

16 July 2024

The Forestry Commission of PEI  
Mr. Jean-Paul Arsenault, Chairman, and  
Members of the Commission

Dear Mr. Arsenault, and Commission Members:

Firstly, as one who is both interested in and concerned for the health of our forests, I thank you for your commitment to serve on the Forestry Commission. The work you are undertaking is both very important, and likely rather overdue. I'm sure that your collective expertise and thoughtful consideration will be much appreciated by many.

Secondly, I should point out that I am neither a forester, nor someone who works in the forest industry, so my input is simply from the point of view of someone who, together with my wife, owns a woodlot, and has long held an interest in nature.... ecology, biologic ecosystems, and the plants and animals that comprise them. Our woodlot is a 20-acre property in Eastern PEI that has been in my family since I was a child. Like many on the Island, we were severely impacted by recent climate events, initially by Dorian, and more recently by Fiona.... the latter resulting in approximately 80% blowdown on our property. Prior to those events, the property had been in the latter stages of post-agricultural succession.... fortunately, we have a very rich and diverse seed source on the property, and although our mature white spruces have virtually all collapsed, we have a vibrant mix of young trees including many red oak and white pine to name but a few. Although we have always intended and tried to be good stewards of this land, somewhat paradoxically these recent climate events have been the impetus for us to hopefully become much more actively engaged in helping it recover and one day become a healthy Acadian Forest once again.... we are now seeing this as a unique opportunity in time to make a genuine difference.

I have read with interest both your preliminary report, "*Towards a New Forest Policy – 31 January 2024*", and the most recent "*State of the Forest Report – 2020*". I note that, unlike other provinces, PEI woodlots are exceeding 85% private ownership, and of those private owners, something approaching 50% of them are small woodlot owners like me. It is for this reason that I feel strongly that the Commission should weigh heavily the collective views/needs of small owners. Given these data, it would seem apparent that if government is to invest in and influence the health of PEI forests, then that must involve both crown and private lands.... i.e., an investment in private forests is also in the public interest.... improved air and water quality, better soil quality, reduced erosion, and enhanced wildlife habitat, to name a few. As an individual, my views and our little piece of forest are but a very small drop in the bucket, but collectively, small woodlot owners have an interest in a very significant portion of PEI's forests. As I have read forest reports in the past, and more recently as I attended one of your consultation sessions, it appeared to me that a very strong focus has been on the economics of forestry as a business. Not to take away from the importance of that, but it is not the only perspective that should count. Although somewhat anecdotal, I am of the view that there are many small woodlot owners whose interests are not focused on the economics of the harvest. I'm sure these owners' goals for their properties are varied, but may include like myself trying to re-establish an Acadian Forest for future generations, or perhaps contributing to carbon sequestration, creating habitat for wildlife, developing beautiful areas for hiking trails, or maybe just being good stewards to the land and passing it along to their children and grandchildren in a healthier state than they found it. Considering these views and goals, and

making recommendations for a new Forestry Policy to better support this sector should be a key consideration.

Like many, I have found the Provincial Forest Enhancement Program to be very beneficial, and I am certainly very glad that we have it. Notwithstanding, however, there are a number of challenges and/or shortcomings in current approaches for owners such as me:

- At least historically, it appears to me that forestry policy has been largely built on the notion of supporting industry objectives: Of course, while appropriate support to industry is desirable, by itself it does not recognize the collective importance of owners such as me who are not directly involved in forestry professionally.
- Limited availability of seedling stock, particularly hardwoods: For those interested in Acadian Forest restoration, this is challenging, and the provincial nursery seems to have historically had a clear focus on softwoods. While I expect this is attractive for commercial purposes, adding more white spruce to the mix is not, in my view, what many are looking for or really need.
- Availability of foresters and assistive funding for selective thinning or harvesting in developing stands: Using large harvesters aimed more at clear cutting is not the optimal approach for selective management. If one is fortunate enough to find a contractor with the right mindset, careful selective work can be possible, but it can be difficult to find those interested in working small stands, and potentially very expensive for the woodlot owner if there is little in the way of stumpage revenue. I sense that many are simply faced with a rather binary decision of doing either next to nothing, or applying a harvesting treatment that goes far beyond their intended outcome.
- Now almost two years post-Fiona, any salvage value in the blow-down is soon coming to an end, and yet there remains a lot of very damaged forests: Longer term, this may well be a good thing as the organic material decomposes and enriches the soil for the betterment of future forests. Notwithstanding that, on a smaller lot, many might like to help nature along by getting much of that material down on the ground so as to speed up the process, and have the forest actually available to use and enjoy in the interim. It can be very difficult to arrange for such selective hand-work, not to mention the associated costs.
- Focussed and outcome based supports: It would be desirable to have a revitalized forest policy that incentivizes both the owners, and the forest contractors with a broader range of silviculture treatment options. This could be inclusive of outcome-based subsidy programs that assist in making it more feasible for both owners and contractors to undertake some of the more selective treatments which may not currently be as viable.

In more general terms, it is my hope that recommendations will be made, and accepted/implemented by Government, that find the right balance between sustainable policies supporting the commercial interests in forestry, and those of people like ourselves who perhaps don't have revenue goals for their properties, but just love forests and want to do right by them. As I noted at the outset, although I have no expertise in forestry, it has seemed to me over the years that practices such as clear cutting and monoculture plantations have been the wrong approach. When I look back at the 2004 Discussion Paper that preceded the Forestry Commission of 2005, together with excellent observations and recommendations (such as those submitted by Kate Poole in 2005), at least on the surface, it makes me question just how much real progress has happened in the almost 20 years since then. Perhaps this is not a fair or accurate characterization, but if correct,

then it rather begs the question: *if progress has been minimal, then why, and what can be done this time around to have a different outcome.* I am, nevertheless, encouraged to see and read about other approaches that to me seem very progressive and on the right course. In particular, those promoted by and embraced by the Macphail Ecological Forest Project.... to my mind, sustainable, ecologically sensitive practices just make so much sense. Enhanced support for Macphail, and like-minded initiatives, could go a long way in achieving optimal forest outcomes for PEI.

As someone who spent a career as a senior policy manager in government, I understand well the challenges of finding agreement and support for long term approaches that come with cost implications today. Nevertheless, it would be my hope that flowing from your Commission's recommendations, the government sees fit to adopt policy provisions not just with a view to the next few years, or a view to the economics of the harvest, but rather to a generational long-term approach for sustainability today, and healthier, diverse, and well-established forests for our children and grandchildren. Albeit an armchair perspective, I've got to think that will stand us all in better stead, and eventually result in a PEI forest that is better able to survive climate change, provide improved wildlife habitat, contribute to carbon capture, while still serving both the interests of the forest industry and more broadly those outside industry who nonetheless have meritorious goals for their woodlands.

Thanks for receiving and considering my views, and best wishes in your deliberations. I shall look forward with great interest to your final report.

Yours sincerely,

J.K. Miller  
Stratford, PEI