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Submission to the Old Growth Strategic Review with Recommendations for BC's Old Growth Strategy

*Prepared by the Ancient Forest Alliance
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The Ancient Forest Alliance (AFA) is a registered non-profit organization representing tens of thousands of BC residents who support science-based protection of BC's endangered old-growth forests and an expedited shift to a sustainable, value-added second-growth forest industry in the province.

Rationale

We welcome the BC government's commitment to develop a provincial Old Growth Strategy and urge the Old Growth Strategic Review panel to recommend meaningful steps to increase protection of endangered forest ecosystems.

BC's old-growth forests are complex ecosystems that have evolved over millennia and are home to some of the largest and oldest trees on Earth. They provide habitat for unique and threatened species, support clean water for communities and wild salmon, store more carbon per hectare than second-growth forests, are a pillar of BC's multi-billion dollar tourism industry, and are vital to many First Nations cultures, whose unceded lands these are. A century of industrialized logging has resulted in over 75 per cent of the original, productive old-growth forests being logged on BC's southern coast, including well over 90 per cent of the valley bottoms where the richest biodiversity and largest trees are found.^{1,2} Old-growth is a non-renewable resource under BC's system of forestry where second-growth forests are logged every 50-80 years, never to become old again.

The global climate crisis has already begun to affect British Columbia's forest ecosystems, contributing to record-breaking wildfires, pest outbreaks, and changing climatic conditions that are putting increased stress on BC's forests and the biodiversity they support. According to the Intergovernmental Panel on Climate Change (IPCC)'s special report on the impacts of global warming of 1.5 °C above pre-industrial levels, as of 2020, we now have only ten years to make dramatic policy changes to avert catastrophic global heating beyond 1.5 °C.³

One of the most readily available means of reducing emissions and maximizing carbon storage, while also addressing the worsening biodiversity crisis, is to protect Earth's primary forests. The old-growth forests of the Pacific Northwest store more carbon than any other forest type on Earth, are typically quite fire resistant, and are critical for maintaining forest resiliency. It is therefore critical that as much of these forests are protected as quickly as possible.

Fortunately, studies have shown that society stands to benefit economically from increased protection of old-growth forests. A 2008 study by Knowler and Dust found that, in BC's Fraser Timber Supply

¹ Ancient Forest Alliance, Maps: Remaining Old-Growth Forests on BC's Southern Coast: <http://ancientforestalliance.org/old-growth-maps.php>

² Sierra Club BC backgrounder, March 2016: http://sierraclub.bc.ca/wp-content/uploads/2015/08/South-Coast-Backgrounder_March-2016.pdf

³ Intergovernmental Panel on Climate Change; Headline Statements From the Summary for Policy Makers: https://www.ipcc.ch/site/assets/uploads/sites/2/2019/06/SR15_Headline-statements.pdf

Area, old-growth forests have a greater economic value standing compared to logging them when factoring in non-timber forest products, recreation, and carbon sequestration/storage.⁴

Preliminary results from another study recently undertaken by ESSA Technologies Ltd. for AFA are also consistent with the findings from Knowler and Dust. The ESSA study found that, for the portion of the TSA occurring within a 250km buffer around Port Renfrew, the net economic benefit to society of standing old-growth forests is higher than if they were logged (see DRAFT version of report included – not for distribution).

Comparing across 18 old-growth protection scenarios ranging from minimal old growth protection (30%) to full old growth protection (100%), this study found that, compared to current timber harvest practices, in 100 years, society would be better off by \$179 million (2018 CAD, net present value) if trees older than 140 years, in both the timber-harvesting land-base (THLB) and non-THLB, were immediately fully protected, and \$97 million if trees older than 250 years were fully protected.

While the modelled scenarios consider economic benefits derived from old-growth across multiple ecosystem services, including timber harvest, carbon storage/sequestration, recreation, non-timber forest products, salmon habitat, real estate values, and education/research opportunities, the main drivers of these results are carbon sequestration, timber harvest, and recreation.

