

Please note that this submission was ready to be submitted to meet your January 31 deadline. However, we lost all our internet connections on Haida Gwaii in January 28 following a major storm which damaged the communication tower in Prince Rupert that serves Haida Gwaii. We were unable to send or receive email until today.

Box 209
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January 29, 2020

Sent via e-mail

Dear Garry Merkel and Al Gorley

Thank you for reaching out and meeting with me in Queen Charlotte last Monday night, January 20. Thank you for listening intently, and encouraging my opinions and for being careful not to tip your hand in where you are going with this process.

As you suggested, I would like to follow up with a few bullet points as a re-cap of our wide-ranging discussion.

There are five specific recommendations points that I presented to you when we met. Briefly these recommendations are:

- Stop all old-growth logging on Vancouver Island and the south coast. We have critical shortage there. Do not do the same on north coast and Haida Gwaii. There is adequate protection and remaining old-growth and more vulnerable economies in these regions. I anticipate there are old-growth deficient landscapes in the interior of the province but I do not know them.
- Engage directly with First Nations – I felt your outreach to the Haida Nation, as an example, was very weak. There cannot be progress on addressing the old-growth issues without the direct participation of the First Nations.
- Use the new emerging international concept of “intact forest landscapes” – and the analytical tools developed by Global Forest Watch and the Forest Stewardship Council among others - as a starting point for identifying the key areas of old-growth in the interior of the province and put moratoria on these while analyses such as ecosystem representation, and scarcity are completed.
- Put an emphasis on restoration as part of the solution to the loss of old-growth ecosystems. In many places, this is our only hope for having old-growth forests in the future in the critically deficient parts of the province. It is important to restore forests to old condition to provide all the benefits to the environment, and our climate that these old forests provide. Restoration activities have economic, as well as environmental benefits, as we saw with the watershed restoration programs of the 1990’s
- Support planning. We need to plan for new economies. This should be done in collaboration with regional processes. But this regional planning can only begin after there are decisive actions by government on old-growth that creates a new base upon which to start planning a new reality. This is not revisiting the land-use plans of the 90’s and 2000’s.

I elaborate here a bit more on my discussion of these points with you.

1. The need to stop all harvest of old-growth immediately on Vancouver Island and at least part of the south coast and potentially other areas is a really clear and obvious to me. This is based on my familiarity with the Vancouver Island situation having worked on several land use planning or data gathering exercises on the Coast over many years. By every measure, and in every ecosystem, the situation is dire for old-growth on the Island. The situation is reasonably straight forward – we are down to the last few stands; the representation in protected areas is weak; we log about 10,000 ha a year, most of it by BCTS, the government’s own corporation; there is virtually no private land logging of old-growth; the benefits of old-growth are diverse and huge. Change is available to government. The economy is already diversified and infrastructure to support the change is in place. If we don’t act now, what remains at the moment will be gone for ever.

Government has all the tools to halt this logging of old-growth on the island. This could be a permanent and immediate halt (my preference), or it could be an immediate 10-year moratorium to allow some detailed analysis and planning if that is needed. However, some kind of transitional phase-out would be a disaster. The pace of logging would increase in that interim transitional phase and the best sites would go. We witnessed that exact scenario on Haida Gwaii in the 1 year after the blockades and before the final 1986 decision to halt logging in the Gwaii Haanas area. Decisive action is needed on Vancouver Island.

Other countries and jurisdictions in other parts of the world have halted old-forest or native forest logging in recent years. We can do the same.

I believe a similar halt to all old-growth logging is needed on the mainland south coast where maps I have seen also indicate we are down to the last few stands and watersheds. I have less familiarity with that area and have only seen the maps. But the work of Dave Lerversee, which I have seen, is very compelling and based on my exposure to his work over many years, based on very diligent, accurate work. I am not sure what the northern boundary should be, but is clear to me that a halt is needed at least on a significant part of the south coast as well.

I do not make any similar suggestion for the central and north coasts (north of Cape Caution) or for Haida Gwaii. There is much more old-growth remaining in these areas, and much more is already protected in formal “park-level” protection, or through land use order and regulation. We also have economies in the north that are much simpler and much more dependent on old-growth forest resources to sustain communities. We don’t have sufficient infrastructure or capacity to make the dramatic changes I suggest for Vancouver Island and the south. On Haida Gwaii, for example, we already have 52% of the land in formal protection, including a lot of old-growth and a further 32% in some form of land-use or regulation protection, also including a lot of old-growth and good representation of all old-growth ecosystems. Certainly, there are issues on Haida Gwaii related to managing the harvest of old-growth, and your report can help address those, but there is a lot more flexibility because we are not down to the last stands and there is time to find the opportunity for solutions up here.

