



# **Forest Policy Decision-Making: The Case for Greater Community Consultation and Engagement**

## **FORESTRY SURVEY FINDINGS**

**Prepared by:**

**UBCM Community Economic Development Committee**

**Submitted to:**

**Minister of Forests, Lands and Natural Resource Operations  
Minister's Advisory Council on Forest and Range Practices (PAC)**

**March 2016**

## **Executive Summary**

The Union of BC Municipalities (UBCM) represents the interests of all local governments in BC, including member First Nations.

Seeking current data about communication and consultation practices between forest tenure holders and local governments, and the impact of forestry decisions upon communities, in December 2015 UBCM conducted a survey of its members. The survey results would inform the work of the UBCM Community Economic Development Committee and Councillor Brian Frenkel, UBCM's representative to the Minister of Forests Advisory Council on Forest and Range Practices (PAC), as he brought forward to the PAC the issues and concerns of local governments.

The survey data represents a broad cross-section of the UBCM membership, both by region and by population. According to the data:

- 79 per cent of respondents identified their communities as forest-dependent; and
- 85 per cent of respondents shared experiences of inadequate community consultation or engagement by tenure holders regarding forestry decisions.

The survey also asked local governments to provide qualitative feedback, such as:

- examples of forestry decisions that would have benefited from better consultation;
- assessment of the community impacts of such decisions; and
- suggestions for ways to improve community impact outcomes of forestry decisions.

After consideration of the survey results, the key finding is that forestry decisions should not be made in isolation. The experiences of communities across BC indicate that a lack of community engagement and consultation on forestry decisions leads to varied but significant consequences, and negative community impacts. Our findings serve as a call for change; for local governments to be key partners in dialogue on forestry decisions, in a manner that considers community interests, identifies environmental impacts, and assesses the other potential consequences of conflicting land uses and strategies within a specific area.

UBCM is pleased to provide this report to the Minister of Forests, Lands and Natural Resource Operations and PAC members. It is our hope that these survey findings will inform ongoing forest policy development. We look forward to continued work with the PAC to ensure that the interests of communities and

citizens are at the forefront of forestry decision-making; for the benefit of local governments and for the province as a whole.

### **UBCM Context**

The Union of BC Municipalities (UBCM) is the association that represents the interests of all local governments and seven treaty First Nations throughout the province. We have served as the voice of local government for over 100 years; and for nearly forty years, all local governments have voluntarily renewed their membership in the association. As local governments' advocate, UBCM participation is sought on a number of boards, committees and organizations to ensure that the interests of local governments are known on a variety of policy matters. One of those committees is the Minister's Advisory Council on Forests and Range Practices.

In November 2014, UBCM nominated Councillor Brian Frenkel from the District of Vanderhoof as a representative to the Minister of Forests Advisory Council on Forest and Range Practices (PAC). Councillor Frenkel has served on the PAC for over a year, while serving as the President of the North Central Local Government Association and Vice-Chair of the UBCM Community Economic Development (CED) Committee.

The terms of reference for the CED Committee speak to a variety of natural resource matters, specifically forestry:

*The primary focus for the Committee is to improve regional economic development opportunities for local governments. As such, the Committee continues to represent and acts as an advocate for communities on resource issues through monitoring, developing and making recommendations on policy regarding fish, forests, energy, mining, agriculture and water (as a commodity) that have the potential to impact the stability, viability and sustainability of BC communities. The Committee also works to connect communities to emerging economic development opportunities (e.g., value-added, tourism, technology sectors, arts, culture and heritage, etc.) and advocates for greater provincial support for jobs/skills training and retraining efforts.*

The Community Economic Development Committee is the UBCM contact point for forest policy, so Councillor Frenkel is aptly informed to convey to the PAC the specific interests and concerns of local governments on forestry matters.

## **Minister of Forests Advisory Council on Forests and Range (PAC)**

The work of the UBCM's Community Economic Development Committee specifically aligns with the role of the PAC to:

*... periodically review and evaluate requirements of the Forest and Range Practices Act for its continued improvement.*

*Considering a broad range of interests, the Forest and Range Practices Advisory Council will report and provide recommendations to the Minister of Forests on policy matters related to forest and range practices. The minister considers council recommendations and may refer them to cabinet for decision.*

[www.for.gov.bc.ca/code/pac.htm](http://www.for.gov.bc.ca/code/pac.htm)

At the July 2015 meeting of the Community Economic Development Committee, Councillor Frenkel reported out on discussions at the PAC table. He advised that the statutory requirements for consultation on certain forestry matters group communities in the same category as "other stakeholders". Recognizing that the role, scope of authority and jurisdiction of local government is not comparable to 'other stakeholders', it was disconcerting to learn that communities were not deemed to have a different status.

Local governments, through the *Community Charter*, are recognized as an order of government, and as such expect to play a greater role in forestry decisions.

The Community Economic Development Committee then wrote to the Minister of Forests expressing support for the inclusion of communities in the *Forest and Range Practices Act*, to better reflect the jurisdiction and authority of local governments as more than just stakeholders. The Committee also expressed support for broadening the mandate of the PAC to forest policy generally, not just to matters within the scope of the *Forest and Range Practices Act*.

Over the past six months, Councillor Frenkel has been contacted by a number of local governments expressing concerns about the lack of consultation with communities on forestry decisions. As a specific example, the Squamish Lillooet Regional District (SLRD) reported a lack of consultation on operational and cut block plans, and a need for tenure holders to provide better information, written in plain language, to facilitate a clear understanding of the tenure holder's proposal. A copy of the SLRD report is attached. The SLRD highlighted two resolutions that were endorsed by the UBCM membership in 2013:

- a request to revise Forest Stewardship Plans every five years, with no provision for any automatic 5 year extension; and
- a requirement for forestry companies to maintain websites with information needed by the community regarding forestry and harvesting. Information

would include Forest Stewardship Plans and operational level planning mapping of cut blocks, roads and visuals.

The SLRD report cited a Forest Practices Board special investigation that was undertaken entitled ***Forest Stewardship Plans: Are They Meeting Expectations***. The Forest Practices Board's report echoed the concerns of the SLRD, reviewing 43 of the 290 Forest Stewardship Plans, and concluding that "most FSPs contain results or strategies that do not demonstrate consistency with objectives, and, that **all** have significant problems with measurability and verifiability. In addition, many FSPs cover vast and overlapping areas of the province making it very difficult for public understanding and review."

Representing perspectives from a completely different geographic region of the province, the Omineca Beetle Action Coalition (OBAC) report ***Making Forest Policy More Effective***, contains a series of recommendations to address the following concerns expressed by OBAC communities:

- The resources are at risk of being further depleted or degraded.
- Nearly all remaining timber will go to a few large centralized mills leaving several communities with fewer jobs and economic opportunities.
- In some communities a single corporate entity could control nearly all of the public timber supply, either through its own licences or as the only buyer.
- The public will have little say in the stewardship, or distribution of, the benefits.

### **UBCM Forestry Survey**

At the November 2015 Community Economic Development Committee meeting Councillor Frenkel reported on his work with PAC and what he had been hearing from local governments. In part, he stated:

*The SLRD is not alone in its concerns around trust and relationships with forest tenure holders and the provincial government (MFLNRO). UBCM should not be seen as an organization that can help with each community's individual concern, but rather as an organization that can advocate for or affect change.*

Common amongst the concerns heard, Councillor Frenkel noted a lack of consultation and engagement with communities on forest planning processes. Recognizing that UBCM was in a position to serve as an important conduit to the PAC, the Committee determined that it would be beneficial to solicit feedback directly from the broader local government membership to determine the extent of these concerns and what could be done to improve the situation. Action items included an article on the PAC, to be published in the Compass, UBCM's weekly

newsletter as well as a survey of local governments to identify specific policies that would benefit from better consultation processes with local governments.

On December 16<sup>th</sup> the Compass article was issued and within it, a link to the Forestry Survey. The brief nine-question survey specifically asked respondents about the types of forest activities and decisions that would have benefited from greater community consultation. A subsequent Compass article was issued on January 13<sup>th</sup>, asking members to complete the survey by January 15<sup>th</sup>.

At the deadline, there were 58 respondents to the survey and these preliminary results were shared with our Community Economic Development Committee at their quarterly meeting on January 21<sup>st</sup>. A few local governments expressed concern that they did not have an opportunity to respond to the survey and wished to make their views known. Arrangements were made to receive these additional survey responses after the deadline.

On February 9<sup>th</sup>, Councillor Frenkel reported out to the PAC on the preliminary survey findings. Since the PAC meeting, UBCM has consolidated all of the responses into the final survey data, which now reflects the total number of survey respondents, 69. That consolidated data is what has been shared in this report.

### **Survey Highlights: What We Heard**

Of the 69 respondents, 52, or 79%, consider themselves to be from forest dependent communities; and 57, or 85% stated that they do not feel that they are adequately consulted or engaged when tenure holders make forestry decisions that will impact their communities.

Survey respondents were then asked the following three questions:

- What forestry decisions would have benefited from better consultation?
- What has been the community impact of those forestry decisions?
- What suggestions do you have to improve community impact outcomes of forestry decisions?

A synthesis of the comments provided for each of the three questions is noted below. A full summary of the feedback can be found in the attachments at the end of the report. The comments on the attachments have been edited to ensure anonymity.

<b><i>What forestry decisions would have benefited from better consultation?</i></b>
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- Communication about, and impact of, harvesting plans (on watersheds, local streams, etc.)
- logs moved out of community and processed elsewhere
- establishing a community forest
- BCTS notification for proposed cutting was misdirected, local jurisdiction not made aware of it until deadline closed (luckily extension granted)
- Approved cutting is within a riparian area and contrary to bylaws
- Visual quality objectives not being met (highway views and roads into park land)
- Tenure transfers that led to mill closures
- Private land logging, not required to consult with communities
- Harvesting plans are not in sync with local plans/bylaws, or are approved without any notice consultation with municipality
- Timber being harvested that shouldn't be from green timber, this timber is needed for communities and wildlife for a sustainable future.
- Would go a long way if consultation took place with local governments
- Tenure transfer that led to the closure of the mill.
- Continuing reduction of staff contingent within the FLNRO offices
- BCTS consultation inadequate when met with public on harvesting plan in area of Ski club.

<b><i>What has been the community impact of those forestry decisions?</i></b>
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- property flooding, loss of agricultural land, damage to private bridges
- lack of trust (BCTS, industry, around community forest process, etc.)
- conflictual relationship between citizens and the forest industry as jobs diminish, and industry centralizes; often removing the resource from the community and along with it, the jobs.
- poverty, social distress, high rates of alcohol and substance abuse when mill closes, people move, job loss, schools close, businesses close
- licensees overcut, AAC overstated, long term viability of license in question
- overcutting of immature stands
- loss of income, sense of purpose
- increase risk of slides, runoff, water turbidity
- impact on views
- revenue not being directed to community
- general uncertainty impedes ability to plan effectively
- quality of decisions would be improved if better information provided.
- lack of commitment by companies to come and reopen mills
- overharvesting green timber in the guise of beetle wood
- boil water orders

- not in harmony with regional growth plans
- cannot comment on forest stewardship plans, too complicated to understand as written, so consultation challenging.
- Increased interest in small scale woodlots, salvage operations
- Reduced tax base
- Impact on wildlife; need better inventory of information.
- Destabilization of local economy, uncertainty about housing and investment
- Community does not have confidence that other community values will be taken into account when forest companies or BCTS harvests near our community. Local values are impacted negatively including Nordic skiing, mountain biking, hiking, etc.
- Not enough conservation officers, natural resource management officers to enforce current regulations as a result there are tree poachers, wildlife poachers and unregulated motorized use of forest land, threatening wildlife habitat.

