

***Submission to the Old Growth Panel
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- 1) What old growth means to us and how we value it***
- 2) Our perspective on how old growth (OG) is managed now***
- 3) How we think old growth could be managed effectively in future***

1) What old growth means to us and how we value it

Intact forests manage our climate for us. Intact forests manage our water for us. Old growth does this best. Once forests have been clear cut, they no longer do this.

Logging practices in the Boundary watershed zone have had a devastating effect on Grand Forks via the May 2018 flood. There is mounting evidence that the severity of the flood was a result of the type of logging practices, the locations of logging, and the extent of the logging in the watershed combined with climate change factors. Over 400 homes were impacted by the 2018 flood. The business losses to the local economy in 2018 alone were estimated at \$65 million.

As of January 2020, the local economy still hasn't recovered – many businesses have not re-opened and many homes did not get rebuilt. Most of the logging done in the Boundary is clear cutting. Forestry experts have asserted that logging rates have been set 20% higher than they should be in the Boundary ([see this article](#)).

The local and regional governments scrambled to deal with the aftermath of the flood. They were not prepared for the emergency, nor are local government staff qualified to deal with the complexity of recovery. The people of Grand Forks are paying the price.

- We need to protect the ecosystems that have the highest structural complexity – they protect us by managing our water. Old growth manages water and climate best. Grand Forks residents need the protection of old and mature growth.
- OG forests:
 - Have the highest biodiversity values

- Provide critical habitat for species at risk
- High value wildlife habitat – due to their complex structure (interlocking crowns with high overstory cover and open understories) and interior forest habitat. Long time observers of wildlife in the Boundary are seeing extreme depletions in wildlife numbers.
- Most adaptable and climate crisis resilience - because of their high genetic diversity and structural complexity are more resilient to disturbances like climate change, wildfire, insects and diseases
- Carbon storage – Old forests provide vital carbon sinks, and store much more carbon per ha than younger forests. With the climate crisis, old growth should be a priority.
- Spiritual/emotional values – old time loggers, spending time in the forest
- Non timber forest values – provide for economic diversification and local employment due to products including food, medicinal.
- Recreational values – Adventure and ethno/eco-tourism – support economic diversification and through non-consumptive use opportunities, e.g., wildlife viewing, eco- and ethnobotany tours, guided hiking/biking tours, guided interpretive education and awareness, etc.). Ecotourism in the Boundary – BFWSS plans on looking into ecotourism and the potential for an ecoforestry project that will contribute to our economy – we need the old growth to do that.

2) Our perspective on how old growth (OG) is managed now

There are myriad problems with the current system – both the details of the management and in the overall strategy and management.

Old growth management has failed:

- patch size targets for interior forest habitat were not implemented
- mature forest targets – not implemented
- forest ecosystem networks (FEN) for connectivity – not implemented
- spatial requirement for OGMAs (Old Growth Management Areas) – not implemented (instead non-legal aspatial) assumption of 12% old forest met in parks (to supplement OG on crown forest landbase) often not met, while old forest targets often met in parks due to double counting
- The only thing that did get implemented was the 2/3rd drawdown policy of ecologically based old forest targets in low BEO areas.

