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Ministry of Forests Lands Natural Resource Operations and Rural Development

RE: Old Growth Strategic Review

Dear Garry Merkel and Al Gorley;

This is to provide my input into your strategic review. It uses the questions from your survey as a guideline.

PREAMBLE

This submission places an emphasis on the un-tapped opportunities found on private forest lands, with a special emphasis on private lands within the Coastal Douglas-fir zone.

My comments are based upon a family stewardship of lands and forests over a continuous period of 134 years. As well, I have extensive experience in the management and policies related to provincial Crown land and First Nation reserve land.

My comments cover a spectrum of concepts and specific recommendations. Consequently, I understand most will require further analytical work and discussion to change both policies and legislation. As well, attitudes regarding forest management and the role(s) of private and public forest management in the provision of private and public goods will require thought and discussion.

COMMENTS

1.0 What old growth means to you and how you value it

1.1 Old Growth means to me:

1.11 mature, big trees like Cathedral Grove and most of the west and northern portions of Vancouver Island, including the higher elevations such as Mount Washington;

- 1.12 scattered individuals and stands found on south-eastern Vancouver Island, such as Goldstream Park, Strathcona Park, etc. and
- 1.13 old stands, regardless of diameter and height criteria, that have had no/very limited impact from human activity. For example, this includes Garry Oak – Savannah forests.

1.2 – how to value it is THE question.

I suggest that currently, there is no common, thoughtful, accepted way (or ways) to value it – only opinions. I suggest that you recommend that government establish an evaluation process to:

1.21 – better describe old growth and the associated value(s) including social, environmental and economic;

1.22 – describe a quantitative (if possible) and qualitative (more likely) evaluation framework or process; and

1.23 – describe a matrix to assist decision makers in making the inevitable trade-offs between, and among, values.

2.0 Your perspective on how old growth is managed now

My perspective is that there has been a lot of talk about the multiple values of old growth but limited work done in describing and evaluating these values. Consequently, my perspective is that the management has been ok/acceptable given the limited evaluation tools available and the limitations this has placed upon thinking and conceptualizing what old-growth provides to the public. In addition, there has been limited resources provided by all types and levels of governments, academics, industry and professional organizations such as economists, accountants, engineers and foresters. For decades, most of society did not care about the values of old-growth other than as timber. Or, if they did care, there was little support and few tools to make an argument other than to appeal to emotions.

However, I believe that it is time for a change in evaluation and thinking.

I believe that old growth deserves better evaluation tools and criteria and that it be recognized for its rarity on the world scale. I suggest that it is like the recognition given to grizzly bears, the Kermode bear and the big fauna of Africa, India and Siberia.

3.0 How you think old growth could be managed more effectively in the future?

- 3.1 I suggest that the management could be improved by considering the land base as a whole, including provincial Crown land, First Nations lands (within reserve and in

treaty settlement lands) and private lands (Managed Forest lands, Agriculture Land Reserve lands and other private forested lands);

- 3.2 Evaluation and work should build upon the existing Land Use Plans, Official Community Plans and related information, using a cross-ministry, cross-government approach and involving social ministries;
- 3.3 Clearer objectives set by government should be developed and stated in legislation such as the *Forest and Range Practices Act*, the *Private Managed Forest Land Act* and in acts related to local government (e.g. the Municipal Act, Local Government act(s) and related acts under the Ministry of Finance);
- 3.4 Non-governmental organizations (e.g. Sierra Club) should help define and then promote a “just transition” from old growth harvesting to second growth harvesting. This transition must work to accommodate impacts upon workers, communities and BC citizens;
- 3.5 Included in this just transition would be support by public investments into initiatives already underway such as the Coast and Interior Forest Revitalization initiatives. However, these initiatives should take a broader look at the industry as a whole and consider a combination of items such as better utilization of biomass in conjunction with the achievement of stand treatments surrounding communities via a Community Wildfire Plan. As well, salvage of waste material from harvesting operations should lead to less burning. Less burning should lead to improved air quality and a reduction in small particulate matter. Less small particulate matter should lead to better health for at-risk citizens which should lead to a reduction in health care costs. An assessment of cost savings to the health system should be measured and reported as part of these forestry initiatives. Ancillary benefits would be the addition of more planting sites, leading to more carbon sequestration.

These efforts must recognize the differences between crown and private lands but should be flexible enough to work on a landscape level to support the affected workers and communities.

The work by FP Innovations is an example of the support that is needed, as is the work by the provincial government in enabling and promoting wood construction;

- 3.5.1** I suggest that the province and industry really get behind efforts to utilize fibre already being conducted by organizations such as the Vancouver Island Economic Alliance (VIEA), Cowichan Tribes, FP Innovations, etc. These efforts would support the BC governments’ goals under both the Coast Forest Sector Revitalization Initiative AND efforts to conserve and protect SPECIES AND ECOSYSTEMS AT RISK. Efforts include alternative fuels, new products and new technology (e.g. drying techniques) to

improve the quality and usefulness of all sawn species;

3.5.2 An additional example would be the use of burners to replace diesel generators in isolated communities not on the BC Hydro grid. Fort Ware in northern BC is a current example;

3.5.3 These initiatives should contribute to a reduction in the demand for old-growth fibre and enable a reduction in old-growth harvesting;