***What changes would you suggest to improve community impact outcomes of forestry decisions?***

***This could include, but is not limited to:***

- ***regulatory or statutory amendments regarding tenure holders' responsibility to local governments***
- ***clarification of requirements for format, content, or level of detail of forest stewardship plans***
- ***clarification of requirements for the communication methods used and frequency of***
- ***communication by tenure holders***
- ***changes or clarification of requirements of the consultation process between tenure holders and local governments***

- Communication prior to plans being developed
- Clarification of requirements on Forest Stewardship Plans
- Harmonization with Riparian Areas Regulation
- Make wood salvaging more accessible
- Forestry language needs to be understood by everyone to ensure meaningful consultation.
- Increased engagement, clarity and explanation
- Land coming out of Private Managed Forest Land (PMF), there are no obligations to local government. They have audits but none are made public.
- Regulatory changes to the PMF regulations to protect local government water supply areas and mandatory consultation on forestry activities within municipal boundaries



- More value in secondary manufacturing, we need to look at things differently
- Notice and consultation with municipality; visual impact and clean up are important for communities who attract large number of tourists.
- Local governments need to have some authority to halt the process until we are properly consulted and satisfied that the local people are in agreement with whatever is being proposed ... municipalities and regional districts should not be expected to rubber stamp.
- BC Timber Sales revenue needs to come back to communities
- Notice and consultation
- Make provisions for a small amount of timber to be harvested locally
- Make forestry language easier to understand
- Direct, active and ongoing involvement by local government in strategic level decision making and policy development related to forest industry within their jurisdiction
- Amend legislation to reinstate the requirement to assess community impact in granting a license.
- Clarification around the tenure holders responsibility to local government
- Develop new site specific "growth and yield" information
- Engagement in a partnership model (province, local government, First Nations)
- Local governments provide input into the granting of licenses
- Community forests
- Formal communication network
- Request to implement the recommendations from the Forest Practices Board report on forest stewardship plans.
- Clarification of the consultation and communication obligations of forest tenure holders
- Legislation completely lacks consideration of the people
- Re-establish appurtenancy provisions
- Greater staffing support in FLNRO offices
- Ensure all users of the forestry road are working together
- Comprehensive Land Use legislation reinstated as it relates to harvesting, recreational and other community values.
- Needs to be more oversight by government on how forestry decisions will ultimately affect areas in a negative manner.
- Reassess AAC, taking into consideration impact on the watershed, impact on wildlife, and no less than 50% of AAC be designated to Community forest and woodlot holdings, and limit no greater than 5% AAC to any one company
- Would love to see more opportunity for comment from impacted areas on strategy or large scale planning for an area. Referrals would be welcomed, and hopefully mutually productive ... possibly even shared visioning for the watershed-level forest management plan

## Common Themes and Messages

Upon review, common themes emerge from the survey data, consistent across the province, by region, and by community:

- absence or lack of consultation and engagement with communities in forest policy decision-making can lead to:
  - forest stewardship plans and other operational decisions that are contrary to existing land uses / regional plans;
  - significant environmental impacts such as watershed contamination, loss of agricultural land, flooding, slides, runoff, land base erosion, water turbidity, boil water orders, etc.;
  - conflicts or incompatibility between tenure holders and user groups such as recreationists (skiers, hikers, mountain bikers), tourists (logging in areas leading to park entrances, visual quality objectives not being met), or residents (logging too near residential neighbourhoods); or
  - lack of trust amongst the affected parties;
- overcutting is putting the forest resource at risk, jeopardizing community stability and the overall provincial economy;
- centralization/amalgamation/reduction of provincial government staff and forest industry workers within communities is resulting in fewer jobs, less economic opportunities and increased social costs (poverty, residents leaving, schools and businesses closing); and
- reconsideration of how the AAC is allocated; provide for more woodlot, salvage and community forest licences; and greater focus on secondary manufacturing to provide local employment opportunities.

UBCM's survey findings confirm and quantify assertions made in forest policy literature for over a decade, including but not limited to:

- **Forest Stewardship Plans: Are they Meeting Expectations?** (Forest Practices Board, 2015) concluded in part, "FSPs alone continue to be inadequate as tools for public review and comment. They are often difficult to understand, do not provide the type of information the public wishes to see, and often overlap with other FSPs that may have different results, strategies and measures."
- **Making Forest Policy More Effective** (Omineca Beetle Action Coalition, 2014):
  - Proposed Action 5.1: *Strengthen the role of communities and local governments in key administrative decisions.*
  - Proposed Action 5.2: *Support meaningful community and local government involvement by making information more useful and available.*

- **Resolutions endorsed by Union of BC Municipalities membership:**  
2013-B78, “Forest Stewardship Plan Extension,” requested that Forest Stewardship Plans be redone every five years (and not automatically be extended for another 5 years).  
2013-B79, “Forest Stewardship and Industrial Activity,” called on forest companies to maintain websites with information needed by the community regarding forestry and harvesting—information including Forest Stewardship Plans and operational level planning mapping of cut blocks, roads and visuals.
- **Submission to the Special Committee on Timber Supply** (Union of BC Municipalities, 2012) included the observation that “while the Province is responsible for making changes to legislation, regulations and policies related to the forest sector, BC communities have always felt that they need to play a greater role in how those decisions get made.”
- **Healthy Forests/ Healthy Communities** (2011-2013) called on the provincial government and tenure holders to “create a better relationship with communities and develop policy to create a greater community influence on planning processes.”
- **Vision Statement** (Working Round Table on Forestry, 2009):  
*British Columbia has a vibrant, sustainable, globally competitive forest industry that provides enormous benefits for current and future generations and for strong communities.*
- **Policy Paper 3: Forest Policy** (Union of BC Municipalities, 2002) was prepared in response to the Province’s proposed forest policy changes, and recommended “greater community participation in the management and utilization of forest resources and revenues.”

The survey results reconfirm what previous reports have already concluded: forest policy decisions need to be made in an open and transparent manner, based on community engagement and consultation, to ensure that the decisions are in the best interests of the community, the province and the overall sustainability of the forest resource.

## **The Way Forward**

It is UBCM's hope that the concerns of our members will be heard and translated into action. The survey data indicates where change is needed. Whether it's legislation, policies or day-to-day forestry practices, communities need to be consulted and engaged in what is happening on the ground.

Forest stewardship plans have been identified as one area of concern. Meaningful, timely consultation by tenure holders in a manner that is clear and understandable (not in forestry jargon) would go a long way in helping communities and residents understand what is being proposed within forest stewardship plans. Once that understanding is clear, communities are better able to provide feedback that will assist tenure holders in making good decisions. Better decisions will lead to better outcomes and prevent situations where watersheds are threatened, wildlife is impacted and forestry practices conflict with other land uses.

In the longer term, we would hope that the Ministry would identify opportunities in existing and future forest legislation to provide for greater consultation and engagement between communities and tenure holders in forest policy decision-making.

UBCM would welcome the opportunity to work with the Province to effect change. Our Community Economic Development Committee, and our PAC representative Councillor Brian Frenkel, would be pleased to participate in that change process.

## **Concluding Remarks**

UBCM's position with respect to forest policy and community consultation has been consistent. For years our members have been calling on the Province of British Columbia and specifically the Ministry of Forests, Lands and Natural Resource Operations to engage in a dialogue with local governments to make forest policy more effective for all of our communities.

We have learned from our survey data that forestry decisions should not be made in isolation. Local governments can be key partners in the dialogue to ensure that forestry decisions are made in a manner that considers community interests, identifies environmental impacts, and how certain decisions will impact existing land use plans and strategies.

Our survey results call for change. UBCM looks forward to continuing our work with the Province, through the PAC, to ensure that the interests of communities are at the forefront of forestry decision-making; not only for the benefit of our local governments but for the Province as a whole.

## **ATTACHMENTS**

- 01 UBCM Forestry Survey
- 02 Forestry Survey summary snapshot
- 03 Summary – What forestry decisions would have benefited from better consultation?
- 04 Summary – What has been community impact of those decisions?
- 05 Summary – What changes would you suggest to improve community impact outcomes?
- 06 Summary – respondents years of service
- 07 Summary – respondents by community population/size
- 08 Squamish Lillooet Regional District – Electoral Area Directors Report – Community Issues with FRPA



# Forestry Survey

The UBCM Community Economic Development Committee is conducting a survey of BC local governments to learn about communication and consultation between forest tenure holders and local governments, and the impact of forestry decisions upon local governments.

Do you consider your community to be a forest dependent community?

Yes

No

Yes

No

When tenure holders make forestry decisions that will impact your community, do the tenure holders consult adequately with your local government?

Yes

No

Yes

No

Please provide some examples of past or current forestry decisions that would have benefited from better consultation with your local government.

Type here

For the examples you provided above, what has been the community impact of those forestry decisions?

Type here

What changes would you suggest to improve the community impact outcomes of forestry decisions?

This could include, but is not limited to:

- regulatory or statutory amendments regarding tenure holders' responsibility to local governments
- clarification of requirements for format, content, or level of detail of forest stewardship plans
- clarification of requirements for the communication methods used and frequency of communication by tenure holders
- changes or clarification of requirements of the consultation process between tenure holders and local governments

Type here

## Respondent Information

Please indicate the office that you hold in your local government.

☐ Electoral Area Director

☐ Councillor

☐ Mayor

☐ Local government staff,  
please specify:

Type here

☐ Other, please specify:

Type here

How many years have you served in this capacity?

Type here

What is the population of your local government? If you are an Electoral Area Director, please provide the population of your electoral area.

Type here

Of which area association is your local government a member?

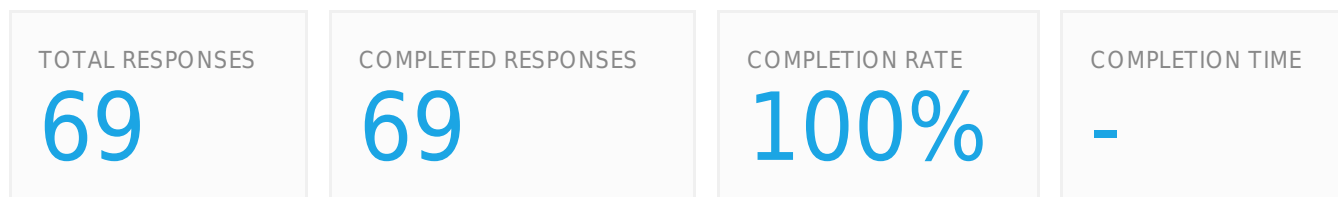


- ☐ North Central Local Government Association (NCLGA)
- ☐ Southern Interior Local Government Association (SILGA)
- ☐ Association of Kootenay and Boundary Local Governments (AKBLG)
- ☐ Association of Vancouver Island and Coastal Communities (AVICC)
- ☐ Lower Mainland Local Government Association (LMLGA)
- ☐ Don't know

