



Erin Nowak

Program Coordinator
(250) 203-5644
Email: erin@cvlandtrust.ca

Mailing Address

P.O. Box 3462
Courtenay, BC V9N 5N5

Office:

2356a Rosewall Crescent
Courtenay, BC, V9N 8R9

Partner Organizations

Comox Valley Land Trust
Project Watershed
Millard-Piercy Watershed Stewards
Morrison Creek Streamkeepers
Beaufort Watershed Stewards
Comox Valley Nature
Comox Valley Water Watch Coalition
Brooklyn Creek Watershed Society
Perseverance Creek Streamkeepers
Cumberland Community Forest Society
Mack Laing Heritage Society

Support Organizations

CV Sustainability Project
CV Council of Canadians
Friends of Comox Lazo Forest Society
Forbidden Plateau Road Residents Association
Black Creek Streamkeepers
Saratoga and Miracle Beach Residents Association
Arden Area Residents Association
Friends of Strathcona Park
Merville Area Resident's & Ratepayers Association
VI Whitewater Paddling Association
Mountaineer Avian Rescue Society
Macdonald Wood Park Society
Tsolum River Restoration Society

Funding Partners

Real Estate Foundation of B.C.
Community Gaming Grant
RBC Blue Water Fund
Comox Valley Regional District
City of Courtenay
Village of Cumberland

www.cvlandtrust.ca/cvcp/

The Honourable Doug Donaldson, M.L.A.,
Minister of Forests, Lands, Natural Resource Operations and Rural Development
P.O. Box 9049 Stn Prov Govt
Victoria BC V8W-9E2

July 22nd, 2019

RE: Private Managed Forest Land Program

Dear Minister,

The Comox Valley Conservation Partnership (CVCP) brings together 23 streamkeeper groups, rate-payers associations and environmental non-government organizations in the Comox Valley into a common forum to work proactively with governments to build stronger policies, regulations, strategies and initiatives supporting environmental protection in the Comox Valley. Protecting sensitive ecosystems is a priority in the Comox Valley. Our work in 2012 to update the Sensitive Ecosystem Inventory (SEI) in partnership with the CVRD illuminates that only 5% of the eastern Comox Valley's ecosystems remain in an "intact" state. Our data suggests that residential and agricultural development is the primary driver of this loss with respect to wetlands and riparian areas, while logging is responsible for most of the losses in old forests and mature second growth forests.

Another strategic priority of the CVCP is to increase the level of protection and community oversight of land uses affecting drinking water supply areas. In our communities this includes the Langley Lake, Cumberland Creek, and Comox Lake watersheds which currently provide drinking water to approximately 65,000 residents of the Comox Valley. Our communities have experienced significant boil water advisories as well as historic flooding and drought conditions in recent years. While taxpayers will be spending over \$100M in engineered infrastructure to address these challenges, the CVCP and others contend that historic and current land uses in these watersheds are significant factors that are relevant to both the causes of and solutions to the issues.

In the Comox Valley, the majority of the land-base is privately owned by forestry companies and included in the Private Managed Forest Land Program. In respect to our desires to see increased levels of protection for sensitive ecosystems and community watersheds, the Private Managed Forest Land Act (PMFLA), its associated regulation, the Managed Forest Council and the guidance material they produce are therefore of particular interest. We are grateful for this opportunity to provide comment.

The CVCP would like to see changes made to the PMFLA, the regulation, the Council and the guidance materials that support:

1. A move towards increased local government influence in how private land forestry is conducted in drinking water supply watersheds and in areas where local governments have designated environmentally sensitive areas (e.g., Environmental Development Permit Areas).

2. Much tighter restrictions on forestry activities in riparian areas (similar to the standards established on Crown lands).
3. Much stronger protection for Critical Wildlife Habitat, including ensuring that the list of species at-risk to which PMFLA applies is regularly updated and synchronized with the lists of species at-risk maintained by the BC Conservation Data Centre.
4. A change to the reforestation objectives such that natural forest ecosystems are the required silvicultural target.
5. The inclusion of regulations that support not just water quality objectives, but that also support water quantity through maintaining forest hydrology and sub-surface drainage patterns within the natural range of variability.

While we understand and appreciate that the forest management companies active in our community often exceed the minimum requirements established under the PMFLA and the regulation, this may not always be the case in the future. It is extremely important to the CVCP and our member organizations that the minimum standards of private land forestry and local community consultation be raised significantly. Again, the CVCP applauds the work of your Ministry in undertaking this review of the PMFL Program, and we look forward to future opportunities to review the proposed changes that result.

Yours in conservation,

A handwritten signature in blue ink, appearing to read 'Erin Nowak', is positioned above the typed name and contact information.

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Erin Nowak, Program Coordinator
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