

Dear Mr. Merkel and Mr. Gorley;

You have been tasked to lead a thorough examination of the value that British Columbians see in old growth trees and forests and provide the government with recommendations that inform a new approach to old-growth forest management. Many of us are passionate about our forests and wish to see them well-managed for all British Columbians.

British Columbia is a global leader in sustainable forest management. The province's Chief Forester works government staff and licensees to confirm that harvest levels in the short term and long term provide social (including cultural, recreational, and spiritual), environmental, and economic benefits to the people of British Columbia at present and for future generations. Numerous highly qualified people including social and biological scientists, biologists, foresters, and economists inform this process. The interests of First Nations and stakeholders are sought and addressed, and values are conserved across the landscape.

- Licensees plan for continual harvest such that the landscape includes stands of multiple age cohorts. This diversity includes old growth preservation apart from parks and conservancies such as ungulate winter range, wildlife habitat areas, and other special management areas set aside for environmental or social values. Sustainable forest management plans are based on a known land base. This age diversity will be unbalanced and lost if significant changes to the timber harvest land base (THLB) are made.
- Licensees harvest stands across the timber profile. This, together with the multiple age cohorts and the parks, conservancies, and non-timber harvest land base, maintains the diversity for which BC forests are world-renowned. Again, a balanced and diverse portfolio cannot be developed and maintained if significant changes to the THLB are implemented.
- The coastal forest industry continues to rely on old growth forests for its economic well-being. Sustainable forest management plans are in place that demonstrate conservation of old growth in conjunction with a smooth transition to greater reliance on second-growth forests. Significant reductions to old growth forests in the THLB will have significant impacts on this transition plan, have dramatic impact on past and future investments in the forest industry, and have serious and unintended consequences for rural communities.
- Timber management goals, objectives and targets are developed at various scales – provincial, regional, and local – that protect and conserve non-timber values. These include objectives for other values and uses. These goals, objectives, and targets drive forest management planning and implementation to deliver sustainable forest management. Drastic changes to the goals, targets and objectives will create imbalance in the sustainability of social, environmental, and economic benefits to the people of British Columbia immediately and into the future.
- The values associated with old-growth forests are delivered in sustainable forest management. Many of the social benefits are only delivered when forests are accessible, and sustainable forest management of Crown Lands delivers access to many forest users. Our sustainable forest management activities – conservation of ecologically important ecosystems, prompt regeneration of harvested stands with native species, and continual improvement of best management practices across all forest management activities – serve to protect the suite of values identified by the stakeholders and people of BC.

I encourage you to make strategic recommendations for Old Growth that recognizes the importance of our sustainable forest management contributions to the social, environmental, and economic well-being of present and future generations in BC. Any changes to the goals, objectives, and targets for forest management must be shown to maintain a balance in this delivery.

Sincerely,



Annette van Niejenhuis, RPF
Brentwood Bay, BC

Dear Mr. Merkel and Mr. Gorley;

You have been tasked to lead a thorough examination of the value that British Columbians see in old growth trees and forests and provide the government with recommendations that inform a new approach to old-growth forest management. Many of us are passionate about our forests and wish to see them well-managed for all British Columbians.

British Columbia is a global leader in sustainable forest management for the economic benefit of the people of British Columbia. Removing large areas old growth forests from the Timber Harvest Land Base (THLB) will lead to significant reduction in Allowable Annual Cut (AAC) and have substantial economic consequences. Rural communities will lose their economic base, and the province will forego significant revenue from the fees paid by licensees as well as the income taxes collected from those employed directly or indirectly in this industry. Industry competitiveness in global markets will be reduced.

- The forest industry prides itself on the good wages and job security it provides through sustainable forest management. This industry compares favourably to many other industry sectors available to rural communities. Many service sector jobs in these communities rely on the activity of the forest sector, both through direct industry use of the services, and through indirect support including access to crown lands for tourism, non-timber forest products, and other uses. Though employment numbers in the forest sector have declined over the decades due to technological improvements and AAC declines, the industry remains a vital and ever-green contributor to the economy of our communities. Significant changes to the THLB will dramatically erode direct and indirect employment. We have seen these impacts on communities throughout the Province with the erosion of AAC: many rural communities have seen housing prices tumble and reductions in the municipal tax base leading to loss of municipal services. Larger communities are not immune; significant milling capacity is established in urban centres throughout the province, and these jobs will also be lost if significant changes are made to the THLB.
- The Provincial government received about 2.5 billion dollars from the forest industry's activities in 2016, including production taxes, corporate income taxes and other regulatory contributions. This industry contributed 12.9 billion dollars to the provincial GDP in 2016 (PWC 2017). Significant decreases to the THLB for the preservation of old growth will result in significant decreases to provincial income and GDP.
- The forest industry has made significant capital investments in milling capacity, forest inventories, and harvesting capacity based on provincial agreements for access to Crown timber. Significant changes to the THLB will put all these investments at risk, and dramatically reduce the competitiveness of the industry in the global markets. What compensation will be required?

In British Columbia, only 42% of the forest land base is included in the THLB. In Coastal BC, this is reduced to about 30%. In the past few decades, significant reductions to the coastal THLB have occurred in the Great Bear Rainforest, in Haida Gwaii, and on Vancouver Island. Areas removed and protected include significant old growth forests across almost all ecosystems. Within the THLB, sustainable forest management includes protection of riparian zones and other values which will continue to support large trees and old growth.

