

January 31, 2020



FAO: **Mr. Garry Merkel and Mr. Al Gorley**

RE: **Old Growth Strategic Review**

I am writing on behalf of The Coastal Douglas-fir Conservation Partnership (CDFCP), a collaboration of agencies, organizations and land managers who aim to promote the conservation and stewardship of Coastal Douglas-fir and associated ecosystems through sound science, shared information, supportive policies and community education. The CDFCP operates within the Coastal Douglas-fir (CDFmm) and parts of the Coastal Western Hemlock (CWHxm1) Biogeoclimatic variants.

As a result of non-First Nations settlement and industry (e.g. coal mining, logging, agriculture), less than 1% (i.e. <700 hectares) of Old Growth forests remain in the CDF zone. This rarity highlights the importance of these remaining stands and the recruitment of old growth forest characteristics to contribute to the ecological integrity of these ecosystems. Despite ongoing efforts by both government, non-government agencies and individuals <11% of the CDF zone is under some form of protection or conservation. The pattern of land ownership in the CDF zone, where 80% is private land and 11% is provincial Crown land also provides a unique set of challenges.

Our recommendations for Old Growth forest management in BC include the following:

- The province should develop better tools to improve the analysis of social, environmental and economic benefits and costs, to inform management decisions and policies around old growth forests including the inevitable trade-offs that will occur;
- The province should promote and facilitate contributions from private lands, including private managed forest land, to maintain and recruit old growth forests;
- The province should promote and endorse land use planning that considers efforts to identify and evaluate natural capital values, as demonstrated by the [Municipal Natural Asset Initiative](#) of the Federation of Canadian Municipalities and the federal government;
- The province should increase support of local governments and planners to implement development bylaws that promote the maintenance and recruitment of old growth forests; such as allowing for the clustering of residential developments and for the transfer/sale of density units from one land parcel to another (see our published "[Conservation Planning in Coastal Douglas-fir Ecosystems: A Quick Guide for Local Government](#)");
- The province should support the development of Incentives to private landowners to retain or recruit old growth and mature/late successional forests. These incentives may be financial or non-financial and could include:
 - planning and assistance to private landowners concerning items such as water quality, volumes and timing within a watershed;
 - planning for fuel treatments to both reduce the hazard of fires in urban interface areas and support better fibre utilization and availability; and
 - allowing individual landowners to participate in the carbon economy through storage and sequestration sales.

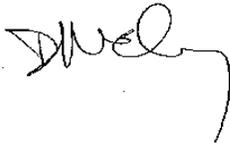
- The province should provide more resources to implement the work of the [Species and Ecosystems at Risk - Local Government Working Group](#) (SEAR-LGWG), sponsored by the Ministry of Environment and Climate Change;
- The province should consider ways to preserve old growth in favour of incentives (i.e. policy and stumpage) to better utilize existing waste wood and second-growth forests. These would encourage and support the Coastal Forest Sector Revitalization Program, support existing pulp and secondary manufacturing and support new industries to use waste fibre (i.e. wood not suitable for chips, salted hog fuel, other species, etc.);
- The province should promote landscape level conservation planning including objectives for biodiversity conservation, old growth forests, connectivity and climate change adaptation and mitigation across all land owners and managers.

For more information about the Coastal Douglas Fir Conservation Partnership, please see our website (cdfcp.ca) and [Conservation Strategy](#) or contact info@cdfcp.ca.

Thank you for your time and consideration.

On behalf of the CDFCP Steering Committee,

Darryn McConkey, RPBio, CDFCP Chair

A handwritten signature in black ink, appearing to read 'DMC', with a long horizontal stroke extending to the right.