



January 29, 2020

Ministry of Forests, Lands, Natural Resource Operations and Rural Operations
Via email: oldgrowthbc@gov.bc.ca

I am third generation forest sector contractor, owner of Coastal Bridge & Construction Ltd, and have been in business for 12 of years. Coastal Bridge contracts support services for companies that harvests old growth timber from the Alberni Valley and area working forest. Access to this working forest is critical to my company's future and success.

I value old growth because my company creates 35 local, stable, well-paid jobs in Port Alberni. These jobs allow people to work where they live and be part of the local community. My company has an annual payroll of \$1,900,000. We contribute to the local economy and help make Port Alberni a place where people can live AND work. Additionally, my company buys locally from a variety of suppliers including Jacks Tire, LB Woodchoppers, Beaver Creek Home Center, Windsor Plywood, Napa, Southside Auto Supply, Alberni District Co-op and Coastal Mountain Fuel. Our work also supports other businesses operating in our area as well as most of Vancouver Island.

Old growth is sustainably managed now because it considers environmental, social, cultural and economic interests together:

1. Environmentally

BC has already protected a significant majority of its rainforests and old-growth. BC is the most sustainably managed forest region in the world.

Under the *Forest and Range Practices Act* and regulations, we manage our Crown forests for different resource values that include recreation, soils, sustainable timber supply, wildlife, water, fish, biodiversity, visual landscapes and cultural resources.

Reforestation ensures the opportunity to sustainably manage BC's forests for generations to come and the newly planted trees help our fight against climate change by fixing carbon as they grow. In fact, the carbon stored in wood products made from BC forests can remain sequestered for 100 years and beyond.

By law, all areas harvested on public land in BC must be reforested. Every year, more than 200 million trees are planted in BC.

Portions of the working forest are harvested over time, replanted and grown into another healthy forest to be shared and then harvested again.

The province has more forested land under third party environmental certification than any other country. On the coast, the Industry harvests only 0.3% (27,000 hectares) of the coastal forest's 8.5 million hectares per year.

55 per cent of remaining old-growth forests, 500,000 hectares, are protected on Vancouver Island alone and will never be harvested. Ever. There are also millions of hectares of old growth trees protected on the BC Coast and in the Interior.

BC takes old growth conservation seriously. The Great Bear Rainforest Act, Old-Growth Management Areas and other safeguards were created to make sure we will never, ever run out of old-growth forests.

The vast majority of old-growth forests are part of the provincial forest resource and owned by all British Columbians. Crown forests are managed with myriad values in mind, including recreation, soils, sustainable timber supply, wildlife, water, fish, biodiversity, visual landscapes and cultural resources.

Clearcutting is a cost-effective and silviculturally-effective way to regrow trees. Reforestation, which is legally mandated in BC, ensures our forests will be sustainable for generations to come, and the newly planted trees help our fight against climate change by fixing carbon as they grow. More than 200 million trees are planted every year in BC.

Carbon stored in wood products made from BC forests can remain sequestered for 100 years and beyond.

The BC government has managed for old-growth conservation through various means for over 100 years when Strathcona Park was the first park created in BC. In addition to provincial and federal parks, ecological reserves, and especially landscape unit plans established over 20 years ago. These landscape unit plans established "biodiversity emphasis option" levels throughout the province to establish old growth management areas (OGMA) and wildlife tree retention areas.

The current proportion of coastal second-growth harvest has risen steadily over the last decade to about 50 per cent today, and that is forecasted to continue to increase. This has reduced reliance on old-growth harvest as additional areas have been protected.

In 2016, the *Great Bear Rainforest Forest Act* provided for designation of new special forest management areas that prohibit commercial timber harvesting activities over an area of 6.4 million hectares

In 2015, government established additional old growth management areas on Sunshine Coast.

It is estimated that more than two thirds of old-growth timber on Vancouver Island's Crown land is already protected, which is a considerable increase over the past decade.

2. Socially

There are relationships between the forest sector and backcountry tourism for skiers, mountain bikers and hikers who gain access to the forest on forest-industry service roads. None of this would exist if not for a forest resource sector that includes harvesting some old-growth timber.

3. Culturally

BC's old-growth forests are part of the provincial forest resource and owned by all British Columbians. As residents, we are fortunate to be able to share this working forest for many uses.

4. Economically

Old growth creates jobs and is critical to the economy of the province, largely in rural areas

- Our forests – primary, intact and old growth currently support 140,000 total jobs in BC through timber harvesting and manufacturing forest products.

Old growth timber can yield 1,500 – 1,800 m³ per hectare vs. second growth is 400 – 600 m³

BC is gaining more traction with companies using old-growth wood to reach high-end markets, producing engineered wood products and drawing in millions of new investment dollars.

The 2018 COFI PriceWaterhouseCooper (PwC) forest industry report (which uses 2016 figures) places the BC forest industry's contribution to gross domestic product (GDP) at \$12.9 billion through direct, indirect, and induced impacts.

Old growth logs have higher value and are globally sought after for fine grain and applicability to high-end building products

Harvesting coastal old growth represents almost half of the coastal harvest. Reductions of such would impact coastal sawmill and pulp mill sector as well. Depending on how Interior forests are classified as old growth, there could be significant impacts to operations throughout the interior as well.

Before any bold changes to old growth policy or legislation are made, we should look to see if there is indeed a problem that needs to be solved.

Managing old growth more effectively in the future needs to continue to consider environmental, social, cultural and economic interests together:

1. Environmental

Land use planning (LUP) during the 1990s established OGMA and other retention legislation to manage for biodiversity.

I recommend a comprehensive assessment of how these LUP have performed.

Fossil fuel substitution effects need to be properly quantified and recognized.

I recommend co-locating species habitat with old growth to minimize unnecessary reductions in the THLB.

I recommend continued research into the habitat that rare and iconic species use.

I don't support wider application of ecosystem-based forest management practices beyond the Great Bear Rainforest.

2. Social

I recommend that an assessment be done to actually determine how much "old forests" are actually used by recreationalists and how much substitution can be done with other forests.

Educate the public of current efforts to manage old growth including the amount of areas already set aside.

3. Cultural

Local Indigenous must be involved in planning in their territories. I recommend that any old-growth planning within their territories must be done inclusively with local Indigenous peoples.

This process and its outcomes must take into consideration that old-growth forests are not just large diameter older trees, but in fact include older trees that can be quite small in diameter. That distinction must be made, especially if recommendations are made about future forest management. Currently government is proposing a Legacy Tree Policy that would address public's general concerns of cutting larger diameter trees.

4. Economic

I recommend that an acceptable economic model or process be developed to look at the cost benefit trade-offs between logging and tourism.

Yours truly,



Chris Dods
President

Coastal Bridge & Construction Ltd.