



Corporation of the Village of Cumberland

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July 15, 2019

File No. 3170

By email: PMFLProgramReview@gov.bc.ca

Ministry of Forests, Lands
Natural Resource Operations and Rural Development
PO Box 9049 Stn Prov Govt
Victoria, BC V8W 9E2

Dear Sir/Madam,

Re: Village of Cumberland - Private Managed Forest Land Program Review – Official Submission

The Village of Cumberland is pleased to see that the Ministry of Forests, Lands, Natural Resource Operations and Rural Development is conducting a review of the Private Managed Forest Land Program, and is thankful for the opportunity to provide a formal submission.

As a community that is surrounded by Private Managed Forest Land on all sides, and has a multitude of dealings with private managed forest land owners, as well as the regulations that they operate under – we feel as though the municipality can provide valuable feedback into the review.

As per the submission requirements we have broken our feedback into the following review topics:

1. Program goals
2. Management Objectives for Public Environmental Values
3. Regulatory Framework for Environmental Values
4. Incentives for Participation in Program
5. Disincentives for Exit from the Program

1. Program Goals

- The Village of Cumberland would like to see cultural, social and community values contained within the overall program goals, along with enhanced environmental goals, ecological services and tourism.
- The Village of Cumberland would like to see climate change adaptation more prominently reflected in the goals of the Private Managed Forest Land Program.

- The Village of Cumberland would like to see the program goals amended to include regulations that allow municipalities the ability to purchase private managed forest land within their community watersheds at their discretion with the Province acting as the land broker.

2. Public Environmental Values and Management Objectives

- The Village believes that the management objectives that apply to Private Managed Forest Lands should take into account greater consideration of the cumulative effects of harvesting in watersheds – especially those in proximity to the a community drinking water supply.
- The Village of Cumberland would like to see management objectives changed to include increased oversight from the province and other agencies, in particular in regards to fish habitat and riparian areas, and improvement of monitoring and reporting programs.
- The Village would like to see penalties for contraventions of *Private Managed Forest Land Act* guidelines increased.
- The Village of Cumberland would like to see management objectives in place that require replanting of a broader variety of species including deciduous and nitrogen building species, including varieties resistant to wildfire and specific to replacing lost wildlife habitat.
- The Village of Cumberland would like to see appurtenancy in place for private managed forest lands to reduce log exports, and increase processing jobs in neighboring communities, and to work with the Ministry and partners on fire smart programs.

3. Regulatory Framework for Environmental Values

- The Village believes that the *Private Managed Forest Land Act* regulations should require consultation/collaboration with adjacent local governments and First Nations.
- The Village believes that the regulations that apply to Private Managed Forest Lands should better protect drinking water quality by increasing riparian zone regulations around non-productive and fish bearing streams.
- The Village of Cumberland would like future regulatory changes to take into account adaptive harvesting and operating practices which account for climate change and heavy rainfalls and erosion, including replanting schemes and road building.
- The Village of Cumberland is concerned about the use of herbicides on Private Managed Forest Lands, especially where the lands are located in watersheds or where there is active recreation – and the Village believes that enhanced regulations excluding their use should be put in place.

- The Village of Cumberland would like to see increased access to waste wood on private forest lands to decrease burning of slash piles.

4. Incentives for Participation in Program

- The Village of Cumberland would like to see regulatory changes to value logs before auction to encourage a more dynamic local manufacturing sector.
- The Village supports conservation incentives around providing ecological goods and services.

5. Disincentives for Exit from the Program

- The Village believes that a review of the *Private Managed Forest Land Act* should revisit the exit scheme in regard to harvesting and replanting periods, exit fees, and application of local environmental guidelines.
- The Village of Cumberland would like to see regulations changed to increase the 15 year program participating term to 30 years and require a minimum of at least two harvesting cuts.
- The Village believes that Private Managed Forest Land rezoned into non-forestry related uses – with the concurrence of the land owner – should trigger the removal of the lands from the managed forest land classification.

6. Communication

- The Village believes that the *Private Managed Forest Land Act* regulations should require consultation with adjacent local governments and First Nations.

Thank you for the opportunity to provide input through the engagement process.

Sincerely,



Leslie Baird
Mayor
Village of Cumberland