- Old forests are being managed at high risk and unsustainable levels, due to watered down legal retention targets which are mistakenly based on timber supply considerations instead of science.
- FLNROD did an analysis of OGMA's and old forest retention in Arrow-Boundary TSA. It showed that the quantity of old forest protected does not meet legal targets, while the quality is very poor and not representative.
- OGMA's consist to a large extent of younger and mature recruitment forests, and we are protecting the wrong forest and not enough of it. Only 17% of OGMA's in Arrow are in fact old. This has happened even though there is a lot more old forest outside of OGMA's. 63% of old forest in Arrow is found outside of the protected OGMA's.
- OGMA's are not representative of natural old forest amounts (by ecosystem type, elevation zone, stand type, or site productivity).
- OGMA's are mainly in high elevation zones rather than low elevations. Low elevations are where a large component of biodiversity and dependent wildlife are found.
- OGMA's consist mostly of small patches and sliver (many less than the minimum 2 ha size permitted and the vast majority under 5 ha)
- Small patches and slivers are unable to function as old growth and interior forest habitat for wildlife and species at risk that require large OG territories or corridors.
- Legal targets for old/mature forest retention are not being met in over half (52%) of the Arrow-Boundary.
- Most of the old forest left is actually outside of OGMA's, but even if all remaining old forest was conserved in OGMA's, we still could not meet legal targets in the Higher Level Plan Order.
- Licensees are addressing legal old forest retention requirements through conservation of *young and mature* forests, even though old forests exist that could help meet the old targets.
 - Licensees are breaking the law in terms of their obligation to protect old forests, e.g. licensees are swapping OGMA areas of true old growth with younger forest – this is not legal – this is not legal under the HLPO and Implementation Strategy (West Kootenay Ecosociety has been making complaints about this – please refer to Candace Batycki's OG report to this panel).
- The government does not share, track, monitor or manage the OG data making it unable to do its job.
- There is no legal mechanism to establish a moratorium on logging old growth (until legal targets are met).
- There is nobody who has the responsibility for or ability to assess and enforce legal compliance.

The system is broken – legislation, regulations, and policy all have a narrow mandate and do not monitor effectiveness of OG retention and cannot address big picture problems.

3) How we think old growth could be managed effectively in future

A New Vision for BC forests is required. Right now, the government of BC has no vision for forests at all – they allowed the status quo of the previous government to continue rather than showing leadership and establishing a new vision. The New Vision must include the protection and restoration of ecosystems (using independent science), include a system of public oversight, and include community co-management of local forests. The New Vision must be written into our legislation, regulations, and policy at all levels.

In light of the climate emergency, the government must redefine forestry and make the protection and retention of OG a priority. The New Vision must implement actions that recognize that OG forests are a carbon sink.

As part of the New Vision, we need clarity of definitions and informed strategic planning. Right now the government actions consist of what could be called the mastering of routines, and while this may be acceptable management to some, it is a confirmation of weak leadership. Strong leadership means setting a positive new direction and establishing a vision.

The tenure system, combined with professional reliance, the disappearance of the Forest Service, and the lack of any substantive, legally enforceable legislation that covers planning and management of "public" forests, means that our forests are public in name only. In essence, Old Growth is managed by corporations, rather than a public body.

The forests that should be held in trust for the public interest, have been handed off to the timber industry in long-term tenures that are renewable at the will of the tenure holders, not the government.

The government can no longer claim that the industrial forestry is essential to the BC economy – it is a declining industry and its policies favour corporate profits over community economic diversity and stability and local jobs.

First and foremost, the specifics of any old growth policy must include removing corporate control of public forests.

Other Old Growth Policy specifics:

- Public oversight of forests must be funded adequately - government must have access to licensee data and oversee the management and monitoring of forests.
- Reinstate government accountability and revoke professional reliance.
- Keep politics out of ecosystem decisions and base decisions on independent science.

- Need to increase old growth to at least 30% of all landscapes.
- MUST get rid of the 2/3 drawdown.
- Stop double counting of OG in parks and protected areas
- Implement targets established for mature forest retention.
- Re-establish connectivity requirements (FENS) –make them legal.
- Prescribe and enforce a minimal 4 ha patch size for OGMA's.
- Amend FRPA to provide OG targets based on **science** not timber supply considerations.
- Redistribute OGMA's to retain the most representative old growth.
- Eliminate the tenure system over 2 years and put public lands and Old Growth back into the control of the public.

Climate change increases the urgency for all this.

Trust for the government is very low. Its time to stop all the consultations and talking and take action. Shift government resources – both human and financial to changing the legislation and transitioning the economy – thus protecting the people who live here.

Stop putting government resources into consultations, stop funding industry, stop implementing what industry wants, take care of citizens, take care of the public good. Take action.

Government leaders must be brave and show leadership. Forestry *business as usual* is damaging to us and it has to be changed. Leaders must develop a New Vision and implement it (or the public will decide they won't be leaders much longer).

Listen to the people. Listen to independent scientists. Not advisors who currently work for or used to work for the forestry industry.