



**Interior Lumber  
Manufacturers'  
Association**

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January 31, 2020

**VIA EMAIL – Re: Old Growth Strategic Review**

Garry Merkel, RPF and Al Gorley, RPF - Old Growth Strategic Review Panel  
Ministry of Forests, Lands, Natural Resource Operations and Rural Development

Dear Sirs,

The Interior Lumber Manufacturers' Association represents 13 members and over 75 Associate members which are largely independent family owned businesses. Our members operate in the southeast of the province in the Thompson/Okanagan, Nicola Valley, Columbia River and the Kootenays. We provide thousands of direct jobs in the rural communities we operate in and manage and purchase about 3.5 million m<sup>3</sup> annually. Our document "The Right Log to the Right Mill" is attached to this document to provide you with further background on our membership and the challenges and opportunities our businesses face.

We write to you to provide our perspective and recommendations on the Old Growth Strategic Review you have been tasked with. Your mandate to provide recommendations to inform a new approach to Old Growth Management in British Columbia is one we strongly support. Quite simply, British Columbia's forest land management approach of locking up our forests in static reserves and ignoring that forests are dynamic, needs to be uprooted.

**Communication**

We are excited that two Professional Foresters will be providing recommendations that, we anticipate, will be science based. Too often we are disappointed to hear Old Growth/forest management mistruths being published in the media. Often the groups involved do not support the well-being of rural British Columbians and provide ideological perspectives that are counter to facts and known science.

- We recommend sustainable, science-based forest management and socio-economic well-being of communities and business form the background for any recommendations.
- We recommend an active communication program be developed for the public at large on existing forest management. This will help to address the mis-information currently being disseminated by certain groups.

## **Existing Protected Areas**

British Columbia has the largest provincial/state park system in North America. There are over 1000 protected areas covering over 14 million hectares – 14.4 % of the province (BC Parks). When Federal Parks, Conservancies, Ecological Reserves and Old Growth Management Reserves are included the protected area is about 30 million hectares. This robust system includes ecological reserves that are representative examples of natural ecosystems. The largest intact temperate rain forest in the world (Kitlope Heritage Conservancy) is found in our province. The Tatshenshini – Alsek Park, together with adjacent parks in Alaska and the Yukon, forms the world’s largest International Heritage Site. 70% percent of British Columbia’s 5 million nesting seabirds are protected in 13 of BC’s ecological reserves (BC Parks). This is not an exhaustive list and does not include that two thirds of coastal old growth stands have been set aside already and forest harvesting does not take place on 75% of the provinces land base. Our membership relies entirely on the current THLB to produce the high-value products they have been focused on for generations. This focus on high-value products is a necessity for most small independent facilities. They do not have the economies of scale or market power when acquiring fibre and rely entirely on a unique timber profile that is already extremely constrained.

- We do not recommend or support additions to current Old Growth Management Areas or further restrictions on the timber harvesting land base.

## **Adaptive Management for Old Growth and the Entire Landscape**

Tweedsmuir Park is British Columbia’s largest provincial park covering 989,616 hectares. It forms an interesting case study on the dynamic nature of our forests when they are left unmanaged and simply set aside or ‘protected’. The largest outbreak of Mountain Pine Beetle in the province’s history had its genesis in this park. Left unmanaged and unchecked, the population exploded and quickly spread outside the park. This devastated the surrounding pine forests and is will continue to significantly impact local and provincial economies for decades.

In 2018, almost ½ of the park area burned in natural wildfires. British Columbia wildfires in 2017/18 vividly demonstrated that our forests are dynamic and change over time. When the smoke cleared, fires had consumed over 500,000 hectares of parks and 100,000 hectares of designated Old Growth Management Area. Over ½ of the 2.5 million hectares burned had constraining management designations.

- We recommend moving to an adaptive forest land management system for the entire land base – including the 69% of the area in the south east of the province which has already been set aside from forest harvesting (see map at the end of this document). 89% and 82% are not available for harvest in two of the main TSA's in the heart of the interior wet belt. Our forests are dynamic and our Old Growth Management needs to be as well.
- We recommend static Old Growth Management spatial constraints on the forest landscape be eliminated in favour of a dynamic approach that includes recognition of climate change and the declining health of our forests.

## Summary

British Columbia leads North American provinces and states in parks and protected areas. Despite this legacy, we are increasingly concerned that access to the forests that our businesses, communities and employees depend on is being taken away by targeted, ideological misinformation. Our expectation is this Old Growth Strategic review will utilize the stark reminder the 2017/18 wildfires have provided us on the everchanging nature of our forests.