3.5.4 Cost savings should be shared between government and industry;

3.6 Governments (and industry) should give serious consideration to work currently underway in BC, Canada and the world to better invest both public and private resources in conserving natural resources to provide social, environmental and economic benefits. This includes, but is not limited to:

3.6.1 the work being done by various local governments, academics and NGOs to better define and evaluate various forms of Natural Capital assessment. The work done by the Municipal Natural Infrastructure Program, the Town of Gibsons and Comox Valley Regional District, and the Federation of Canadian Municipalities are several efforts being made to better quantify and evaluate environmental values. This work involves engineers, biologists, foresters and accountants and seeks to record these natural assets in the audited financial books of a local municipality. Also, I note that this is a topic of the upcoming AGM of the ABCFP in Nanaimo in Feb 2020. In addition, the Municipality of North Cowichan is working with faculty at UBC forestry to evaluate the potential of selling carbon offsets from the Municipal Forest Reserve. This could be a useful pilot project (if implemented) and could assist in buffering communities from any reductions in old-growth harvesting;

3.6.2 the work being done by the Ministry of Environment and Climate Change, Species and Ecosystems at Risk – Local Government Working Group (SEAR – LGWG). This work has identified approximately 45 recommendations for local governments concerning species and ecosystems at risk. While these do not all involve old-growth, I suggest that their implementation would encourage newer ways of thinking and creating solutions. More specifically, some would assist in retention of scattered remnants of old growth and would encourage recruitment of stands to produce old growth. This would be particularly useful on private, forested lands (both inside and outside of the Managed Forest

classification) near the urban interface zone;

3.6.2.1 A key proposal is the creation of a Conservation Tax Incentive Program for conservation of forest values on private land. This is via the creation of enabling legislation allowing local governments to conduct tax shifting activities within their local jurisdictions. This involves both Ministry of Municipal Affairs and Ministry of Finance. However, tax shifting analysis indicates that the actual cost implications to most taxpayers is miniscule. An existing program for residents in the Islands Trust area can serve as a model;

3.6.3 tax shifting and related examples of paying for the provision of environmental values. For example, habitat restoration along past or current salmon streams in being implemented on private lands with public funds in Washington State. Australia has been the subject of several academic papers regarding tax shifting for conservation benefits which could inform future public policy changes. Ontario and New Brunswick also have examples;

3.6.4 consideration should be given to private forest landowners with second growth stands that could be used to recruit future old-growth stands. These stands that are 80 – 100+ years old are growing well and are sequestering carbon at a high rate and the stewardship of the owners should be recognized for the public benefits being provided. This is particularly applicable within the Coastal Douglas-fir zone where human activity has impacted essentially all the old growth that existed at time of European contact. See www.Cdfcp.ca for more information;

3.6.5 the use of the Environmental Farm Plan (under a Canada-BC agriculture program) should be expanded to include forests on private agricultural lands. These forests could be recruited as future old growth stands and act as carbon sinks, riparian protection and habitat for pollinators and wildlife. As such, the definition of farm crops (under BC Assessment rules) should be amended to include all trees;

3.6.6 the use of incentives (both financial and non-financial) should be encouraged as a compliment to the existing regulatory approach;

3.7 These and similar evaluations should then be incorporated into local, provincial and federal budgets and land-use planning work;

3.7.1 encouragement for local governments to practice SMART growth principles when considering residential and industrial/commercial

development. This would contribute to a change in thinking that forest lands are just sitting around waiting for development;

3.7.1.1 the definition of 'highest and best use' of lands often defaults to a development process and I suggest that this thinking is now out-moded and the definition needs to change;

3.7.1.2 This would be combined with an evaluation and recognition of the public values provided such as visual, carbon sequestration, pollinator habitat, water protection etc. With these environmental values recognized, it is suggested that many landowners would then prefer to maintain their forests standing, rather than clear for housing or other activities.

3.8 a rehabilitation program/job creation program such as the employment supporting programs of the 1980s and Forest Renewal BC may need to be funded and introduced as part of the supports for workers and communities that may be affected by any reduction in the harvesting of old growth. The purpose of this support would be to provide fibre to existing and new businesses and reduce the reliance upon old growth fibre. It would broaden the opportunities to utilize wood FROM the current chip-supply agreements TO include fibre not covered by these agreements such as salted hog fuel, non-traditional species, commercial or non-commercial thinnings, etc.

4.0 Included in these efforts should be a discussion concerning inter-provincial benefits which could assist in the divisions around pipelines between BC and Alberta. While this is a 'blue-sky' idea, I suggest that it is related to the conditions stated by the former BC Liberal government regarding the Trans-Mountain Pipeline. In other words, preserving old-growth should be related to fossil fuel developments;

5.0 All these suggestions require a cross – ministry, cross-government, integrated evaluation of policies and related subjects and programs such as:

5.1 Stumpage;

5.2 Wildfire programs;

5.3 Water quality and quantity issues;

5.4 FESBC, Trees for Tomorrow, etc.;

5.5 Inter-provincial trade; and

5.6 Federal government programs and policies.

CONCLUSION

Old-growth forests need and deserve better evaluation methods and conservation (wise use) management. We should learn from the past and strive to achieve these aspirational suggestions.

If there are any questions, please contact me at 250-748-9166 or via email.

Yours truly

David Haley RPF
Owner – Managed Forest and Century Farm