

Dear PMFL Review Board:

I am a private citizen, not a forestry professional or an industry representative, but I know enough to realize that we are in deep deep trouble when it comes to the state of our forests. I am concerned. Very concerned. In fact, I am afraid. We depend on intact, viable forests for so many things: clean air, clean water, carbon sinks and carbon sequestration, biodiversity, habitat for species at risk -- in short, without trees we are doomed.

Gigantic areas of forest in BC are being logged and clearcut by private forest companies with no thought beyond monetary profit; corporate greed trumps all. There is no public notice or consultation, no thought about communities or their watersheds, wildlife or long-term sustainability in the forest sector.

In particular, at the rate that productive old growth is being hauled out of valley bottoms, there will be none left in a few years. Mr Donaldson may believe that forestry practices, and particularly logging of old growth on private lands, is sustainable but when you are cutting down 350 - 500 yr old trees, and your logging rotations are anywhere from 30 - 80 years, this cannot be sustainable. The enormous and critical role that old growth plays in keeping the planet healthy, in mitigating climate change (and by the way, we are in a state of climate emergency) and in supporting the mycorrhizal connections that literally keep this planet alive is not a resource that is considered by private forest land owners.

Current regulations on private land logging provide little to no oversight, protections for wildlife, water, local communities' needs or the rights of indigenous peoples on whose unceded territories much of this logging takes place.

This leads to these forests being "managed" for short-term profit rather than long-term sustainability -- which is so critical at this stage of climate breakdown.

There are clearcuts in my community's watershed and in others all around the province, the result of little to no government oversight on private forest lands, which threaten our water supply -- so much so that these very communities, including my own, are having to pay out of pocket, with their taxes, for extremely expensive water filtration plants, all while timber companies reap huge profits, exporting our forests overseas, and enjoying enormous tax breaks for doing so.

Does this seem right to you?

It doesn't to 100's of 1000's of British Columbians.

When forests are managed sustainably, it benefits all: communities have clean drinking water, they benefit from a thriving tourism industry (folks do not come to BC to look at clearcuts, believe me), and they breathe clean air. Forestry jobs would actually be protected by moving to more sustainable forestry practices and encouraging value-added manufacturing in-province rather than logging the very last tree (no jobs then) and sending every last twig overseas.

We all know the history of how these lands became private and fell into the hands of a small number of profit-above-all logging corporations. However, it behooves us to remember that these lands were formerly managed as crown lands would be today, that these lands couldn't be bought and sold without at least a portion being held back in the public trust (reverting back to crown), and that there used to be much stricter regulations governing the logging of these forests.

It is beyond time for the PMFLA to be updated and, at the very least, to bring regulations in line with those on crown land. For much too long, a lack of strong government oversight and little to no safeguards for environmental and community values has ensured that critical ecosystems have not been adequately protected: in fact, they have not been protected at all. And now, when huge tracts of forest land that large logging companies have had in the PMFL Program in order to benefit from enormous tax cuts have come up to or close to the end of their mandatory 15 years of "time" in the program, the public faces the very real danger that these companies will begin selling off what remains as real estate to the highest bidders. This is dangerous. This must not be allowed to occur.

We must prioritize our watersheds, our old growth, our communities, indigenous rights, our ecosystems and our wildlife now before it is too late -- for the sake of future generations and the future of this planet. Here in BC, where we are still blessed with such diverse ecosystems and much of the clean water and forested land left in Canada and indeed in the world, it is of critical importance that this government act now to protect and sustainably managed ALL forested land in this province.

The broad goals of the PMFL Program are not adequate; they should not be encouraging but rather ensuring that private forest landowners meet environmental standards and adhere to long-term sustainability goals. The goals should include such things as larger riparian buffers (adjusted for slope distance), longer rotations, protections for watersheds and older, more mature forest stands, protections for habitat and SAR, and encouraging local manufacturing sectors and less raw log export. In short, protecting public interests and non-timber resource values should be the priority and take precedence as a goal of the program, another important goal being bringing the management of private forest lands back in sync with the management of crown lands – this would result in clearcutting not being the default in forest practices on private (mis)managed lands. In many European countries, privately owned forest land is overseen by government foresters and managed in the same way that public lands are. They are also very strongly protected with no chance of rezoning. For example, in Sweden very low (or no) taxes are paid by private forest landowners in return for “good” sustainable forest management with the public interest in mind. Ecosystem based management & protections such as these work.

