



Old Growth Strategic Review

Submitted by the BC Wildlife Federation, Forestry Committee

We welcome the opportunity to participate in this exercise. The review is long overdue, given the last extensive review and development of an Old Growth Strategy was in 1992. Over the past four decades, the BC Wildlife Federation (BCWF) has participated in many forestry related reviews starting with the Pearce Commission in the 1970's. Unfortunately for BC's forests, little positive has resulted and many of the predictions regarding timber supply, old growth liquidation, fish and wildlife impacts, etc. are evident today. We sincerely hope and trust this will not just be another exercise in 'talking while they continue logging as usual.'

The questionnaire provides valuable insight on public perceptions and values associated with old growth forests; however, a comprehensive review requires information on the current status of old growth supply and the degree of protection. Inventory of existing old growth forest by Forest District is required, summarized by Biogeoclimatic (BEC) subzone/variants. The amount/proportion that is under some form of conservation/protection would provide the necessary background to move forward. Again, we recognize the value of obtaining public feedback to assess where values lie and what emphasis to put on certain old growth values. However, we want to emphasize that any strategy developed must be based on science and not on the populist values at a certain time in history.

As we will point out later, our forests, to be sustainable in more than just fiber values, must be managed over a long period of time and with scientific data as the strategies' foundation. Current forms of old growth protection include a number that are in addition to the common designations of Parks (provincial and federal), Ecological Reserves, Wilderness Areas and Wildlife Management Areas. The general public may not be aware of FRPA designations such as Old Growth Management Areas, Wildlife Habitat Areas, Ungulate Winter Range, and Riparian Reserves that contain old growth forest, although the amount of these designations is currently constrained by policy to 1% of the AAC.

How best to incorporate this information into policy and application?

The BCWF supports a resurrection of land-use planning, as most regional plans are dated (ie. Vancouver Island, Caribou-Chilcotin LUPs). BCWF has long advocated for landscape-level planning that includes a range of landscape and watershed values with participation of local community, Indigenous and government, and incorporates inventory, science and local information. It should:

- produce a vision for the landscape in terms of what the future state should be;
- have clear and enforceable objectives for the values;
- and be developed so there are clear and explicit trade-offs that are made.

Arbitrary limits on the potential constraints on timber supply should be removed in establishing forest objectives for a range of values including fish and wildlife. This concept involves more than just consideration of 'old growth' as it involves the entirety of forest management in our Province. We will address this aspect in more depth below.

To make our old-growth forests more resilient and able to adapt to external pressures, we need more intensive forest management. Many projects that have been funded by the Forest Enhancement Society of British Columbia (FESBC) and Habitat Conservation Trust Foundation (HCTF) partnership provide excellent examples of labour-intensive, stand-level activities that

reduce susceptibility to wildfire and help alleviate current job loss. The government needs to make more of an effort to establish forest management objectives that support the sustainability and resilience for important old-growth forest values at the landscape level, particularly aquatic and terrestrial habitats and fish and wildlife populations. In landscapes dominated by second-growth, prescriptions designed to recruit old-growth attributes should be pursued. There is a body of research on this topic, but application by the forest industry has been minimal and requires some economic incentives to do so.

Forest planning operations to mitigate the risks of wildfire and the benefits to other resources are virtually non-existent, particularly in the northeastern part of the province. Wildfire prevention, response and mitigation should be a provincial function that is strategically planned provincially and implemented tactically and in the various regions. Currently, fire suppression priorities are generally directed to areas already developed with roads and layout, and proximity to residential areas. Old growth areas are considered much lower priority. Priority and type of response to wildfires consuming old growth should consider the Natural Disturbance Type in which they occur. In providing our comments on 'old growth' the BCWF cannot omit comment on the broader issue of forest management in general. The way in which our whole forest land base is being managed relates fundamentally to the issue of 'old growth management' as well as to the totality of forest management.

At present, the model being used to manage our public forest resources is known as the 'Professional Reliance' model. This model devolves the responsibility of forest management from the Provincial Government and turns that responsibility over to the forest industry. It was implemented in the early 2000's and was designed to reduce regulation of the forest industry; which it did. However, it also handed over the operational and planning components to industry and was specifically designed to eliminate any restrictions on the industry regarding fish, wildlife and their habitats. It did away with the Forest Practices Code, and it allowed the industry to hire their own professionals (ie. foresters, engineers, agrologists, etc.) to sign off on forest development plans that impacted fish and wildlife populations and their habitats. Biologists were specifically excluded from the process of approving, or not, forest development plans. This was done by not including biologists in the legislation as having a 'right to practice.' In essence, this removed landscape level planning from the provincial government and handed over forest, fish, wildlife and other forest value management to 'for profit industry.'

The Provincial Government conducted a review of this issue in 2017 but little has been done to restore the public trust and remove industry from its conflict of interest (ie. by being able to approve their own plans and actions). We urge you to recommend this management change as it will be key to avoiding the elimination of what little old growth forests this province still supports.

So, the connection with this management model to the old growth strategy is that no matter how the old growth strategy is changed and reframed it will be of little value if the forest industry is still allowed to decide such things as: what is old growth? what value does it have? how much should be preserved? where should it be preserved? For industry to have their own employees making these decision and trade-offs against their employer's profits negates the public trust in any old growth strategy we may come up with.

The BCWF supports and urges the return to government of their responsibility to manage our forest resources. This would involve resurrecting the Forest Practices Code with landscape level planning



and establishment of a meaningful monitoring and enforcement program. Without these actions the 'old growth management strategy' will be just 'more talking while logging continues.'

Finally, it is time the Provincial Government developed legislation which does not subject forest management decisions to the four-year political cycle. There have been numerous commissions, reviews, assessments, etc. starting with the Pearce Commission in the 1970's that predicted the forest management crisis that we are now experiencing in B.C.

No provincial government has had the strength of moral conviction to change the model and to recognize that forests operate on hundred and even thousand-year cycles. Submitting the management of these resources to ill conceived and redundant political changes (most of which have been based on industry lobbying) on a four-year election cycle will never achieve a sustainable forest resource for the citizens of B.C.