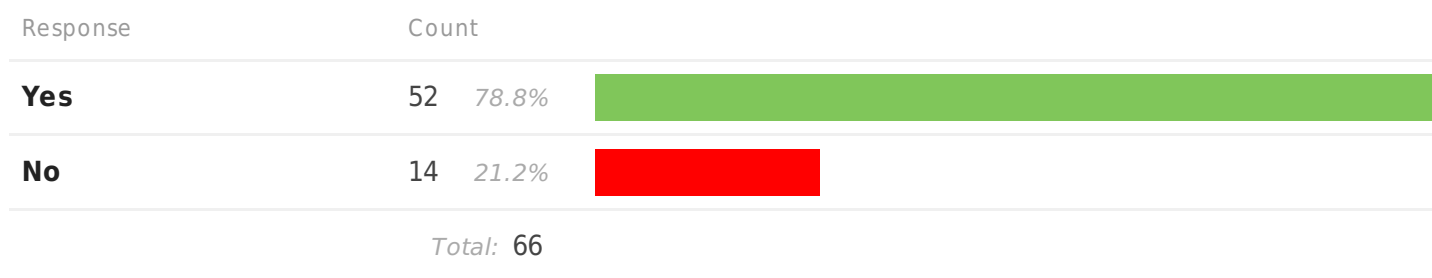
Submit

## Forestry Survey Basic Results

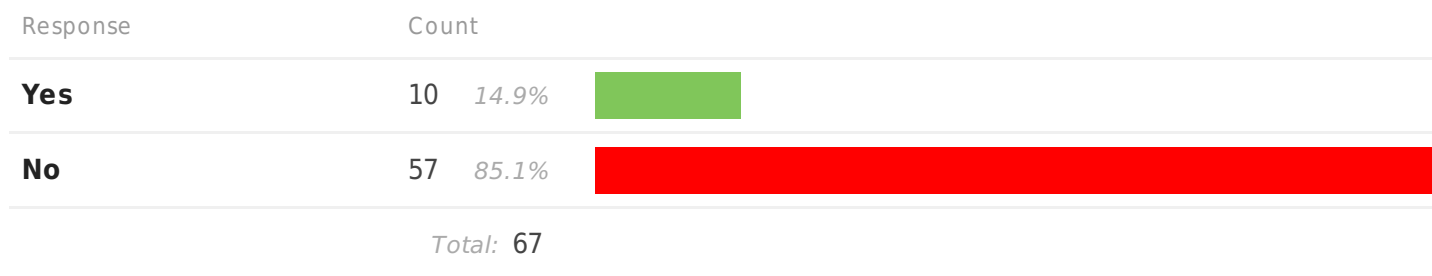
\* Filtered: Completed responses



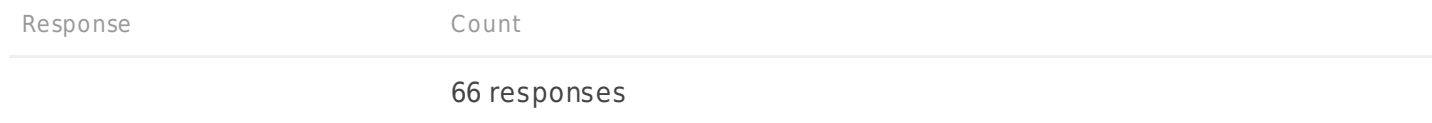
Do you consider your community to be a forest dependent community?



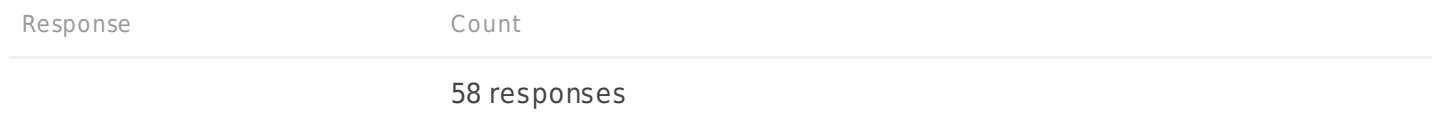
When tenure holders make forestry decisions that will impact your community, do the tenure holders consult adequately with your local government?



Please provide some examples of past or current forestry decisions that would have benefited from better consultation with your local government.



For the examples you provided above, what has been the community impact of those forestry decisions?



What changes would you suggest to improve the community impact outcomes of forestry decisions?

Response	Count
	58 responses

Please indicate the office that you hold in your local government.

Response	Count	
<b>Electoral Area Director</b>	18	26.1%
<b>Councillor</b>	24	34.8%
<b>Mayor</b>	10	14.5%
<b><u>Local government staff, please specify:</u></b>	10	14.5%
<b><u>Other, please specify:</u></b>	7	10.1%
<i>Total:</i>		69

How many years have you served in this capacity?

Response	Count
	65 responses

What is the population of your local government? If you are an Electoral Area Director, please provide the population of your electoral area.

Response	Count
	66 responses

Of which area association is your local government a member?

**North Central Local  
Government Association  
(NCLGA)**

23 33.8%



**Southern Interior Local  
Government Association  
(SILGA)**

10 14.7%



**Association of Kootenay  
and Boundary Local  
Governments (AKBLG)**

14 20.6%



**Association of  
Vancouver Island and  
Coastal Communities  
(AVICC)**

19 27.9%



**Lower Mainland Local  
Government Association  
(LMLGA)**

1 1.5%



**Don't know**

1 1.5%



*Total: 68*

# Forestry Decisions

Please provide some examples of past or current forestry decisions that would have benefited from better consultation with your local government. (^^^ denotes edit to ensure anonymity)

#	Response
1.	Impact of harvesting pine on local watershed, runoff, and spring flooding. Residents interests were not considered
2.	^^^ Community Forest decision for City of ^^ / ^^ Indian Band & lack of genuine consultation with rural communities
3.	Cutblocks destined for clearcutting on Cherry Ridge, Cherryville by BC Timber Sales, without regard for the potential slides within the community watershed or impact on water quality of local streams <a href="http://www.vernonmorningstar.com/news/330304651.html">http://www.vernonmorningstar.com/news/330304651.html</a>
4.	Local employment rate would be higher
5.	Policies that were created in the 1990's during our LRMP are no longer the same values that we have. They need to be updated. We have heard from many logging contractors in our community that our local MOFLR office is the most difficult to work with. We have not had any engagement with the MOFLR for quite some time (years...)
6.	Local community forest started acquisition of renewable forest license from big business. Started the process almost four years ago. Lots of hurdles. Deal still not ratified.
7.	we just ratified a new tree protection by-law for both urban and rural sectors. we were a forestry dependant community many years ago but those days are gone along with most of the mills. we are fortunate the we have the Malcolm Knapp UBC Research Forest and it is doing great. I have been on their Community Advisory Board since it began. We are looking forward to Demo International.
8.	<p>BCTS notification was mis-directed so the jurisdictions for proposed and approved cutting were not made aware of it before the comment period closed. Regional staff were able to get an extension but it points out the lack of attention to ensure proper notification takes place.</p> <p>The proposed and approved cutting is within riparian areas and contrary to bylaws required to protect those areas.</p> <p>The proposed and approved cutting directly affects water licence holders on creeks but there does not appear to be any direct contact with the licencees.</p>

Similar issue arise for domestic wells down gradient of the proposed and approved cut areas.

Regional bylaws require geotech reports on steep slopes for all development permits but no information has been provided for the proposed and approved cut areas.

9. The First Nations in the area complain that none of the benefits trickle down to them, the regular citizens, while chiefs oppose or control the tenures through ^^^^^ which does not adequately or truthfully represent them. The local people do not benefit either as stumpage is unfairly priced, compared to other areas, contractors have been forced out of business and have moved on. There is no value-added manufacturing, just export of whole logs. In our northwest region, we do not have a fair share agreement to give us back a percentage of natural resources extracted from our area, so we have a billion dollar deficiency of infrastructure, while the proposed economic development from LNG, pipelines, mining and forestry is \$40+ billion, depending on whose figures you believe. This is patently unfair when the south, i.e. Victoria and Vancouver, the lower mainland, receives all our revenue and all the benefits, and has for decades, while we are stripped of our resources and lack housing, education, medical and recreational facilities. Our education, health and quality of life stats are abysmal, and could be reversed with the proper social supports and resource benefits proportionately and appropriately shared. It's overdue, a social justice issue and false economy to neglect First Nations and settlers in this area who not only provide natural resources but the social capital and social license necessary for BC to succeed. Besides which, forestry practices have impacted fisheries and killed lots of streams which supply our salmon resources, so that the fish are no longer plentiful or prolific and some species are endangered. This affects the subsistence food economy of First Nations, commercial fishers and recreational fishers, as well as tourism and the appearance of our wilderness. For example, mega projects such as the Northwest Transmission Line scrapped all the timber that was cut - it was burned as transportation was too costly. Another example, a recent pipeline project in ^^^, supposedly not yet approved, has clearcut a secondary growth forest due to be harvested that had grown for 30 years, now wasted for a lay-down yard. NO CONSULTATION, NO LOCAL KNOWLEDGE, NO TRADITIONAL KNOWLEDGE, NO BENEFITS. Forestry cannot be considered in isolation of these other systemic flaws and willful blindness to what is going on.
10. A beautiful highway corridor along which we spend effort to encourage tourism traffic heading to Yukon and Alaska has been visually torn apart in sections.
11. I have had no consultation with the forestry industry specifically related to Area B of the ^^^^ Regional District. I was elected 1 year ago and have had some updating by the Regional District Board but really have no experience to determine whether my area (or me personally) would have benefitted from dialogue. I do know that the role of the rural elected official is often underappreciated by industry who do not understand how the Regional District works or that the Area Directors are significant political entities on their own. An example of this would be industry contacting the Mayor of ^^^^ on forestry issues when the forest is really in the Regional District governance authority....
12. Burning of slash piles that are less than 4 km from a pellet plant  
With the switch to short logs the amount of waste left in the forest has increased by 15%

	With the increase in cut allowance for pine beetle wood while maintaining the same % split the actual volume of green wood increased proportionately.
13.	<p>1) Using Growth and Yield tables that exaggerate the speed in which the typical rate in which the second growth contributes to the AAC.</p> <p>2) Minimizing the cut in Stumpage bearing stands to reduce the amount paid to the Crown.</p> <p>3) Over cutting the more valuable stands to increase profitability.</p> <p>4) Using a culmination age of 120 years (stands considered as mature) for all stands when the average old growth stand is 250 years plus.</p> <p>5) Over cutting young stands (under 120 years old) the access export prices for white wood.</p>
14.	Closing work at Woss was unexpected and affected members of our community.
15.	<p>The closing of the Youbou mill.</p> <p>Logging trucks go right by the small mill without dropping logs for the mill. The mill has to go down to Crofton log sort 40 Kms away and bring logs back to mill.</p>
16.	Decisions made over the PLC in the Great Bear Rain Forest. There was no consultation with local government.
17.	<p>The business deal that recently saw ^^^^acquire some of ^^^^^ Annual Allowable Cut. ^^^ could now be harvesting wood that belongs to ^^^ and ^^^ nearest processing plant is close to ^^^.</p> <p>This business deal may cause some very serious unrest in the forest industry.</p>
18.	<p>Logging on provincial Crown and private managed forest lands adjacent to and surrounding residential neighbourhoods has completely changed the character and aesthetics of some residential neighbourhoods in our region. This happens in the City of ^^^^^ and the Electoral Areas.</p> <p>Logging on provincial Crown and private managed forest lands along access roads and approaches to provincial, regional and municipal parks has completely changed the character and aesthetics of some parks and recreation experiences in our region. This happens in the City of ^^^^^ and the Electoral Areas.</p> <p>Lack of replanting on some private managed forest lands has resulted in lands that become taken over by invasive species and never return to forest.</p> <p>Major forest licensee ^^^^^in our region relies on a Community Advisory Committee to fulfill their community consultation function. People appointed to this committee do not have the knowledge or experience to analyze and assess impacts on communities and neighbourhoods.</p>

Forest harvesting plans should be referred to local governments for review and comment (the same as all other provincial crown land and resource applications). If this happened, harvesting plans could be assessed from the perspective of local government bylaws (official community plans and zoning) negative impacts and risks could be managed and result in fewer negative impacts on adjacent residential neighbourhoods and park lands.

Private managed forest landowners should also be required to refer their forest harvesting plans for review and comment.

19. Cutting within sensitive areas if the watershed

20.

Awarding of licences. The inpartancy clause

21. Raw log export is not providing local value added jobs.

22. ^^^^ has CSA Certification. A local Community Advisory Group receives excellent updates and information on a regular basis.

^^^^ has SFI Certification and has done a very poor consultation in the past, but has improved after much pressure. They still don't publish their audit results.

23. The Village of ^^^^^ is surrounded by Private Managed Forest Land, and because there is no mandatory consultation in the Private Managed Forest Land legislation, more often then not decisions take place within the Village's watershed that we are unaware of.

24. TIMBER SALES BEING GEARED TOWARDS LOCAL GOVERNMENT.

25. Protecting our water shed, layed out to clear cut and skidder log.

shift changes well known community killer.

not creating more jobs in other uses of land and waste wood.

not interested in investing in more finished product here.

no interest in agro forestry or any annual crops.

