFL.

Recommendation: Invest a percentage of log export fees in provincial or municipal ownership of sufficient land surrounding a watershed so as to protect the water supply of residents for perpetuity.

Thank you in advance for your consideration.

Kind regards,

Mayor Sharie Minions City of Port Alberni