



Old Growth Strategic Review Background

In July 2019, the province announced the appointment of a two-person panel (comprised of Garry Merkel and Al Gorley) to undertake a province-wide Old Growth Strategic Review to inform the development of broad public policy regarding old growth forests. Part of this review included an opportunity for the public, organizations and professionals to share their thoughts on old growth in BC.

The panel's report and recommendations were released to the public in September 2020. The province has subsequently committed to the implementation of all 14 recommendations in the panel's report which will inform a new approach to old growth management in BC.

In November 2021, the province announced its intention to temporarily defer approximately 2.6 million hectares of forests deemed to be at very high risk, subject to the agreement of First Nations while the province, First Nations and other partners develop a new, long-term approach to forest management that prioritizes ecosystem health and community resiliency. Proposed deferrals were identified on maps prepared by an independent Technical Advisory Panel (TAP).

How BC Timber Sales Fits into the Old Growth Strategic Review

As an operational part of the Ministry of Forests, BC Timber Sales (BCTS) is responsible for the management of approximately 20% of the province's public forest land. BCTS' primary goal is to ensure the province receives fair market value from publicly held timber. Harvest of this timber provides significant jobs and economic benefits throughout BC.

Sustainable forest management is an overarching principle for BCTS and we take this responsibility seriously. Sustainable forest management includes planning our activities in order to maintain old growth and the many other values that are associated with BC's forests.

The total operable and economic land base (commonly known as the timber harvesting land base) within BCTS operating areas is 4.5 million hectares (ha), of which about 765,000 ha, or 17% percent, is old forest (defined as forest greater than 250 years old on the coast and interior wet belt, or forest greater than 140 years in the rest of the interior).

BCTS respects the recommendations of the Old Growth Strategic Review and is operating consistent with Provincial implementation direction related to old growth deferrals. As part of the deferral announcement of November 2021, the province directed BCTS to immediately suspend advertisement and issue of timber sales licenses (TSLs) overlapping TAP polygons. TSLs issued prior to the announcement were not impacted by this announcement.

As the result of ongoing provincial engagement with First Nations and further guidance from the Ministry of Forests, BCTS' approach to deferrals has been further refined. Specifically, BCTS has resumed advertisement of TSLs containing old growth, but continues to defer harvest of TAP identified areas within traditional territories of First Nations supporting the TAP recommendations. Consistent with Ministry field verification guidance, these TAP areas are assessed to confirm they contain the at-risk ecological values described by TAP. If the area does not contain these values, it may be harvested, but must, where possible, be replaced with an area in the vicinity which meets TAP identified ecological values.

In areas where First Nations have indicated they do not support the TAP recommendations, BCTS continues to defer TAP identified Remnant Old Ecosystem areas from harvest, unless field verification demonstrates them as mapped in error. When mapping errors are identified in TAP identified Remnant Old Ecosystem areas and harvest is proposed, ecologically equivalent replacement areas are identified. In other TAP identified areas within these First Nations territories, BCTS will proceed with activities consistent with current legal requirements and best practices as described below.

In areas where First Nations have yet to provide a response, or have requested additional time to respond, BCTS continues to defer TAP identified Remnant Old Ecosystem areas from harvest, unless field verification demonstrates them as mapped in error. When mapping errors are identified in TAP identified Remnant Old Ecosystem areas and harvest is proposed, ecologically equivalent replacement areas are identified. In other TAP identified areas within these First Nations territories, BCTS will proceed with activities consistent with current legal requirements and best practices as described below. If TAP identified areas are harvested in this situation, BCTS will work towards identifying and deferring ecologically suitable and feasible replacement areas until superseded by other planning processes.

In areas where First Nations do not support the TAP recommendations, have yet to provide a response, or have requested more time, BCTS continues to seek direction from these First Nations during the operational consultation process to understand their preferred approaches to old growth management.

BCTS will continue to defer harvesting in TAP identified at-risk areas, in accordance with the processes outlined above, for a period of two years, or longer, as determined by the province. Ultimately, the future conservation, or harvesting of temporarily deferred areas will be determined through consultation with First Nations governments, stakeholders and the public

through some form of regional or local planning process (e.g. Modernized Land Use Plans or Forest Landscape Plans).

Based on current government direction to BCTS, 99.5% of the TAP identified areas within BCTS operating areas will remain unharvested during this time.

Summary of BCTS Approach to Temporary TAP Deferrals

First Nation Response	BCTS Approach
Supportive of TAP deferrals.	Defer TAP identified at-risk area. If field verification demonstrates TAP area as mapped in error, it may be harvested and replaced.
Not supportive of deferrals.	Defer TAP Remnant area only. If field verification demonstrates Remnant area as mapped in error, it may be harvested and replaced.
No response or needing more time.	Defer TAP Remnant area only. If field verification demonstrates Remnant area as mapped in error, it may be harvested and replaced. Other TAP identified areas may be harvested and replaced.

Regulatory Requirements and Management Approaches for Old Growth

High Level Objectives:

Order Establishing Provincial Non-Spatial Old Growth Objectives (2004) (the Order) – The Order establishes provincial non-spatial old growth objectives. By establishing non-spatial retention targets for biodiversity targets (including old growth), the Order assists in clarifying the amount of area available for timber harvesting.

Land Use Plans (LUPs) – Historic LUPs like the Vancouver Island or Cariboo-Chilcotin Land Use Plan typically provide high level objectives and strategies for the management and/or conservation of range of values, including biodiversity and old growth forests. Components of these plans are “legalized” through a subsequent Order declaring them as a High Level Plan (HLP). HLP legal requirements, drive the planning and development activities for the associated areas including the maintenance or recruitment of old growth forests as described in Forest Stewardship Plans.