26. Land to first nations

27. Cutting permits were given within the Municipal boundaries without any notice or consultation with the Municipality. We are a relatively new community and proper procedures may not have been adapted to our new status as a Municipality.

28. The forestry company coming to the RD to explain what their plans are

29. 5 years ago we had some major wind storms, numerous Spruce Trees were downed. This invited a major Spruce Bark Beetle infestation. BC Timber Sales holds tenure on a most of this wood and to date they have not done a lot as say they do not have the staff to plan for the harvest of the infected wood.



30.	none - we have good relationship with ^^^
31.	<p>In the recent past the Township has had concerns respecting decisions which affect a significant parcel of Crown Land known as a ^^^^^ Recreation Area specifically related to:</p> <ol style="list-style-type: none"> <li>1. potential changes in the status of Crown Lands</li> <li>2. potential changes to the use of the Crown Land which may adversely impact recreational use of these Lands</li> <li>3. potential changes in access to Crown Land</li> <li>4. potential negative impacts to or loss of identified sensitive areas</li> <li>5. changes to ownership/tenure of Crown Lands</li> <li>6. changes to operating areas</li> </ol>
32.	<p>Current plans to log in the ^^^^^ with logs being processed outside the region, planned without genuine consultation.</p> <p>No substantive consultation in continuing the abeyance of PA14 despite the tenure holder being in violation of their agreement.</p> <p>No effective consultation related to the exclusion of forested lands in the ^^^^^ in the interests of preserving Boreal Caribou habitat.</p> <p>No significant consultation on the removal of appurtenance provisions from the Forest Act allowing tenure holders to ship unprocessed logs outside the forest district for processing.</p> <p>No information to the ^^^ regarding forestry related Government-to-government negotiations with First Nations.</p> <p>The continuing reduction of staff at the local MFLNRO office. The current staff provide exceptional support to the Municipality and its projects.</p> <p>No financial support from the province for our forestry Rejuvenation Project although funding was requested.</p>
33.	Companies operate under provincial legislation so any "forestry decisions" are made under that umbrella which municipal government have no control over. Local companies are diligent in keeping Council informed once a decision has been made so we can be prepared for the "fall out" that could follow.
34.	PA14 Pulpwood license agreement, currently held by ^^^^^, but not currently operating mills in our community.
35.	We have seen amalgamation of licenses in neighboring communities that have a big impact on the ability of our community to remain viable. I believe if the government had had better consultation with the community that hopefully they would not have made the decisions they do. I also think there should be consultation regarding how much green wood is being harvested.
36.	The majority of local Govt. and public have no clue what is going on in the woods unless they are directly involved.
37.	The AAH. The licences have been given free reign to take whatever timber whenever they

	wish. The results of this has clearly impacted mid term fibre that communities and wildlife need for sustainable futures.
38.	<p>-sale of lakefront land</p> <p>-harvesting plan on slopes facing our lake</p> <p>- transportation of timber through community</p>
39.	<p>Access to information</p> <p>e.g. Landslide at ^^^ from CP SUG 025 on April 25, 2012</p> <p>C and E Report</p> <p>Geotechnical Report</p>
40.	<p>^^^ had a combative relationship with the corporate representatives. It was subsequently left with the major assets of a deep sea dock, barge loading ramp and the industrial lands left as a concrete jungle now growing over with alder as the view scape in the heart of the community. The current corporate entity being ^^^^ , has inherited the mess and can not wholly be held responsible for whatever took place in the past although many of the current inhabitants view them with mistrust.</p>
41.	<p>The company in this area moved 6 high paying jobs out of our community with no consultation or heads up to the local government. They then decided to close an office and have the remaining staff do work from their homes and not have a presence in the community. We have been told that we are their main forestry area and yet, no consultation. After I had many discussions with them and they met with council, moving of the jobs was not changed but the company, after much discussion agreed to have an office presence in the community. If you want our support, you need to work with us(Mayor and council).</p>
42.	<p>Exporting logs instead of processing (milling) them locally</p> <p>Segregation of local watersheds due to irresponsible logging to maximize their profit</p>
43.	<p>Question #1 above was answered NO because we are an area where there is resource extraction but a very small % of the economic activity generated stays in this area.</p> <p>Examples:</p> <p>1. One major licensee had their FSP renewed for a further 5 years with NO consultation/engagement of any kind let alone with local government. That makes a 10 yr. span of basically the same FSP. In that 10 years much has changed in our area in the first 5 years let alone adding another 5 years without further engagement and understanding of the area.</p> <p>2. Operational planning and consultation when harvesting is planned very near to communities and neighborhoods is very very poor. There are many examples in our area over the last 5 years. One of the worst is a particular licensee sent a Forest Technician to doors in the immediate vicinity THE DAY they started harvesting and when pushed on where was the consultation was in this case, they itemized this visit as their consultation. In this particular case, the harvesting, because of its location and lack of mitigations severely</p>

impacted our winter snowmobile tourism and almost knocked a key business in that community out of business. In addition, numerous safety and noise concerns arose, ALL of which could have been worked out with an engagement process.

3. Transparency and accountability of the engagement/consultation process at an operational level (i.e. when planning harvesting in a specific area) with local government and their communities is non-existent.

Again, we have many examples, will provide a couple: a) ^^^ is a high property value/recreational property area. A committee of their Ratepayer's Assoc. worked hard to build relationship with the licensee & seek mitigations to a planned cutting permit at ^^^. The licensee would not provide their visuals for the cut blocks. They would not provide the hydrological study commission in whole or redacted to the committee. They continue to demand that residents drive 2 hrs. to ^^^ to view these in their office. In the end in this particular case, the visuals left by one cut block are very very bad and impact on property values and resident's enjoyment of their property. Totally unnecessary and a complete non-trust builder in the community. b) ^^^. Cut blocks planned around a large and expensive property on ^^^. The owner sought consultation. As Director I attended a meeting with owner with the licensee's representative. We were told, and I quote "we (the licensee) do not have to consult with you". Following a rather direct conversation, he calmed down and we did a walk through of the issues. This representative wrote down the items and emailed them to us. Unfortunately though he did not inform his contractor and the key item the home owner wanted and was agreed upon was ignored, leaving this owner's expensive property and home exposed to the main road with no buffer.

44. Just taking the time to meet with local government would go a long way

45. the current project to cut down trees by ^^^ in the heart of ^^^ and ongoing clear cutting in the region

46. Consultation from landowners of Private Managed Forest Land (PMFL) regulated by the Private Managed Forest Land Act and Regulations and the Managed Forest Council that administers the Managed Forest Program is not adequate and does not meet the expectations of local government or the community.

Consultation from the ^^^ Community Forest is excellent. Consultation from a local tenure holder of two woodlots (W0029 and W1671) is also excellent, primarily via a website that includes an operations map and an option to subscribe to email updates of operations. Consultation from ^^^, TFL 39, is also very good via an operational information map updated regularly and available online as well as via a community advisory group on which a representative from City council sits as an alternate to a Regional Board representative for local government. Consultation from remaining tenure holders is primarily limited to that which is required to meet legislative or certification requirements.

There is a significant amount of PMFL within and adjacent to the City of ^^^. The local government and community would benefit significantly from the PMFL landowner sharing the management commitment, operations map, harvesting plans and supporting

assessments and long-term disposition or development intentions for their land. The benefit of sharing such information would be the coordination of PMFL landowner activities and plans with community planning initiatives such as official community plans, integrated community sustainability plans and economic development initiatives. Sharing information should be welcomed by the landowners and the Managed Forest Council, particularly given the realized benefits of lower taxation and the right to harvest of trees unrestricted by local government bylaws.

Approximately 245 hectares of private land owned by ^^^^ within City boundaries were classed as managed forest land under the Assessment Act in 2009. These lands have since been harvested at a rate suggesting they are not being managed for long-term production and harvesting of timber but rather short-term liquidation and disposition within less than a decade of being classed as managed forest. This is arguably inconsistent with the intent of the managed forest property classification to encourage private landowners to manage their lands for long-term forest production. If disposition is intended, It is certainly unfair to the remaining landowners within the municipality that will have shouldered an unfair taxation burden in previous years given the exit fee adjustment factors that would apply as outlined in the Private Managed Forest Land Regulation.

47. The Great Bear Rainforest Agreement - leading to forest tenure holders choosing to house their main offices out of region.

48. The answer to the second question is a result of our largest tenure holder being certified as sustainable under CSA. CSA is the only certification process requiring ongoing public participation. PMFL operations often fail to inform and/or consult local governments prior to harvesting. Okeover operation of Island Timberlands is an example of this.

49. I don't know of any such examples locally, as we're not a forestry-dependent community (there are no mills in our area and few if any people here are employed in the industry).

50. Tenure transfers that led to the closure of a mill, even the provincial government was not apprised until a press release was issued by the companies involved.

The renewal of a license for one company (after it had not achieved its supposed intent of stimulating investment and a new mill/jobs) by the District Manager that negatively impacted other mills in our community and sent fibre out of our community.

51. Logging activities occurring near ^^^^ with logs to be processed outside the Northern Rockies region impairs our local struggling economy. This initiative was planned and implemented without real consultation.

No substantive consultation by BC in continuing the abeyance of PA 14 despite the tenure holder being in violation of their agreement and a blind eye is turned.

52. The whole history of the ^^^^^ tenure is a prime example of how easily the community and land base can be eroded by a license. If legislation still included a review of the community impact, the overall management of the tenure and subsequent devastation could have been

prevented. This is just one example.

53. As reflected in the ^^^ current draft proposal to the Province, making a case for greater local influence over decisions related to the use of the regional forest resource, and given the recent action by ^^^ to engage in logging plans intended to harvest timber to be transported out of the region for processing, over the loud objections of the ^^^Municipality, the answer to the question above is an emphatic and clear "No".

While industry may contact the ^^^ regarding its plans, and while the local FLNRO does its best to encourage industry players to consult with the ^^^, there is no technical requirement for them to do so, and often it either does not happen, or the ^^^'s input is disregarded.

Examples of situations which would have benefitted from better consultation include:

- plans for logging in the ^^^, with logs to be processed outside the region ostensibly to assist the local economy, were made without genuine consultation before the fact. The potential long-term net result will be harmful rather than helpful to the local economy.
- no substantive consultation by BC in continuing the abeyance of Pulpwood Agreement 14 despite the tenure holder being in violation of their agreement, having closed its mill and stated on the record that they will not be restart. Industry and government arranged the abeyance without serious consultation with the community.
- no effective consultation or communication by BC or local industry related to the exclusion of forested lands in the ^^^ in the interests of preserving Boreal Caribou habitat [could amount to a significant reduction in Annual Allowable Cut]
- no significant consultation on the removal of appurtenance provisions from the Forest Act allowing tenure holders to ship unprocessed logs outside the forest district for processing. This was done by BC at the behest of industry without consultation with the community.
- no flow of information to the ^^^ regarding forestry related Government-to-government or industry-to-Nations negotiations with First Nations. While it would likely be too much to expect the Province or industry to share details of ongoing negotiations, the ^^^ has not even been made aware that talks were underway. Attempting to determine what was happening in this regard, and what potential implications existed for the ^^^ so as to allow us to represent and protect the interests of the ^^ has required significant research and only provided a vague picture. Most of what has been discovered has been accessed through non governmental third parties.
- the continuing reduction of the staff contingent at the local MFLNRO office has the

potential to limit the ^^^s efforts to see the re-establishment of forestry, but it has been and continues to be done without involving the^^. The local FLNRO's high quality of support has been crucial in the formulation of the ^^^s Forestry Rejuvenation initiative.

- while not related to "consultation" per se, the fact that the Province has not provided financial support for the the Rejuvenation Project although they were requested to do so, is significant.

54. We were a forestry community and now we are a tourist community.

Most of our employment in the winter months revolves around snowmobiling.

Over the years the forestry industry has slowed and the snowmobile industry has grown.

We now have the snowmobiling industry trying to groom trails for the vacationers while the forestry is ploughing the same trails. It does not make sense that for 4 months of snowmobiling the forestry industry cannot find another area within a short distance to harvest while the snowmobile industry continually grows and bring in all that tax dollars as well and keep our people employed in a tourist reliant town.

