

January 31st, 2020

Endangered Ecosystems Alliance submission to the BC Old-Growth Strategic Review

This is the Endangered Ecosystems Alliance's submission to the BC Old-Growth Strategic Review panel. Note that we had previously requested a chance to directly meet and present to the panel last year but were told the panel had no "space" to meet with our organization.

Take note that while the Endangered Ecosystems Alliance is a relatively new national organization founded in August of 2018 (based in Vancouver, with 32,000 supporters thusfar, primarily in British Columbia), the organization's founder and executive director Ken Wu has worked continuously for 29 years so far to protect old-growth forests via multiple organizations, including as the executive director and co-founder of the Ancient Forest Alliance for 8 years, as the campaign and executive director of the Wilderness Committee's Victoria bureau for 10 years, and for a large number of smaller conservation groups previously through the 1990's. Therefore the protection of old-growth forests and the development of sustainable second-growth forest policies in BC is central to the Endangered Ecosystems Alliance's efforts and mandate.

Our central interests are that we would like to see:

- Science-based legislation that ends the logging of endangered old-growth forests in all BEC variants and site series.
- Moratoria on old-growth logging in old-growth hotspots, of BC's biggest trees with buffers and grandest groves, in the most endangered forest types (based on BEC variants and site series), and in BC Timber Sales' operating areas.
- Conservation financing support from the province for First Nations to modernize land use plans and develop Indigenous Protected Areas that protect old-growth forests (that at least matches the scale of the federal commitment relative to the province's population)
- A dedicated \$100 million/year land acquisition fund to purchase and protect old-growth forests on private lands (and other endangered ecosystems)
- A commitment by the province to at the very least adopt our national and international protected areas targets (17% by October of 2020, 25% by 2025, and 30% by 2030), as is expected.
- Incentives and regulations that greatly-scale up a value-added, second-growth forest industry,

Our written submission here will be fairly brief on many key points that we are sure have been made by thousands of others to this panel. However, there are certain points that we believe have not been emphasized enough and that we will elaborate on first.

Highlighted Points:

Protecting old-growth forests is a major net benefit to the economy relative to forestry – in Real Estate, Tourism, Recreation, Angling/Fisheries, Carbon Offsets, Non-Timber Forest Products, and Attracting Skilled Labour/Tech Workers

Numerous studies have shown that protected areas are a net benefit to regional economies relative to conventional industrial resource extraction. A 2008 study by Dr. Duncan Knowler of Simon Fraser University showed that in the “spotted owl country” of southwestern BC, the Fraser TSA, that protecting the remaining old-growth forests would exceed the economic value of logging them when factoring in tourism, recreation, carbon offsets, non-timber forest products, and fisheries.

<https://www.for.gov.bc.ca/hfd/library/documents/bib108384.pdf>

The experience of other many communities, including Tofino and Ucluelet since the implementation of the Clayoquot Science Panel recommendations and the designation of Tribal Parks and the Ahousaht Land Use Plan (though provincial buy-in is still needed here), and of the Port Renfrew region of southern Vancouver Island, now billed as the Tall Trees Capital of Canada, has also shown this to be true. Port Renfrew has seen a major expansion in tourism, recreation, and real estate/construction businesses as a focus on old-growth forests and “Tall Tree Tourism” in the area has expanded since the protection of Avatar Grove. New studies will likely confirm this to be the case.

One only needs to look at region after region to see that after old-growth forests are protected (such as in Oregon and Washington State in 1994 after Clinton’s Option 9 plan that protected most of the old-growth forests in those coastal western states went into effect), that economies boom. Conversely, the old-growth logging “Port Alberni” model of economic development has resulted in economic impoverishment and a whole array of social ills as a result in region after region where old-growth forests have been largely liquidated.

The most prosperous Central American nation is Costa Rica, a country that has protected about one-third of its land area and promoted eco-tourism. Much of British Columbia’s “old-growth communities” (including most First Nations communities and pretty much all of Vancouver Island) have the potential for a majorly ramped-up tourism sector, combined with real estate development (which should largely be confined to existing towns and development nodes for environmental reasons), if the old-growth forests in their region be protected. We have not even scratched the surface of the economic potential of protected old-growth forests in BC. Tourism (essentially walking and hiking, as infrastructure will be largely built in nearby areas, not in the old-growth forests – and only a small part of the old-growth forests given their density and ruggedness are ever directly accessed) would have an infinitely smaller ecological footprint than logging and a larger benefit for businesses and jobs.

