



April 15, 2022

Peter Luckham, Chair
Islands Trust
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Re. Submission to **Phase 3 of Islands 2050 Public Engagement**

Dear Chair Luckham,

The Private Forest Landowners Association (PFLA) appreciates this opportunity to participate in the Islands Trust “Phase 3 of Islands 2050” public engagement process.

As background, the PFLA represents Managed Forest owners throughout BC, including in the Islands Trust area, where about 30% of PFLA and Managed Forest Land (Class 7) members reside. Managed Forest owners in the Islands Trust area maintain healthy forested lands that are significant contributors to ecosystem health in the Gulf Islands.

Managed Forest Land is a BC Assessment property classification (Class 7) established in 1988 to encourage private landowners in British Columbia to manage their lands for long-term forest production. The Managed Forest Program is the jurisdiction of the Province of British Columbia’s Ministry of Forests, under the Private Managed Forest Land Act.

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.

The PFLA’s primary concern with the Islands Trust *Draft New Policy Statement*¹ is its failure to acknowledge the jurisdiction, capacity, and expertise of the Ministry of Forests over the provincially

¹ Draft New Policy Statement Bylaw No. 183 – Updated July 15, 2021
<https://islandstrust.bc.ca/document/draft-new-policy-statement-colour-coded-july-2021/>

regulated Managed Forest Program and Managed Forest Lands, located throughout British Columbia, including the Islands Trust area. Part 4.3 (Forest Stewardship Policies) of the *Draft New Policy Statement* does not acknowledge the provincial Managed Forest Program's role in governing Private Managed Forest Lands and does not adequately reflect the importance of sustainable forest management in the Islands Trust area, given its compatibility with the Island Trust's important goals of reconciliation and climate action. We encourage the Islands Trust to collaborate with the Ministry of Forests on issues related to Managed Forest Lands, to ensure the enhanced viability and health of these forests in the Gulf Islands.

Active, sustainable 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 wildfire risk – all of which have potential impacts in the Islands Trust area.

The PFLA notes the findings of Great Northern Management's Islands Trust Governance Review, dated February 2022, are consistent with PFLA's assessment of the issue of the Island Trust's tendency toward jurisdictional overreach. The Islands Trust Governance Review notes, for example, that there is 'inadequate demonstration that financial and human resources are allocated commensurate with Islands Trust priorities'. The PFLA concurs with this view, and agrees with the overall findings of the Islands Trust Governance Review that relate to criticism of the Islands Trust expansion of its scope of responsibilities. We believe in the paramountcy of the Private Managed Forest Land Act to adequately manage private forest lands consistently and in a comprehensive manner.

The PFLA asks that an update to the Islands Trust *Policy Statement* recognizes the jurisdiction of the Ministry of Forests under the Private Managed Forest Land Act regarding oversight of Managed Forest Lands within the Islands Trust area.

Thank you for the opportunity to participate in the 'Phase 3 of Islands 2050 Public Engagement'. We are committed to working with you to ensure the updated Policy Statement for the Island Trust recognizes the important role that Managed Forest lands play in balancing economic realities, community interests and environmental values. We would very much appreciate a response to confirm receipt of this correspondence.

Sincerely,



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