

# Fraser Valley Woodlot Association

January 27, 2020

Minister of Forests  
PO Box 9049  
STN Prov Govt  
Victoria, BC  
V8W 9E2

Dear Sir:

Subject: Old Growth Strategic Review

Thank you for the opportunity to respond to the Old Growth Strategic Review on behalf of the Fraser Valley Woodlot Association. Woodlots are small, area-based tenures that account for less than 8% of Crown Tenure in the Chilliwack Natural Resource District. There are currently 16 Woodlots in the Fraser Valley ranging from 278ha to 800ha, many of which are owned by individuals, families, and First Nations who have personally invested in their forest tenure. Often our Woodlots are in the urban interface, so we have worked hard to build working relationships with communities and user groups to maintain our forestry business successfully in these operationally difficult areas. Our Woodlot program is a strong example of flexible and adaptable forest management that should not be overlooked.

Despite these positive attributes, our Woodlots in the Chilliwack Natural Resource District are under duress. Woodlot owners have had boundary and allowable annual cut adjustments due to the presence of Wildlife Habitat Areas (WHA's) for a variety of species at risk including Coastal Giant Salamander, Pacific Water Shrew, and Tall Bugbane. There are surely more to come with Northern Goshawk, Marbled Murrelet, and Oregon Spotted Frog mandates on the horizon. Urban sprawl is increasing the number of individuals and user groups competing for use of forest lands adjacent to communities putting additional pressure on the forest land base and pushing our management abilities to the limits. We are now concerned about the advent of large reserves around Big Trees and additional protections of mature forests. While our small allowable annual cuts provide management flexibility and adaptability, continual net downs within our tenure boundaries limit the economic viability of our businesses.

When considering the implementation of further restrictions on forestry that could negatively impact our Woodlots, please consider that a great deal of the Crown Forest Land Base in the Chilliwack Natural Resource District and Province of British Columbia is already conserved in Parks, Old Growth Management Areas, Wildlife Habitat Areas, Riparian Reserves, Cultural (spiritual) sites, Ungulate Winter Ranges, Archeological Sites, Recreation Sites and Trails, Low productivity sites, and inoperable areas. These areas all contribute to conserving and recruiting old growth stands and large trees. Rather than a continual reduction to the available Crown Forest Land Base, look to conserve interface forests by limiting urban sprawl and promoting preserved areas within city lands. Work with BC cities to conserve

forested areas outside of our working forest. Please avoid, or exempt Woodlots from further large-scale conservancies.

Regarding the conservation of individual Big Trees, it is important to make the distinction between large trees and old trees. Many of our Woodlots are on lands of high productivity where the potential for a tree to get very large at a young age is quite likely. Is protection of young large trees the intent of the regulation? Is reducing our most productive growing sites by one hectare at a time the intent of the regulation? We request that the focus of this regulation is narrowed by placing age and species restrictions on Big Trees. We also request that Woodlots be exempt from this regulation.

In summary, as BC's best example of low-impact forestry, Woodlot owners have been managing their tenures effectively and creatively for generations and have a vested interest in long-term forest stewardship. Our members have been managing BC forests beyond just an economic value, accounting for recreational, educational values, and more. Please consider the investments our members have made into the lands they manage. Consider local needs and conditions and support local initiatives in managing BC's forests. Please allow our members to continue to collaborate on solutions to forest management issues with the local Natural Resource District staff and First Nations.

Thank you for your time and consideration on behalf of our undersigned Association members. If you have any questions please contact the Fraser Valley Woodlot Association at [fraservalleywa@gmail.com](mailto:fraservalleywa@gmail.com).




Cc FVWA

Cc Chilliwack Natural Resource District, Attention: District Manager

Cc FBCWA, Attention: Brian McNaughton

Cc Old Growth Strategic Review Panel, Attention: Garry Merkel and Al Gorley

Support Signatures:

 _____ <b>NAME / SIGNATURE / STAMP</b> David B. Allen
 _____ <b>COMPANY / WOODLOT</b>
 _____ <b>DATE</b>

Support Signatures:



*Kevin J. Webber*

NAME / SIGNATURE / STAMP



*Ch-ihl-kway-uhk Forestry Limited Partnership W0084*

COMPANY / WOODLOT

*January 21, 2020*

DATE

Support Signatures:

	
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Kevin Vanderboom RFT 2097



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Cascadia Environmental Services Ltd

Kwantlen Woodlot Licence 00086

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Wood / W1436  
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*J. McNicol*


Jacquelin McNicol, TFT  
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Infinity Pacific Stewardship Group - W0007  
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January 21, 2020  
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Support Signatures:





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Support Signatures:



Ryan Biller *RL*

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Jan 17<sup>th</sup>, 2020

DATE