55. There have been 2 significant operations that would have benefited from adequate public consultation.

These are harvesting in the ^^^ area in 2013 and the upcoming harvesting in the Mt. Macpherson area this winter.

The former resulted in a complaint I submitted to the BC Forest Practices Board:Re Stella Jones harvesting in a sensitive are near ^^^ BC. Following is a portion of their decision:

Forest Practices Board FPB/IRC/18911 Complaint # 121080 [You can read the details on their website]

The licensee's communication regarding its planned harvesting activities was inadequate. The forest licensee provided only a limited opportunity for the residents of Revelstoke and Area B of the Columbia Shushwap Regional District to comment on the proposed 2012 FSP amendment that removed the only legal commitment it had to meet Begbie Falls Integrated Resource Plan requirements. As well, the forest

licensee did not meet the legal requirements for advertising its amendment

The BFIRP is a dated plan, with many prescribed practices that have been superseded over the past 20 years by other land use plans, legal orders, and regulations. Because no attempt has been made by government to update or officially rescind or amend the plan, it does not necessarily provide good planning guidance. Nevertheless, the BFIRP represents considerable effort and was relevant when created for a relatively small area. While non-legal in nature, the engagement of the planning group and the signatures of participants — including the MFLNRO, local governments, stakeholders and licensees — invokes an expectation about the manner in which this area should be managed. This area is locally

sensitive and there was a reasonable expectation on the part of the plan participants that licensees would respect the BFIRP. It follows that members of the original BFIRP planning committee would expect any changes to the plan's intent, as expressed in licensee planning and practices in the area, to be transparent and discussed with them prior to making those changes.

The second involves concerns re BCTS harvesting in the same general area. Mt McPherson is home to the Revelstoke Nordic Ski Club and the Revelstoke Cycling Society also has tenure. Last summer a petition was circulated against their plans that accumulated 1723 signatures.

BCTS held a public meeting regarding their plans and announced at the outset that they would not take any questions from the floor. Anyone who wanted to ask questions or get further information was told they could speak to BCTS after their presentation. They had a subsequent open house to explain the plan but did not hold another public meeting. They are going ahead with harvesting after minor changes to their plan.

56. Spraying in FN territory - which killed the wild berries they depend on.

Roads for hauling logs can impact the ranchers.

57. 1. There is a ^^^ Community Forest that does not include, as a stakeholder the Area director for the ^^^. There is no communication when meetings are or how to get the plan- should be in public libraries
2. There was a very short comment period for a Operating Plan in the ^^^^watershed that was not advertised periodically. There was not consultation with local governments either in ^^ or the ^^^^^^.
3. BC Timber Sales logged an important corridor for the habitat (Granby Grizzly) movement which does not have a current population estimate. There is over 15,000 km of forest service roads that have been built in the ^^^^Watershed.
4. There is no plan for responding to climate change.

58. Canfor, the biggest forest company in Canada--by far, controls well over 10% of BC's AAC and growing. A few years ago they acquired Tembec (Invermere/Cranbrook area). They then acquired the AAC of Springer Creek (South Slokan) and more recently that of Meadow Creek (Kaslo) and just a short while ago purchased Wyndell Box and Lumber. Canfor now has monopoly control over a large area of northern BC and virtually all of SE BC! This is not good for anyone or any community or the local logging contractors working therein as they virtually have only ONE industry and ONE boss and no bargaining power. Canfor has inordinate influence over the welfare of local communities and the BC government.

We are very fortunate in the Boundary area in that we (the local people and contractors and communities) are blessed with Atco, Kalesnikoff, Vaagen Fibre, Gormans and Tolko, all of which are family owned and compete well with each other. Interfor is our other local player



<p>(Grand Forks) (5th biggest in BC) which also provides competition for the local timber.</p> <p>The loss of any of the family-owned mills to either Interfor or Canfor would be very damaging to all of the communities involved. We must stop the incessant corporatization of BC's forest industry.</p>
<p>59. watershed logging issues</p>
<p>60. No they don't consult, we had to ask for appointments for information</p> <p>clear cutting of trees in areas not far from town with concerns that the visible areas from town will be treated in the same manner, this would destroy our tourism economy not to mention what it will do environmentally to the land and animals.</p>
<p>61. I feel we get more of a 'heads up' and not a consultation.</p> <p>What Jemi Fibre is planning to do.</p>
<p>62. No, we are not consulted on most forestry decisions. BCTS is just beginning to include us more in their consultation list, and has expressed an interest to increase this going forward. We're excited about this, but it's still in a very nascent stage.</p> <p>BCTS recently issued their Operating Plan #11 for comment, but we as local gov't mainly missed the opportunity to comment since we were simply unaware. They have graciously offered to receive some comments from the Electoral Area covering their area after the posted closing date for comment, which is great ... but we might have had more time to communicate the communities desires if we had been on the initial list.</p>
<p>63. No, there should be something sent directly to each municipality and regional district. Although going through the UBCM may seem an appropriate way to communicate with local governments, it is apparent from what I am hearing that: a) not enough time given to respond, and b) concern that some members may not fully understand the intentions.</p>
<p>64. Not to my knowledge</p> <p>None that i am currently aware of</p>
<p>65. They don't consult at all as far as I've seen</p> <p>All logging in the ^^^^ watershed</p>
<p>66. No, we do not know what forestry plans are being negotiated within our watershed.</p> <p>Plan #11, Kootenay Boundary</p>



# Impact of Forestry Decisions

**For the examples you provided above, what has been the community impact of those forestry decisions? .** (^^^ denotes edit to ensure anonymity)

#	Response
1.	flooding property, loss of large amounts of agriculture land, damage to private bridges and no hope that anything will change for several decades, as the damage has been done to the forest and it will take decades for nature to restore a new balance.
2.	Lack of trust in process around community forest proposals
3.	None yet, except for an increase in distrust of BC Timber Sales.
4.	If the Minister does not approve both the sale and reallocation of volume into a comfort license, families move to another community. Schools close.
5.	between logging and fire our industry has changed. We still cut a lot of wood every year but its more for clearing for other uses.
6.	Cutting has not started so impact remains unknown.
7.	We are in poverty, social distress, e.g. high rate of alcohol and substance abuse, chronic disease, family violence, poor health outcomes, unemployment (read negative flow of tax dollars!), early death among adults (especially males), children and youth have a low graduation rate and are sometimes hopeless enough to commit suicide. These are the true effects of greed and failure to share benefits with the local population. Generations of young, vibrant, energetic BC Canadians are wasted human capital. Check out the First Nations demographic of young people. How about investing in PEOPLE, our most precious and priceless resource?!
8.	Reduced traffic
9.	I am not able to guess the larger impact other than to suggest that the habit of by passing local elected rural officials is alive and well when quick and knowledgeable answers are required for immediate problems. Industry and government alike seem to forget that the Forestry policy and past experiences are understood by some but not all. It is a complicated issue at the best, and without sufficient and significant effort to educate and update newly elected officials and the public to that history, ineffective dialogue will result.
10.	air quality issues. Does nothing to create jobs or secondary industry
11.	1) Grossly over states the AAC and allows the licensees to over cut thereby reducing the merchantability of successive stand to the point where it becomes uneconomic the harvest (especially in remote communities) without the Crown subsidizing the licensees by reducing standards such as allowable waste restrictions through sympathetic administrative applications, etc. 2) Over cutting non stumpage bearing timber reduces the long term economic viability of

<p>the license area thereby accelerating the inevitable date that the licensee will require bail out measures or face closing operations.</p> <p>3) This leaves stands of diminished values and the inevitable escalation of closure dates well ahead of the of the planned AAC.</p> <p>4) The assumption that a 120 year old tree is mature is not based on any scientific evidence as trees grow well beyond 250 years and add much value the older they get. The choice of 120 years is solely based on flawed economic used to do nothing else but increase the AAC beyond the sustainable level. Applied to the more remote areas of our province where the cost of delivery to the converting facility is higher this has had a devastating effects on communities.</p> <p>5) The over cutting of these immature stands contributes to an accelerated "fall down effect" thereby accelerating the need to reduce the AAC and its attendant negative on communities that rely on an steady AAC to maintain their tax bases.</p>
12. Community members in fear of losing income and sense of purpose.
<p>13. It devastated the town of Youbou.</p> <p>The small mill at ^^^^ can't operate economically. Imagine going 40 Kms to pick up your logs and 40 Kms back when it is completely unnecessary .</p>
14. unknown to date.
15. To date there has not been any impact so far. Depending on what the future brings will depend on how many logging trucks go down Highway 27.
<p>16. Forestry decisions can and do sometimes negatively impact community economic development:</p> <ul style="list-style-type: none"> <li>- Negatively impact character and aesthetics of residential neighbourhoods resulting in lower assessed property values and decreased desirability for attracting new residents to our region.</li> <li>- Increased storm water runoff has contributed to increased vulnerability for flooding and landslides in residential areas down slope from forest harvesting activities. This too can result in lower assessed property values and decreased desirability for attracting new residents to our region.</li> <li>- Negative impact on aesthetics along approaches and access roads to park lands can result in a lower value recreation experience and result in lower desirability of our region for tourism and amenity migration.</li> </ul>
17. That has led to increased water turbidity and drinking water quality issues.
18. lack of local employment
19. We lost many local jobs and the opportunity to develop secondary manufacturing jobs
<p>20. ^^^^ receives very little bad publicity.</p> <p>^^^^ tends to "cut and run"</p>
21. The forestry decisions impact the following:

<ul style="list-style-type: none"> <li>- Viewshed</li> <li>- Water Supply</li> <li>- Recreation</li> </ul>
22. REVENUE NOT BEING DIRECTED TO THE COMMUNITY.
23. Since 1970,s a declining industry poorer quality of wood agro culture land worth \$3.00 a sq. ft. annually..... forestry .25 a cubic meter every 60 years and we are in court with ^^^they are claiming this is to much..
24. Community forest hold up
25. Poor forestry management practise were allowed to be carried out by the contractor and certainly not of a standard expected within a heavily used public area.
26. I have been told that Spruce Bark Beetle needs to be harvested in a very tight frame 3 possibly 4 years, because of the inaction of BCTS we are losing viable timber because of inaction.
27. The Township, as well as a number of community stakeholder groups, continues to have significant and on-going concerns related to some of the above.
<p>28. The ^^^ has been left to absorb the financial and personnel costs of addressing the deficiencies of information and the pursuit of the re-establishment of forestry.</p> <p>The failure to consult with and heed the wishes of the ^^^ related to PA 14 has created a tenure situation which potential investors have indicated is a disincentive to investment.</p> <p>We are concerned that the local FLNRO office will not have the capacity to address demand as the Rejuvenation Project progresses.</p> <p>The ability of the ^^ to engage First Nations in the rebuilding of a forest industry has been impeded because we were not aware of the full context in which we are operating [including G2G negotiations of which we are unaware]</p> <p>The ^^ is left to absorb the economic, infrastructure and social consequences of decisions on which we have had no input.</p> <p>General uncertainty impedes our ability to plan effectively.</p> <p>The quality of decisions could be improved were the knowledge and expertise available through the ^^^ accessed in instances of decision making.</p> <p>Actions taken by industry has and can adversely affect the long-term interests of NRRM communities.</p>
29. Currently the major tenure holders in our District are experiencing growth and prosperity so forestry decisions being made are positive impacts, it is when there is uncertainty and financial challenges presented to companies, that the hard decisions must be made and they are not always open to share issues, in part because they are part of a larger company.
30. Lack of committment from outside companies to come into our community and reopen mills.
31. it takes away the confidence in the community. people and investors find it hard to invest when they know a vote in a board room, or a stroke of a pen in Victoria can change the

