



Project Watershed's Position Paper on British Columbia's Private Managed Forest Land (PMFL) Program

Dear Review Committee,

We are heartened to see that the Ministry of Forests, Lands, Natural Resource Operations and Rural Development is conducting a review of the Private Managed Forest Land (PMFL) Program (also known as the Managed Forest Program). It is our professional opinion that this review is long overdue and tighter restrictions on private land logging are sorely needed. As an ENGO located in the Comox Valley we are surrounded by significant tracks of private forest lands and have witnessed the systematic degradation of forest ecosystems, watersheds and habitats that has occurred since forest management and oversight was effectively vacated by the government and handed over to the forest corporations with the implementation of the PMFL Program in 2003.

The **ecological importance** of old, intact and natural **forests** cannot be overstated. In terrestrial systems, forests are our most important carbon sinks and produce the highest quality water throughout an annual cycle. Old, intact forests support substantial biodiversity and provide important habitat for myriad species of flora, fauna, fungi and lichens. We here in the Comox Valley are at high risk of water shortages, particularly as climate change impacts, such as warmer drier summers and decreasing snow packs are expected to become more frequent. We rely on intact forests to retain and filter water and prevent further destabilization of our watersheds. Generally, current forestry practices do not prioritize forest health, the unique habitats, species or the ecological functions that old, intact and natural forests provide.

For the most part, current forestry practices systematically clear-cut in ever decreasing rotation age classes to satisfy a mandated requirement of forestry companies to turn a profit, not to protect the integrity of our forests. This clearcutting of ever-younger trees, in addition to the continued need to log what little remains of our old growth forests within their purview, is a recipe for ecological disaster and adds to the severity of our current climate change emergency. This degradation, primarily through clear-cut logging and poor road building practices, has helped exacerbate the detrimental effects of climate change our planet is now dealing with. The loss of carbon sequestration, precipitation interception, and stream and land form degradation have led to worsening of flooding and drought conditions through loss of retention abilities across the landscape. Conventional forestry practices also degrade biodiversity to dangerously low levels and can have negative downstream consequences related to flooding and fish habitat degradation when done in the headwaters of rivers and streams.

The only truly sustainable forest management practices require us to transition to Ecosystem Based Forestry Management where the functioning health of our forest ecosystems is the primary goal. Ecosystem Based Forestry model is an adaptive management approach that requires the consideration of all ecological and social values inherent in forest lands to ensure the future health and sustainability of forest ecosystems and the communities that depend on them. The profit margins and shareholders' returns that have driven forest management and legislation on Crown and PMF Lands for far too long cannot continue to the model of forestry practices in BC. The BC Tenure System and corporate concentration in the industry has led to a downward spiral in degrading the natural values of our forests for far too long – a concern expressed as far back as the late 1940's by H.R. MacMillan that continues to be expressed today, seven decades later.

A good start to achieving the dual goals mentioned above would be to revisit **“Professional Reliance”** (regulatory outsourcing) legislation and implement the 123 recommendations described in the independent report by Mark Haddock. That action would go a long way to restoring public confidence in provincial forest policies by reinstating government field officers that would protect the public interests. Some of those would be restoring the proper functioning condition of our streams, creeks, and rivers, which would mitigate floods and droughts. In some areas, such as the Comox and Cowichan Valleys, Ecosystem Based Forestry practices coupled with adequate oversight by government foresters, would also go a long way toward protection of quality and quantity of public drinking water resources.

At minimum, regulations and standards for private land logging need to be brought in line with those that apply to Crown forest land. The current PMFL system allows the industry to regulate itself and oversee itself through the Council. Most logging on private lands is done by three companies – TimberWest, Island Timberlands and Western Forest Products – and the current system effectively allows these companies to log their lands as they choose and not publicize all their logging data. As such, it is difficult for the public to know what occurs on these public lands, let alone whether or not it is done while considering “key public environmental values.”

The use of the word **“encourage”** in the two guideline statements assumes that voluntary action by industry will help restore some of the better forest policies that were in place prior to the former government having degraded public oversight and the entire BC Forest Service. However, we anticipate that it is going to take a major legislation change, likely in conjunction with some “carrot” encouragement, to bring our Provincial Forests around to a healthy and sustainable future state. “Encourag[ing] private landowners to manage their lands for long-term forest production” is directly in contradiction with activities that involve wholesale clear cutting and the subsequent sale of the land for development, as seen in the community of Sooke when Western Forest Products pulled 28,000 ha of land out of their Tree Farm Licenses and put it up for sale for development. “Encourag[ing] sustainable forest

management practices, including the protection of key public environmental values must involve the protection of the significant, long carbon sequestration abilities provided by old growth forests on private managed land – a practice that is unlikely going to be a voluntary action by an industry that is driven by a profit motive.

From a Vancouver Island perspective, one of the greatest disasters to befall our forests was the Federal Government's ignorance of indigenous rights in the great E&N Land Grant giveaway to Lord Dunsmuir. These lands, now owned almost entirely by large forest corporations, have been systematically clear-cut in ever decreasing rotation age classes to satisfy a mandated requirement of these companies to turn a profit, not to protect the integrity of our forests. This clearcutting of ever-younger trees, in addition to the continued need to log what little remains of our old growth forests within their purview, is a recipe for ecological disaster and adds to the severity of our current climate change emergency. As it stands, the logging industry barely has to follow any rules. An example of this lack of regulation occurred here in the Comox Valley when, in 2008 a \$35,000 fine assessed by the PMFLC was rescinded when TimberWest asserted that it did not instruct its contractor to cut all the trees along one side of stream in the Comox Valley drinking watershed. However, the contractor received no fine. The entirely denuded stream bank and riparian buffer was self-reported by TimberWest and confirmed by the PMFLC. However, the issue was not investigated until the B.C. Tap Water Alliance filed a formal complaint a year and a half later. In reality, "encouragement" is likely not going to be enough to make our forestry practices sustainable for both communities and ecosystems.

We are beyond the era where some tinkering around the edges and making minor adjustments to deeply flawed policies is going to result in adequate and timely changes to bring our forest management policies and legislation to a point where the continued degradation of our forested landscape is addressed. Private ownership of these lands should not be sacrosanct to the level where they allowed to be damaged to the detriment of the global condition. We need only to look south of the border for how regulations around forestry on private lands could be managed. By addressing these issues and looking to future restoration forestry and the products that can be provided by a healthy functioning forest, job losses can be minimized and healthy forestry practices can be sustained for future generations.

Thank-you for your consideration of this feedback on the PMLF program, which in our professional opinion, as scientists working in the non-profit sector, needs to be overhauled and modernized within a lens of ecosystem-based forestry practices. If we truly want a sustainable forestry industry in this Province, the PMLF program cannot be allowed to continue operating in its current form.

Sincerely,

PROJECT WATERSHED
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