

January 25, 2020

Dear Old Growth Strategic Review Panelists Garry Merkel and Al Gorley,

Re: Written submission to the panel

We are two conservation groups based in northern BC that value our province's wild and natural spaces. We represent hundreds of British Columbians from every walk of life and many scientists from Western Canada. Old growth forests are among the most threatened natural habitats in BC, and we provide this written submission because we hold a stake in the long-term protection and maintenance of these critically important ecosystems. We request that our feedback be included in your report to the Minister of Forests, Lands, Natural Resource Operations and Rural Development.

The long development period of old growth forests is what drives their globally significant ecological importance, but what was once intact primary forest (often much older than 250 years) is now fragmented by roads and monoculture plantations (mostly under 50 years). Half a century of large-scale exploitation of BC's interior old growth forests has resulted in a vast industrial patchwork that bears no resemblance to the ecosystems that dominated these lands for thousands of years.

The overharvest associated with industrial logging is causing wildlife and fish populations to collapse and rare species to be lost. Even once common animals like moose and bear are adapted to use old forests for some part of their life cycle. Fishes such as bull trout and arctic grayling require streams kept cool and clear by unlogged watersheds. Intact forests also provide clean water and help mitigate climate change by storing vast quantities of carbon. Unlike monoculture forest plantations, intact old growth forests offer resilience in the face of a changing climate that is leading to a devastated planet.

We would like to make the following points in light of the Review Panel's stated aim to achieve balance in reporting to the Minister. In April of 2019, Premier John Horgan wrote a [letter](#) to forest industry executives that made two concerning assertions: (a) that 36.7 percent of the BC land base is under some form of habitat protection (outside of parks and protected areas), and (b) that so much habitat is protected in BC that it is a "constraint [which] limits harvest planning" and the development of "beneficial business relationships."

Statement (a) is simply false, as existing mechanisms such as Old Growth Management Areas (OGMAs), Wildlife Habitat Areas and Visual Quality Objective areas *do not prohibit logging or road-building* and are thus not a robust form of protection for old growth forests. Moreover, many OGMAs are inoperable or unharvestable areas like plantations or bogs. Statement (b) suggests that the Premier is not taking forest conservation in the interior seriously and does not understand

that the current model of industrial logging can only survive in the short-term, and that diverse local economies are key to our future sustainability.

Our recommendations would support stable local economies and community control over the last primary forests on our public lands. We support a return to real balance with respect to our natural heritage through the following two actions:

- 1. Legislated protection of our remaining old growth.** This should start with an immediate moratorium on harvesting in the most endangered forests, which include the remaining productive, accessible stands of the inland temperate and spruce-fir rainforests that industrial forestry is currently intent on liquidating. A science-based plan for the protection of all remaining primary forests in the interior should follow this moratorium.
- 2. A just transition away from the industrial harvest of our remaining old growth forest and towards community-based forestry focused exclusively on second-growth.** A planned but rapid transition to a sustainable economy that focuses harvesting on areas previously logged must occur. Returning public forests back to communities would enable this transition and would serve human and natural communities better than the existing tenure system.

The remaining old growth forests in BC are valuable not only in terms of things like climate maintenance and the provision of clean water. In addition to their intrinsic value, they are also biodiversity hotspots, supporting a stunning array of animal and plant life (much of it threatened or endangered) that rely on intact old growth for their survival. Continued industrial exploitation of the last of these forests and their conversion to plantations connected by networks of roads is in direct conflict with all of these values.

Humans have never successfully re-created the structure and complexity of an old growth forest. We only lose it; we never regain it. Please use your report to protect an irreplaceable natural asset for the long term. Future generations of British Columbians will thank you for it.

Sincerely,



Keaton Freel
Youth Representative, Conservation North



Jenn Matthews
Outreach Coordinator, Conservation North

CONSERVATION NORTH

606 Freeman Street
Prince George BC
V2M 2R2

Save-The-Cedar League

401-2120 West 2nd Ave
Vancouver, BC
V6K 1H6



Kate Logan
Science Coordinator, Conservation North



Michelle Connolly
Director, Conservation North



Rick Zammuto, Ph.D., Interdisciplinary Ecologist
CEO and President of Save-The-Cedar League
(807) 622-2025
STCedarL@galaxymail.ca