Economic benefits from timber harvest drop comparatively little in the 100% old-growth protection scenario (\$17 million) and this loss is easily compensated for by gains from other ecosystem services. For example, increasing old-growth protection would reduce the current status of the land base as a net carbon source by up to 1.8 million tonnes of carbon over the next 100 years, for a net welfare gain to society of nearly \$162 million. Recreation benefits alone would balance out losses from timber harvest, contributing nearly \$36 million.

Both these economic analyses demonstrate the need for the BC government to understand and consider the opportunity costs of continued, destructive old-growth logging in BC. It is imperative that this government recognize and foster the immense, under-developed, and long-term economic potential and employment opportunities associated with old-growth forest protection to support BC businesses, First Nations, and rural communities.

Problems with the current approach to old-growth forest management

British Columbia's approach to forest management and the regulatory framework that guides forest practices in the province has, for decades, given precedence to the supply of timber at the expense of all other forest values. While significant progress has been made in the Great Bear Rainforest (GBR) toward achieving an ecosystem-based approach to forest management, outside the GBR, forest planning and practices continue to be guided by outdated legal mechanisms that fail to sufficiently recognize, incorporate, or address Indigenous rights, the current global climate and biodiversity crises, modern Western science and Indigenous knowledge systems, and BC's changing social and economic landscapes.

Current legislated targets for old-growth protection are set too low and are not based on the best-available science, meaning BC is losing the species, ecosystem services, tourism and recreation opportunities, First Nations cultural values, and valuable carbon stores that old-growth forests provide.

⁴ Knowler, D. and K. Dust, 2008, *The Economics of Protecting Old Growth Forest: An Analysis of Spotted Owl Habitat in the Fraser Timber Supply Area of British Columbia* <https://www.sfu.ca/rem/econ/research/owl.html>

A paradigm shift that places the long-term ecological integrity and resilience of BC's forests ahead of timber supply is urgently needed to ensure species and ecosystems can thrive while adapting to our rapidly changing climate and British Columbians can continue to reap the benefits that fully functioning forest ecosystems provide for generations to come.

We therefore urge the BC government to prioritize the health, integrity, connectivity, and climate resilience of BC's forest ecosystems in its proposed Old Growth Strategy by implementing the following legislative, regulatory, and policy changes. (Please refer to the attached Old Growth Protection Policy Brief for more detail on these and other recommendations to the province).

Recommendations

1. Develop an Old-Growth Forest Protection Act or Amend Existing Legislation to Establish Science-based Old-Growth Protect Targets

We strongly recommend the BC government develop a comprehensive, legislated plan to protect BC's endangered old-growth forests using the ecosystem-based approach of the Great Bear Rainforest as a model. This involves either amending the *Forest and Range Practices Act* or creating new legislation to establish higher, legally-binding old-growth protection targets, based on the latest science, to sustain the long-term ecological integrity of old-growth forest ecosystems and to prioritize the management of biodiversity over timber supply across landscapes.

This plan must also avoid loopholes that allow much of Earth's grandest forests and biggest trees to be logged, such as moveable Old Growth Management Areas and a lack of forest productivity distinctions (which is currently used as a major loophole to skew representation of protection towards marginal stands with small trees and less biodiversity), and must include provisions for protection of old-growth at all spatial scales (e.g. at the big tree, grove, ecosystem, watershed/landscape levels).

We recommend the BC government's Old Growth Strategy include the creation of an old-growth science panel, tasked with establishing a much more comprehensive, science-based approach for determining old-growth retention/restoration targets and timelines. This more rigorous, science-based approach would involve:

1. Surveying the amount of old-growth remaining in all forest types down to the Biogeoclimatic Ecosystem Classification (BEC) variant or site series level of classification, factoring in forest productivity.
2. Determining how much old-growth must be retained and/or restored in every ecosystem type relative to its range of natural variation (RONV) in order to ensure the long-term ecological integrity of those systems, based on a wide variety of factors that are employed in modern conservation biology assessments. These include ensuring the population viability of wide-ranging and old-growth dependent species, healthy hydrological processes and sustenance of aquatic species and salmon bearing streams, intact large predator-prey relationships, natural disturbance regimes and minimum dynamic areas of all old-growth forest types, sustenance of endemic, rare and often obscure species (in particularly, little known canopy arthropod, lichen, and fungal communities), and viability for the adaptation and resilience of the ecosystem in light of climate change, among many factors.
3. Ensuring that, under the law, these targets are reached in each forest type within a given time frame based on the level of endangerment of each forest type.

