

27 January 2020

Garry Merkel and Al Gorley  
Old Growth Strategic Review Independent Panel  
Via email [oldgrowthbc@gov.bc.ca](mailto:oldgrowthbc@gov.bc.ca)

Dear Garry and Al:

The Fraser Basin Council (FBC) respectfully submits the following to your independent review of old growth management in BC. The primary mandate of the Fraser Basin Council (FBC) is “to advance environmental, economic and social sustainability in British Columbia with a core focus on the Fraser River Basin.” Formed in 1997, the FBC is a charitable, not-for-profit organization committed to advancing sustainability. Well into its third decade of service, the FBC works to bring people together to find practical, common sense solutions to longstanding sustainability issues. The FBC has a collaborative governance structure, led by 38 directors drawn from the four orders of government – Federal, Provincial, Local and First Nations – and from the private sector and civil society. To achieve its goals, the FBC acts as an impartial, trusted facilitator operating under a unique model of collaborative leadership. The FBC was founded on the belief that major sustainability priorities cannot be effectively addressed by any one jurisdiction. The reason so many contentious issues remain unresolved is often because leaders in different sectors are working in isolation from each other.

With respect to old growth management in BC, FBC believes that the ecological attributes of old growth are important, old growth management must be within the context of a variety of land uses and designations, resilience of old growth areas must enable their management to maintain old growth attributes, and community safety must be paramount.

The ecological attributes of old growth forests are indisputable: they provide unique habitats for wildlife of all scales, ecological processes, and social and cultural values for all peoples. British Columbia is the most ecologically diverse province in Canada, therefore it’s important that representative areas of old growth are managed to capture the biodiversity of all ecosystems in BC, from valley bottom to alpine environments.

Old growth management must be within the context of a variety of land uses and designations. Parks and protected areas, private lands and their forests, federal lands (parks, Indian reserve lands and others) and other jurisdictions must be considered; old growth managed by the provincial government does not exist in a vacuum. In fact, other provincial land uses designated such as ungulate winter ranges, visual quality objective areas likely contribute to old growth values and these should account for such. To meet old growth goals, the province is encouraged to break down the silos of jurisdiction to understand what old growth exists across the landscape.

Old growth management areas must enable and incentivize management to maintain their old growth attributes. Too often in the Interior of BC, designated old growth management areas have succumbed to forest health issues such as bark beetles, or developed into areas of significant

wildfire threat. While management measures have been enabled by legislation, there is no financial incentive for the forest industry to manage these areas. These static reserves on the landscape have often turned into dead old growth management areas, affectionately referred to as DOGMAs, which while are part of a natural system, do not perpetuate the old growth values for which they were established. An innovative approach of enabling old growth management areas to move around the landscape has been discussed by many in recent years, and is encouraged to be explored.

Building on the concerns about lack of feasible management, human safety must be paramount in the location and management of old growth management areas. In the unprecedented wildfire years of 2017 and 2018, it is very likely that unhealthy or dead old growth management areas with significant portions of bark beetle killed trees or build ups of significant forest fuels in close proximity to homes, neighbourhoods, rural subdivisions or ranches contributed to the extreme conditions and subsequent wildfires. While old growth forests and their attributes are important, the safety of people and their homes should be paramount. Having co-authored two community wildfire protection plans and overseen hundreds of hectares of forest fuel management projects, addressing high wildfire threats adjacent to homes and neighbourhoods where old growth management areas and other restrictive land use designations exist has been challenging.

In conclusion, the value of old growth forests for ecological, social and cultural purposes is not disputed. Representative old growth forests must be maintained to reflect the diversity of ecosystems across BC. The challenge is in recognizing and accounting for old growth attributes in other land use jurisdictions and designations, locating old growth management areas where they do not encumber human safety, and enabling their management to maintain these old growth attributes as healthy forests and reduce the risks to communities.

Sincerely,

A handwritten signature in black ink, appearing to read 'MS', written in a cursive style.

Mike Simpson, MA, RPF  
Senior Regional Manager  
Thompson Region