



Cowichan Lake & River Stewardship Society

**P.O. Box 907
Lake Cowichan, BC
V0R2G0**

Re - Review of the Private Managed Forest Land Act

Who We Are

Cowichan Lake & River Stewards have contributed 2,000 volunteer hours every year for the last 8 years protecting and preserving the Cowichan watershed through our core activities:

- shoreline riparian area restoration and landowner education;
- rescuing stranded salmon fry;
- cleaning up the upper Cowichan river;
- monitoring water quality;
- working with students and providing public education;
- erecting signs on fish bearing streams.

We feel that this review of the Private Managed Forest Land Act (and its improvement) is a critical component of significantly improving the management of the private forest lands which dominate our watershed.

We have reviewed the materials published about the review and offer our comments for your consideration.

Question - How well is the Private Managed Forest Land Program meeting its goals to:

- encourage private landowners to manage their lands for long-term forest production, and
- encourage sustainable forest management practices, including the protection of key public environmental values?

Broad goals have not been sufficient to protect public environmental values, in particular excessive siltation and gravel accumulation in creek bottoms blocking fish passage to Cowichan Lake from its tributaries due to past logging practices. Our forests do more than provide fiber for industry and export, including management of hydrology, sequestration of carbon and

providing habitat for a host of biota. We need to ensure that those making decisions about our forests include these other values, especially as we move into a period of climate uncertainty.

Our organization has been actively moving fish fry from stranded pools in tributaries around the lake for years. Gravel removal, stream remediation and road decommissioning must be required on private lands as a condition for continued operation in order to reduce impacts on fish bearing waters and to arrest further gravel deposition. Publicly available specific annual remediation goals with plans are needed and must be monitored for all private forest lands.

Timberwest and Island Timberlands are now owned by British Columbia Investment Management Corporation (BCI), the Public Sector Pension Investment Board (PSP Investments), and Alberta Investment Management Corporation (AIMCo) making them much more like a Crown corporation than a private shareholder entity. Given they have this public character they, and all private forest land operators, should now be held to rigorous public interest standards in the environmental and social impacts of their operations. Mosaic Forest Management states it intends the affiliation to generate benefits through an “Integrated best practice approach to watershed, ecosystem, species at risk and visual quality management”. A revised PFLMA must require increased public transparency in order to ensure this best practice approach is a reality and reflects broad public consensus not just industry support.

Rewording the goals section of the PFLMA to substitute “require” for “encourage” would be a significant improvement and an addition of adequate resources to the Managed Forest Council to provide proper oversight of progress to meeting these goals would be essential.

MOSAIC Forest Management makes a strong public statement about its intention to become carbon neutral in its operations. We applaud this goal but the lack of any public access to the plan and its review points to the challenge of evaluating performance. Increased transparency and peer review can generate better public outcomes in meeting larger public environmental and social goals.

For example, the Cowichan Station Area Association has been hard at work on an ecosystem-based assessment for the Koksilah watershed. This community based work, led by forest industry professionals, has been hampered by the lack of active collaboration and information sharing from the largest land-holders in the watershed - Timberwest and Island Timberlands. Transparency is key to understanding whether these companies are adequately managing these forests lands for long-term forest production.

The existing PFLMA is seriously deficit in the area of requiring public agreement with corporate harvesting plans when these plans can have significant downstream impacts. For example, when a municipality undertakes a serious professionally done Geohazard assessment which includes private forest lands and concludes that clear cutting within a watershed could increase

downstream risks a revised PFLMA must require all party agreement with the harvesting plans not just notification of those potentially impacted.

We need PFLMA to require increased transparency so that large-scale private forestry companies are required to share logging plans with local government, community groups and others who might be affected by logging. Seeking community input and support is essential to long-term sustainable forestry on the private lands which dominate our Cowichan Valley watershed.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ken Traynor', with a stylized, flowing script.

Ken Traynor
President