## Old Growth Strategic Review Submission

January 29, 2020

Dear Mr. Gorley and Mr. Merkel;

Thank you both, and thanks to the BC Government for this unique opportunity to comment on the future of the economically critical forest industry and the biologically critical, old growth forest communities that underpin the success of the industry.

I am submitting this as a private citizen and also as a representative of Surrey Environmental Partners and as a member of other BC based non governmental organizations. I will comment on the numerous attributes of our old growth forests, which I think should be given much more consideration for highest and best use when planning future annual cuts, and offer comments regarding some of the problems with the current forestry model.

Having worked in the forest industry as a logger for a number of years, I have seen and contributed to the brutal effects of clear-cut old growth logging on the landscape. In fact destruction of the soil, loss of the ancient fungi and mycelium networks, damage to hydrologic systems, wildlife habitat loss, wide spread loss of superior carbon capturing capabilities, diminishing biodiversity, drastic decline in anadromous aquatic species, the use of destructive glyphosate, infiltration of roads, loss of wildfire resiliency, all a result of the way we conduct business now. We have vast areas of Not Satisfactorily Restocked (NSR) land needing rehabilitation. The evolutionary blueprint that has been bestowed upon us in the form of old growth forest, is being destroyed; lost forever. We are suffering from the phenomenon of shifting baselines resulting in historic amnesia, where we're no longer aware of the level of richness once provided by our forests because the reference points are being lost to history. Years of blatant mismanagement of old growth forest continue to pass. This has got to change.

We have liquidated and otherwise degraded much of the 10-12,000 year old primary forest cover of this province in only two human lifetimes. An alarming, heart wrenching thought considering it continues unabated to this day. A 40, 80 or 100 year horizon on clearcut old growth harvesting is not acceptable stewardship. Developing an integrated strategy for managing remaining old growth for it's intrinsic values and long term use as a living legacy is the right direction. New Zealand, Thailand, Sri Lanka, Philippines and Finland have banned old growth logging in recent years.

It's obvious some serious changes are needed for the long term health of our forests. Some innovative solutions should be considered, to have our forest industry evolve with long term holistic goals in mind. For example, with the recent uncertainty of BC lumber mills and their markets, anticipated retooling of mills and predicted drop down to annual second growth logging levels, unemployed loggers and mill workers could be retrained as 'Forest Restoration Specialists' on the sprawling Non Satisfactorily Restocked (NSR) lands, or employed at emerging secondary manufacturing businesses. Put exported raw logs back into local communities to increase job opportunities and employment levels. Create a transition program where former loggers once retrained, have their pay tied to previous levels through a subsidy, consisting of contributions from various levels of government and company stumpage contributions. Support log supply and secondary manufacturing, at adjacent local locations. Accurate government forest inventory information is missing. Government oversight of forestry needs to be brought out of the dark ages. The location of every tree and the use of every log in the forestry cycle should be known using modern tracking technologies if real efficiencies are to be realized and true sustainability is to be achieved.

Innovative ideas are needed for change.

I support the Union of BC Municipalities (UBCM) resolutions to reduce logging impact on old growth forests, to create better oversight of logging on private lands and to have their various municipal members build future commerce based on increased sustainable forestry and ecosystem tourism. The forest industry has been promising for four decades a change to second growth logging is in the works. Year after year, decade after decade of the talk and log scenario is unacceptable.

Meanwhile the destructive human impacts grow.

Better protection is needed for karst landscapes such as on Vancouver Island, a hot spot for limestone and caves. The United Nations (UN) Karst Research Institute in Slovenia has confirmed; old growth forests on karst is an ecosystem of international significance here in BC. Government Actions Regulation (GAR), regulatory orders currently applied to forestry, are weak and don't go far enough to conserve and protect karst features. The opportunity to preserve these biologically and historically significant landscapes and the natural services they provide, will sadly be relegated to memory with the continuation of our current logging practices.

They deserve better protection.

Change the BC Timber Sales model. The stumpage rates are entirely inadequate when all natural services provided by old growth forests are taken into account. BC Timber Sales manages 20% of the annual allowable cut for Crown Timber. Focus BCTS on maturing 2nd growth, increasing it's pivotal role in reforestation, decommissioning roads, allowing candidate areas for parks additions. One of the stated goals of BCTS is sustainable forest management. Make changes to the BCTS goal of reliance solely on the market pricing system for the auctioning of harvested timber. The Province mentions sustainable forest management a number of times in BCTS goals and objectives, but what does that mean in context with the stated goal being singly focussed on economic value? It's very disappointing to know our own Provincial government, through BCTS, is responsible for the terrible, wide spread, indiscriminate destruction of the non renewable old growth forest ecosystems of the Nahmint Valley, Tahsish River, Port Renfrew area, Schmidt Creek and many others, none of which will ever recover their incredible, former natural wealth. In some cases licenses are awarded without consideration for local community's needs. For example in an episode of negligence to local communities, the mature and biologically diverse second growth, potential park lands on Mount Elphinstone are being logged with BCTS approval over the objections of the local governments of Sechelt, Gibsons, the local Regional District and local residents. Rather than being put to a higher and better long term use, the targeted lands are being used for one time cut and run logging, doing a great disservice to the long range plans of the local community. BCTS needs to serve communities and the people of BC better with a more holistic model that considers the forest's full range of intrinsic values as the primary guiding principle. BCTS needs to be reigned in, and the gold rush mentality changed. The model is broken. Stop logging old growth forests to zero.

## In summary:

- Stop logging old growth forests.
- Stop raw log exports.
- Change the BCTS model.
- Develop an integrated long term plan to manage all old growth forest as a living legacy.
- Protect all significant karst landscapes.
- Bring better management oversight and control to the Forests Ministry through the latest technology and adequate staffing levels.
- Legislate improved oversight and protection on private lands.
- Build secondary manufacturing businesses close to local log supplies.
- Increase local management and control over local second growth forestry resources.

Thank you for your attention.

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