For more details, please see to the University of Victoria Environmental Law Centre's report *An Old-Growth Protection Act for British Columbia* here: <http://www.elc.uvic.ca/publications/old-growth-protection-act/>.

2. Support enhanced economic and community wellbeing for First Nations through conservation financing solutions

An opportunity exists to support the NDP government's commitment toward meaningful reconciliation with First Nations by supporting the implementation of modern conservation approaches with First Nations, strengthening co-management and Indigenous-led decision-making, and building government-to-government relationships. We strongly recommend the NDP government commit funding to conservation financing solutions for First Nations' sustainable economic development and diversification in lieu of old-growth logging, tied to modernized, Indigenous-led land-use plans, improved community wellbeing, and support for and legal recognition of new and existing Indigenous Protected and Conserved Areas. This funding commitment would be similar to the \$120 million that was provided by the BC provincial and federal governments and conservation groups for conservation, economic development, and community wellbeing initiatives in the Great Bear Rainforest.

3. Provide annual funding for the creation of Indigenous Protected and Conserved Areas.

In its February 2018 budget, the Canadian government earmarked \$1.3 billion over five years to expand protected areas and help endangered and threatened species. The commitment aims to fulfil Canada's pledge under the Convention on Biological Diversity to safeguard at least 17 per cent of Canada's land and inland waters by the end of 2020. The commitment includes a \$500 million "Nature Fund," aimed at protecting sensitive ecosystems, expanding species protection, and helping Indigenous groups play a role in conservation efforts through the creation and management of Indigenous Protected and Conserved Areas (IPCAs). Additional federal funding is also expected in coming years to fulfil the Government of Canada's commitment to protect 25 per cent of the country's lands and oceans by 2025 and 30 per cent by 2030.

There is a growing body of scientific evidence that anywhere from 30 to 70 per cent of ecosystems are required to be protected in order to safeguard biodiversity and our own wellbeing. However, British Columbia lags far behind these targets, having protected only 15.4 per cent of the province's lands and inland waters.

This presents a significant opportunity for the BC government to adopt an ambitious protected area target for the province and work with the federal government to direct federal funds to protect old-growth forests, drinking watersheds, and lands of high conservation and recreational value in BC. The province should match these funds to help create and manage IPCAs across BC, starting in Clayoquot Sound, where in 2019, the federal government committed funding for the implementation of the Ahousaht and Tla-o-qui-aht First Nations' land use visions⁵.

4. Create a provincial Natural Lands Acquisition Fund for the purchase and protection of endangered old-growth forests on private lands.

Many of BC's most endangered and biologically rich and diverse ecosystems, including many old-growth stands, are found on private lands, which constitute about 5 per cent of the province's land base. Establishing new protected areas on private land requires the outright purchase of lands from willing sellers. To this end, the B.C. government should implement a minimum annual \$40 million provincial

⁵ Narwhal article: <https://thenarwhal.ca/biodiversity-crisis-feds-announce-175-million-new-conservation-projects/>

Natural Lands Acquisition Fund, which could increase by \$10 million/year until the fund reaches \$100 million/year. The proposed fund would enable the timely purchase of significant tracts of endangered private lands of high conservation, scenic, and recreation value to add to BC's parks and protected areas system and resolve countless land use battles in the province.

5. Use its control over BC Timber Sales to quickly end old-growth logging in BCTS-controlled lands.

The logging of endangered old-growth forests by BC Timber Sales (BCTS) has become the focus of much public criticism in recent years with the logging of some of Earth's largest trees (including Canada's ninth-widest Douglas-fir tree according to the BC Big Tree Registry) in the Nahmint Valley near Port Alberni, the "Donut Hole" between Manning and Skagit Provincial Parks, and Schmidt Creek west of Sayward, mere kilometres away from globally-renowned orca rubbing beaches, as just a few examples. We are particularly concerned by the results of a 2018 FLNRORD investigation that reveal that BCTS logging in the Nahmint Valley has failed to comply with government-established land-use objectives,⁶ which has further weakened public trust in BCTS and cast serious doubts on the integrity of their planning and decision-making, not only in the Nahmint Valley, but anywhere BCTS operates.