Forest Stewardship Plans (FSPs) – Under the *Forest and Range Practices Act (FRPA)*, BCTS is required to have an approved FSP prior to harvesting public timber. FSP mandatory content includes results and strategies to address the objectives set by government including any Orders or HLPs in effect for the area. All holders of an approved FSP are subject to old-growth retention requirements. The results and strategies and other commitments in approved FSPs are legally binding.

Ecosystem-Based Management (EBM) – EBM is an adaptive approach to managing human activities that seeks to ensure the coexistence of healthy ecosystems and human well-being. Following extensive collaboration among First Nations, industry, government and environmental groups, EBM was implemented within the Great Bear Rainforest (GBR) and Haida Gwaii.

- GBR – *The Great Bear Rainforest (Forest Management) Act* and the GBR Land Use Order (GBRO) support an EBM regime on the north and central coast. The GBR covers 6.4 million hectares and through the GBRO will conserve ~ 70% of the natural range of old growth forests. BCTS operations in the GBR area are consistent with EBM and the GBRO.
- Haida Gwaii – The Haida Gwaii Land Use Objectives Order (2010) established EBM on Haida Gwaii and balances cultural, ecological, and social and economic objectives. The order provides legal objectives for forest-based values to support implementation of EBM. The order covers an area of one million hectares and establishes First Nations cultural objectives for cedar stewardship, including monumental trees and old forests.

Forest Certification – 100% of BCTS operating areas are certified under the Sustainable Forestry Initiative (SFI). Certification includes objectives, criteria and indicators for the conservation of biological diversity, including threatened and endangered species, forests with exceptional conservation value, old growth forests and ecologically important sites that must be achieved for certification to be maintained. Consistency with certification requirements is determined through regular independent audits across BCTS operations.

Landscape Level Protection:

Old Growth Management Areas (OGMAs) – OGMAs are spatially (mapped) or non-spatially (not mapped) defined areas of old growth forest, or old growth recruitment. BCTS staff contribute to the planning and protection of OGMAs which are an effective way of conserving biodiversity at the landscape level. Coastal forests, for example, currently contain 281,700 ha of OGMAs and an additional 21,700 ha of draft OGMAs. BCTS is required to maintain legally established and spatially defined OGMAs and meet the targets of the provincial old growth order (the Order) or local HLP Orders when preparing FSPs.

Wildlife Habitat Areas (WHAs) and Ungulate Winter Ranges (UWRs) – WHAs and UWRs occur at the stand level scale and are represented on the map portion of FSPs. A total of 409,000 ha of UWRs and 38,100 ha of WHAs have been mapped within BCTS operating areas across BC. Examples WHAs on Vancouver Island in place for marbled murrelet, northern goshawk, and red-legged frogs. WHAs may overlap with OGMAs because they protect similar values.

Stand Level Protection:

Wildlife Tree Retention Area (WTRAs) – BCTS conducts stand level field reconnaissance to confirm forest cover types and to identify features that may be of concern or require special

management. On average, BCTS harvested areas on Vancouver Island retain over 11% as WTRAs, in addition to other set asides. WTRAs are identified and mapped to ensure their integrity over the long term. WTRAs can be 'anchored' to special features such as culturally modified trees, animal dens, specific plant communities and large legacy trees. The percentage area to be retained is specified in the approved FSP.

Riparian Management Areas (RMAs) – unharvested reserve areas adjacent to streams and other water features protect riparian values as well as functioning as ecological linkages throughout the forest landscape. These constrained areas can be comprised of old growth trees making them ideal for locating Large Cultural Cedar trees, plus providing unique stream and riparian habitat features. In areas dominated by second growth stands, over time these riparian areas will develop characteristics found in old growth habitat.

Best Management Practices for Coastal Legacy Trees (aka Legacy Tree BMP) – Beginning in 2017 BCTS voluntarily developed and implemented an internal operating procedure to protect and track exceptionally large-diameter single trees in its coastal operations. BCTS recognizes that legacy trees are often attributed with having important cultural, aesthetic and ecological value. These trees, when retained, can play an important stand level role in habitat conservation by bridging old-growth characteristics into second growth stands. In addition, large trees are increasingly supporting the growing ecotourism economy as valuable destinations in and of themselves. Groves of big or unique trees are considered component parts of stand level biodiversity and are more appropriately protected under legal designations like WHAs and OGMAAs.

Special Tree Protection Regulation (STPR) – arising from BCTS' Legacy Tree BMP the province adopted the STPR to protect the very largest trees throughout the province surrounded by a one hectare reserve. The STPR protects those individual specimens that are found outside of the other preservation areas listed above.

Veteran Tree Retention in 2nd growth stands and some older stands – in some instances, near communities or in areas with high public interest, BCTS retains large remnant old growth trees (called veteran trees) during harvesting. While these trees may not meet the diameter thresholds of the BCTS Legacy Tree BMP they do provide the same bridging function of retaining old growth features to the surrounding regenerating stands.

Large Cultural Cedar (LCC) – LCC is a unifying term that represents the general specifications of First Nations for cedar required for cultural use (larger cedar intended for longhouses, canoes, totem poles, carvings, etc.). LCC is considered a cultural heritage resource as described under Objective 10 in the *Forest Planning and Practices Regulation*. BCTS incorporates the management of LCC into its FSP strategies.

Summary

All the above legal requirements and voluntary actions lead to the retention, rehabilitation, and recruitment of old growth features and structures at a variety of scales throughout the current and historic land base that BCTS and the forest sector operates on. In aggregate, the outcome of retention, rehabilitation, and recruitment by BCTS and other forest managers leads to higher levels of old growth across the landscape than is currently portrayed in certain public forums.

BCTS will continue to evolve and adapt its approaches to old growth management consistent with emerging science, indigenous knowledge, government policy and public expectations.