I encourage you to make strategic recommendations for Old Growth that recognizes the importance of our sustainable forest management contributions to the economic well-being of our Province, the rural communities that can only thrive with a robust forest sector, and the thousands of British Columbians whose income relies on the continued competitiveness of the forest resource in the global marketplace.

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Annette van Niejenhuis, RPF
Brentwood Bay, BC

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You have been tasked to lead a thorough examination of the value that British Columbians see in old growth trees and forests and provide the government with recommendations that inform a new approach to old-growth forest management. Many of us are passionate about our forests and wish to see them well-managed for all British Columbians.

British Columbia is a global leader in forest management. Government objectives for BC forest management include climate change adaptation and mitigation. Forest management and conservation allows us to make significant progress to these objectives, but broad-scale preservation limits advancement in these areas.

- Preserved old-growth forests store carbon, but whether they are a net sink or net source of greenhouse gasses is variable. Harvested stands – particularly those delivering high-value products – store carbon in these products, but they also release greenhouse gasses for a period after harvest, both from the site itself, and from the low-value products that all harvested stands generate. With the strong regeneration policy and practice in British Columbia, this period is minimized, and regenerating stands become strong carbon sequestration points. Well-managed stands have been targets for further carbon sequestration investment in recent years through the forest fertilization program to mitigate climate change. This opportunity will be limited if extensive old growth preservation is implemented.
- Climate-based seed transfer policy has been developed and broadly adopted by forest managers. This adaptation policy allows forest managers to match historic seed source climate to the present and predicted climate of the regeneration area. Trees planted under this policy will be more resilient to the impacts of climate change than natural regeneration. This, combined with decades of tree improvement investment for growth, wood quality, and forest health traits can only be delivered to managed forests, not preserved old growth forests. This new seed transfer policy, combined with the results of the tree improvement investments, leads to incremental carbon sequestration (mitigation) where the seed is deployed.
- Species selection tools are under development, with FLNRORD ecologists examining current stocking standards, and their fit with emerging climates. Continual improvement of this practice, in conjunction with the climate-based seed transfer policy, will add to the adaptation of our managed forests and to their use in mitigation of climate change through added carbon sequestration. These investments and benefits will only be realized through sustainable forest management.
- BC Forest products come from managed forests where reforestation is prompt and successful. Reducing the volume of wood products from BC will result in the global need being filled by other jurisdictions, including those with weak forest policy and practice that results in deforestation leading to increased global carbon emissions and decreased global carbon sequestration. Or the need may be filled with emissions-intensive alternatives, again adding to the global green-house gas budget.

I encourage you to make strategic recommendations for Old Growth that recognizes the importance of our sustainable forest management contributions to the BC government objectives for carbon.

Sincerely,



Annette van Niejenhuis, RPF
Brentwood Bay, BC

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You have been tasked to lead a thorough examination of the value that British Columbians see in old growth trees and forests and provide the government with recommendations that inform a new approach to old-growth forest management. Many of us are passionate about our forests and wish to see them well-managed for all British Columbians.

British Columbia is a global leader in sustainable forest management. The Forest Sector's policies and practices address multiple values across the landscapes in which we operate. The industry engages highly qualified professionals across a range of disciplines to develop detailed management plans for every harvest stand. We manage for Visual Quality values identified at the stand and landscape level.

Visual Quality is cited by tourism operators as affecting their livelihood, such that in 2016 the BC Chamber of Commerce recommended that the province increase the protection of old growth forests with the ultimate objective of permanent expansion of parkland or conservancies (<http://www.bcchamber.org/policies/protecting-old-growth-rainforest-economic-benefit-tourism-based-communities>). Has the BC Chamber of Commerce engaged qualified professionals to make such a recommendation affecting the practice of forestry in BC?

- Plans to maintain visual quality while harvesting timber have been implemented to great success in many landscapes in British Columbia in recent years. Limiting access to old-growth forests is not required to meet visual quality objectives.
- Have tourism operations proven that visual quality due to forestry practices has had a negative economic impact on their business?
- The economic argument put forward by the BC Chamber of Commerce from a kayaking company is incomplete:
 - The value presented for 60 ha of timber near Robson Bight appears to be \$80/m³, assuming 750m³/ha, and less if the site is more productive. This value perhaps takes the wood to the dryland sort but does not recognize the rest of the value chain; this wood is also likely to support mill jobs on Vancouver Island.
 - The view-scape in the example is much larger than 60 ha, and the kayaking company will not be content to have 60 ha of old growth surrounded by 3,540 ha of cutover (hypothetical: 60 ha x 59 years). Thus, a comparable valuation of the tourism industry must account for the full view-scape, as each subsequent 60 ha block in the 60-year rotation will be opposed as well, and the view-scape may be much larger than 3,600 ha.
 - How do each of these activities benefit the people of British Columbia? Does the tourism activity generate more Provincial revenue from this hypothetical 3,600 ha view-scape, or does the logging, regeneration, and carbon sequestration generate more revenue?
 - How do these industries compare in their support of local communities? Would preservation of this view-scape generate the same number of high-income local tourism jobs or are the tourism jobs more limited in season and income such that employees do not live in local communities and contribute to the municipal tax base?

I encourage you to make strategic recommendations for old-growth forest management that demonstrate a thorough analysis of the benefits and costs of the options.

Sincerely,



Annette van Niejenhuis, RPF
Brentwood Bay, BC