

## **Submission to the British Columbia Old Growth Strategic Review**

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I would like to thank the Old Growth Strategic Review panel for this opportunity for input, and to acknowledge the Government of British Columbia's initiative in launching this important review.

Before my retirement from the British Columbia public service in 2011, I worked extensively in forest and land management policy, with a primary emphasis on land and resource planning.

Subsequently, I have been pursuing a graduate degree in Political Science at the University of Victoria, focusing on interactions between co-existing State and Indigenous sovereignties and the role of government-to-government agreements in reconciling these two forms of sovereignty.

I offer the following submission for your consideration.

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British Columbia's old-growth forests have been, and continue to be, a vital component of our shared natural resource inheritance – with profound practical and symbolic value to the people who reside here.

First Nations connect with and depend upon old-growth forests in specific and unique ways, which only these peoples can fully and properly articulate.

Many of the settlers who arrived in this province over the past century and a half came to rely upon – and build a mythology around – old-growth forests. These magnificent trees are part of us, and no doubt they will continue to play an elemental role in our ever-evolving story.

The ongoing and multiple benefits of old-growth forests to British Columbia are clear – be they spiritual, cultural, biological or economic. The latter has centered historically on procuring the abundant and at times high-value wood products these forests can

provide. More recently, as we have seen a rise in local economies that depend upon living trees, their economic value for recreation and tourism has become more evident.

### **Responding to the Climate-Change Imperative**

A new chapter in the story of British Columbia's forests is now taking shape as humankind confronts an emergency of its own making – that of human-caused climate change. This widely acknowledged emergency should catalyze new goals for old-growth forest management in British Columbia, due to the unique role that these forests can play as existing sites of carbon storage. Put another way, while all the benefits that can accrue from old-growth forest use and management are of major importance to the Province and its citizens, it is these forests' role in storing carbon that should now propel the Province's priorities for the management of its remaining old-growth forest.

As British Columbians think about the value of our old-growth and formulate a vision for its future management, we must remember that our Provincial Government represents just one decision authority, with Indigenous peoples in British Columbia also possessing an independent authority rooted in their own culture and laws. While my recommendations are directed to the Province, respect for Indigenous values is of the utmost importance and the Province's strategic direction needs to be determined in dialogue with First Nations leaders.

The forest biomes that the Province and First Nations share across British Columbia are remarkably varied, and forest management strategies must vary accordingly.

Most Boreal forest, sub-boreal forest and higher-elevation montane forest is dominated ecologically by periodic catastrophic fire and, by recent experience, other widespread disturbances such as insect attack. Old-growth management in these forest types is unlikely to play an important role in carbon management.

In the drier forest ecosystems of the southern Interior where stand-maintaining fires were naturally prevalent, the outright conservation of old growth may be less important than other strategies focused on reducing the risks – for communities as well as for carbon storage – that stem from the unnatural catastrophic fires that have recently become all too familiar in these forest ecosystems.

The Province's strategy around old-growth forest should, therefore, strongly focus on the geographic area where old-growth conservation makes sense: the Coastal region, the "wet belt" of the Columbia and Rocky Mountains, and the Northwest (Nass and Upper Skeena basins). Although a changing climate may see higher fire disturbance risks in some of these forests, they potentially remain amenable to the overall maintenance of forests in an old-growth condition, with commensurate benefits for carbon storage and other values. To use a technical reference, these are the forests subject to disturbance regimes defined by B.C. Government agencies as Natural Disturbance Types (NDTs) 1 and 2, where natural disturbance is characterized by rare or infrequent stand-initiating events.

I offer no expertise regarding carbon storage in living forests. I make the simple assumption that standing old-growth forests in NDTs 1 and 2 hold significantly more carbon than does an equivalent area of this forest managed primarily for industrial wood production. I am aware of the argument that sequestration of wood-based carbon within built infrastructure can provide significant carbon storage. However, I see this as an argument for wood as a construction choice in relation to alternative materials and for the overall sustainability (including carbon considerations) of managed forestry. I do not see this as an argument for converting all of our potentially harvestable remaining old growth to managed stands, with attendant short-term consequences for carbon storage.

