

July 20, 2019

TO: Ministry of Forest, Lands, Natural Resources Operations and Rural Development

RE: Submission to the Review of the Private Managed Forest Land Program July 2019

Thank you for conducting this review and receiving public input as part of it.

I am a long time resident, landowner and taxpayer of Galiano Island, one of the Southern Gulf Islands, within the Capital Regional District and the Islands Trust Area.

I write this submission as a private individual, not on behalf of any group or organization. I am a retired ferry worker. My background also includes serving one term as an elected Local Island Trustee for Galiano which happened to coincide with the phasing out of the Forest Land Reserve and the beginning of the Private Managed Forest Land Program. I have also served on a Transportation Advisory Committee and an Advisory Planning Commission for the Galiano Island Local Trust Committee. Along with many fellow community members I have actively participated in Official Community Plan and Land Use Bylaw Reviews.

Review Topics and My Comments

Program Goals	<ul style="list-style-type: none">• The goal of seeing land managed for long term forest production is not as important to me as seeing land managed for long term forest sustainability and a healthy viable forest ecosystem.• The goal of encouraging sustainable forest management practices, including protecting key public environmental values, is extremely important and in the public interest. However, I do not find anywhere in the PMFL Act or Regulations what the definition of sustainable forest management practices actually is in the view of this program.
Management Objectives for Public Environmental Values	<ul style="list-style-type: none">• In general terms the public environmental values that are stated are fine, however in some cases the actual meaning that the PMFL Act and regulations holds for these objectives is not clear.• Climate change and the role of forests in mitigating the impacts of that change, has not been considered in the PMFL Act or regulations.• Soil conservation is a stated objective, but I cannot see any restriction on cutting trees in shallow soil areas (identified as DP areas in Galiano OCP). Nor is there evidence of restrictions on cutting on steep slopes. Many Galiano forest parcels include parts of the series of significant rocky ridges that run length of the island. Removal of trees and vegetation from these ridge tops and cliff faces can increase soil erosion and instability. The swales between parallel ridges are the key groundwater catchment areas.• Drinking water quality is stated as public value, yet there is no consideration of the impact upon the quality or quantity of groundwater resources. There is only mention of streams and riparian areas. Galiano, indeed most of the Trust Area, is groundwater dependent. Much of our forest zoned land includes upland groundwater recharge areas. How and where forestry is done, the rate of cutting

	<p>and how the forestry roads are constructed can have significant impact on how the land captures the moisture that falls on our island, and allows it to be absorbed and fed into the fractured bedrock aquifers. In addition some forest management activities listed in Schedule A have the potential to pollute an aquifer that serves a much larger area than a single PMFL parcel.</p>
<p>Regulatory Framework for Environmental Values</p>	<ul style="list-style-type: none"> • I do not think the environmental values that are important, especially groundwater resources, are given enough consideration and protection in the PMFL Act and regulations. • The structure of the Council is so heavily stacked with representation by “owners” and there is no voice for communities and local government directly affected. The Council has a great deal of authority to apply penalties, interpretation of the regulations, set fees and therefore budgets and extent of resources. • Section 21 of the Act negates our local land use authority’s power to plan our community’s future and act upon the mandate of the Islands Trust Act. • The ease of withdrawal from the program renders the protection of environmental values weak or meaningless. • The PMFL does not adequately protect our forest cover, because it doesn’t set a sustainable annual cut rate and because after 15 years owners can simply withdraw. Any PMFL owner can clear cut their entire lot it seems... as long as they replant. They can also pull out of the PMFL after 15 years with no penalty and clear cut the whole parcel and not replant. • The PMFL does not protect the forest land base. • Communities and local governments are cut out of the decision- making processes, not even consulted. If the PMFL Program is to be continued it must be changed to ensure communication and cooperation with local governments, regional districts and the Islands Trust. • I think that if the government of BC wants to encourage or require truly sustainable forest practice on private forest land for a broad public benefit, that it would be more effective to create legislation and regulations that apply to all private forest lands. Regulations could vary region by region to address special environmental values.
<p>Incentives for participation in the program</p>	<ul style="list-style-type: none"> • The opportunity for lower property assessments and tax rates is a huge benefit to owners in PMFL but a detriment to other land owners who must pay more tax to make up for it those reductions. • I strongly disagree with this special group of landowners being given the “right to harvest trees” in exchange for the loss of the public’s legislated right to have their duly elected form of local government manage land use and protect the environmental values of their rural community. Why is this even necessary? Have there been rural communities who stopped all tree cutting of any on private forest land? • On Galiano there has never been any measure designed to restrict tree cutting entirely. We do have a development permit area (DPA) for tree cutting that

	<p>applies to the entire island. It sets an allowable cut per hectare within a time frame and if an owner wishes to cut more they have to prove that the that the commercial tree cutting is part of a long-term sustainable forestry management plan. This provision exists primarily in order to protect our groundwater resource We also have DPA's for steep slopes and shallow soils which are sensitive to vegetation removal. Because of our groundwater dependence these land use tools are very important to us. Climate change certainly adds emphasis to their importance. But the PMFL blocks our ability to use these land use tools granted us by the Islands Trust Act.</p> <ul style="list-style-type: none"> • No timber cut from PMFL lands should leave the province unprocessed in order to maximize public benefit of employment.
Disincentives for Exit from Program	<ul style="list-style-type: none"> • Getting out of the PMFL should be much more difficult. • The program should be run more like the ALR. • The Ministry should consider creating forest practices legislation that applies to all private forest land, with different standards by region as necessary. • The Ministry should consider forming a new Forest Land Reserve and put all private forest land into the reserve, protecting the forest land base from un planned development and insisting on environmentally sustainable forest practices and cut rates in exchange for a reduced tax rate. This would do the most in terms of addressing climate change and protecting BC forests for future generations.

In closing, thank you again for the opportunity to submit comments to this review. I have tried to restrict my comments to the review topics you have identified, but I will admit that has been difficult to do so.

My conclusion is that the PMFL has not provided any significant public benefit in return for the tax reduction it has granted to a small number of land owners. It appears to be a tax shelter for real estate speculation masquerading as a program encouraging sustainable forest management. Reading the PMFL Act and the regulations once again has reminded me of how wrong it is. Please fix it or replace it with more effective means of preserving our forest land base and sustaining healthy forests, while permitting timber harvesting that will benefit the Province as a whole.

Sheila Anderson