Key public environmental values are not well protected under the Act. Private forestry goals are simply not compatible with the public interest. In the Act, key environmental values are too vague and some are left out (biodiversity) with the assumption that other laws will take care of them (SARA for eg). This in practice is failing. Current environmental values need to be updated to include protection of wildlife, protection of water (including but not limited to just watersheds – more broadly to include water quality, strict stream and riparian management

that applies to all streams, lakes and wetlands whether they are fish-bearing or not, and whether or not the water is for human consumption; in particular protections for headlands must be included), and cumulative effects land management, ie conserving biodiversity as a priority.

It is of interest to note that by simply implementing the Water Sustainability Act, 60 – 70 % of the changes that need to occur to better protect our forests would be covered, leaving only 30 – 40 % of the necessary changes at the forestry level – perhaps this seems less daunting? The current regulatory framework is simply not effective. The Private Managed Forest Council is dominated by industry; there needs to be an independent body that is responsible for overseeing compliance and enforcement on privately owned forest lands. The current regulations don't protect public resources affected by logging on private lands; nor do they allow for community, local government and First Nations involvement and input in decision-making.

Current incentives for large private land owners are too generous. After 15 years they can also sell off their lands to foreign investors through their real estate arms. This is unconscionable. The tax incentives to these large companies are significant while they are in the program; the benefits to the public are less clear (understatement) as we suffer from impacts to water, recreation, visuals and tourism, to name but a few. What we perhaps need is something akin to the ALR: an FLR – Forest Land Reserve, a way to designate forests as “privately managed” (perhaps dropping from 25 ha minimum to 2 ha minimum) with strict rules about how to manage them. At the very least there needs to be public input on all plans regarding PMF lands.

As well, the Forest Lands Reserve Act must be reinstated to ensure privately managed forests are not sold for urban development. Sustainable forest management is about a longer term than 15 years, and the current exit fee is not working at all to keep land in the program. As it stands, logging companies can log the heck out of their privately (mis)managed lands with little to no consequences, then leave after 15 years with – again – little to no consequences, wringing their hands with delight at the prospect of continued financial gain in real estate. Timber companies who leave the program should face the prospect of all of their private lands reverting to TFL's or publicly (government) managed forests. The time is now to put these controls and protections in place, before we (the public, the government) have virtually no control when forests formerly managed through the PMFLA leave the program and become entirely private: this possibility is looming as we speak.

In summary, corporate capture should not supercede public and ecological values – ever, but particularly now at this critical time of climate change. The “business as usual” attitude does not work anymore; neither does “talk and log”. The fear of what might happen (to jobs, to the economy, etc) if the government were suddenly to implement much stronger, more far-reaching legislation and regulations with regards to forest practices on private lands is inconsequential in comparison to the consequences of doing nothing. Taking a soft approach at this point is akin to doing nothing. If forestry companies revolt, refuse to pay taxes owing, or take their business elsewhere, so be it – they can't take the forests with them, and the point is that we need our forests: we need them to survive so that diverse ecosystems survive, so that

we have clean water and clean air for our kids, so that species at risk who depend on these forests and ecosystems will continue to thrive and in turn continue to protect the living systems we humans also depend on.

Nothing short of a complete change in our way of thinking will make a difference now. We, the people of BC, have entrusted you to take care of our forests. Thank you for this opportunity to provide input and please know that we want to encourage you to take bold steps and stand behind when you do.

Sincerely,  
Monica Hofer  
Unceded territory of the K'ómoks First Nation

Cc:  
Doug Donaldson, BC Minister of Forests  
John Horgan, BC Premier  
Adam Olsen, BC Green party Forests Spokesperson  
Ronna-Rae Leonard, MLA Courtenay-Comox



Willemar Lake logging