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Sent via email only: oldgrowthbc@gov.bc.ca

Steve Kachanoski, Project Manager
Garry Merkel, Panel Member
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Dear Old-growth Strategic Review Panel:

Re: Old-growth Strategic Review - Comments from Comox Valley Regional District

Thank you for the opportunity to provide feedback on the significance of old-growth forests to our region. We have provided our answers to the questions below, as requested.

1. What old-growth means to you and how you value it.

To science, old-growth means original, unlogged, first growth forest with the intact surrounding ecosystem including understorey, soils and riparian and aquatic features. There is very little of this left in BC, and much of what is left is in areas that were previously locally inaccessible or uneconomic to log. These areas tend to be either steep, alpine, wetland/riparian, or remote from communities. For example, those areas within the Comox Lake Watershed that border Strathcona Park are still true first growth.

Where true old-growth (i.e. first growth) forests are no longer present, the next best things are old trees/forests. These stands have some of the attributes of first growth forests, but not all. The difficulty is that these areas may have recovered somewhat, but the act of logging unalterably disturbs forest soils, understorey and complex ecological processes. These forests are not ecologically the same as first growth forests.

Modern technology such as LiDAR has revealed the presence of these forests which may have previously been ignored. Modern logging techniques, such as tethered logging, have made it possible, though not desirable, to cut those trees. This places these rare remnant ecosystems at risk.

Both first growth and old growth forests have an ecological complexity that is not present in forest plantations. They may hold answers to questions that we are not yet knowledgeable enough to ask. If we are to understand the effects of land management on ecosystems we must retain as many examples as possible of natural, intact systems, with which to compare our managed systems. This will help us devise new management and restoration protocols that better mimic natural systems and are therefore more likely to be resilient to climatic changes such as increased intensity and frequency of precipitation, prolonged drought, loss of snow pack, change in overall rainfall patterns and growing degree-days etc. It will also protect essential habitat for rare species which represent a vital genetic resource as species adapt to a new climate regime.

In alpine or higher elevation areas, the old forests may have very small trees. These trees still constitute old-growth and are critical to the protection of headwater streams. Headwater streams represent the largest percentage of streams (in terms of lineal length) in any given watershed and their function is critical to the quality, quantity and timing of flow in downstream creeks and rivers. This is especially important in drinking water watersheds and doubly important given the predicted changes to weather patterns. Within the Comox Lake Watershed, the upper Cruickshank River has comparatively small, first growth trees along headwater streams that are fed by lakes in Strathcona Park. These streams are vital to Comox Valley Regional District summer water supply, yet their riparian trees are now being logged. Since the lands are Private Managed Forest Lands, no buffers are required on these small streams which leaves them vulnerable to drying up. It will take centuries for the riparian zones to regrow, due to the short growing season at this altitude.

The value of old-growth forests cannot be overstated. They are critical for wildlife habitat, stabilization of headwater streams and water flows, serve as a genetic bank, and serve as an ecological library of knowledge for current and future generations of researchers and land managers.

2. Your perspective on how old-growth is managed now.

Old-growth is very poorly managed. Logging companies, including government agencies such as BCTS, are only required to maintain a specified percentage of a Timber Supply Area in old-growth management areas (OGMAs) when preparing forest stewardship plans for Crown Land tenures. The boundaries around what is and isn't protected can be modified easily to accommodate timber harvesting as long as "new" old-growth areas are added. There are no protections for old-growth forests on Private Managed Forest Land.

The definition of old-growth is too weak. Under the Forest and Range Practices Act, old-growth is defined as: "**old-growth management area** means an area that is subject to old-growth management objectives established under section 3 [resource management zones and objectives] or 4 [landscape units and objectives] of the Forest Practices Code of British Columbia Act (FRPA)".ⁱ

The referenced sections of FRPA have been repealed, so it is unclear what the status of OGMAs are under FRPA. The accepted BC forestry definition of an old-growth forest is "...all Coast region forests more than 250 years old, Interior forests dominated by lodgepole pine or deciduous species more than 120 years old, and all other Interior forests more than 140 years old."ⁱⁱ Research conducted in BC demonstrates that "stand age alone may not be sufficient to adequately describe the progress of stand development and that other attributes must be considered."ⁱⁱⁱ Definitions of old-growth should consider the ecosystem functions present within intact first growth systems and not only the age of the trees.

The Province of BC's recent (July 2019) protection of 54 big trees is a red-herring. A tree is not equal to a forest ecosystem. While it is important to care for individual large trees, this announcement appears to be a stop-gap to draw attention from the loss of hundreds of large and old trees across the province annually.

3. How you think old-growth could be managed more effectively in the future.

- Create two definitions to better represent the ecological reality of old forests: first growth and old-growth. Revise the definition of old-growth to include the ecosystem functions and attributes most essential and representative of resilient, diverse, old forests.
- All first growth areas should be protected in perpetuity, without consideration to what percentage of the land base they represent. Those areas, especially on the coast where trees may be in excess of 1000 years old due to low fire frequency, must be permanently and completely protected.

The Nahmint Valley near Port Alberni is an excellent case in point. Size of trees should not matter and should include alpine areas where first growth trees may be very small. True first growth ecosystems are not a renewable resource, once they are gone they are gone for good. Use modern techniques, including LiDAR, not to find old forests and cut them, but to find them and protect them.

- Where there are significant intact stands of first or old-growth on Crown Land, create new parks or protected areas. E.g. Nahmint Valley, Robson Bight.
- Provincial law must be changed on both Crown and Private Managed Forest Land to protect old-growth forests. Boundary changes should not be permitted except to correct errors (verified by third-party auditors) and add areas that have been missed. Within that defined land base, the province, with input from researchers and other experts, should determine what harvesting is permitted, if any. The old-growth areas should be removed from Annual Allowable Cut and managed separately.
- Protected old-growth areas should not be based on an arbitrary percentage of the land base. Current estimates are compared to the forests that remain in BC, not the original forest cover pre-settlement, which is misleading.
- The province should invest significant resources in monitoring and auditing, with boots-on-the-ground, the activities of both Crown and Private Managed Forest licensees/owners, including compliance with first and old-growth protections (current and recommended).

Thank you again for this opportunity. Please feel free to contact me if you have any questions.

Sincerely,

K. La Rose

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ⁱ Forest Planning and Practices Regulation (http://www.bclaws.ca/Recon/document/ID/freeside/14_2004)

ⁱⁱ Ministry of Forests and Range Glossary of Forestry Terms in BC, 2008.
(<https://www.for.gov.bc.ca/hfd/library/documents/glossary/>)

ⁱⁱⁱ DeLong, S.C., P.J. Burton and M. Harrison. 2004. Assessing the relative quality of old-growth forest: An example from the Robson Valley, British Columbia. BC Journal of Ecosystems and Management. Vol 4(2): 1-16.
(<http://www.forrex.org/jem/2004/vol4/no2/art8.pdf>).