



September 2, 2025

Director Morrison – Chair Electoral Area Services Committee
Cowichan Valley Regional District
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Dear Chair Morrison,

We have recently become aware through several private managed forest landowners that belong to the Private Forest Landowners Association (PFLA), that the draft CVRD OCP Bylaw 4373 is in its final stages of review. We feel it is necessary to contact the Cowichan Valley Regional District to advocate for better representation in this process and to request more time to thoroughly review the draft Official Community Plan.

We kindly ask why the Managed Forestry Council (MFC) and the PFLA were excluded from the formal consultation process over the past few years while this OCP was being formulated. We note that the agriculture community and the Agricultural Land Commission (ALC), which holds jurisdictional authority, were included. We ask that in addition to an extension of time to the process, that PFLA be included in relevant future consultations.

Given that private managed forestry parcels make up a significant portion of the land base—and a remarkable 78%, or 262,586 hectares is designated forestry, across the CVRD—it is imperative that the forestry industry, which has a major economic, ecosystem and land-holding impact on the region, be included in this critical process.

The PFLA represents Managed Forest owners across British Columbia, with a significant amount of its members and lands located right here in the CVRD. These landowners maintain healthy, forested lands that are vital to ecosystem health, carbon sequestration and wildfire resiliency of the Cowichan Valley. Managed Forest is a BC Assessment property classification (Class 7), created in 1988 to encourage private landowners to manage their lands for long-term forest production and resilient forest cover and ecosystems. The province's Ministry of Forests oversees this program under the Private Managed Forest Land Act. Landowners with private managed forests are subject to strict regulations. Besides the Private Managed Forest Land Act, they must also comply with an additional 35 acts and regulations. These include the:

Water Sustainability Act	Wildfire Act
Drinking Water Protection Act	Assessment Act
Environmental Management Act	Federal Migratory Birds Convention Act
Wildlife Act	Federal Fisheries Act
Federal Species at Risk Act	

PFLA's primary concern with the CVRD's draft OCP is that Part 1.2, Jurisdiction, fails to recognize the authority and expertise of the Ministry of Forests. This ministry with robust resources and staff oversees the provincially regulated Managed Forest Program and Managed Forest Lands, which are located throughout British Columbia, including the CVRD.

Additionally, 3.8 (Improve Governance and Implementation) of the Draft New Planning Policy does not acknowledge the provincial Managed Forest Program's role in governing private Managed Forest Lands. This is a missed opportunity, as sustainable forest management is highly compatible with the CVRD's important goals of reconciliation and climate action.

We urge the CVRD to collaborate with the Ministry of Forests on issues related to Managed Forest Lands. This partnership would help ensure the long-term viability and health of these vital forests in the Cowichan Valley.

Proactive and sustainable forest management on private Managed Forest lands, especially in consideration of changing climate impacts, is essential for the health of both forest stands and ecosystems. This approach also plays a critical role in mitigating the negative impacts of a changing climate, which includes drought, disease, pests, and wildfire risk, all of which pose potential threats to the CVRD.

Upon our initial review of the draft Official Community Plan policies, the PFLA has identified a clear tendency toward jurisdictional overreach. This is largely due to a lack of understanding of the Private Managed Forest Land Act, a key piece of legislation that governs the consistent and comprehensive management of private forest lands throughout British Columbia.

This oversight not only risks creating conflicting regulations but also undermines the important work already being done under provincial law to ensure sustainable forest management. We believe that a more collaborative approach, one that respects existing legal frameworks, is essential for the long-term health of our forests and our communities.

The PFLA asks that the CVRD update the OCP to formally recognize the Ministry of Forests' jurisdiction under the Private Managed Forest Land Act regarding Managed Forest Lands within the CVRD. Additionally, we request more time for a comprehensive review of this key planning document, which will impact the future of 78% of the land holdings in the CVRD.

We are committed to working with you to ensure the updated Official Community Plan policies represent a balanced approach to land planning. It is crucial that the CVRD recognizes the important role Managed Forest lands play in balancing economic realities, community interests, and environmental values.

We would appreciate a response to confirm receipt of this letter.

Sincerely,



Megan Hanacek, RPF, RPBio
CEO | Private Forest Landowners Association