



June 20, 2025

The Honourable Ravi Parmar, MLA  
Minister of Forests  
Parliament Buildings  
Victoria, BC V8V 1X4

Sent via email: [FOR.Minister@gov.bc.ca](mailto:FOR.Minister@gov.bc.ca)

Dear Minister Parmar,

The Association of Vancouver Island and Coastal Communities (AVICC) is the Union of BC Municipalities (UBCM) area association representing the interests of local governments and member First Nations in the British Columbia region of Vancouver Island, qathet, the Sunshine Coast, Central Coast and North Coast.

After consideration at the AVICC Annual Convention in April 2025, AVICC members endorsed a resolution, sponsored by the Cowichan Valley Regional District, that is of interest to your Ministry. The resolution and background information are enclosed for your review and attention. Since this resolution is regional in nature, it will not be forwarded to UBCM for consideration at the UBCM Convention in September.

***AVICC Regional Resolution R1 – Addressing Local Community Concerns with Private Managed Forest Lands (PFML)***

AVICC and UBCM members have consistently endorsed resolutions asking the Province to regulate private land logging in the same manner as crown land, and to ensure that local governments are consulted in advance of harvesting to prevent damage to watersheds and other infrastructure –bolded items are those originating from AVICC members (**2025-R40** (*endorsed at AVICC to be considered at the 2025 UBCM convention*), **2023-NR40**, **2021-EB29**, **2020-EB48**, 2020-EB65, 2019-B38, 2019-B46, 2019-B48, **2019-B49**, **2018-B41**, 2018-B42, **2011-B50**, **2010-B26**, **2008-B34**, **2006-B102**, **2005-B27**).

In addition, the AVICC and UBCM members have endorsed a number of resolutions asking that the Province enact legislation requiring private managed forest lands to be regulated and managed to the same standards as crown managed forest lands; referencing challenges with water quality and safety of drinking water in community watersheds – bolded items are those originating from AVICC members (**2023-NR67**, **2021-EB29**, **2020-EB48**, 2019-B48, **2019-B49**, **2018-B41**, **2011-B50**, **2008-B34**).

In 2024, in collaboration with several of our members, the AVICC Executive met with the Minister of Water Land and Resource Stewardship and Ministry Staff to discuss resolutions focused on protecting vital ecosystems and ensuring the long-term safety of drinking water. Following that meeting, AVICC issued a [press release](#) to call for provincial attention to address the critical challenges surrounding watershed security and land conservation, specifically on privately managed forest lands within the historic E&N Land Grant on Vancouver Island. Privately Managed Forest Lands, watershed security and land conservation have been identified as being a priority issue for AVICC members.

**We kindly request your feedback on this matter, including an estimated timeline for the completion of the Privately Managed Forest Lands Review and the implementation of the subsequent recommendations.**

If you have any questions, or require further information, please contact Theresa Dennison, AVICC Executive Director, at 236-237-1202 or at [tdennison@avicc.ca](mailto:tdennison@avicc.ca).

Sincerely,



President Ben Geselbracht, AVICC  
Councillor, City of Nanaimo

cc: Hon. Randene Neill, Minister of Water, Land and Resource Stewardship  
Hon. Brittney Anderson, Minister of State for Local Governments and Rural Communities  
Danielle Myles-Wilson, Chief Administrative Officer, Cowichan Valley Regional District  
Chair Kate Segall, Cowichan Valley Regional District, Director Area A

## **ADDRESSING LOCAL COMMUNITY CONCERNS WITH PRIVATE MANAGED FOREST LANDS**

**Whereas** population growth within the Cowichan Valley Regional District, like much of Vancouver Island, is concentrated in the fertile lower portions of our watersheds and is reliant upon surface and groundwater originating in the undeveloped upper watersheds;

**And whereas** while the entire Cowichan Valley Regional District lies on unceded First Nations territory, the majority of the land in the upper watersheds on eastern Vancouver Island is privately managed forest lands over which local governments have little or no authority regarding forest management activities which impact the hydrologic cycles and the availability of water to meet community and ecological needs;

**Therefore be it resolved** that AVICC request that the Province of BC and the Ministry of Forests complete the currently stalled Private Managed Forest Land Program Review and reform the Private Managed Forest Lands Act to ensure that forest management on private lands prioritizes the protection of ecological values while providing economic benefits to communities and allowing for local government input to resource harvesting activities within the watersheds that support their communities.

## ADDRESSING LOCAL COMMUNITY CONCERNS WITH PRIVATE MANAGED FOREST LANDS

### Backgrounder

While the Cowichan Valley Regional District spans Vancouver Island, the majority of the region's population is concentrated in a narrow band along the eastern coast of the region. The District of North Cowichan, City of Duncan, Cowichan Indian Reserve No. 1, and the unincorporated communities of Shawnigan and Mill Bay all generally lie within the fertile valley bottoms of several major watersheds, including the Cowichan, Koksilah, Chemainus and Shawnigan watersheds. The upper portions of these watersheds are largely undeveloped and are essential for providing clean water to support the downstream communities, along with an array of other important ecosystem services. They are also an important source of jobs and economic benefits including both forestry and recreation.

