



31 January 2020

**Submission from the Federation of Mountain Clubs of BC**  
**re Old-growth Strategic Review**

The Federation of Mountain Clubs of BC (FMCBC) is a province-wide federation of 44 outdoor clubs with a membership of over 5,000 people from across the province. The FMCBC promotes self-propelled activities, such as hiking, mountaineering, trail running, snowshoeing and backcountry skiing through leadership, advocacy and education. Many of our clubs build and maintain trails used by the public. The FMCBC and clubs engage with outdoor recreation organizations, government agencies and others to protect and maintain access for quality non-motorized recreation in B.C.'s mountains, forests and wilderness. We are committed proponents of the "Leave No Trace" and "Right to Roam" principles.

We welcome the opportunity to submit comments to the Old-growth Strategic Review panel.

We value the diverse old-growth forests in our province, their biodiversity and the recreational opportunities they offer. We would like to see legislated protection of our old-growth forests, with an immediate moratorium on harvesting endangered old-growth, pending independent scientific studies to determine where to preserve sufficient areas to protect the different types of old-growth and the wildlife dependent on them.

In response to the question, what does "old-growth" mean, all one needs to do is hike through "old-growth", second growth and re-planted forests to appreciate the intrinsic features of "old-growth":

- A climax ecosystem, characterized by relatively tall, old trees and by trees in all phases of their life cycle – saplings, mature trees, dead standing trees and rotting trees on the forest floor, providing a rich nutrient base for lichen, mosses and other shade tolerant plants
- Forests not exposed to a significant disturbance, such as wildfires, forest insect infestations or clear-cutting, for a century or more, depending on the forest type

With B.C.'s diverse geography, climate and soils, "old-growth" includes coastal rainforests with towering Sitka spruce and red cedars; inland temperate rainforests of spruce, fir and cedars; dry forests with Garry oak, arbutus and massive Douglas-firs; and, high elevation forests with slow-growing yellow cedars and mountain hemlock. This diversity makes "old-growth" particularly valuable for their biodiversity, as well as for their recreational, environmental and aesthetic values.

We value old-growth for many reasons and highlight the following three:

- **Old-growth forests are valuable for recreation and tourism.** With the development of trails, old-growth forests can be accessible to locals and visitors. As such, old-growth forests are a valuable resource that visitors can enjoy repeatedly, generation after generation.
- **Old-growth forests are biologically diverse** and provide refuge for many species of plants and animals that need old-growth forest to survive and thrive, including species at risk such as spotted owl, marbled murrelet and caribou.
- **Old-growth forest ecosystems help mitigate the effects of climate change** because of the amount of carbon they sequester, which is far more than second-growth forests. They also provide long-term, stable water retention and regulation of water flow.

In our view, the three greatest risks to old-growth are logging, other industrial activity and roads. It is unclear why “not replanting fast enough” would be considered a risk for old-growth because once logged, old-growth is gone. It is not renewable in the time prescribed by conventional logging.

We believe the following plans, policies and practices are very important in managing old-growth in B.C.:

- Provincial parks protecting old growth
- Appropriate land-use plans
- Protecting defined patches of old growth on the landscape, subject to our further comments below

With respect to the latter, we do not believe that “protecting defined patches of old growth on the landscape” is enough. The existing Old Growth Management Areas, along with Ungulate Winter Ranges and Wildlife Habitat Areas (for marbled murrelet), were established in the mid-1990s before sensitive area inventories were done; as such, they may not reflect the areas in the greatest need of protection. While all are old-growth, these areas are small fragments of what was originally there. They are scattered and not nearly enough to provide wildlife corridors, as originally intended. Further, since many are still in draft form and could be changed, and since roads are allowed to be constructed through them, these areas are not a robust form of protection for old-growth forests.

Other than the provincial government and First Nations, we believe the following should be actively involved with decision making about the future of old growth forests in B.C.:

- Local communities and governments
- Recreational users
- Naturalists or conservation groups
- Tourism industry, particularly eco-tourism businesses
- Commercial or domestic water users
- Youth
- Other: Ecologists and biologists



By prioritizing timber supply above other values, old-growth forests in B.C. have been reduced to small fragmented areas that pose high risk to biodiversity, forest resilience, and ecological integrity. It is time to protect our remaining old-growth in B.C. To conserve the remaining old-growth, we recommend the following:

1. Legislated protection of old-growth, with an immediate moratorium on the harvesting of endangered old-growth, which would include (not limited to) the remaining
  - productive, accessible stands of the inland temperate rainforests
  - old-growth temperate rainforests on Vancouver Island; and,
  - high elevation forests in many of the heavily logged valleys in B.C., such as the Squamish, Elaho and Mamquam in southwest B.C.

On southern Vancouver Island, for example, much of the land is Private Managed Forest Land where there is practically no requirement to preserve old-growth. This places even more pressure on the Crown land to preserve the necessary habitat to protect biodiversity.

2. Studies by independent scientists not affiliated with industry or government to determine where to preserve sufficient areas to protect the diverse types of old-growth ecosystems and the wildlife, such as the marbled murrelet, spotted owl and mountain caribou, which are dependent on them. It is very important to preserve what remains and to restore areas along the valley bottoms that should be left to grow undisturbed and eventually become old-growth.
3. A transition away from the industrial harvest of our remaining old-growth to community-based forestry, selective logging practices, focus on second growth, forest rehabilitation and reducing fire risks.

Thank you for your consideration of our comments. Again, the FMCBC appreciates the opportunity to participate in the Old-growth Strategic Review.

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