



Private Forest Landowners Association Submission to the Coastal Marine Strategy Intentions Paper

Submitting Organization: Private Forest Landowners Association

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Table of Contents

- I. Executive Summary
 - II. Background on the Private Managed Forest Program
 - III. Contributions of Private Managed Forest Landowners to Forest Management in Coastal Marine Ecosystems
 - IV. PFLA Comments on the Coastal Marine Strategy Intentions Paper
 - V. Conclusion
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The Private Forest Landowners Association (PFLA) appreciates this opportunity to provide feedback on the Intentions Paper which will inform development of the Coastal Marine Strategy. The PFLA supports all opportunities to enhance the efficacy of the Managed Forest Program in delivering long term, sustainable forest management and log transportation on British Columbia's coast.

I. Executive Summary

This submission summarizes the views of the PFLA, which operates for long term sustainable forest management on Private Managed Forest lands in British Columbia. Private Managed Forest lands are located throughout British Columbia, and many rely on access to the coastal marine environment for a range of forest management activities including transportation of log products to value added manufacturers and other markets.

Private Managed Forest landowners in British Columbia play a key role in forest management in marine environments:

- Private Managed Forest landowners are regulated to manage for marine ecosystems 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 marine environments in their adjacent locations.

Critical in any consideration of a Coastal Marine Strategy is that the Private Managed Forest Program be considered holistically. Symmetry between Acts and regulations that incentivize private forest landowners to voluntarily enter the BC Assessment Class 7 Managed Forest program and commit to active engagement in adaptive and sustainable management is critical to the continuation of the program.

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. Many of these private managed forest lands rely on marine waterways for transportation of harvested logs to key markets.

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. Diversity in the PFLA membership allows for tailored approaches to the unique and dynamic economic, social and environmental conditions of an owners' private forest land and often, adjacent marine areas. 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. Actively monitored and managed forest lands adjacent marine environments contribute to a holistic healthy environment for overall ecosystem function.

Inherent in 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 Federal and Provincial Acts and regulations that guide forest management activities and log transportation in marine environments.

III. Contributions of Private Managed Forest Landowners to Forest Management in Marine Ecosystems

PFLA is a strong proponent for bringing all Private Managed Forest landowners into the Ministry of Forests Managed Forest Program, as it provides a means to manage cohesively for multiple public values that intersect with private lands throughout British Columbia, including those that overlap the coastal marine environment. 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 forest management in marine ecosystems are many:

A. Private Managed Forest landowners understand that comprehensive forest management looks different across the land base and unique marine transport areas and is best defined locally with place-based timely information. This requirement for attention to regional variation of the land base and marine environments (especially in consideration of climate change impacts) makes private forest landowners well suited for collaboration on local knowledge and implementation of activities.

B. Private Managed Forest landowners are regulated by Federal and Provincial legislation.

Forest management adjacent to marine ecosystems sees BC regulated professionals working under Provincial and Federal legislation to make science-based decisions for the health of lands and adjacent marine ecosystems. 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. 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.

IV. PFLA Comments on the Coastal Marine Strategy Intentions Paper

The PFLA supports the six values (A-F) presented as Policy Intentions in the Coastal Marine Strategy Intentions Paper, and the collaborative approach taken to incorporate the perspectives of First Nations, western science, existing planning and technical documents, and discussions with provincial staff across government in the development of the Intentions Paper. The PFLA appreciates this opportunity to be part of the development of the Coastal Marine Strategy and looks forward to ongoing opportunities for engagement and input. In particular:

A. Support for the role of the First Nations National Guardians Network

Towards the goal of First Nations' cultural revitalization and resilience (E-3), the PFLA supports the opportunity to engage the First Nations National Guardians Network in the monitoring of coastal ecosystems as part of the Coastal Marine Strategy. The Guardian's Nation-based model of self-determination, and Nation-to-Nation-based model of reconciliation provides a cohesive structure for land and marine stewardship.

B. Support for 'Engage[ing] British Columbians in coastal marine management' (C-2)

The PFLA supports the concept of a collaborative approach to coastal marine management, providing more opportunities for community and stakeholder engagement. As described, "Understanding the underlying values held by different stakeholder groups is important for building trust and informed decision making."

C. Concern around debris from logging

The PFLA believes Policy Intention A-3 incorrectly cites 'log handling debris' among the list of common forms of marine pollution. While there is historic evidence for the negative impact of log handling debris on marine life, modern legislative controls serve to mitigate that risk substantially. Private Managed Forest landowners rely heavily on access to coastal marine environments for storage and transportation of log products, and therefore ensure their operations meet or exceed best management practices as well as regulatory requirements. We look forward to inputting forward on this Intention A-3 with evidence-based knowledge.

V. 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 BC Assessment Class 7 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 Intentions Paper that will inform development of the Coastal Marine Strategy. The positive contributions of Private Forest Landowners to effective forest management and adjacent marine ecosystems are many. The PFLA looks forward to future meetings to discuss our submission and the results of the public engagement initiative, toward the development of a Coastal Marine Strategy.

Sincerely,



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