	entire outlook of ones town, When people don't have confidence, they don't buy homes in the community, the wage earner will rather travel the extra distance or they will rent a room rather than the family move to your town and be an asset to the community. This same thought process holds true when it comes to the business investor.
32.	The community will understand when the last mill closes when the mature timber is all done and their will be a slow down for the next 30 to 50 years
33.	We have witnessed over harvesting of mid term green timber that was harvested under the guise of beetle wood. It was taken to make the permits more financially attractive
34.	<ul style="list-style-type: none"> <li>- not necessarily in harmony with community growth plans</li> <li>- boil water advisories are becoming the norm after every rain event, due to increase turbidity</li> <li>-timber transport goes through Center of town. It may be useful to know when large volumes are on the move</li> </ul>
35.	<p>3 private properties were degraded</p> <p>And others feel at risk</p> <p>Loss of trust in professional reliance</p>
36.	Financially, it's a tight rope. The low hanging fruit is to evolve into a tourist destination which does provide seasonal benefits but not enough employment to attract families. School enrollment is low, 15% of historical numbers. Aging infrastructure will be more challenging than most of us realize. Federal downloads of D.O.T. infrastructure did not come with maintenance dollars attached. Access to the waterfront industrial land remains limited at best. Most folks involved in the forest industry live elsewhere leaving very little financial benefit behind.
37.	The loss of jobs and families impacts our community hugely. We are a small community and trying to survive. We lost 150 forestry jobs in 2008 when the industry went down and we are still trying to recover. It affects our schools, hospitals, services that we provide because the income is not there and the loss of tax revenue is significant. The fact that more and more of our forests are being preserved for caribou etc. also affects our ability to make a living.
38.	<p>Unemployment in sawmills, less business for sawmill service industry</p> <p>Dirty water during heavy rainfall</p>
3.	<p>The examples provided above are brief and few in number in comparison to those issues I have dealt with since 2011 related to forestry.</p> <p><b>1. Finding out about proposed cut blocks and roads near communities, neighborhoods and private property only after ribbons have been laid.</b> There is a consistent level of disbelief by the public that they would not be engaged (informed and consulted) long before cut blocks are actually reconnoitred.</p> <p><b>2. Consulting with forestry companies regarding operational level plans is challenging:</b></p> <p>There is no “set out” process or role for private property owners, neighborhoods and communities. Forest companies consult and engage when and how and with whom they</p>

see fit.

- We have had a number of examples where private property owners have been told by a forest company employee “we do not have to consult with you”
- Different neighborhoods and communities continuously need to reinvent the advocacy wheel when seeking mitigations each time harvesting is planned in their area . The feeling is that the degree of success in getting even minor mitigations is based on how fast volunteers can learn about FRPA and how hard they can fight the companies. It is a very reactive process.
- Information is hard to obtain from forest companies:

Items such as visual renderings, hydrological studies, site plans are often withheld in whole or in part by companies or not distributed digitally which makes it difficult for far distant rural/remote property owners to access.

- Registered Professional Foresters generally represent the interests of the forest company they work for and are often very defensive about requests for basic information .

### **3. Forest Stewardship Plans (high level planning by Forest Companies):**

- Are very hard to understand even though they are written for the public, they are written in “forester” talk
- Process for consultation is often missed as the only requirement is advertising in newspapers when there are often not newspapers available in the rural communities.
- Generally do not include thorough mapping
- Are based on objectives and not specifics and therefore hard to find relevancy for private property owners, neighborhoods and communities
- The public is unaware that this is , currently their only opportunity to commend on forest planning in their neighborhood

### **4. Compliance:**

- Communities advise they have little to no confidence that there is currently enough observation to ensure compliance with FSPs and operational site plans has been achieved
- FLNRO officials are rarely seen observing and examining specific harvesting locations

### **5. Economic Benefits**

- While property owners recognize the benefit of the forest industry to the province, they repeatedly mention that the specific economic benefits and job opportunities for their communities have diminished over the last ten years as industry has centralized. This sets up a conflictual relationship between residents of communities and the companies removing what they view as their resource and their jobs with marginal returns to the community
- There is a clear desire for increased small scale opportunities: woodlots, small scale salvage, community based forest licences, value added and that support be provided for development of these opportunities

The overall result for private property owners, neighborhoods and communities is a lack of trust in forest planning and harvesting practices.

40.	despair, also some coming together by community to protest the cuts and purchasing by the City of trees within the City boundary
41.	Reduced tax base. Inconsistency and uncertainty for community planning. Impact to community aesthetics and recreation, particularly with respect to green space and trails.
42.	<p>^^^ communities have a declining economic base. With the exception of Community Forest Tenure holders who are based in the ^^^ Valley, the other major forest tenure holders in the ^^ region have a minimal presence in and do not have offices in the regional communities.</p> <p>The structure of the Great Bear Rainforest Agreement has resulted in forest tenure holders choosing to house the main offices out of region. This has resulted in loss of local employment and population. This loss of population has resulted in a significant decrease to the number of private and public services and programs in the region.</p> <p>Furthermore, with the existing structure of forestry practices in the ^^ Region there are significant barriers created with regards to access to Forest Stewardship Plans which are made available through the tenure holder's main offices (which are typically in the Lower Mainland and on Vancouver Island). Additionally, due to the limited resources of the local government any consultation that is extended to the local government cannot receive a detailed review process. This leads to our local government being reactionary to forestry decisions instead of proactive and engaged.</p>
43.	^^^ operations in TFL 39 Block 1 are largely non controversial. The CSA Advisory Group meets regularly and is kept fully informed of current and planned operations. This RD holds a seat on the advisory group. ^^^ operations are controversial with the potential for blockades, etc. Although certified under SFI there is no public involvement in IT planning or operations.
44.	<p>Significant and permanent job losses (about 250 direct).</p> <p>Loss of tax revenue to the City.</p> <p>Destabilization of our local economy and uncertainty about housing and business investment.</p>
45.	The community is impacted greatly and will continue to be impacted economically. Forest areas recently destroyed by wildfire need to be included in forest inventories. MFLNRO should be gathering accurate statistics on the impacts forestry has on wildlife.
46.	<p>Total erosion of the land base with liabilities breaching more than a million dollars.</p> <p>Thousands of dollars unpaid to contractors by the licensee with no avenue for recourse short of small claims court. Which when many are already impoverished, leave no option to seek payments. A community with little to no job opportunities who are now watching truck after truck drive to mills south of the region. Overall, despite an immense value in our resources, our community members are faced with going to the food bank and welfare to survive.</p>
47.	<ul style="list-style-type: none"> <li>• ^^^ unilateral decision to log and transport timber from the ^^^ for processing hundreds of miles outside the ^^^ has been taken despite the company's knowledge of the community's longstanding opposition to such practices. The company persists in its</li> </ul>

assertion that it is undertaking this logging "to assist the community during hard times."

- the ^^^ has been left to absorb the financial and personnel costs of addressing the deficiencies of information and the pursuit of the re-establishment of forestry in the region
- the failure to consult with and heed the wishes of the ^^ related to PA 14 has created a tenure situation which potential investors have indicated is a disincentive to investment. As a result, ^^^ has been allowed to hoard timber they have no intention of using, while potential investors are discouraged by the perceived unavailability of wood fibre.
- there is a concern that the local FLNRO office will not have the capacity to address demand as the Rejuvenation Project progresses.
- the ability of the ^^ to engage First Nations in the rebuilding of a forest industry has been impeded because we are not aware of the full context in which we are operating [including G2G and industry-to-Nations negotiations of which we are unaware].
- the ^^ is left to absorb the economic, infrastructure and social consequences of decisions by industry and government, on which they have had no input
- general uncertainty spawned by a lack of sharing of information of plans by industry impedes our ability to plan effectively
- the ^^ is disadvantaged vis-a-vis industry in attempting to advance community interests- there is an imbalance
- the quality of decisions could be improved were the knowledge and expertise available through the ^^ accessed in instances of decision making.
- actions taken by industry have and can adversely affect the longterm interests of ^^ communities

48. Less employment for the locals if the forestry is ploughing the same trail were grooming the vacationers will not come which does not benefit the town.
49. The community does not have confidence that other community values will be taken into account when forest companies or the BCTS harvests near our community. Local values are impacted negatively including nordic skiing, mountain biking, hiking, mushroom picking etc.
50. We were able to contact ^^^ and they did discuss the issue - finally getting resolved.
51. 1. Lack of a sustainable yield will result in loss of jobs in the future.  
2. There are not enough conservation officers, natural resource management officers or recreational positions to enforce current regulations and there is tree poaching, wildlife poaching and unregulated motorized use of forest land and in wildlife habitat.
52. ^^^ very recently closed their mill in ^^^ which has decimated that community.
53. nothing tangible, some dirty water and backwashing required.
54. some community organizations have been negotiating with the company to get some concessions and have been successful, we are hoping that our request not to clearcut our visible viewscapes will be as successful
55. WE have yet to see the plan enacted however the view scapes from the town and highway are going to be greatly impacted.

56. Just starting now.

57. Although it does create some local jobs, habitat loss and low summer river levels result. An areal photograph of the ^^^ watershed, past and present, is horrifying! Drought conditions have lead to watering restrictions in the summer months impacting local food production.

58. We have lost massive swathes of unique and vulnerable forest in our watershed. The forest service roads ribbon ever steeper mountainsides, causing erosion and silt runoff into the ^^ River, ^^ Creek, ^^ Creek and other streams. This is also grizzly habitat, which is under threat due to ongoing clear cutting, which once again requires many kilometres of access roads. This area is mixed forest, not all pine, yet all trees are being harvested, so the excuse of needing to stop the spread of MPB is a moot point. The amount of waste left is also unacceptable.



# Suggested Changes to Forestry Decisions

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## What changes would you suggest to improve the community impact outcomes of forestry decisions? (^^^ denotes edit to ensure anonymity)

#	Response
1.	Communication prior to plans being developed. The plan was presented as a fait accompli, and concerns about the impact on the community was not enough to review and/or change the plan.
2.	clarification of requirements for format, content, or level of detail of forest stewardship plans  clarification of requirements for the communication methods used and frequency of communication by tenure holders
3.	Stewardship remains high on my priority list, which leads to sustainability.
4.	All of the points mentioned above should be initiated. Harmonization of the Riparian Area Regulation between forestry practices and local government should be established - current double standard is not appropriate.
5.	Municipalities and regional districts should not be expected to rubber stamp whatever notifications we are given. We have no authority environmentally or socially to enact anything, just influence by saying "no objections in the proper authorities and First Nations are consulted." We need to have some actual authority to halt the process until we are properly consulted and satisfied that the local people are in agreement with whatever is being proposed, and are properly and fairly compensated. To just go ahead and do whatever, by notifying and communicating with us during the process, is a farce, as we have no authority to change the outcomes. I could say more. We are stuck with the effects of these policies, and downloading of the consequences, but no input.
6.	Better/more positive reaction to input
7.	<p>Good examples are listed above -- these examples all assume some basic common vocabulary and understanding of the words people are using. The reality is that the ordinary person does not use "forestry" language in their everyday discussions. I do not believe a meaningful discussion can be had until we slow down somewhat, teach people the meaning of words as they relate to the forestry industry, explain the multiple roles of Government, explain the roles of industry and the roles of professionals in that field, we will not have meaningful dialogue.</p> <p>I believe that the "assumption" that everyone in the room is on the same playing field when discussing the forestry issues is a huge mistake.</p> <p>A clear example here is my reality. When I am in the same room with Mayor ^^^, who has a respected and significant background in forestry, I cannot pretend to understand the issue as he does. It has nothing to do with intelligence, it has everything to do with</p>

	understanding the vocabulary, training in the field and real current experience of which I have little in that area. I do respect him and his background so I am prepared to learn a great deal from him...just don't expect me to have the same quality of input.
8.	make wood salvaging more accessible to create secondary industry Industry should not be monitoring themselves
9.	1) A commitment from the Crown to develop new site specific (by licensee's areas) "growth and yield" information based on site specific "site indices". 2) Set rate of cut legislation based on the licences area stumpage vs non stumpage bearing contribution to the AAC. 3) Calculate AAC levels based on watersheds. Introduce legislation that penalizes "creaming" by reducing the AAC accordingly. 4) Increase the culmination age to 200 years in stand of greater than a Site Indices of 15. 5) Restrict the cutting of stands less than culmination age unless it can be shown that the stand is in imminent threat from disease of windthrow.
10.	Increased engagement, explanation, and expectation clarity. Decisions, even negative ones, are easier to accept when fair process has been followed.
11.	land coming out of PMF
12.	Allow some, logs to be dropped off at the mill without going to the log sort.
13.	all of the above listed. That said, the Ministry of Forest, Land & Range has been very supportive to our area.
14.	When there is large volumes of wood leaving a Community there should be some assurances that the local sawmills remain competitive.
15.	There should be regulatory and statutory amendments that would require both forest licensees and private managed forest land owners to refer their forest harvesting plans to local governments for review and comment (the same as all other provincial crown land and resource applications).  If this happened, harvesting plans could be assessed from the perspective of local government bylaws (official community plans and zoning) and community impacts could be more adequately addressed.
16.	changes or clarification of requirements of the consultation process between tenure holders and local governments and a requirement to be part of integrated water resource management plans.
17.	I think the problem is deeper than that. We need to look at the industry differently, there is exponentially more value in secondary manufacturing but we can't seem to make it happen.
18.	The Private Managed Forest Act and regulations result in no obligations to local government. They have audits, but none are made public.  We meet with ^^^ twice a year, but it is informal and what they tell us is controlled by them. Their SFI Certification is limited and cheaper to manage than CSA.

