

**From:** [FLNR Old Growth BC FLNR:EX](#)  
**To:** [Old Growth Strategic Review](#)  
**Subject:** FW: Old Growth Strategic Review input  
**Date:** Monday, February 3, 2020 11:40:31 AM

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**From:** Andrew Fall <andrew@gowlland.ca>  
**Sent:** January 31, 2020 9:05 PM  
**To:** FLNR Old Growth BC FLNR:EX <Oldgrowthbc@gov.bc.ca>  
**Subject:** Old Growth Strategic Review input

Hello,

I would like to offer a few comments and a request as input to the review process.

The Great Bear Rainforest Land-Use Order adopted a goal of protecting enough old-growth in all ecosystems to meet "low risk" to biological diversity. Low risk to biodiversity means that there is a high probability that native species may persist and thrive, and that ecosystems can continue (and adapt to climate change). Not meeting low risk to biodiversity means a high probability of causing extirpation or extinction of native species and/or loss of ecosystem resilience and functioning.

Low risk was scientifically defined in the Great Bear Rainforest process as protecting 70% of "natural levels of old forest" in each ecosystem, where natural levels of old forest depends on pre-industrial natural disturbance rates. In some coastal temperate rainforest types, natural levels may be over 90% (and so a low risk approach would mean protecting at least 63% of the ecosystem type). In some drier forest types, natural levels may be much higher (e.g. if natural levels of old forest is 20%, then a low risk approach would mean protecting 14% of the ecosystem type).

**I would like to request that the Province adopts a goal to protect enough old growth in each ecosystem type to meet low risk to biodiversity.**

In ecosystem types that do not currently have sufficient old growth to meet a low risk target, then enough younger forest (preferably natural origin) should be protected as recruitment to meet the old growth target over the long term.

Protecting enough old growth to meet low risk to biodiversity would still leave a fairly high percent of the forest and land base for other uses, including logging, to support a diverse and vibrant economy.

This may be economically challenging in some areas (e.g. the Coastal Douglas-Fir zone), but the fundamental question/principle is: do we accept to lose biodiversity, or do we prioritize ensuring a high chance of maintaining natural biodiversity for the future?

Thank you,

Andrew Fall

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