

Paul Griffiths

July 21, 2019

Honourable Doug Donaldson  
Minister of Forests, Lands & Natural Resource Operations and Rural Development  
Parliament Buildings  
Victoria, British Columbia V8V 1X4

By email

Re: Private Management Forests Land Program Review

Dear Minister Donaldson,

Karst resources, widely recognized as sensitive and vulnerable to natural and human-caused disturbances, occur in the private forests lands of BC, especially on southeastern Vancouver Island. Industrial forestry is the most significant land-use and resource development activity impacting these karst resources in private forest lands.

In 1997, the Province recognized karst as an integrated three-dimensional system with subsurface and surface components, including forest vegetation and soils. The BC Government espoused the ecological approach to managing karst and developed comprehensive voluntary provincial karst standards and guidelines, primarily in a forestry context. These standards and guidelines continue to be recognized and cited internationally.

Protection and management of karst resources in private managed forest lands have not improved since introduction of the *Private Managed Forest Land Act* in 2003 or establishment of the Private Managed Forest Land Council in 2004. The Act and regulations do not address karst specifically – e.g., the legislation does not recognize karst as an environmental value. Attempts to encourage better karst management outcomes using available non-statutory mechanisms, including effective implementation of the voluntary karst standards and guidelines have had limited success based on our field observations.

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Attempts to engage the responsible parties, the Council, or compliance and auditing officials since 2003 in meaningful professional dialogue to reverse the situation have been unsuccessful. These parties have generally been unresponsive to our concerns, or they do not answer the concerns in a meaningful or timely manner. Our inquiries and suggestions have often been left unanswered.

In consequence, valuable and vulnerable karst system elements in private managed forest lands, part of the natural heritage of BC and Canadian citizens, have been unnecessarily damaged or degraded in recent years. Much of the karst damage documented is irreversible in our lifetimes. Many of the poor karst management outcomes that we have documented in private managed forest lands can be traced to failures of the “results-based approach” and the Province’s professional reliance experiment.

We have long pressed for a more thorough survey of the environmental damage caused to karst resources, and legislative provisions to: a) adequately protect what little of the resource is left in an undisturbed state, b) compel science-based remediation of karst resources damaged since 2003, and c) compensate the public in instances where successful remediation is deemed infeasible. In our view, legislative changes should also legally *require* implementation of the Province’s own karst standards and guidelines, with effective government oversight.

We have separately requested the Private Management Forests Land Program Review to contact us directly to discuss these matters further, including details of our proposed legislative changes and other possible countermeasures.

We look forward to your acknowledgement of today’s letter and any future opportunities to meet and elaborate on our concerns for karst resources in private managed forest lands.

Sincerely,

**ORIGINAL SIGNED BY**

Paul Griffiths and Carol Ramsey