19. Regulatory changes to the Private Managed Forest Land regulations to protect local government water supply areas and mandatory consultation on forestry activities within municipal boundaries.
20. Timber sales revenue should be tunnelled back to the community or at least a portion of the monies from the sale. Resources and the removal of resources have an impact on infrastructure in a community and the use of road uses need to be paid back to the community that are impacted.
21. Get rid of TFL and go to lease lots whole north Island this could apply to communities some is going on now ^^^ will not invest here communities will.... example 10 million in tourism ^^^ native community.... Forestry industry has fought this for years we need to invest our biggest resource back into our economy not somewhere else Like cranberry wharf in London England..... Clear cutting cedar swamps? most of the value is on the ground and a 50 ton machine driving over?? salvagers need to go first no roads to build and high stumpage to government not ^^^ who now add a native stumpage on to pay for logging rights salvager pays double we already have government foresters to manage forest.
22. Keep us in the loop
23. Notice and consultation with municipality if within municipal boundary or if visual impact will be obvious to those accessing the municipality.  Including the municipality in the site observation when evaluation of clean-up and forestry practises are assessed by the Ministry.  For resort municipalities, visual impact and clean-up are important as the communities attract large of numbers of visitors who should not be witnessing poor forestry practises within the communities.
24. Make the language of the forestry easier to understand
25. We need to put the same controls on BCTS that we put on other tenure Holder's with TSA's
26. I have heard from fellow regional district directors that the independent loggers have no relationship with the municipal and electoral area leaders- so all of the above would be improvements.
27. The Township proposes that there be a requirement for an improved consultation/engagement process with the Council and community which includes both the Province and Tenure Holders and is framed by the following principles:  1. the communication is more regular and on-going  2. the communication is timely and meaningful i.e. it significantly precedes any formulation of a policy change or a decision on the above concerns  3. the consultation process and concerns of the community identified thereby will be seriously considered and result will affect decisions or policies by reasonably mitigating community concerns
28. Direct, active and ongoing involvement of local govt. in strategic level decision making and policy development related to forestry within their jurisdiction  Engagement in a partnership model [province/local govt/involved first nations] is

<p>establishing directions and policy.</p> <p>The re-establishment of appurtenancy in the Forests Act to redefine and rebalance the relationship between communities and industry [the provision could include measures to allow the Province to achieve desired flexibility while giving greater security to communities].</p> <p>The establishment of a requirement that local government be consulted at a similar level to that required for First Nations</p> <p>The establishment of a mechanism to inform local govt.[at a minimum] of the existence [and direction] of G2G negotiations with First Nations</p> <p>The opportunity for local govt. in put into the granting of and conditions related to forest tenure</p> <p>More ready access to and the potential for greater volume associated with community forests in order to give local govt. a window into the industry in its jurisdiction, while allowing the operation of the forest to be more viable</p> <p>Provincial support for staffing at District FLNRO offices to sustain adequate service levels and to support local initiatives</p>	
<p>29. Tenure holders are under no legal responsibility to consult with local government on forestry decisions, that is the role of the provincial government and I cannot see that changing. Our community is fortunate to have a good working relationship with the local FLNRO district office. During the past two months we have had three presentations to Council by FLNRO and BC Timber Sales staff regarding the increase in AAC, spruce bark beetle infestation and the new "training" program for forestry technicians which wil be piloted in our community.</p>	
<p>30. Forestry licenses responsibilty of local government or shared between local government and Provincial government.</p> <p>Better communication for tenure holders between provincial government to local government.</p> <p>More consultation process between tenure holders and local government.</p>	
<p>31. I think that if you make a decision that has a big impact to the community, there should be a chance that the neighboring community would get a piece of the tenure as a community forest, I think this would force tenure holders to work with the community.</p>	
<p>32. To cut back on harvest levels as the dead pine is all gone now or not worth making lumber out of. and put harvest levels to what will sustain some logging and sawmilling for the next 30 years until the next crop grows enough to harvest levels.</p>	
<p>33. All of the above. Implementation of the Morris report.</p> <p>Recognizing other values</p>	
<p>34. We need some formal communication network, wherein all parties have sense of each other's activities. This is most important to me as a lot of what happens affects a large population in a large watershed.</p>	
<p>35. All of above plus civility</p>	

36.	Make provision for a humble amount of timber to be processed locally. There are considerable rules for the logging company to live with in the lead up to harvesting. Beyond that, once the 2nd crop has reached the "free to grow" state, precious little silviculture is applied leaving a severely downgraded in value second crop for the next generation. I would also suggest full participation of the TFL holders in the stream restoration process which is becoming fairly well defined.
37.	All of the above.  Also some of the decisions made on caribou habitat etc. is questionable. The scientific studies had our area having less areas set aside for caribou habitat. A larger community lobbied hard and had their area cut and our area increased. This was totally against the research.
38.	All of the above
39.	<ol style="list-style-type: none"> <li>1. That we support the recommendations of the Forest Practices Board report, "Forest Stewardship Plans: Are they meeting expectations"</li> <li>2. That the ^^^ Regional District recognizes the importance of the forest industry to our communities and our province. It is understood that the business framework and the land base the industry works within is complex and therefore we recommend any changes to the system of planning be considered within the context of balancing interests and ensuring the industry can continue to operate.</li> <li>3. That local community (through local government) engagement at all levels of forestry planning be specified and defined in regulation in order to account for the interests of private property owners and other business interests</li> <li>4. That the local community(s) through local government is provided the same rights in legislation covering forest planning as tenure holders and other key interests in forest planning</li> <li>5. That forest companies be required to provide complete information to community and do so in such a manner that ensures the information is widely available in the area that the planning and operations are occurring in.</li> <li>6. That additional criteria for Forest Stewardship Plans be developed which include: <ol style="list-style-type: none"> <li>a. Plain language</li> <li>b. Clear definition of areas covered using maps</li> <li>c. Inclusion of operational level planning – cutblocks, roads, etc.</li> </ol> </li> <li>7. That changes be made to the system of professional reliance to ensure clear accountabilities of professionals when planning. Specifically these account abilities need to take into account all interests and most specifically those of local communities in the forest planning process at all stages of operations.</li> <li>8. That a more robust accountability system of reviews of 'on the ground' forest practices be put in place to ensure compliance with FSP's and operational site plans.</li> </ol>
40.	actually new regulations for forestry practices to insist on sustainable harvesting and forbidding clear cutting also fewer sales to timber companies of crown property for harvesting purposes

41.	<p>1) Amendments to the Private Managed Forest Land Act and Regulations are required.</p> <p>Amendments to the Act are required to provide more local government authority regarding uses of Private Managed Forest Land. Section 21 of the Act is an unacceptable restriction on the authority of local government to adopt bylaws or issue permits that would regulate activities on PMFL. Residents of municipalities reasonably expect that their local government should be able to regulate activities on PMFL. This is particularly reasonable given the reduced taxation benefits.</p> <p>Amendments are also required to the PMFL Regulation with respect to the exit fee adjustment factors. The timelines and adjustment factors are not reasonable given the intent of the managed forest property classification to encourage private landowners to manage their lands for long-term forest production.</p> <p>Annual consultation and sharing of the management commitment, operations map, harvesting plans and supporting assessments and long-term disposition or development intentions for land within municipal boundaries should be required.</p> <p>2) Amendments to the Crown land forestry legislation (Forest and Range Practices Act and Regulations, etc) are recommended to require annual consultation via presentation and sharing of an operations map and development plan (outlining proposed harvesting, road building and other forestry activities) with local government.</p>
42.	<p>Clarification of the communication and consultation requirements for forest tenure holders.</p> <p>Clarification regarding tenure holders' responsibility to local governments and operating region (specifically relating to labour/employment).</p> <p>Increased engagement with the local government, such that significant changes to activities are brought to the local government in advance.</p> <p>Regulation requesting forest tenure holders provide annual/semi-regular updates on regional activities to the local governments.</p>
43.	<p>At a minimum, operators need to properly inform the public early. The operator must be ready and willing to explain what it is it wants to do, how it will do it, and what the result will be for both the forest and the people. If CSA certified this is achieved.</p>
44.	<p>In the unlikely event that forestry decisions were to have a direct impact on our community, I would want to see all the above in place and adhered to.</p>
45.	<p>Changes to FSPs as per the Forest Practices Board's recommendations.</p> <p>Restoration of Forest Act requirements for license holders to engage the Province, local government and the community in transfer and sale of licenses and tenures.</p> <p>Removal of timber pre-eminence from FRPA and inclusion of community values and mandatory consultation requirements to establish priority values for forest management.</p> <p>More and significantly larger community forests and First Nations Woodland tenures.</p>
46.	<p>Realistic consultation and information gathering with local governments and all community sectors and stakeholders by timber license holders MUST occur. The license holders speak about sustainable forest practices but don't practice it and it is allowed to occur. There have been reports of non-native trapline territories being greatly impacted. For example, instead</p>

of systematic logging in trapline areas to protect species, all large timber was removed and fur bearing animals are no longer there. One non native trapper reported he has paid his own money to build nesting boxes to try and bring the animals back. Annual yields of hundreds of martens in a 300 mile trapping area are reduced to less than a dozen.

47. Legislation completely lacks consideration for the people, the communities and land base that it prospers from. At least, reinstating the requirement to assess community impact in granting a license needs to be put back in. Besides that, I would a metric indicator that reviews the direct benefits the community and landbase will receive from a tenure. Without a substantially positive score, the tenure should not be permitted either through transfer or on-going operations.

In addition, the concentration of manufacturing of logs in fewer and fewer large mills has effectively eliminated mill jobs in smaller communities -- former mill workers now watch logs being driven through town to large mills hours down the road. How this gets addressed through legislation could be creative, but would best come from the community stakeholders the process has effected.

