



**BACKCOUNTRY  
HUNTERS & ANGLERS**  
BRITISH COLUMBIA

Old Growth Strategic Review Panel  
Attn: Garry Merkel and Al Gorley  
[oldgrowthbc@gov.bc.ca](mailto:oldgrowthbc@gov.bc.ca)

January 29, 2020

Dear Mr. Merkel and Mr. Gorley,

**RE: Old Growth Strategic Review**

The British Columbia Chapter of Backcountry Hunters and Anglers (BCBHA) represents hunter-conservationists throughout the province who are dedicated to the conservation and proper management of our public lands. Our organization is growing rapidly and has a young, impassioned member base across the province. BCBHA welcomes the opportunity to provide feedback during this strategic review of old-growth management to improve our province's stewardship of this sensitive ecosystem.

In many recent consultation processes including both the proposed Together for Wildlife Strategy and the review of the Forest and Range Practices Act, BCBHA has advocated for landscape level management plans that include measurable objectives to mitigate the cumulative effects on the landscape from industry, forestry, recreation and development. In particular, we believe that any legislation that manages our public lands and waters, including old-growth forests, needs to meet the following requirements:

1. Require resource extraction and development to have net-positive impact on biodiversity, water quality and critical wildlife habitat. Old growth forests are a non-renewable resource and critical habitat for sensitive species. For industry to have a net-positive impact, old-growth forests must be protected.
2. Clear and enforceable road and trail densities with thresholds based on the best available science for the protection of critical habitat and sensitive fish and wildlife species. Roads and trails are particularly detrimental to old-growth forests because mitigation measures such as deactivation and reclamation are unable to re-establish habitat lost when old-growth forests are logged.
3. Maintain and increase roadless areas to improve habitat connectivity and protect sensitive ecosystems and critical wildlife habitat.

BCBHA believes that improvements to old growth management and enforcement are necessary. The current Old Growth Management Area (OGMA) system has flaws that render it ineffective, favoring timber harvest over conservation and eroding public trust. In particular, we



see problems with the lack of transparency in the delineation of OGMA's and in the ability of forestry companies to shift the location of OGMA's.

BCBHA believes that the management of old-growth forests in the province must be strengthened to ensure that the identification and conservation of OGMA's is based on maintaining biodiversity, critical habitat, and connected tracts of pristine wilderness. Importantly, the management of old-growth forests must be governed by clear, enforceable regulations that are resilient to economic pressures, incentivize conservation leadership, and penalize infractions.

Finally, as part of building the public trust, we would like to see improved communication on old-growth management, the status of old-growth forests and OGMA's, and industry compliance. Publicly available reports should include maps that show planned harvest, cumulative effects, OGMA's, critical wildlife habitat, and road/trail networks and density.

Thank you for the opportunity to provide feedback on the improvement of old-growth forest management and protection in British Columbia. BCBHA would welcome the opportunity meet with the Old Growth Forest Strategic Review Panel to discuss our organization's position more extensively.

Yours in conservation,

Alan Duffy  
Chair – BC Chapter  
Backcountry Hunters and Anglers

cc. Doug Donaldson, Minister of Forests, Lands, Natural Resource Operations and Rural Development

