



Private Forest Landowners Association Submission: Watershed Security Strategy and Fund Intentions 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 Intentions Paper. 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 the economy. Provincial statutes and regulatory authority provide Private Managed Forest landowners a cohesive framework to manage for key public values, including watersheds.

I. 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.

Currently, 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.

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.

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 Forests Managed Forest Program, as it provides for cohesive management of multiple public values that intersect with private lands. 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 include:

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.

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

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, and the federal Fisheries Act, Migratory Birds Convention Act and Species at Risk Act.

IV. PFLA Comments on the Watershed Security Strategy and Fund Intentions Paper

A. The PFLA recommends a concise definition of ‘watershed’ (including details around scale and scope) as integral to a comprehensive Watershed Security Strategy.

B. *Policy intention 1 AND Policy intention 4:* The PFLA supports a collaborative and holistic approach to watershed management. 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 including watershed management. This regulatory oversight brings a holistic approach to watershed management on Private Managed Forest Lands.

Further, the PFLA believes ‘enhanced communication’ (**Strategic theme 4.3**) is critical to successful watershed management. 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, elected officials and local government staff to ensure awareness of planned forest management activities. PFLA and several members belong to local community watershed roundtables including the Koksilah Watershed Drought Working Group.

C. *Policy intention 3:* The PFLA supports a science-based approach to watershed management. In addition, the PFLA applauds the ‘early engagement with Indigenous Peoples’ to inform the Intentions Paper (pg. 3). 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 local First Nations as we move forward on reconciliation in British Columbia.

Thank you again for the opportunity to provide feedback into the Watershed Security Strategy and Fund Intentions 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 ongoing operations.

Sincerely,



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