December 12, 2019

Old Growth Strategic Review Panel
Minister of Forests, Lands, Natural Resource Operations and Rural Development

Attention: Al Gorley, RPF; Garry Merkel, RPF

RE: Old Growth Strategic Review - Gorman Group Comments

Thank you for meeting November 13th in Canoe and November 14th in Revelstoke with the Gorman Group (GG) – represented by Canoe Forest Products Ltd, Downie Timber Ltd. and Gorman Bros. Lumber Ltd.. As part of the Old Growth Strategic Review, we appreciate the opportunity to share our thoughts on Old Growth in BC. The following comments encapsulate the discussion we had with you during the meetings.

The GG operates from the southern dry-belt portion of the Okanagan Timber Supply Area (TSA) to the northern wet-belt of the Selkirk TSA. A wide array of biogeoclimatic zones are included from the very dry Ponderosa Pine / Bunch Grass zone to the very wet Interior Cedar Hemlock and Engelmann Spruce Subalpine Fir zones. Given the large variation of operations within the GG, we assert that the definition or management of Old Growth cannot be a "one size fits all" approach, rather it must be reflective of the local ecological conditions. What might work for the dry IDF will not work for the wet-belt ICH or ESSF, or anything in between.

We are fortunate in that we operate in parts of the Province where detailed land use plans were completed in the 1990's. Considerable analysis and landscape level planning has been conducted to refine how the values on the land base that are important to society are managed – in all these areas, old growth is a primary focus of our land use plans and in all our operations.

Canoe FP and Gorman Bros. operate under the Okanagan-Shuswap Land and Resources Management Plan (OSLRMP) which was developed in a consensus driven, multi-party, interest-based negotiation process that resulted in a management plan for numerous interests and objectives that are all balanced across the plan area. Old growth areas are protected in parks and within multi-stakeholder-identified Old Growth Management Areas (OGMA's = 125,000ha.), as well as in a variety of GAR order areas, Enhanced Riparian Reserves (ERR's), etc. A recent 'OGMA co-location' project, spearheaded by the MFLNRORD, has further refined and improved the old-growth representation and contribution to managing other values in the TSA. This extensive and inclusive planning work in the OSLRMP area negates the need for further constraints to the Timber Harvesting Landbase (THLB) to protect more old growth. In fact, doing so would cause the balance achieved in the consensus agreement to be disrupted.

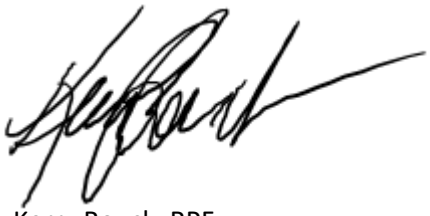
Our northern operation, Downie Timber, is one of the largest employers in Revelstoke and is focused entirely on producing high-end, value-added products. Downie relies on "old growth" cedar to supply a portion of the high-value cedar products to the global market. Under the Revelstoke Higher Level Plan (RHLP), vast amounts of "Old Growth" in the THLB were captured in OGMAs and in the GAR areas set

aside for caribou habitat. The remaining THLB (which is only 10% of the forested area in the TSA) in the Revelstoke Forest District contains about 15% of the "Old Growth" in the TSA, and all the licensees access this forest type as a major component of the timber available for harvest. This old growth is utilized not only by Downie Timber, but many of the small "value added" mills in Revelstoke and surrounding areas. Additionally, pulp logs – mainly hemlock - form an important component of the requirements for pulp production in the area. Because the timber harvest landbase in the Revelstoke area has been so thoroughly refined though collaborative planning efforts over the last 30 years, any arbitrary removals of additional "Old Growth" in the THLB will jeopardize the most significant part of the economy in the Revelstoke area.

Putting a definition on old growth will be extremely challenging. Any additional protection / conservation efforts for a single resource will result in unintended consequences. The management of old growth in the interior is already balanced and incorporated wherever possible with other values. Management of Old growth must be on a landscape level and must consider the inclusion of net-downs on the landscape that already factor in old growth – parks, caribou, Wildlife management, OGMAs, etc. Operationally, we have the flexibility to make small changes and adjustments to OGMAs to maintain old age classes while still allowing forest management to proceed in a cost-effective manner. Maintaining that flexibility is critical if any changes are to come of this review.

Aside from the Old Growth Strategic Review, many other initiatives are underway – Interior Forest Revitalization, Caribou Recovery, the Big Tree Initiative, etc.. Any recommendations coming from the Old Growth Strategic Review must be harmonized with these other initiatives to avoid unintended consequences, fully understand impacts to all resource values, and to maintain economical commercial access to the timber harvesting landbase.

