

## BC Community Forest Association

### Submission to British Columbia's Old Growth Strategic Review

January 23, 2020

#### Introduction

The following recommendations are based on input from BC Community Forest Association (BCCFA) members to the Old Growth Strategic Review.

#### **Key points regarding community forests and old growth:**

- Old growth forests are important to community forests and the communities that manage them, both Indigenous and non-Indigenous.
- Community Forest Agreements (CFAs) are managing for the full range of economic, social, cultural and environmental values on a fixed landbase. This includes working towards greater ecosystem resilience.
- Some CFAs have a disproportionate amount of Old Growth Management Areas (OGMAs) in their tenures, many of which are in the Wildland Urban Interface (WUI). As most CFAs operate on a highly constrained landbase to begin with, hard “no touch” boundaries significantly impact management options and good stewardship of the land.

See the “Community Forest Context” section below for more details.

#### Theme #1 Inventory and OGMA Selection

##### Recommendations:

1. Allow CFA Managers to make changes to the locations and boundaries of OGMAs to improve their ecological value and to reduce impacts to the Timber Harvesting Land Base (THLB) by co-locating them with other land designations where appropriate. A structured goal or value-based process could be used to do this to ensure that key biodiversity conservation objectives are maintained.
2. Support investments in improved inventories. Many CFA holders have made these investments. By utilizing improved inventories, overall OGMA quality will be improved, while maximizing overlaps with other constraints. Augmenting this with a province-wide BC Government investment in LiDAR will allow for better decision making when selecting areas for old growth management.

##### Rationale:

- In many community forests, the location of existing OGMAs does not make sense on the ground. OGMAs were first established about 20 years ago through a mapping exercise based

on Vegetation Resources Inventory (VRI) and in many cases outdated aerial photography. Inventory data was inadequate and inaccurate. In most areas of the province no ground-truthing was conducted. In addition, many of the OGMA's were located at a higher-level plan perspective across a given TSA, a process that did not consider the dynamic of smaller area-based tenures that are now a reality. CFA Managers are finding areas where existing old forests are not in OGMA's and where the majority of forests contained in OGMA's are not old. In many cases, the designated areas are not serving the desired objectives.

- When OGMA's were first established, the impacts of climate change, forest health, and decades of fire suppression on the resilience of forest ecosystems were not considered.
- Some CFA Managers have been able to make improvements in the selection of OGMA's and co-locate them with other land designations. Others that have tried to make improvements have been met with resistance from their natural resource district staff. There appears to be inconsistency across the province, whereby the willingness to make changes depends on resource district staff, and some are reluctant to allow for changes.
- We need to fully embrace new technology such as LiDAR. It is imperative that a province-wide investment be made to our inventory to improve management on the ground.
- Examples: Westbank First Nation has used LiDAR and a District-led OGMA co-location project to maximize overlaps with other resource constraints and in the process significantly improve the quality of the OGMA's within its community forest. The Creston Community Forest is being met with resistance, even though they know there are places that should be protected that aren't.

## Theme #2 Old Growth Management, Natural Disturbance and Climate Change

### Recommendations:

1. Old growth management must account for natural disturbance patterns, climate change and the negative impacts of decades of effective fire suppression.
2. The approach to old growth conservation should be dynamic given the variation in disturbance regimes.
3. CFA Managers in fire adapted ecosystems need the ability to "manage" OGMA's to restore and maintain forest health and resiliency and for community protection.
4. BC's approach to old growth management can't be "One Size Fits All". It must be tailored to the ecosystem (i.e. BEC zones) and must consider the impacts of climate change.
5. The provincial government must also account for community safety. This means that old growth management must be aligned with a new integrated approach of FireSmart, WUI management and landscape level management for greater ecosystem resilience.
6. Old Growth Management (meaning "active management"), and options for undertaking it, should be a key component of Landscape Level Planning tailored to a specific landscape, ecosystem, disturbance regime, etc.

### Rationale:

- Our forests are dynamic. Establishing fixed areas for one purpose ignores the fact that forests change over time and the values that were originally aimed to be protected may no longer be there.

