



July 24, 2019

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Sent Via Email: pmflprogramreview@gov.bc.ca
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Dear Privately Managed Forest Land Program Review Representatives:

Re: Private Managed Forest Land Review Feedback Submission

On June 24, 2019, the Regional District met with The Ministry of Forests, Lands, Natural Resource Operations and Rural Development regarding the Province of British Columbia's Private Managed Forest Land program Review. Due to administrative and procedural time constraints, the qathet Regional District (qRD) was granted an extension to provide comment by the end of July 2019. To this end, we put forward our feedback for inclusion in the review of the Private Managed Forest Land (PMFL) Program, for your consideration.

Climate Change

Climate Change is a Strategic Priority of the qathet Regional District. Due to our region's extensive urban/forestry interface, the qRD has an enormous concern with drainage and storm water. Run-off, erosion, and overland flooding must be mitigated or eliminated. We believe the best way to enforce this is by mandating Privately Managed Forest Land owners to develop contingency plans for any and all potential aftermaths of any PMFL logging operation.

Climate Change also affects the potential for fire and puts us at risk. Expedient elimination of slash and waste debris must be paramount in any PMFL activity. Slash piles appear to sit for years, creating a fire hazard. Atypical weather patterns must be addressed in PMFL planning and logging activities to encourage social and economic sustainability.

Habitat Protection

The PMFL Act should ensure stronger and more explicit protections for critical wildlife habitat. It should include or cite a clear definition of what is meant by critical wildlife habitat, which is referred to in the PMFL Act but is seemingly not defined. We ask that you take account that the Wildlife Act defines critical wildlife area, but does not define critical wildlife habitat.

The PMFL Act should ensure that riparian protection standards meet or exceed the same level as required for logging operations on crown land.

Oversight

The PMFL Council is made up of two government representatives, two landowner representatives, and one person chosen by the other four. There should be some balance struck with at least one (possibly two) representative who has environmental interests. There is concern that not enough watchdogging or enforcement is taking place on PMFL logging operations. PMFL must be monitored with the same diligence as logging operations on provincial Crown land.

Engagement

Engagement with local governments must be mandatory before logging operations commence, regardless of existing bylaws. Local governments should be granted the opportunity to comment on the operation and possibly come to a compromise. Public engagement with local community residents interfacing with PMFL logging operations should be compulsory. Education surrounding complaint driven issues must be increased. Local governments and the public should be fully informed on what the due process is; who to contact, when to contact, and how to elevate concerns when no action is noticed or response received.

Our region, like many throughout British Columbia, has a linked history with the logging industry and our residents are not strangers to the importance of forestry-based industries in our communities. The qRD appreciates the Province's efforts to review current practices and programs in order to encourage long-term sustainable forest production and management, as well as to protect key natural assets for environmental resiliency.

Sincerely,



Patrick Brabazon,
Chair
qathet Regional District

CC: Patrick Russell, Manager, Timber Tenures, Ministry of Forests, Lands, Natural Resource Operations and Rural Development
Al Radke, Chief Administrative Officer, qathet Regional District