Logging in our remaining harvestable old-growth forests continues, of course, to be important to the rural economies of many regions. Clearly, it is incumbent on Government to address forest-dependent communities' and workers' needs and expectations, in balance with climate-change imperatives. These communities and workers should be the central focus of a managed transition process that sees our forest sector shift entirely over the next several decades to sustainable second-growth management.

With these assumptions and arguments in mind I offer the following recommendations:

## Recommendation 1:

- A) the Province should collaborate with First Nations leaders to develop an old-growth conservation strategy that applies to provincial Crown land forests areas within Natural Disturbance Type 1 and 2, with climate-change mitigation as a primary goal and rationale; and**
- B) this strategy should specify an overall target of retaining at least 50 percent of the remaining potentially harvestable old-growth forest area on provincial Crown land within NDTs 1 and 2.**

Experience obtained in the 1990's through the B.C. Protected Areas Strategy demonstrated the utility of a numerically expressed provincial-level target for meeting intended strategic policy outcomes.<sup>1</sup> For additional old-growth retention, it is important that the province-wide target pertain to the area of remaining potentially harvestable old growth, meaning that within the assumed timber harvesting land base. Old-growth forests outside the potentially harvestable area will undoubtedly continue to contribute substantially to carbon retention and other biological, cultural, and (non-harvesting) economic benefits. But these forests are not in contention. Therefore, a target that refers to old-growth forest within the assumed timber harvesting land base would serve as a focused and practical benchmark to directly address the trade-offs at hand between carbon storage and community and worker transition. A target of less than 50 percent retention would seem woefully inadequate given the current climate emergency. Indeed, further analysis could indicate that an even more ambitious provincial retention target is achievable while still allowing a workable transition for forest communities.

The approach recommended here stands in contrast to previous strategies concerning old growth, which have focused on assuring a prescribed level of conservation over a specified unit of forest landscape, while explicitly or implicitly minimizing impacts on the available harvestable timber area. This is the case both for the Ecosystem-Based Management framework adopted in the Great Bear Rainforest and the generally more

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<sup>1</sup> In this case, the expressed target was to expand the area of the province in Protected Areas from 6 percent to 12 percent.

modest conservation levels provided for in the 1990's and 2000's through the application of the Biodiversity Guidebook and Landscape Unit Planning Guide. The contrasting approach of specifically setting a target for maintaining old growth within the assumed timber harvesting land base is appropriate, however, if carbon storage becomes the paramount rationale for additional old-growth conservation and the imminent cessation of old-growth harvesting.

As with the Protected Areas Strategy of the 1990's, absolute adherence at a local scale to a provincial-level target would be inappropriate. The actual level of old-growth retention within NDTs 1 and 2 can and should vary across regions, Indigenous territories, and forest management units.<sup>2</sup> As such, locally developed old-growth retention targets, while reflective in the aggregate of the provincial target, should also respond to local Indigenous needs and aspirations, the specific transition requirements of forest-dependent communities and workers, and local forest conditions such as the area's previous harvesting history and its current forest age-class distribution.

### **Providing space and support for Indigenous actions around Old Growth**

Any process for expanding old-growth forest retention must fully respect government-to-government relationships between the Province and First Nations, consistent with the now-adopted United Nations Declaration on the Rights of Indigenous Peoples.

Previous government-to-government land use planning activities have demonstrated that government-to-government processes can yield meaningful results, particularly where the First Nation has been able to exercise substantial leadership within the process, including an unfettered opportunity to articulate Indigenous land use priorities as either a precursor to or part of the government-to-government process.