Thank you again for the opportunity for the Gorman Group to meet with you and share our thoughts on the Old Growth management. If you require more information from us or any clarification on the discussion, please contact us at your convenience.



Kerry Rouck, RPF
Corporate Forestry Manager

3.0 Timber Harvesting Land Base

3.1 Land Base Definitions

The Crown Forested Land Base (CFLB) is the area of productive forest under crown ownership. This is the land base that contributes to landscape level objectives for biodiversity and resource management. The crown forested land base excludes non-crown land, woodlots, non-forest and non-productive areas.

The Timber Harvesting Land Base (THLB) is the portion of the TSA where forest licensees under license to the province of BC are expected to harvest timber. The THLB excludes areas that are inoperable or uneconomic for timber harvesting, or are otherwise off-limits to timber harvesting. The THLB is a subset of the CFLB. Table 3 summarizes the land base for the Revelstoke TSA.

Table 3. Timber harvesting land base area netdown summary

Land Base Element	Total area (ha)	Effective Netdown* Area (ha)	% of TSA	% of Crown forest
Total area	**833,444**			
Less:				
Tree Farm Licenses		283,006		
Private Land, Woodlots, etc		23,433		
Total TSA Area		**527,005**	**100.0%**	
Less:				
Non-forest / Non-productive forest	286,995	286,995	54.5%	
Non-Commercial Brush	108	108	0.0%	
Unclassified existing roads, trails and landings	9,806	3,777	0.7%	
Total Crown Forested Land Base (CFLB)		**236,126**	**44.8%**	**100.0%**
Less:	In CFLB:			
Parks and Reserves	31,094	19,310	3.7%	8.2%
Specific Geographically Defined Areas	635	635	0.1%	0.3%
Inoperable/Inaccessible	144,715	127,252	24.1%	53.9%
Unstable Terrain	57,892	2,265	0.4%	1.0%
Environmentally Sensitive Areas	23,772	944	0.2%	0.4%
Non-Merchantable	2,764	1,923	0.4%	0.8%
Low Sites	46,539	4,197	0.8%	1.8%
Riparian Management Areas	3,129	1,616	0.3%	0.7%
Community Watersheds	4,449	255	0.0%	0.1%
Drinking Water Intakes	59	25	0.0%	0.0%
Wildlife Habitat Areas	6	4	0.0%	0.0%
Permanent Sample Plots	264	179	0.0%	0.1%
Backlog NSR	412	300	0.1%	0.1%
Cultural Heritage	0	0	0.0%	0.0%
Mountain Caribou Reserves	66,098	18,909	3.6%	8.0%
Existing Wildlife Tree Patches	690	404	0.1%	0.2%
Timber Harvesting Land Base –THLB (ha)		**57,908**	**11.0%**	**24.5%**
Less Temporary Reserves:				
Spatial OGMA's and MOGMA's	84,405	5,549	1.1%	2.4%
Effective Timber Harvesting Land Base –THLB (ha)		**52,358**	**9.9%**	**22.2%**
Volume Reductions:				
Future Wildlife Tree Patches (%)		215	0.0%	0.1%
Future roads, trails and landings		1,100	0.2%	0.5%
Long-term Timber Harvesting Land Base (ha)		**51,044**	**9.7%**	**21.6%**

Table 2. Netdown table to identify crown forest management land base (CFMLB) and timber harvesting land base (THLB) for the Okanagan TSA. All reported values are in hectares

Netdown factor	Within gross land base	Within TSA Section 8 decision	CFMLB	Unique area excluded from THLB
Okanagan TSA gross	2 449 135			
Non-provincial lands	355 524	0	0	159 079
Not managed within TSA AAC	322 006	0	0	294 730
Non-forest and unproductive	479 809	259 436	0	259 436
Roads, trails, landings*	42 391*	TBD	0	TBD
Crown forest management land base	TBD			
Provincial parks & reserves	188 896	188 895	144 752	59 137
Inoperable	303 038	285 151	202 245	30 053
Terrain stability**	333 975	273 249	246 491	88 841
Sites with low growing potential	159 030	146 372	118 063	16 991
Problem forest types	333 721	268 738	219 012	64 141
Deciduous	42 493	20 767	19 831	10 919
Landscape-level biodiversity – OGMA	125 710	110 536	108 464	48 429
Wildlife habitat areas	9 734	9 609	8 787	3 368
Very dry sites	426 400	167 480	95 659	30 702
Ungulate winter range	14 293	14 125	13 924	6 673
Riparian reserves & management areas*	TBD	TBD	TBD	TBD
Lakeshore management zone reserves	TBD	TBD	TBD	TBD
Stand level biodiversity – WTP*	TBD	TBD	TBD	TBD
Timber harvesting land base	TBD			