2. I was surprised by your lack of high level and formal engagement with the Council of the Haida Nation here on Haida Gwaii. Maybe you resolved that while you were here. This may be moot because I do not expect any big recommendations that involve Haida Gwaii, so it is probably not a big problem here. But for other areas, where I hope your recommendations are going to significantly change things, consultation with First Nations, and their direct participation, is key. In my experience (on Haida Gwaii, the north coast and Clayoquot) not much is really going to change without that direct engagement with, and participation of the First Nations who have huge interests in all of this. They need to be part of the decision-making process.
3. Through my international forestry work, I am familiar with the emerging work on identification of “intact forest landscapes” and the concept of using those IFLs as the anchors in a conservation area network. Intact Forest Landscapes are well explained at <http://www.intactforests.org/>.

Technically, an Intact Forest Landscape (IFL) is defined as a single unit of forest cover which contains forest and non-forest ecosystems minimally influenced by human economic activity, with an area of at least 500 km² (50,000 ha) and a minimal width of 10 km. This concept was originally developed around 2005 by forest scientists at World Resources Institute, Global Forest Watch and other organizations to track the loss of forests through degradation, deforestation and conversion around the world. Today, it is also used as an important tool and data set to identify the last remaining large stands of forest. As the world looks to protect more forest, and agrees on the need to expand protection well beyond the 12% suggested by Bruntland for many good reasons, these intact forests become the most obvious starting points for conservation. In 2017, the world’s leading forest certification program, The Forest Stewardship Council, brought protection of IFLs into the FSC Forest Management Standard (<https://fsc.org/en/page/intact-forest-landscapes>).

According to the Intact Forest Landscape website, published research shows that Russia, Brazil, and Canada have nearly 2/3 of the IFLs in the world. These three countries also share the largest area of the IFL loss and showed an increase from the 2000-2013 to the 2013-2016 analysis. Canada’s annual rate of IFL reduction area over that interval was 9%. Information is not readily available for BC, but it is evident from the maps that IFLs exist within British Columbia and that we need to step up our efforts.

To date, this has not had much attention in BC, but I suggest this is a potential tool and concept to explore as part of your task to identify important remaining areas of old-growth in BC, particularly in the interior. We have an international obligation to do that.

4. In 2019, the United Nations declared the Decade of Ecosystem Restoration. See <https://www.unenvironment.org/news-and-stories/press-release/new-un-decade-ecosystem-restoration-offers-unparalleled-opportunity>

In making the declaration the UN announced that “Ecosystem Restoration offers unparalleled opportunity for job creation, food security and addressing climate change.” I agree that

restoring old forests creates many benefits. In many parts of BC, restoration is our only option for seeing old-growth forests in the future. In some cases, restoration will simply involve identifying candidate stands and letting them grow to an old age. In other situations, it could involve active intervention to speed and enhance the development of old-growth attributes.

I recall the massive amount of good work that was done in watershed restoration in BC in the 1990's. A similar initiative, with similar innovative financing, is needed now for forests. I think there could be real benefits, environmentally and economically and I hope you can recommend pursuing opportunities in restoration.

5. I am a professional forester. I have mostly practiced in the areas of forest management planning over my 40 years in the business. Over that time, I have been involved in many land-use planning exercises– from Clayoquot, to the Central and North Coast LRMPs and Great Bear, and on Haida Gwaii. I fundamentally support planning, and I would support engaging in new planning initiatives on Vancouver Island and in other parts of the province. But some decisive action – in terms of halts on all old-growth – has to be a prelude to that planning. Otherwise it is just the same old “talk and log” and the same old perspectives on land-use. We do not have time for that. More dramatic change is needed. It requires a new basis on which to plan – planning to address new land-uses and planning for the fundamental transitions that are occurring and that will continue to occur and that should include a phase-out of old-growth on Vancouver Island at the very least.

The planning that I hope you will recommend has to be regionally-based planning to adjust to the new priorities and realities. It is not new or updated “land-use planning” based on the same old land-uses. New approaches to planning have to be based on value, and healthy employment, not volumes of old-growth, and on the transition to that different economy. Much of this rests with government and First Nations and significant decision need to be taken and implemented before we do any more planning. I hope that “planning” is NOT be the starting point for the recommendations in your report. Recommendations for government action should be. Planning should be a follow up to bold action.

Again, thank you for this opportunity. I await your recommendations with keen interest. As a final point, I hope you can strongly encourage the government to release your report in full.

Sincerely



Keith Moore RPF