



Canadian Operations

January 31, 2020

Garry Merkel and Al Gorley, Old Growth Strategic Review Panel

Via E-mail: oldgrowthbc@gov.bc.ca

RE: Old Growth Strategic Review

Dear Mr. Merkel and Mr. Gorley,

Thank you for the opportunity to comment on Old Growth Strategic Review Process. At Hampton Lumber we understand old growth forests are important to our local economy and environment. As you are aware, the BC forest industry is experiencing challenging times. Along with challenging market conditions, access to economically viable raw material is becoming increasingly more challenging and is now a barrier to efficiently operating in the interior of British Columbia. Our Babine Forest Products and Decker Lake Forest Products Mills (Babine and Decker) operate in the Lakes Timber Supply Area (TSA) and this TSA in particular has recently undergone a significant AAC reduction in the Provinces history. It is important that this process be mindful of the challenges facing the industry today and that it does not place undue strain on an already struggling industry, particularly in the Lakes TSA. This TSA is small with limited absorption capacity when introduced with management disruptions. The TSA has already been decimated by mountain pine beetle and wildfires. Additional constraints coupled with pending Caribou UWR orders and herd plans could have catastrophic cumulative effects on timber supply. We are currently in the process of constructing a new mill in Fort St. James within the Prince George TSA and available timber supply is also important for the continued viability of that project.

Old growth forests in particular contribute to forestry, tourism and recreation, provide habitat for wildlife and have cultural and economic value to First Nations. Strategic Reviews of our natural resource policies are necessary due diligence processes that ensure the long term sustainability of our industries. Through such reviews we can adapt to ensure our forests are healthy and resilient.

The strategic review should analyze a whole system of management objectives rather than simply its individual components. Policies should be all-inclusive within the whole forest management framework. In this way they can consider multiple benefits of overlapping objectives; be considerate of community and landscape wildfire risk and vulnerability; and make sure they do not interfere with ability to manage resilient landscapes amid climate change. (I.e. mitigate effects of beetle infestations, drought and fire). In consideration of climate change, each old growth area can be evaluated to measure if it's a carbon sink or carbon source. Areas reserved in parks, protected areas, ungulate winter ranges, wildlife connectivity corridors, habitat reserves as well as landscape biodiversity targets can be assessed for their current contribution to Provincial old growth targets. Such a holistic approach would ensure cumulative impacts from multiple timber supply demands can be evaluated and the balance between social, cultural economic and environmental objectives can be efficiently optimized.

A strategic review should include an accurate inventory of the amount, quality, and distribution of old growth, available timber and biodiversity in the Province. It should catalogue the regional biodiversity emphasis relative to the provincial biodiversity emphasis. The Lakes TSA for example is currently recognized as having a low relative biodiversity emphasis.



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The Lakes TSA for example is currently recognized as having a low relative biodiversity emphasis. An up to date inventory developed with the best available tools will ensure we can make informed management strategy decisions with best available information. It gives us a precise starting point for monitoring changing forest conditions resulting from natural succession as well as climate change. The review should also include an assessment of the effectiveness of the current policies and procedures as well as an assessment of the impact policy amendments may have to the environment and the economy. Any public and First Nation consultation should include the results of such assessments. Recommendations following the strategic review should be based on informed public feedback and sound science and should be in the interest of balancing a hierarchy of multiple public objectives.

The Province has indicated that part of the Old Growth Strategic Review Process is to explore and hear about public perspectives of old-growth management to ensure the interests of “all” British Columbians are taken into account. For this to be meaningful, the public should have a clear understanding of what old growth forests are and why they are important. A consistent definition of “old growth” is currently lacking and the phrase can mean different things to different people. Policies are generally based on a specialized scientific understanding of a specific objective. This understanding may be void of the feelings and perceptions people have when they envision old growth. People should be able to identify the important characteristics of old growth forests and their relative importance before they can proficiently inform Government of their perspectives and opinions. Also, public interests of British Columbians geographically disconnected from old growth areas are likely to be different from local interests of those most impacted by management decisions. While there is diversity of people and socio economic issues across the Province, there is also diversity of old growth. Hence there is likely to be differences in how people would like their local old growth managed across the province. Public policy should take into account the environmental, social, cultural and economic needs of those most closely connected to the resource and these needs are likely to vary between geographic regions.

With particular reference to the Lakes TSA, policy outcomes resulting from this strategic review should be mindful of the timber supply availability in the area and its contribution to the local and provincial economy. In this regard there should be no further negative impact to the Timber Supply. Provincially it should be recognized that just as economic, social, cultural and environmental values are in constant flux, so are the ecosystems associated with old growth forests. Policies resulting from the strategic review should be flexible. They should be adaptive to changing values and allow for timely stewardship action in the events of forest health threats and climate change. They should be reflective of the ecological diversity across the Province and therefore should not be standardized across the Province.

Hampton Lumber appreciates the opportunity to participate in the Old Growth Strategic Review process. Please feel free to contact us to discuss the contents of this letter or to discuss more detailed operational considerations for Old Growth Management.

Sincerely,

Richard Vossen

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