We therefore recommend the BC government to use its control over BCTS to quickly phase out issuance of old-growth forest cutblocks and to begin supporting the implementation of conservation measures on forested lands under BCTS' authority. Such a move would be politically advantageous, given the public's distrust of BCTS and ongoing media scrutiny.

6. Expedite the transition to a sustainable, value-added, second-growth forest sector in BC and support the economic diversification of forest-based communities.

It is clear there is concern within the ministry and among many forestry workers, particularly given the current forest sector downturn, that a sudden end to old-growth logging would result in thousands of workers being left unemployed. It's important to note that we are advocating for a timely transition, not an immediate end to all old-growth logging everywhere. Our proposal calls for moratoria in key old-growth forest areas while science-based timelines are identified to quickly phase-out logging of endangered old-growth ecosystems, giving the industry time to retool for second-growth stands with accompanying government incentives and regulations to stimulate this transition.

This must also be accompanied by long-term economic planning that explores alternative means of economic development and employment for forest-based communities, including wood processing and value-added manufacturing from second-growth logs, new and innovative manufacturing and recycling initiatives, and the considerable potential opportunities tied to protected old-growth forests such as carbon offsets, recreation, and eco- and cultural tourism.

We recommend the BC government implement the following regulations, policies, and incentives to expedite the transition to a sustainable, value-added, second-growth forest sector in BC. (See our Sustainable Forestry Jobs Policy Brief, attached to the email accompanying this submission, for more detail on the below recommendations).

1. Provide fiscal incentives, such as eliminating the PST for new second-growth milling equipment, reducing property taxes on private managed forest lands, and reducing stumpage and tenure licencing fees on Crown lands for companies that invest in second- growth manufacturing.

⁶ Ancient Forest Alliance press release (FLNRORD investigation reports and a summary of the investigation findings can be viewed by scrolling to the bottom of the page): <https://www.ancientforestalliance.org/bcts-non-compliance-nahmint-valley/>

Conversely, revenues from the fee in lieu of manufacture (log exports tax) could be directed toward rebates for companies that invest in second-growth manufacturing.

2. Curb raw log exports through regulations and by increasing the fee in lieu (log exports tax).
3. Expand the geographic scope of log export regulations and the fee in lieu (log exports tax) to include private managed forest lands that were previously encompassed within Tree Farm Licences managed by the province.
4. Help market sustainable, value-added second-growth forest products using proceeds from stumpage fees or other sources.
5. Support First Nations to engage in sustainable, second-growth forestry through conservation financing and skills training.
6. Support high-end, value-added wood working training in post-secondary institutions, including apprenticeships.
7. Undertake structural changes, such as tenure diversification (Community Forests and First Nations tenures) and establishing regional log sorts.

7. Place an immediate halt on logging in old-growth 'hotspots' while the BC government develops its Old Growth Strategy.

BC's last remaining, intact areas of unprotected old-growth are rapidly disappearing. Without swift action by the BC government, these old-growth 'hotspots' with the greatest ecological and recreational value will be lost forever, reduced to small, isolated fragments among vast landscapes of second-growth forest.

While the BC government considers the panel's forthcoming recommendations and works to develop its provincial Old Growth Strategy, it is critical that moratoria be placed on logging in the most endangered old-growth forest types (at the BEC variant level) and in the old-growth 'hotspot' areas (remaining intact areas of high conservation and recreational value), particularly those identified in the Vancouver Island old-growth hotspots map presented to the panel in December 2019 (see email attachment). Failure to do so will result in a 'talk and log' scenario where the last remaining, exceptional, intact, and contentious areas are lost while negotiations for long-term solutions take place. This would result in considerable losses in terms of biodiversity, ecological processes, opportunities for tourism, and First Nations cultural values, and could spark significant conflict and controversy.

We strongly believe these bold changes are needed to safeguard BC's endangered old-growth forests for the sake of our wildlife, water, the climate, communities, First Nations, and future generations.

Thank you for your careful consideration.

Sincerely,

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