Jurisdiction over land use in the upper watersheds is complex. The entirety of the CVRD lies within the unceded traditional territories of the Quw'utsun, Malahat, Ts'uubaa-asatx, Halalt, Penelakut, Stz'uminus, Lyackson, Pauquachin, Ditidaht & Pacheedaht Peoples; however, over half the land within the region, including almost all the land within the upper watersheds, is Private Managed Forest Lands (PMFL), a legacy of the 1884 Esquimalt & Nanaimo (E&N) land grant. While local governments can influence the subdivision of these lands through zoning, municipalities and regional districts have no control over forest management or other resource extraction on these lands.

In the latter part of the nineteenth century, approximately 8,000 km<sup>2</sup> of land on the south-east coast of Vancouver Island was granted to Robert Dunsmuir to encourage the construction of the Esquimalt & Nanaimo Railway. These lands, commonly referred to as the E&N Land Grant have been consolidated over the years and are now mostly owned by two forestry companies, TimberWest and Island Timberlands. Mosaic Forest Management manages all of these lands on behalf of TimberWest and Island Timberlands, effectively giving Mosaic control over a vast swath of lands adjacent to communities on southeastern Vancouver Island. In the case of the CVRD, Mosaic controls forest harvesting as well as public access to nearly half the land within the regional district. Forest harvesting within the PMFL is governed by the *Private Managed Forest Land Act* and administered by the Private Managed Forest Land Council. The *Forest and Range Practices Act*, which governs forest harvesting on Crown Lands and provides for a greater degree of government oversight and public input to forest harvesting, does not apply to the PMFL.

In 2019, the provincial government initiated a review of the Private Managed Forest Land Program as part of the Coast Forest Sector Revitalization Initiative. This review began with an invitation for input from the public and from specific stakeholders through either an online survey or via a formal written submission. In total, 1,225 survey responses and

283 written submissions were received. Locally, written submissions were made by the CVRD, Municipality of North Cowichan, the Hul'qumi'num Treaty Group, and the Cowichan Watershed Board, along with many other local and regional governments on Vancouver Island. Issues and solutions identified by the CVRD included:

- Accountability and transparency - The PMFL program needs to have complete, comprehensive and enforceable management objectives to protect public environmental values. Open and regular communication between PMFL landowners and local governments and communities including sharing information, data and reports needs to be enhanced.
- Climate change and forest function - Management should reflect current and future climate reality and recognize healthy forests' role as a buffer for climate change impacts such as drought, fire and floods.
- Compliance - Formalized collaborative management agreements with local governments and water purveyors that include regular third-party environmental audits, hydrological assessments and mechanisms for adaptive management would build trust and enhance durability of positive working relationships.
- Interface between community and private forests - Resource lands play an important role in our region and should be maintained for resource purposes, consistent with community planning processes. Buffers for burning, logging and chemical use next to residential areas should preserve visual quality, safety and minimize environmental risk. Access for recreation and infrastructure maintenance should be preserved.
- Reconciliation - Opportunities for reconciliation with an economic benefit for First Nations where their traditional territory overlaps with private forestry land.

The public engagement to the PMFL was summarized in an extensive “What We Heard Summary Report” (<https://engage.gov.bc.ca/app/uploads/sites/121/2019/11/PMFLPR-WWH-Report-Final-1.pdf>); however, in the five years since this report was produced, there has been no further action on addressing the issues identified.

In the five years since the initiation of the PFML review, the CVRD has been dramatically affected by the impacts of climate change, many of which are exacerbated by forest harvesting in the upper watersheds. Climate projections are for wetter winters with more intense rainstorms, along with hotter and drier summers. Healthy forests slow the runoff from winter storms, allowing more water to be absorbed into the soils. When these forests are removed, the result is higher, more rapid flooding in the winter months and less water available to maintain summer flows. Within the Cowichan region, examples include:

- Summer river flows in the Cowichan River are no longer sustainable. Low flows combined with warm temperatures resulted in the death of over 84,000 salmon in 2023. Winter flooding has had devastating effects on the community, particularly after the atmospheric river in November, 2021.
- Drought in the Koksilah watershed has led to Fish Protection Orders, banning local farmers from irrigating forage crops. Lack of water in the river and aquifers is preventing new farmers from obtaining water licenses.

- The Chemainus River has experienced severe flooding in both 2020 and 2021, resulting in evacuations and damage to property, especially to the Halalt First Nation

The watersheds within the CVRD have, for millennia, been relied upon to provide sustainable flows of clean water to support healthy ecosystems and thriving communities. The combined impacts of climate change and decades of forest harvesting mean that these watersheds can no longer be counted on to provide these ecological services.

The CVRD is calling upon the province to complete the PMFL program review with a focus on revising to the Private Managed Forest Lands Act to prioritize:

- Protection of the quality and quantity of both surface water and groundwater
- Limiting forest harvesting to an ecologically-sustainable level to maintain ecological values including hydrologic cycles and biodiversity,
- Creation of a mechanism for local governments to have input to resource harvesting activities within the watersheds which support their communities.