The increased environmental quality of life afforded by protected old-growth forests and protected areas in general will also attract skilled labour in the high tech sector to live in adjacent cities and communities (as has occurred in the Capital Regional District, where several prominent old-growth forests are protected, including the Avatar Grove,

Goldstream, Francis King, John Dean, and Royal Roads lands) and this ultimately may be one of the most powerful economic consequences of a major expansion of old-growth protection if combined with some marketing.

The protection of old-growth forests is nested within a National and International Context of Canada's land and freshwater protection targets to meet our UN commitment to expand protected areas under the UN Convention on Biological Diversity – October, 2020 is the UN Biodiversity Conference

Canada currently has adopted a target of 17% protection of its land and freshwater area by October of 2020 under the United Nations Convention on Biological Diversity's protocol. The federal Liberal government has also adopted a 25% protection target by 2025 and a 30% protection target (also shared by the federal NDP and Greens) by 2030. The UN Convention on Biological Diversity in its draft protection target has also adopted a 30% by 2030 goal. Currently about 15% of BC is protected.

The BC government has not officially endorsed these national and international targets – but they and all provinces are expected to by the federal government to honour our national and international commitments. The pressure on the province to commit will only increase dramatically over the ensuing months.

An expansion from 15% to 25% of the province under protection in 5 years and to 30% in 10 years (ie. 10% in 5 years, and 15% in 10 years), is an unprecedented rate of protected areas expansion – and old-growth forests will be front and center in much of the conservation movement's, many First Nations', and aligned industries' focus. This is a natural and unavoidable driver to protect most of BC's endangered old-growth forests. Another reason for the province to devise a science-based old-growth protection plan.

The protection of BC's old-growth forests is also nested in the push for "Nature-Based Solutions" as we head towards the pivotal UN Climate Summit in November, 2020.

Across Earth, there is now a push for "Nature-based Solutions" to climate change, primarily meaning the protection of forests, grasslands, and wetlands to mitigate greenhouse gas emissions. Recent studies show that we will be unable to meet our international target to keep the global average temperate rise below 1.5 degrees Celsius unless we "draw down" enough carbon by protecting native ecosystems at the same time as reducing emissions. See

<https://advances.sciencemag.org/content/5/4/eaaw2869> and

<https://www.nationalgeographic.com/environment/2019/04/science-study-outlines-30-percent-conservation-2030/>

On Earth, BC's old-growth forests store more carbon per hectare than virtually any other ecosystems – and twice as much as the ensuing second-growth tree plantations that replace them. The protection of millions of hectares of carbon-rich old-growth forests in BC and the Pacific Northwest will be recognized as one of the great “Nature-Based Solutions” in our part of the world as we head towards the UN Climate Summit this November.

Old-Growth forests in BC cannot be protected without major support for First Nations Indigenous Protected Areas and land use plans that protect old-growth forests.

Given that almost all of the old-growth forests in BC are on unceded First Nations territories, and that most First Nations are either receiving revenue-sharing agreements for old-growth logging or are logging old-growth forests directly (due to the province systematically allocating logging tenures in old-growth forests for First Nations), there is no means to protect old-growth forests unless the province financially and legally supports economic alternatives and a transition with “conservation financing” packages for new businesses and guardians/stewardship programs for First Nations via Indigenous Protected Areas and land use plans that protect old-growth (conservation financing has been a major step forward in the Great Bear Rainforest, Haida Gwaii, and Clayoquot Sound to support First Nations old-growth protection and economic development) – just as the federal government is doing in Clayoquot Sound and that private conservation organizations are doing. The province will be held responsible shortly for failing to do their part in this regard.

The existing legislation and policies are highly inadequate to protect old-growth forests.

This is due to several reasons:

- A lack of a science panel and conservation biology principles to ensure the long-term viability of ecosystems (ie. which requires a lot more protection than the “representative samples” currently). The factoring in of hundreds of species and ecosystem processes, including the viability of wide-ranging species, the maintenance of viable populations of keystone species, endemism (particularly canopy arthropods that are very particularistic and localized to epiphyte mats and suspended soils in old-growth canopies), predator-prey relationships, natural disturbance regimes, evolutionary processes, watershed health, protecting the full range of environmental gradients, and climate change impacts, is what a science panel must do to set “threshold targets” of how much should be

protected of each BEC variant and site series of old-growth. This does not exist under BC's system.

