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July 22, 2019

To Private Managed Forest Land Program Review Team

Re: Review of Private Managed Forest Lands regulation

The following are the views of the Tsolum River Restoration Society on how the Private Managed Forest Land Program (PMFLP) protects key environmental values.

The review asks how well the Private Managed Forest Land Program is 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.

Our concern is the use of the word "encourage" in the second broad goal. We feel that the protection of the key environmental values requires an enforcement component beyond the encouragement of best management practices. The goal would be better stated as "to ensure sustainable forest management practices, including the protection of key environmental values".

The *Private Managed Forest Land Act* establishes the management objectives for the following key public environmental values:

- soil conservation
- critical wildlife habitat
- fish habitat
- drinking water quality
- reforestation

This list needs to be updated to protect and to restore other key public values such as:

- The protection of water quantity and quality beyond those of drinking water. The role of watersheds in moderating the water flows and maintaining water quality for all the biota needs to be recognised in light of a warming climate.
- There is no legal requirement for logging practices on private land to be sustainable over time. This allows landowners to remove most or all of the forest cover in a short time period despite major impacts on wildlife, water and communities.
- Critical wildlife habitat is narrowly defined and used on PMFLA lands. We would recommend expanding this to include protection for wildlife and wildlife habitat to meet sustainability, community and First Nation's needs and maintain biodiversity.



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- There are 11 key environmental values in the Forest and Range Practices Act while there are only 5 somewhat restricted value named in the Private Managed Forest Land Act.

Lax regulation means that private landowners are not prevented from logging practices that can increase flooding risk and impact fish habitat by degrading riparian areas. It's time for the province to regulate harvesting on private land. It's the only way we can make sure forest harvesting is sustainable for our communities and ecosystems into the future.

We have heard a lot of community feedback that it's not rational that large-scale logging should have two standards of care in the province. If the Forest and Range Practice Act is the standard for sustainable forest practices on public land why would it not be the standard for sustainable forest practices on all land in BC? Especially when we are looking at the large blocks of land on Vancouver Island and in the Kootenay Region, which cover large areas of several major watersheds, the public land standard (the Forest and Range Practices Act) needs to be the only standard.

In order that the public has confidence that the values expressed in the legislation are governing the actions of the large-scale logging companies, those companies should be required to share logging plans with local governments and the public who might be affected by the logging. If opposition to the proposed plan can demonstrate that the plan does not embrace the values of the Act, even while following the Forest and Range Practices Act, there should be an agreed mechanism to curtail or modify such activity.

Thank you for providing the opportunity to comment on this review.

A handwritten signature in black ink, appearing to read "Wayne White", with a stylized flourish at the end.

Wayne White, President
Tsolum River Restoration Society