48. Measures which would be useful:

- Agreement to particulars contained in the ^^^'s draft proposal to the Province [presentation to the Minister pending] including:
  - direct, active and ongoing involvement of local govt. in strategic level decision making and policy development related to forestry within their jurisdiction
  - engagement in a partnership model [province/local govt/involved first nations] is establishing directions and policy
  - The re-establishment of appurtenancy in the Forests Act to redefine and rebalance the relationship between communities and industry [the provision could include measures to allow the Province to achieve desired flexibility while giving greater security to communities]
  - The establishment of a requirement that local government be consulted at a similar level to that required for First Nations
  - The establishment of a mechanism to inform local govt.[at a minimum] of the existence [and direction] of G2G forest related negotiations with First Nations
  - The establishment of a mechanism to encourage to inform local govt[at a minimum] of the existence [and direction] of G2G of significant industry-to-nation forest related negotiations with First Nations
  - The opportunity for local govt. input into the granting of and conditions related to forest tenure
- More ready access to and the potential for greater volume associated with community forests in order to give local govt. a window into the industry in its jurisdiction, while allowing the operation of the community forest to be more viable
- Provincial support for staffing at District FLNRO offices to sustain adequate service levels and to support local initiatives
- Provincial support for the funding/shared funding for local government initiatives for the



<p>marketing and sustainable development of forest resources</p> <p>NB: The ^^^ has engaged in an extensive and intensive initiative [Forestry Rejuvenation Project] including a proposal pending presentation to Minister Thomson. The thrust of the proposal is to bring greater local influence to bear on forestry through a BC/^^/First Nations partnership. The proposal will be made public and available to the UBCM once the Minister has received it.</p>
<p>49. Work together to ensure all user groups of the forestry road are working together and not against one another.</p> <p>Very easy to co coordinate this and it would be a win win for the province.</p>
<p>50. All of the above. There needs to be comprehensive Land Use Plan legislation re-instated as it relates to harvesting, recreational and other community values.</p>
<p>51. Communication with the other users of Crown Land</p> <p>Communication with the elected local government representatives.</p>
<p>52. All of the above bullets need more public advertisement for public review.</p> <ol style="list-style-type: none"> <li>1. Needs to be total overhaul of the total AAC in BC. It's way to high.</li> <li>2. No more old growth should be cut, period.</li> <li>3. Wildlife and habitat values should be prioritized.</li> <li>4. There should be no more consolidation of small timber outfits-big companies have a clear advantage in the market to the detriment of our rural rural communities and economy.</li> </ol>
<p>53. With the ever increasing monopolization of the forest tenure regime in BC it is ever more important for local communities to have local control over their local resources. The corporate concentration grows all too rapidly while work on the expansion of the Community Forests appears stalled at zero or closely thereto.</p> <p>Communities and Woodlot Licensees should have management authority over 50% of BC's AAC. The forest industry can and likely should manage the rest with the above proviso. And, the companies can still have the timber---all they have to do is purchase it from the Communities and woodlot licensees. The Community forest and woodlot models are already hugely successful in BC and hence should be expanded.</p> <p>Promoting and adopting the policy that no one company can hold more than 5% of BC's AAC is essential. With this policy in place the worst case scenario would be that we would have at least 20 companies in BC.</p> <p>Without it we are rapidly trending towards very few and possibly even only ONE. Don't say it can't or won't happen because we are dangerously close to that position now.</p>
<p>54. all of the above mentioned, there needs to be more oversight by government on how forestry decisions will ultimately affect areas in a negative manner</p>
<p>55. I would love to see more opportunity for comment from impacted areas on strategy or large scale planning for the area. Referrals would be welcomed, and hopefully mutually productive. I also understand that in some RDs, there has been actions taken by local gov't to bring together large tenure-holders to have some shared visioning for the watershed-level forest management plan; that's exciting, and we would be keen to help explore that</p>



kind of proactive conversation.

I like most of the suggested potential options above as well, specifically changes or clarification of requirements of the consultation process between tenure holders and local governments. Without overburdening anyone, it'd be great to see this updated.

56. clarification of requirements for the communications & consultation process

57. Regulatory or statutory amendments regarding tenure holders' responsibility to local government.

58. Allowable Annual Cut (AAC) be reassessed, taking into consideration impact on the watershed, and impact on wildlife, and no less than 50% of AAC be designated to Community Forest and Woodlot Holdings, and limit no greater than 5% of AAC to any one company,

Ministry of Forest, Lands and Natural Resource Operations require all licensees to widely advertise in print, and online, of their FSPs, and solicit public and local government input so that all parties have a reasonable opportunity to bring forth their concerns before planning and layout begin.

# Years of Service

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**How many years have you served in this capacity?**

#	Response
1.	7
2.	1
3.	18
4.	Four
5.	4
6.	almost 9
7.	One - Nov./14 newly-elect
8.	5 terms
9.	7 years
10.	4 years
11.	25
12.	one
13.	4
14.	Mayor 12 years, Councillor 11 years, BOV 2 years, Committee work
15.	.2
16.	4
17.	10years
18.	1 year as Mayor, 9 years as Councillor.
19.	seven
20.	5 years
21.	1
22.	7 years
23.	7
24.	16 years
25.	Four
26.	1 year
27.	been involved in logging since 1953 till 2015

28.	10
29.	5 years
30.	7
31.	1
32.	1 plus 3 as a councillor
33.	Two years as CAO and Members of Council serving from one to fifteen years
34.	1
35.	seven
36.	7
37.	7
38.	50
39.	7
40.	1
41.	2nd term
42.	10 years as Mayor and 20 years total on council.
43.	35
44.	4 years (2011)
45.	Seven
46.	1
47.	Between 1 and 10 years (6 Councillors)
48.	1
49.	13
50.	1
51.	18 years
52.	One
53.	2.5
54.	1 year director, 3 years alternate
55.	5
56.	This is my first year
57.	20 years
58.	27 years
59.	7 years

60.	5th term on council, second term as mayor
61.	11
62.	4
63.	one
64.	1
65.	1.4

# Population of Electoral Area or Municipality

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**What is the population of your local government? If you are an Electoral Area Director, please provide the population of your electoral area.**

#	Response
1.	3700
2.	2,999
3.	1800
4.	1700
5.	500
6.	3600
7.	1066
8.	80,000
9.	Approx 4,000
10.	7,000
11.	1000
12.	4006 citizens
13.	1050
14.	
15.	440
16.	3800
17.	2500
18.	34,000
19.	1550
20.	7,000
21.	3500
22.	6 councilors 1 mayor
23.	1700
24.	Area C 2,000 As Regional rep. on the CAG the population is 20,000

25.	3900
26.	2000
27.	2500 and dropping
28.	1300
29.	550 year round with 1500 seasonal and over 800,000 annual visits each year
30.	3000
31.	4500
32.	850
33.	5,050
34.	5000
35.	4000
36.	5,500
37.	4500
38.	3000
39.	4,500
40.	350
41.	1600 in our community but we service approximately 5000.
42.	500
43.	1900
44.	7400
45.	14,000
46.	3206
47.	1000
48.	1,600
49.	4200
50.	10,000 City; 25,000 area
51.	5000
52.	1200
53.	6,500
54.	3000
55.	My population is small, 600 but the City of Revelstoke is affected and their population is @ 7200

56.	5-6,000
57.	700
58.	660
59.	2088
60.	less than five thousand permanent residents with many secondary home owners (4700)
61.	4700
62.	3200
63.	4000
64.	4000
65.	4000
66.	4900



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## Electoral Area Directors Report – Community issues with FRPA

### History of this issue to date:

The Squamish-Lillooet Regional District has responded to community concerns regarding forestry in proximity to their neighborhoods and private property in 2013 and 2014.

In 2013 two resolutions were forwarded to and passed by UBCM:

- Requesting that Forest Stewardship Plans be redone every five years (and not automatically be extended for another 5 years)
- Calling for Forestry Companies to maintain websites with information needed by the community regarding forestry and harvesting. Information would include Forest Stewardship plans and operational level planning mapping of cut blocks, roads and visuals.

In 2014, the board met with the Minister Thompson, FLNRO at UBCM and once again put forward community concerns regarding the lack of engagement and consultation with communities, neighborhoods and private property owners by forest companies.

In August 2015, the Forest Practices Board produced a report called: Forest Stewardship Plans: Are they meeting expectations?

<https://www.bcfpb.ca/sites/default/files/reports/SIR44-FSP-Are-They-Meeting-Expectations.pdf>

In mid-September we received a response to our 2014 UBCM meeting from the FLNRO Minister Thompson advising us that he plans to respond to the report by November 30, 2015. He also referred us to Clr. Brian Frenkel, Vanderhoof Councillor who is appointed by UBCM to the Forest Practices and Range Council as well as Norah White, the FLNRO Ministry Official with the role to review the report and suggestions for processes.

The Electoral Area Director's committee met on October 14, 2015 to review this issue. Clr. Frenkel joined us and explained his role and his main goal, which is to have community engagement built into the forestry planning process.

All of the Electoral Area Directors have experience (to varying degrees) with the challenges caused by the current Forest Practice and Range Act's provisions for community consultation.

### Key issues we have heard from our communities are:

1. Finding out about proposed cut blocks and roads near communities, neighborhoods and private property only after ribbons have been laid. There is a consistent level of disbelief by the public that they would not be engaged (informed and consulted) long before cut blocks are actually reconnoitred.



2. Consulting with forestry companies regarding operational level plans is challenging:

There is no “set out” process or role for private property owners, neighborhoods and communities. Forest companies consult and engage when and how and with whom they see fit.

- We have had a number of examples where private property owners have been told by a forest company employee “we do not have to consult with you”
- Different neighborhoods and communities continuously need to reinvent the advocacy wheel when seeking mitigations each time harvesting is planned in their area . The feeling is that the degree of success in getting even minor mitigations is based on how fast volunteers can learn about FRPA and how hard they can fight the companies. It is a very reactive process.
- Information is hard to obtain from forest companies:  

Items such as visual renderings, hydrological studies, site plans are often withheld in whole or in part by companies or not distributed digitally which makes it difficult for far distant rural/remote property owners to access.
- Registered Professional Foresters generally represent the interests of the forest company they work for and are often very defensive about requests for basic information .

3. Forest Stewardship Plans (high level planning by Forest Companies):

- Are very hard to understand even though they are written for the public, they are written in “forester” talk
- Process for consultation is often missed as the only requirement is advertising in newspapers when there are often not newspapers available in the rural communities.
- Generally do not include thorough mapping
- Are based on objectives and not specifics and therefore hard to find relevancy for private property owners, neighborhoods and communities
- The public is unaware that this is , currently their only opportunity to commend on forest planning in their neighborhood

4. Compliance:

- Communities advise they have little to no confidence that there is currently enough observation to ensure compliance with FSPs and operational site plans has been achieved
- FLNRO officials are rarely seen observing and examining specific harvesting locations

#### 5. Economic Benefits

- While property owners recognize the benefit of the forest industry to the province, they repeatedly mention that the specific economic benefits and job opportunities for their communities have diminished over the last ten years as industry has centralized. This sets up a conflictual relationship between residents of communities and the companies removing what they view as their resource and their jobs with marginal returns to the community
- There is a clear desire for increased small scale opportunities: woodlots, small scale salvage, community based forest licences, value added and that support be provided for development of these opportunities

The overall result for private property owners, neighborhoods and communities is a lack of trust in forest planning and harvesting practices.

#### **Recommendations:**

1. That we support the recommendations of the Forest Practices Board report, “Forest Stewardship Plans: Are they meeting expectations”
2. That the Squamish-Lillooet Regional District recognizes the importance of the forest industry to our communities and our province. It is understood that the business framework and the land base the industry works within is complex and therefore we recommend any changes to the system of planning be considered within the context of balancing interests and ensuring the industry can continue to operate.
3. That local community(s) engagement at all levels of forestry planning be specified and defined in regulation in order to account for the interests of private property owners and other business interests
4. That the local community(s) is provided the same rights in legislation covering forest planning as tenure holders and other key interests in forest planning
5. That forest companies be required to provide complete information to community and do so in such a manner that ensures the information is widely available in the area that the planning and operations are occurring in.
6. That additional criteria for Forest Stewardship Plans be developed which include:
  - a. Plain language

- b. Clear definition of areas covered using maps
  - c. Inclusion of operational level planning – cutblocks, roads, etc.
- 7. That changes be made to the system of professional reliance to ensure clear accountabilities of professionals when planning. Specifically these accountabilities need to take into account all interests and most specifically those of local communities in the forest planning process at all stages of operations.
- 8. That a more robust accountability system of reviews of ‘on the ground’ forest practices be put in place to ensure compliance with FSP’s and operational site plans.