- A failure to distinguish between old-growth forest productivity levels (allowing for stunted low productivity stands to strategically act as surrogates for the economically valuable moderate to high productivity stands in various conservation designations where most endangered species are)
- Loopholes in Old-Growth Management Areas that allow their removal/ re-location for logging the best stands, while replacing them with low productivity stands.
- A general a lack of a scientific, ecosystem-based approach.

In contrast the Great Bear Rainforest agreement, though not without some deficiencies, is much more solidly based on the latest science and ecosystem-based management (EBM) approach. It was a promise by the existing provincial government in their election platform to manage BC's old-growth forests based on the EBM approach of the Great Bear Rainforest – a promise that they have not kept, but that they must.

The BC government must provide accurate and honest statistics on how much old-growth forests remain with critical distinctions in productivity and “before and after” stats across the entire land base.

Much of BC's remaining old-growth forests consists of stunted, marginal stands with small trees growing in bogs, on steep rocky mountainsides, and at high elevations covered in snow most of the year. This fact is used by the BC government and industry to confuse the public with PR-spin, where they release numbers that make it look like lots of old-growth forests remain and are protected. What they fail to distinguish are the low productivity stands versus the moderate to high-productivity old-growth stands with the large, commercially valuable trees targeted for timber – and which grow in the most biologically diverse sites with the endangered species. It's like saying because there are still lots of sardines, we don't need to stop fishing endangered bluefin tuna.

The BC government also groups together and/or hives-out various portions of the land-base in order to manipulate the old-growth statistics – for example, combining Vancouver Island's heavily-logged, under-protected and contested old-growth forests with the largely protected and more intact northern Great Bear Rainforest – which after decades of protests, blockades, boycotts and negotiations resulted in the protecting of about 85% of its forests (but which are lacking many of the ecosystems and with smaller trees than on Vancouver Island), while Vancouver Island only has about 8% of its productive forests protected in parks and Old-Growth Management Areas. It's like lumping together West Vancouver with the Downtown Eastside, and then proclaiming that homelessness is not really that big of an issue.

In addition, they conveniently hive-out the southeastern 25% Vancouver Island where the richest forest lands lie, where almost all old-growth has been logged, and which is

still largely under provincial management as Private Managed Forest Lands, in order to increase the ratio of remaining old-growth forests on the remaining Crown or public lands. Ecologically, to get a clear picture of their status, all lands must be included regardless of the management authority.

A win-win solution is possible.

By protecting old-growth forests, implementing incentives for a second-growth forest industry (eg. Removing the PST for second-growth processing equipment, R&D and markets support for sustainable value-added second-growth and engineered wood products), fostering an economy around BC's old-growth forests (in tourism and First Nations economic development), and financially supporting Indigenous Protected areas and First Nations land use plans that protect old-growth forests, a net greater prosperity can be had across the board in BC – environmentally and economically.

Other key points:

In short what is needed?

Comprehensive, Science-Based Old-Growth Protection Legislation is Needed

Across most of the province, old-growth forests are extremely endangered and are lacking adequate protection. A science-based Old-Growth Forest Protection Act or amendments to existing legislation is needed that:

1. Inventories how much old-growth forests remain in each ecosystem type
2. Undertakes scientific assessments on what are the minimum necessary protection levels in each ecosystem in order to sustain its biodiversity and ecological integrity.
3. Most importantly, mandates the legal protection and the restoration of old-growth and native forests to reach those minimum viable protection levels.

Moratoria are needed to avoid “Talk and Log”

The BC government must implement Cabinet Orders-in-Councils or Land Use Orders to implement moratoria on logging in old-growth “hot spots” – that is, the regions with the most intact and significant tracts of ancient forest – as well as in the most endangered old-growth forest types, so that by the time new legislation and land use plans are implemented, there are still some of the more significant ancient forests left to protect. So far, they have been reluctant to enact any moratoria.

A BC “Park Acquisition Fund” is Needed for the Private Lands

While 94% of British Columbia is comprised of public or Crown lands, in some regions, such as much of eastern Vancouver Island, private forest lands dominate. Where old-growth forests are found on private lands, such as the mountainside about the world-famous Cathedral Grove, they must be purchased if they are to be protected. As private land trusts and environmental groups are too cash-poor to purchase most of these lands quickly enough to prevent their demise, it is vital that the BC NDP government re-establish a land or “park acquisition fund” to purchase and protect endangered ecosystems on private lands for protection. For example, a \$50 million/year fund would only constitute about 0.1% or 1/1000th of the \$55 billion/year provincial budget, yet would significantly help to save significant areas before time runs out.