### **Recommendation 2:**

**A) In partnership with individual First Nations or mandated First Nation alliances, the Province should develop and undertake specific planning processes to identify and secure additional conservation of old-growth**

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<sup>2</sup> By "forest management unit" I mean timber supply area or tree farm licence as defined by the Province.

**within their territory or territories, to contribute to the provincial retention target as well as meeting territory specific needs; and**

**B) The Province should seek and support First Nations leadership within these processes, unless a Nation or Nations elects to defer to Provincial agency leadership for the process within their territory(ies).**

The type of role assumed by First Nations would therefore be at their discretion, as determined in dialogue with the Province. In all cases, the Province should assure First Nations have sufficient funding to support their elected role.

As noted above, it is essential for the Province to be respectful of any specific First Nation priorities affecting the balance of old-growth retention and harvesting within their territory. For example, a First Nation may see its own economic development imperatives as requiring more old-growth harvesting in their territory than is suggested by the Province's overall target. Or a Nation may lean towards greater levels of retention in their territory to meet their own needs. The Province should respond openly and flexibly to any of these unique First Nations priorities.

Where a First Nation or Nations elect not to play an active lead role for identifying levels and areas of old-growth retention within their territory, the process should be led by the Province in close consultation with the First Nation(s). In all cases, the process itself as well as its results should be confirmed wherever possible through government-to-government agreements specifying mutual intentions for the retention and management of old-growth forest within a specific territory. Decisions on administrative approaches for old-growth retention, be it through additional Old Growth Management Area designations, Protected Areas, or other mechanisms, should be outlined through the process and agreements. In addition to carbon storage parameters, choices around old-growth retention areas should consider other important values such as cultural significance or tourism potential. Controlled and limited selection harvesting of particular high-value wood products in some old-growth retention areas might be appropriate provided that carbon-storage or other objectives are not unduly compromised. Clearly, Indigenous uses would have priority in this regard.

Government-to-government old-growth retention processes should build on, rather than replace, existing land use agreements and government-to-government engagement structures such as those in the Great Bear Rainforest. Provisions must also be made for consulting communities and other sectors of interest as to area-specific priorities for old-growth retention. Forest industry input should be sought, notably to bring forward specific forest economic and operational considerations.

Actions to conserve old-growth that might otherwise be harvested is likely to present opportunities to obtain economic benefits through the sale of carbon offsets. Measures outlined in a number of previous government-to-government “Atmospheric Benefit Sharing Agreements,” whereby the relevant First Nations receive the majority of such benefits, should be affirmed in any future government-to-government agreements on old-growth conservation and management.

## **Summary**

The Province should make a substantial move towards further conservation of British Columbia’s priceless remaining old-growth heritage, proceeding on a government-to-government basis that supports a potential lead role for First Nations.

Although old-growth forest provides a multitude of benefits to both Indigenous and non-Indigenous British Columbians, it is above all the immediate value of our remaining old growth for carbon storage that compels action in the face of a global climate emergency.

At the same time, forest communities’ and workers’ needs must be actively addressed through accelerated planning for a transition away from the old-growth dependent harvesting model of the past, towards an industry built on the sustainable model of second-growth management.

Setting a numerical target of retaining at least 50 percent of remaining potentially harvestable old-growth within NDTs 1 and 2 would be a powerful tool towards meeting the strategic provincial goal. However, the target should be implemented flexibly at the local scale to respond to Indigenous priorities and other local needs and conditions.

The climate emergency calls for radical, and at times difficult, actions. I foresee humankind asking our neighbours in Alberta to leave much, even most, of their remaining extractable oil in the ground. It seems the least British Columbia can do is leave most of our remaining carbon-rich old-growth forest on the stump. With the enormous and multifaceted benefits offered by living old-growth forests, a meaningful shift towards their further retention will also stand as a gift to ourselves and the future.

Thank you again for this opportunity to provide my perspective and advice on the future of the remaining old-growth forests in British Columbia. I wish you well in your deliberations, and look forward to government action.