



Private Forest Landowners Association Submission to the Watershed Security Strategy and Fund Discussion Paper

Submitting Organization: Private Forest Landowners Association

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The Private Forest Landowners Association (PFLA) appreciates this opportunity to comment on the Watershed Security Strategy and Fund Discussion Paper. The PFLA supports all opportunities to enhance the efficacy of the Managed Forest Program in delivering long term, sustainable forest management on British Columbia's Private Managed Forest lands.

I. Executive Summary

This submission summarizes the views of the PFLA membership, who operate for long term sustainable forest management on Private Managed Forest lands in British Columbia. Private Managed Forest lands are located throughout British Columbia and in some locations include watersheds that are the source of a variety of water needs for surrounding users.

The PFLA believes that healthy watersheds are critical, not only for fulfilling the regulatory requirements of the Managed Forest Program, but for achieving watershed security and resiliency that are the foundation for stable communities, ecosystems, and economy. Provincial statutes and regulatory authority provide Private Managed Forest landowners a cohesive framework to manage for key public values, including watersheds.

Private Managed Forest landowners in British Columbia play a key role in watershed management on private managed forest lands.

- Private Managed Forest landowners are regulated to manage for watersheds under a range of federal and provincial legislation,
- Private Managed Forest landowners have intimate knowledge of the land base and address the unique requirements of watershed management in their location, and
- Private Managed Forest landowners approach watershed management on their lands collaboratively with adjacent communities and stakeholders.

Critical in any consideration of a Watershed Security Strategy is that the Private Managed Forest Program be considered holistically. There must be symmetry between Acts and regulations that

incentivize private forest landowners to voluntarily enter the Managed Forest Program and commit to active engagement in adaptive and sustainable forest management. Active forest management on Private Managed Forest lands manages for both the health of forest stands and ecosystems, and mitigates the detrimental impacts of climate change, including drought, disease, pests, and risk of wildfire.

II. Background on the Private Managed Forest Program

The PFLA is a non-profit organization dedicated to the responsible stewardship of British Columbia's Private Managed Forest lands. PFLA members are passionate about sustainable forest practices and strive to balance environmental values, community interests and economic realities.

Managed Forest Land is a BC Assessment property classification (Class 7) established in 1988 to encourage private landowners to manage their lands for long-term forest production, while also managing for a myriad of public environmental values. The Managed Forest Program is the jurisdiction of the Province of British Columbia, specifically the Ministry of Forests under the Private Managed Forest Land Act. PFLA members' forest lands are assessed for real property tax purposes as Managed Forest Lands (Class 7) under the Assessment Act and its regulations.

As of December 2021, there are approximately 280 Private Managed Forests occupying approximately 900,000 hectares of land in British Columbia. These forests range in size from 3.5 hectares to 166,000 hectares. Approximately 70% of the private managed forests are on the coast of BC and 30% in the interior of the province.

PFLA members are as diverse as the forests themselves, from small family run properties to larger-scale operations, including numerous First Nations that have holdings in Class 7 lands. The PFLA welcomes more place-based management in collaboration with First Nations as we move forward on reconciliation with First Nations.

Diversity in the PFLA membership allows for tailored approaches to the unique and dynamic economic, social and environmental conditions of an owner's private forest land. Currently, many PFLA members are actively managing and adapting their forests to protect against climate change, and this investment benefits all surrounding stakeholders. These management activities include reducing understory fuel load in high-risk wildfire areas, planting tree species based on assisted migration ecotypes, removal of diseased trees, and removal of invasive plant species.

Inherent to the Managed Forest Program is that Private Managed Forest landowners make individual management commitments based on their assessment of the benefits of the program versus the costs of managing for the public values contained in the Private Managed Forest Land

Act. PFLA members could choose to place their forest lands in another BC Assessment Class that precludes forest cover objectives.

Private managed forest landowners are thoroughly regulated and are subject not only to the Private Managed Forest Land Act but an additional 35 Acts and Regulations including the Water Sustainability Act, Drinking Water Protection Act, Environmental Management Act, Wildlife Act, Wildfire Act, Assessment Act, and the federal Migratory Birds Convention Act, Fisheries Act and Species at Risk Act.

III. Contributions of Private Managed Forest Landowners to Watershed Management

PFLA is a strong proponent for bringing all Private Managed Forest landowners into the Ministry of Forest's Managed Forest Program, as it provides a means to manage cohesively for multiple public values that intersect with private lands throughout British Columbia. For Private Managed Forest landowners, water quality is a surrogate for the successful execution of forest management and is at the forefront of planning considerations. The contributions of Private Managed Forest landowners to effective watershed management are many:

a. Private Managed Forest landowners have intimate knowledge of the land base.

Private Managed Forest landowners understand that comprehensive forest management, including watershed management, looks different from watershed to watershed, and is best defined locally. This requirement for attention to regional variation in the land base (especially in consideration of climate change impacts) makes private forest landowners well suited to watershed management.

Many Private Managed Forest landowners utilize customized planning tools such as 'watershed management programs' to minimize the risk of operating in drinking water source areas. These planning tools consider detailed terrain stability reviews to reduce the risk of sediment delivery to streams. Training for field layout crews and principals of operations contractors help ensure Environmental Management System processes for onsite risk management are implemented.

b. Private Managed Forest landowners are regulated by federal and provincial legislation.

Watershed management on Private Managed Forest lands sees BC regulated professionals working under provincial and federal legislation to make science-based decisions for the health of watersheds.

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c. Private Forest Landowners Engage with Communities.

Private Managed Forest landowners work closely with water licensees to minimize or eliminate disruptions to their water supply. It is clear in the Water Act that anyone who disrupts a licensed water supply is responsible to remedy the situation and ensure the licensee has a supply of water until any problem is fully repaired.

Private Managed Forest landowners increase outreach efforts in community watersheds, meeting regularly with community watershed groups to ensure awareness of planned forest management activities. The Koksilah Watershed Working Group, for example, has as its goal to ‘build the knowledge and capacity of the community to bring sound science-based recommendations into land use decision making processes for the Koksilah/Xwulqw’selu Watershed.’ The PFLA and several of its members belong to local community watershed roundtables, including the Koksilah Watershed Working Group.

IV. Conclusion

It must be emphasized that the Private Managed Forest Program is voluntary for participants. Stable incentives and a stable regulatory environment are necessary to ensure membership in the Private Managed Forest Program. We have seen in recent years that private forest landowners carefully consider all options when making decisions about how to manage their lands.

Thank you again for the opportunity to provide feedback into the Watershed Security Strategy and Fund Discussion Paper. The contributions of Private Forest Landowners to effective watershed management are many, and the PFLA looks forward to a future meeting to discuss our submission and operational considerations, the results of the public engagement initiative, and any contemplated details of a Watershed Security Strategy Intentions Paper.

Sincerely,



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