



January 31, 2020

Gerry Merkel RPF and Al Gorley, RPF
Old Growth Strategic Review Panel
Ministry of Forests, Lands, Natural Resource Operations and Rural Development

RE: ATCO Wood Products submission for the Old Growth Strategic Review Engagement Process

Dear Sirs,

ATCO Wood Products is a third generation, family business that has been sustainably and responsibly managing crown and private forestlands, and has been producing value added wood products from our Fruitvale, BC location for over six decades. We are responsible for over 100 jobs in our forest industry dependent community. We appreciate the opportunity to provide our following comments to help shape the Old Growth Strategic Review's recommendations of how "Old Growth Forests" in BC are managed.

Current forestry land base management regimes in BC already have regulations and standards that manage and protect "Old Growth Forests". For tenure licensees operating on Crown Land, like ourselves, the Forest and Range Practices Act and Higher-Level Plan Orders have policies and requirements governing the management of Old Growth Management Areas (OGMA's). While improvements may be made to the identification and classification of OGMA's on provincial forest maps, the current legislation provides a rigorous framework for the responsible management of these areas. Further, the existing legislation as applicable in our region, contains a process that allows professionals to properly assess and protect true old growth forest areas that are currently not identified or protected, while allowing areas improperly classified as old growth to be available for sustainable forest management. Further, companies like ATCO Wood Products certify crown forest management areas to 3rd party certification systems, like the Sustainable Forestry Initiative (SFI), that require additional management strategies for the identification and conservation of appropriate climax forest areas.

The current land base management framework in BC already protects more than reasonable amounts of the Timber Harvesting Land Base (THLB) for conservation reasons including "Old Growth Forest" protection (as well as parks, conservation areas, etc.). 56 million hectares of BC's 95 million hectares of land is forested. Of that forested area, only 22 million hectares of forests are available for sustainable forestry activity, leaving 61% of our forests already permanently removed from THLB for conservation reasons (parks, conservancies, ecological reserves, OGMA's, etc.). In total, about 50 percent of the Province has some leave of harvest restriction beyond that defined under the Forest and Range Practices Act (including Community Watersheds, Ungulate Winter Range, Visuals restrictions etc.), totalling about 48 million hectares! In our local region of the West Kootenays, even more of the land base is restricted from harvesting than these provincial averages. In the Arrow Timber Supply Area (TSA), 76% of the land base is not available for forestry, and in the Kootenay Lake TSA, 82% of the land base is reserved for conservation reasons



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including restrictions on harvesting “Old Growth Forests”. The persistent and unbalanced reduction in THLB erodes our Province’s ability to realize the economic and social benefits that our renewable forest resource provides such as jobs, tax revenue, and community support.

Because forests of BC vary by region, and because of the lack of consensus around clear definitions of “Old Growth Forests”, management strategies, policies and legislation for managing “Old Growth Forests” should also vary across the province, and be flexible to allow professionals to make proper decisions on how to best manage the forests at local levels.

The forests of the BC Coast are fundamentally different from the forests of the BC Interior. Forests of the interior have been subject to cycles of natural disturbances (fire, pests, etc.) for millennia, that have resulted in the existence of very little “Old Growth Forest” areas in the interior. This is in contrast to coastal forests that do not experience the same degree or type of natural disturbances, and consequently have vast areas of older, climax forests. These coastal, old growth forests with trees hundreds or thousands of years old covered in thick layers of moss are the typical image most people have when envisioning the term “Old Growth Forest”. These differences in forest types in our province contributes to the reality that there is no consensus around the definition of an “Old Growth Forest”. Age base thresholds of single trees, definitions based on biological attributes within stands, or definitions based on stand dynamics, all singularly lack the ability to adequately distinguish between an “Old Growth Forest” and other forest types. Forests are complex ecological structures and require trained professionals to design and implement the proper forest management plan for each hectare of forest. Forest policy must be designed to give professionals the flexibility to make proper decisions for the full range of forest values and to allow different management strategies to be employed in different parts of the province (i.e. coastal forest management policies and legislation should differ from policies and legislation for managing climax forests in the West Kootenay Region). Blanket, simplified, province-wide management ideas such as “banning old growth forest harvesting in BC” fail to allow for proper management of our forests for the full range of values, are unable to be implemented in any pragmatic manner, and will ultimately not create healthy forests or communities in BC.

Further encumbrance of the remaining THLB in southern interior of BC, for any reason, including for additional old growth harvesting restrictions, will irreparably harm the local, family wood product businesses that are key to the economic and social health of our local communities.

Over the last 2 decades, our region has felt the impact of the closure of many mills in small communities due to an inability of those mills to secure enough timber to operate. Reductions in the Annual Allowable Cut (AAC) throughout the southern interior because of fires, pests, and the removal of more and more land from the available THLB have placed West Kootenay mills, including ATCO Wood Products, in precarious situations where our ongoing viability is in question. Without enough timber to process through our mill, our ability to continue to operate is threatened along with the 100+ jobs that we provide, and the communities that we support economically. This situation is replicated with every mill in our region.

Evaluation of the Province’s regulatory framework of the management of “Old Growth Forests” and the consideration of any changes to that policy must be rooted in facts. We are dismayed by the abundance of misleading information and inaccurate statements regarding the current state of “Old Growth Forests” and their management policies in BC circulating in both social media and traditional news sources. Agendas that do not embrace the well-being of all British Columbians through sustainable forest management and socioeconomic realities, are abundant in the public discourse, but should not be part of the discussions on this topic. We believe it is the Provincial Government’s responsibility to not only use the clear facts on this topic as the foundation for making policy changes, but also to inform the general public about the current state of “Old Growth Forests”; including how much of these forest structures are current conserved. Additionally, the socioeconomic impacts of any proposed changes to policy or regulation must be fully understood, and communities and companies that will be impacted by any proposed changes must be properly and fully consulted before those changes are enacted.

British Columbia forests must be managed to balance the ecological, economic, and recreational values of our forests (the necessary legs of the 3-legged stool of BC forest management) to provide the optimal social benefits

for the citizens of our Province. Forest Policy should be structured to achieve this equal balance of values in all forest management plans. Current forest policy in BC is sufficient to conserve the small amount of “Old Growth Forests” in the southern interior region of the Province. Coupled with other THLB conservation areas currently in place, the balance of forest value management in the West Kootenays is currently tilted too far away from protecting the economic values (i.e. we are failing to protect the “working forest THLB”). Protection of any additional THLB will not add to the ecological health of the forests in our region, but will certainly result in the deterioration of the economic health of the region as more mills will close and jobs are lost. We are supportive of changes to improve mapping of old growth in our region, but we are not supportive of any additional restrictions on old growth logging in the southern interior. If such additional restrictions or moratoriums are being recommended, then ensuring no net loss of THLB and continued health of our region’s forestry-based economy requires adding an equivalent amount of THLB from currently protected areas, that have less conservation value.

Thank you for the opportunity to participate in the engagement of this vitally important topic, and we welcome any inquiries or further discussion on our perspectives and comments that you may have.

Sincerely,



Scott Weatherford
Chief Executive Officer
ATCO Wood Products Ltd.