

July 22, 2019

To: The Ministry of Forests, Lands, Natural Resource Operations and Rural Development - Forest Tenures Branch

Re: Private Managed Forest Land Program Review

We appreciate the opportunity to participate in the process for changes to the Private Managed Forest Land Act.

It is clear that the climate change emergency, coupled with increased logging activity and growing development pressures in coastal urban areas, calls for change in how we manage our valuable forested lands.

Our society was incorporated 25 years ago and is dedicated to protecting and restoring wild fish habitat. Our volunteers are involved in monitoring water quality and fish habitat and are aware of significant issues specifically related to at least four major streams in our area: namely, Little Qualicum River, Grandon Creek, Beach Creek, and French Creek. These streams have been experiencing anomalies in temperature, velocity, flow, and sediment in both traditional high and low water level periods. This trend has been documented in reports by the Regional District of Nanaimo.

Our concerns include the rate of logging within our community watersheds. Also of concern is the transfer of designated Managed Forest into residential, or other uses, that do not protect water quality and quantity. Moreover, there needs to be a greater understanding of the impact of "clearcut" logging practices on the ecological values that support the food web for wild salmon, and protect our water supply. The lack of a community watershed management framework is a major shortcoming.

In addition, we think the riparian regulations need to be revisited, and we recommend that regulations on private land should be at least equal in protection to those of Crown Land.

Thank you for your consideration.

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July 22nd, 2019

To: The Ministry of Forests, Lands, Natural Resource Operations and Rural Development

The opportunity to make a submission to the review of the Private Managed Forest Land Act is much appreciated.

I have lived in Qualicum Beach, in the Regional District of Nanaimo, and in the Mount Arrowsmith Watershed since 2004.

Over this time I have become increasingly concerned about the Private Managed Forest Land Act, and more specifically about **the lack of transparency** with respect to the operations of the two forest companies, TimberWest and Island Timberlands, now managed by Mosaic Forest Management.

These two companies are held in the portfolios of three pension funds, namely: British Columbia Investment Management Corporation (BCI), the Public Sector Pension Investment Board (PSP Investments), and Alberta Investment Management Corporation (AIMCo).

Because these forest companies are private entities, there is absolutely no visibility of their operations. Their strategies and operations are not reported in the publicly available financials of the three pension funds.

We understand with the recent re-organization that has Mosaic Forest Management managing the affiliation of these two forestry companies, that a Board of Directors has been established to oversee this affiliation.

I do not suggest nor believe that these forest companies are in non-compliance with the Private Managed Forest Land Act, and are not managing their operations well.

My point is that because of their high ownership percentage of the land base of southeastern Vancouver Island, and the impact of their activities on the health of our watersheds, our ability to deal with climate change, our ecosystems, our relationships with indigenous people, and many other factors, that their operations should be available to public scrutiny.

I request that the Ministry investigate this lack of transparency in conjunction with this review.

Sincerely,

Pat Jacobson