It is critical that this review recognizes and supports the continuation of socio-economic benefits derived from harvesting Old Growth. Our membership predominantly produce high-value products and employ 2-3 times the jobs/m<sup>3</sup> than dimensional mills. Access to the THLB is critical to their survival. Any further reduction in access to fibre, will severely impact the economic viability and negatively affect many rural communities. We feel an emphasis on adaptive forest management solutions, specifically addressing static constraints on the forest landscape, will provide enhanced, sustainable benefits for British Columbia and our Old Growth forests.

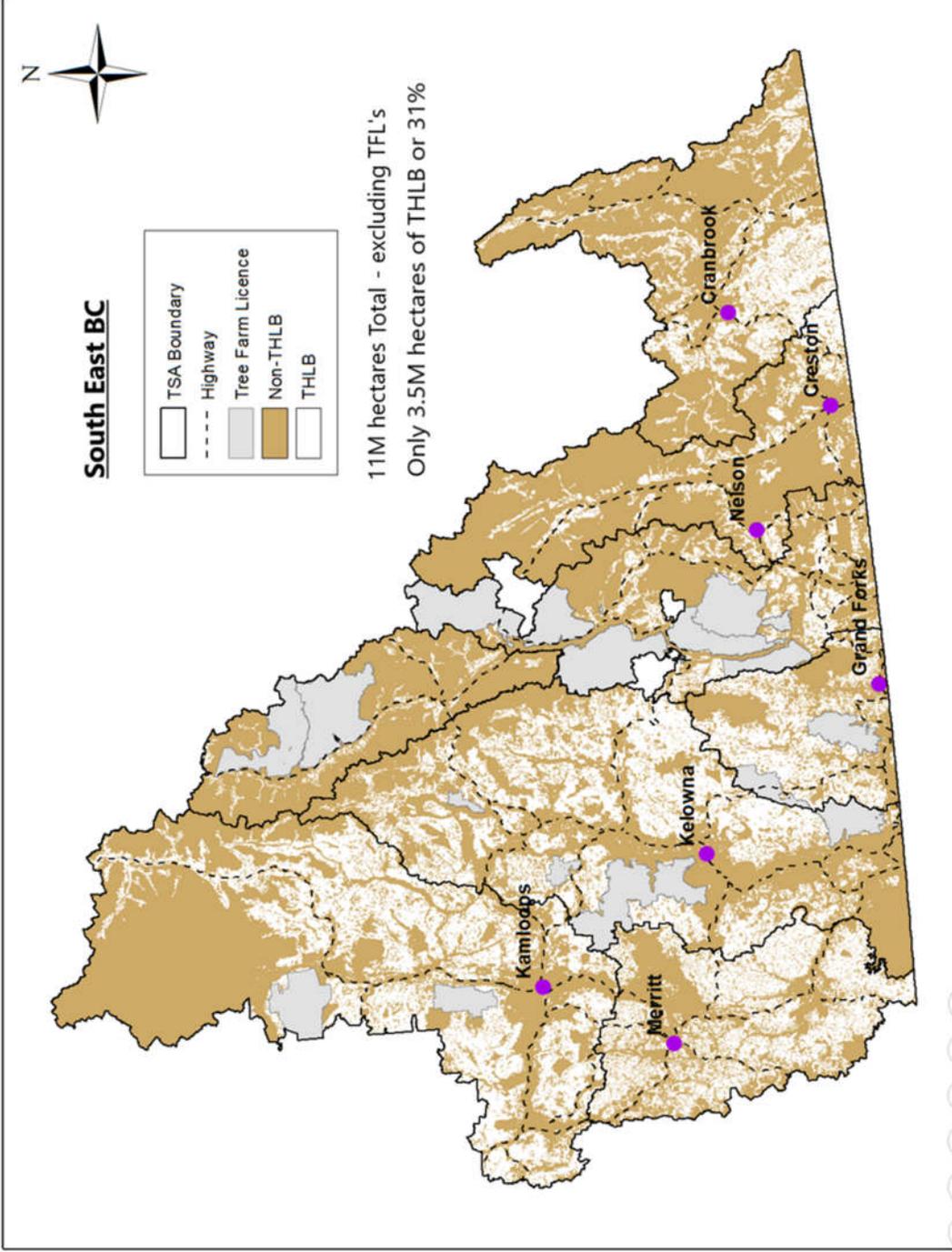
We look forward to working on the proactive recommendations arising for your Old Growth Management Strategic review.

Sincerely,



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CC: Engage BC website  
ILMA Board



**11 mill total ha.**

**Only 3.5 mill ha.  
part of THLB**

**Only 31%**



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