January 27, 2020

Dear Old Growth Panel,

Please accept this as my personal input on the Old Growth Strategic Review. I am not affiliated with any group or organization. I live on Kootenay Lake in the West Kootenays at the southern end of the Inland Temperate Rainforest. Most of my comments regarding Old Growth relate specifically to the Inland Rainforest where I live.

I do not know a lot about Old Growth management but I have read various online FLNRO reports including the *'Biodiversity Analysis for Arrow and Kootenay Lake; A Response to the West Kootenay Ecosociety's Old Growth concern*s' (October 2018, MacKillop etal) as well as articles on a number of conservation and environmental websites.

I include my own thoughts and information gleaned from above and information summarized, excerpted, and borrowed from the 2011 book, *British Columbia's Inland Rainforest* by Susan Stevenson, Harold Armleder, Andre Arsenault, Darwyn Coxson, Craig DeLong and Michael Jull. I recommend if the panel and others have not yet done so, to please read this book authored by a number of (former and possibly current) Ministry staff.

What does Old Growth mean to me?

-Old Growth to me includes a complex structure of many diverse habitats with old and very old living trees, snags still standing, fallen trees, large coarse woody debris, mosses, fungi, shrubbery, devil's club and the many microorganisms above and below the ground which we cannot see.

Why is Old Growth Important?

-Old Growth forests are not renewable and given climate change, they likely won't be coming back

-The Inland Temperate Rainforest is the **only one of its kind in the world**. This ecosystem exists only in BC. Unlike the coastal rainforest, the Inland Rain Forest experiences snowpacks that persist throughout the winter. This is the **only rainforest in the world** where a large proportion of the available moisture comes from groundwater flowing from melting snow.

-Old Growth provides connectivity North to South, and for low to high elevation which could aid in upslope migration of species. The North/South continuity of the Inland Rainforest Old Growth could be critical for species shifting distribution with **climate change**.

-Old Growth forests can be sinks or sources for CO2.
     -A recent Sierra Club BC report (https://sierraclub.bc.ca/clearcutcarbon/) shows that **BC Forest activities are the greatest source of CO2 in BC.**

     -Old Growth forests are **existing carbon stores** with the capacity to rapidly sequester carbon. Old Growth Rainforest stores some of the highest amounts of carbon in the world.

     -Radio carbon dating of well decayed coarse woody debris indicates ages of 195-1200 yrs.

     -Old Growth 'Snags' are known to remain standing for over 250 years after death.

What are the Greatest Risks to Old Growth?

-**Logging**!

> -the west side of Duncan Lake, the accompanying BCTS logging road, clearcuts, landslides
> -the current logging and proposed clearcuts by BCTS near Trout Lake

-The **unsustainable Annual Allowable Cut** (AAC) reflects no intent by government to reduce logging

-The historic and continuing fragmentation (by logging and roads) of connectivity does not allow for dispersal or reestablishment of species. The Inland Rainforest is a natural north-south dispersal corridor but is vulnerable to fragmentation.

-The excessive exploitation of Old Growth ecosystems for continual growth of corporate profits

> -in exchange for increased timber yields, ecological factors are being treated as constraints on timber harvesting

-False claims and misinformation, refuted by scientific research, such as that trees replanted in clearcuts are better at absorbing carbon than old forests are repeated.

> -industry's view of Old Growth as "decadent" old trees, does not recognize any of the other values. The largest western red cedars of the Inland Rainforest are characteristically hollow, a condition that results in a rare type of habitat for wildlife.

-The apparent practice of **colocating Old Growth and visual corridors** puts Old Growth at risk given that the province-wide 'success' rate of achieving VQOs in designated scenic areas is 57%!

-An industry trend province-wide toward **preferential selection of smaller trees for inclusion as wildlife tree patches** and other reserves within cut-blocks compromises the biological effectiveness of the reserves.

What are the Plans, Policies or Practices I feel are important?

-The Inland Rainforest is largely on public lands yet the landscape is being transformed by decision makers on a block to block basis without consideration of cumulative landscape level impacts.

-The **Professional Reliance model** in practice since FRPA **has failed to protect our Old Growth.** Steps must be taken to ensure that only truly qualified professionals with knowledge of Old Growth ecosystems and the values other than the economics of timber, are the ones making decisions about Old Growth.

-The **Precautionary Principle should be applied** to landscape level planning so those who destroy the last remnants of connectivity bear the burden of proving that corridor disturbance will not cause harm. Unexpected natural disturbances such as beetle infestation outbreaks brought on by climate change require that redundancy be built into the plan.

-Under FRPA, industry is allowed to adjust OGMA boundaries on their own to accommodate their logging plans. A problem identified in a 2012 Forest Practices Board Report that the **Ministry does not track Old Growth logging** resulting in missing accurate data continues in 2020. As identified in

the MacKillop analysis, industry holds 'rights' over their data and does not share that data with the Ministry.

-The government policy should be to **protect Old Growth not manage it**. All Old Growth must be **protected by legislation**. Declare an immediate **moratorium on logging Inland Temperate Rainforest and all Old Growth in the province until protection is in place.** This needs to include blocks currently proposed and slated for logging by BCTS and other licensees. Reduce all AACs.

What are my thoughts about Old Growth Management in BC?

-In the long term, the **wellbeing of the timber economy and many other social values depends on the wellbeing of the ecosystems**. **We have the last remnants of a forest that cannot be replaced.** With climate change they are not coming back.

-The government needs to be more ambitious, and to **do more now**.

-What do we want the future Inland Rainforest to look like? **A vision for the future begins with an appreciation of what we have to lose if we do not act.**

-Take back our public forests from the 'Big Players' and **return our public forests to us**, ie the communities living within the forest.

-Significantly **increase the full protection of BC's remaining Old Growth temperate Rainforest** which would include habitat protection for species at risk, ie the mountain caribou.

    -the amount and proportion of BC Inland Rainforest as park or protected in the Kootenays appears to be significantly lower than the rest of BC.

What has Happened Where I live:

-A significant extraction of Old Growth occurred in the southern Inland Rainforest above the west side of Kootenay Lake in the early 2000s. Some trees on the landings had been spray painted across the stump end "Too Big". We worked successfully with the licensee Slocan Forest Products, who was not aware of a designated forest recreation trail through the Old Growth forest, to not log around or near the trail. The licensee left what they called a "**Wall of Cedar**" just above the trail terminus at Fishhook Lake.

    -On the 2003 July 1st long weekend, a holdover fire from the previous fall blew up and raced through the large clearcuts, which ran in the same direction as the prevailing winds, and completely burned the 'Wall of Cedar'.

-**The remaining Old Growth must be protected**. There are culturally modified trees, multi-topped cedars, and high ecological and recreation values. Value is more than 'timber's' fickle fluctuating market evaluation. **There are more values in leaving than in logging.**

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