- The concept of compartmentalizing forest values is outdated and does not fit well with the emerging philosophy of interconnected wholistic land management.
- The establishment of designated OGMAs, and the rules that govern them, ignore natural disturbance patterns, climate change and the negative impacts of fire suppression. Areas of the Interior are vulnerable to biotic and abiotic, large-scale disturbance – at increasing severity.
- Many of us live in fire-adapted ecosystems that have heavy and continuous fuel loads as a result of decades of fire suppression, and in some cases exacerbated by a range of forest health factors. We cannot expect these ecosystems to remain unchanged and to continue to sequester and store carbon indefinitely. We must recognize that there are some trade-offs and difficult decisions to make regarding when and where storing or sequestering carbon should be a top priority, and when and where wildfire risk reduction needs to be the top priority. We should thus be explicitly zoning our landbase into priority areas for carbon, and priority areas for climate adaptation and fuel mitigation.

### Theme 3: Impacts of Land Use Decisions on Small Area-Based Tenures

#### Recommendations:

1. The constraints that community forests face as small area-based tenures must be considered in any new Old Growth Strategy. Further impacts to their Timber Harvesting Land Base may undermine their viability.

#### Rationale:

- More set asides and static reserves will pose problems for small area-based tenures. For example, one Coastal CFA is 8,000 hectares, 44% is already not available to timber harvesting. This community forest has about 700 ha of old growth in their THLB. If more area is removed from THLB they will be forced to harvest younger second growth, which will remove the transition they plan to attain in order to sustainably manage the full age class structure.
- The concept of social licence in community forestry originates with the tenure itself. CFA licences are managed by the community, for the community. This sets them apart in the forest sector. Further, CFA holders have demonstrated that they are going above and beyond tenure requirements to build local relationships and cultivate social licence for their operations. They are thinking differently about engagement with their Indigenous and non-Indigenous neighbours and recognize that the stewardship role they have for their long-term, area-based tenures is not just a relationship with the land, but also with the people who call it home.
- As a result, we see that many community forests have a greater ability to operate in socially constrained areas adjacent to communities. This includes harvesting and conducting fuel treatments in areas that major licensees and BCTS have been challenged to access due to local opposition.
- While “doing nothing” is a form of management, it should not be considered the only management option for Old Growth Management. Our province is diverse, our

management strategies should reflect that. Old Growth, in the same way as other forest values, should be actively managed.

## Notes on the Community Forest Context

The Community Forest Agreement (CFA) is an area-based licence that provides the exclusive right to harvest timber within the CFA area, and the right to manage botanical forest products. Licences are long-term, 25 years, replaceable every 10. Since the development of the CFA tenure in 1998, BC has issued 58 CFAs across BC ([click here to view the map](#)) with another 5 formally in the application process ([click to view the status sheet](#)). These licences are held by a variety of community-based legal entities, including Limited Partnerships, Societies, Co-Ops, First Nations Bands and local governments. Collectively, over 100 Indigenous and rural communities are involved in community forestry in BC.

Half of the operating CFAs are held by First Nations or are partnerships between Indigenous and non-Indigenous communities. In addition to community forests where First Nations are owners or partners, many community forest organizations include First Nations representation on their boards. In many cases, First Nations are engaged in cooperative planning, share profits, have MOUs and employment contracts, and work with community forest organizations in capacity building activities like training and education.

The CFA tenure was developed to give local communities the opportunity to manage local forests for the benefit of those communities, in a manner consistent with locally defined objectives and values. CFAs are governed by the Forest Act and the Forest and Range Practices Act, and all other applicable statutes and regulations.

Community Forest Agreement holders are uniquely incented to make investments in the forest resource for long-term sustainability. A community with a long-term, area-based tenure must live with the consequences of their decisions, and conversely, is motivated to invest for future benefit. For the same reason, CFA holders are managing for a range of objectives including:

- wildfire mitigation & community protection
- climate change mitigation and adaption
- enhanced forest stewardship and incremental silviculture
- conservation of ecologically and culturally significant areas and values, including old growth forests.

*The [BC Community Forest Association](#) represents over 90 rural and Indigenous communities across our province. We share a vision of a network of diverse community forest initiatives, where local people practice ecologically responsible forest management in perpetuity, fostering and supporting healthy and vibrant rural communities and economies. Contact [info@bccfa.ca](mailto:info@bccfa.ca) for more information.*