First Nations and Old-Growth Forest Conservation

Many of BC’s diverse First Nations cultures evolved over millennia in old-growth forests. In particular, old-growth western redcedars are important for making canoes, totems, long-houses, masks, baskets, clothing, and countless other items of cultural importance. Virtually all of BC is comprised of unceded First Nations territories, and successive Supreme Court rulings have asserted that major decisions regarding land and resource use in BC – including the logging and/or protection of forests – requires meaningful First Nations consultation, accommodation, or shared decision-making. Many First Nations are proposing their own Tribal Parks and protected areas (such as the Ahousaht and Tlaocquiaht First Nation bands in Clayoquot Sound), while most are also taking part in the industrial logging economy and are heavily involved in old-growth logging via revenue sharing agreements, joint venture logging agreements with major companies, their own Tree Farm Licenses, Woodland Licences, and Woodlot Licences, and through employment agreements with major companies. Conservation groups are working to support the development of economic financing initiatives for BC’s First Nations to help them build conservation-based economies focused on sustainable tourism, non-timber forest products, sustainable second-growth forestry, and green businesses, and that allow old-growth forests to remain standing.

A more comprehensive write-up on recommendations to protect old-growth forests (which we fully support) can be found here: <https://www.ancientforestalliance.org/learn-more/policy-recommendations/>

Other key points:

How Much Old-Growth Remains?

Most of BC’s most magnificent, endangered old-growth forests are found on Vancouver Island and in the southwestern mainland – the southern coast. On Vancouver Island, already about 79% (1.7 million hectares) of the original, productive old-growth forests (2.2 million hectares) have already been logged (meaning that only 21% or 550,000 hectares remain), including over 90% of the valley bottoms where the largest trees grow. Meanwhile only 8% (173,000 hectares) of the original productive old-growth forests are protected in parks and Old-Growth Management Areas. The situation is a lot more dire across much of the province. Second-growth forests now dominate the vast

majority of BC's productive forest lands and can be sustainably logged to support the forest industry.

What about Jobs?

Old-growth forests today are a minority fraction of the land-base. On BC's southern coast, only 21% of the productive forests (those with moderate to fast growth rates, with the larger, commercially valuable trees) where most logging takes place are old-growth. Second-growth forests constitute the other 79% and can be sustainably harvested at a reduced rate of cut, with extra value-added manufacturing of the logs within British Columbia in order to sustain forestry employment in BC instead of exporting vast amounts of raw logs to the USA, China, and Japan. This would enable us to protect the last remaining old-growth forests while sustaining a vibrant forest industry based on second-growth stands.

A full transition into only logging second-growth forests is in fact inevitable when the last of the unprotected old-growth forests are logged out. For the sake of future generations, we need to make the full transition into a second-growth, value-added forest industry sooner, BEFORE we eliminate the remaining unprotected old-growth forests.

In recent years, the BC Chamber of Commerce, the province's largest business association, and many individual Chambers of Commerce, have passed resolutions for the increased protection of old-growth forests in province to support the economy. Old-growth forests are often more valuable alive than logged from a strictly economic standpoint when you factor in their value for tourism, recreation, wild salmon, carbon, and non-timber forest products (mushrooms, berries, game, etc.).

Why Protect Old-Growth Forests?

Old-growth forests are important because they:

- Support many species at risk that can't flourish in younger forests, such as the marbled murrelet seabird, spotted owls, mountain caribou, and many others.
- Counteract climate change by storing two to three times more carbon per hectare than the ensuing second-growth tree plantations that they are being replaced with.
- Provide clean water for people, wild salmon, and wildlife.
- Are fundamental pillars of BC's multi-billion dollar tourism industry.
- Are important for many First Nations cultures.

Thank you most gratefully for your time!

Ken Wu

Executive Director

Endangered Ecosystems Alliance

www.EndangeredEcosystemsAlliance.org

Email: endangeredecosystemsalliance@gmail.com

Mailing address:

Endangered Ecosystems Alliance

PO Box 21573

Vancouver, BC

V5L 5G2