### Submission to Old Growth Strategic Review

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Who We Are:

The Friends of Carmanah Walbran is an ENGO devoted to the protection of old growth forests on Vancouver Island, especially the Walbran Valley, where we have been engaged since the late 1980s. In addition, we are involved in proposals to reform industrial forestry on the Island, through Island Forest Futures.

In 1995, a portion of the Walbran was added to the Carmanah Walbran Provincial Park. Our group, through volunteers, has established and maintains a series of signed trails, including major boardwalks, a campground and kitchen area. The province has carried out no development in this section of the park. We hold periodic events, including the annual Summer Convergence and two annual surveys, one of the flora and fauna and the other, a mycoblitz. We work with elders of the Pacheedaht First Nation, the Walbran being part of their traditional territory.

#### General:

When we apply full cost accounting to forestry in BC, to include:

- 1.the immense degradation of forest ecosystems and biodiversity
- 2. the natural services forests provide and climate change mitigation
- 3. the privatization of the public forests by the TFL system and low resource rents
- 4. the major job loss and dislocation of forest-dependent communities
- 5. significant contribution to flooding and wildfires and;
- 6. compromising of community drinking watersheds, the conclusion is inescapable that forestry, as practiced in BC, is operating at a net loss to the economy, the environment and social values.

On the definition of old growth, the government, over several regimes, has conflated high elevation, scrub and bog forests with merchantable low elevation, high value forests.. For the Friends, we agree with the province and call for the protection of all remaining old growth everywhere in the face of a climate emergency.

You will be aware that as early as the late 1980s there was an Old Growth Strategy Committee and other inquiries since that have been characterized as "talk and log," since very little progress as been made, with the exception of about 6% of the highest value, low elevation old growth on Vancouver Island receiving permanent protection and a little more in OGMAs, that are not permanent at this time and can still be impacted under the continuing edict in forest policy of not having undue influence on the timber supply. The industry is still entirely dependent on old growth and the cut has increased on VI from 10 000 to more than 11000 hectares in recent years. Clearly, the intention is to take it all out, having so badly managed the second growth, even though much of it is ready for harvesting, the wood is of much diminished value by comparison.

We have to look at forestry in BC as a system very hard to change, nearly impossible to do so, by the evidence. Old growth is only one part of that system. We need to see two kinds of transition to the whole: transition to second growth logging with intensive silviculture (not poisoning so-called weed species) and fair transition for forest workers with a combination of early retirement packages, deployment in the second growth, opportunities for retraining and long term work in forest ecosystem restoration and intensive silviculture, like the Swedish model. The Democratic U.S. Senator, in his proposal for a Green New Deal, calls for a 5 year transition where displaced workers are paid at or near their full salary while retraining for work in the new economy. Although this appears to be an huge outlay, it is an order of magnitude less expensive than the consequences of carrying on business as usual in the way we practice forestry in direct opposition to the needs of climate change mitigation.

# The Friends supports the tradition of families working in forestry with the opportunities to be had in a new sustainable forestry.

### Case Study: The Walbran Valley

The Friends have been engaged in the protection of the Walbran Valley since 1989 and have achieved a portion of the Walbran that became part of the Carmanah Walbran Provincial Park in 1995. At the time, a critical portion was left out in favour of timber interests. Now, 24 years later, the company with the timber rights wishes to log 8 cutblocks on the park boundary, of which one has been approved but not yet logged. The Central Walbran is the last remaining unprotected significant, contiguous highest value rainforest left on the S. Island with access from large, urban areas.

We call upon the panel to recommend completion of the park with the addition of all the lands in the unprotected Central Walbran as a significant addition to the fully-protected old growth forest inventory on Vancouver Island and to further recommend that these park lands be co-managed with the Pacheedaht First Nation.

## Case Studies: BC Timber Sales

The recent internal review of BCTS operations in the Nahmint by the Compliance and Enforcement Branch, reveals that BCTS is operating unlawfully, even within its very slender regulations in regard to protecting ecosystem integrity and old growth protection, allowing destruction of world-class trees. I have flown over the entire island on two different recent flights, including Nahmint in particular, and the devastation belies description with logging right to the water's edge, appearing like a sacrifice zone. The Minister's response has been to ban the C and E Branch from investigating BCTS and that the study exceeded its scope by referring to VILUP violations in its findings. The scandal is amplified by the fact that this is an entirely - owned operation of the government, operating on public, unceded lands, held as a sacred trust for the people of BC. As people become more aware of this corrupt behaviour, along with their desire to protect the old growth, polled at 94%, they will be enraged and the Friends and allies are doing that outreach.

#### BCTS Timber Auction #A95483(Parkinson) near Port Renfrew(2019)

In this case, the plan was to log within 50 metres of the Juan de Fuca Wilderness Trail and immediately adjacent to Soule Creek eco-lodge, without prior consultation with the owners whose business would have been devastated by this ill-advised project. The Friends and the lodge owner met with BCTS workers responsible for the design of the cuts who seemed

surprised about our concerns and offered some minor but inadequate mitigation of the harm. In the end, due to public outcry, the auction was withdrawn.

Other grievous examples could be offered of ill-advised logging projects including Haida Gwaii, in a proposed addition to Manning Park, Schmidt Creek with its unstable steep slopes and threat to the Robson Bight whale sanctuary and Clack Creek Forest, adjacent to Mt. Elphinstone, where logging is imminent at the time of this writing.

We recommend that, in the face of the evidence, BCTS should be wound up as it has violated the public trust and for the conflict of interest that exists by this government agency operating within the same ministry responsible for compliance with forestry law and regulations. Since BCTS has 20% of the AAC and almost all of these forests are old growth and are on public, unceded lands, there could be no better way to increase the old growth inventory by establishing all of these lands in full protection.