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## Submission to Old Growth Strategic Review

January 31 2020

Submitted by THE PEACHLAND WATERSHED PROTECTION ALLIANCE (PWPA)

### **About the PWPA:**

The Peachland Watershed Protection Alliance, a non-profit organization, endeavours to promote the preservation and protection of all watersheds in the community and is dedicated to the protection of the ecosystem of the District of Peachland's watershed including its quality, quantity and timing of flow both at the source and through our taps. The Alliance is dedicated to raising awareness of the key issues facing our watershed, water use and healthy water practices. Members of the PWPA watch our forests, conduct research and providing public education to ensure healthy and sustainable ecosystems within Trepanier and Deep Creek watersheds, and encourage the use of site sensitive, ecologically based forestry practices.

**WHY WE ARE HERE:** For decades, citizens have been telling the BC government that the way it manages old-growth forests is unsustainable, unethical, and is putting species, the climate, and communities at risk. But the liquidation of ancient forests has continued unabated while ecosystems and species are pushed further to the brink.

**Due to the vocal concerns of PWPA and other organizations in the province, our movement has forced the province to review the way it manages old-growth.**

**One major hurdle stands in our way , there is no universal definition for old growth , so how can we give the government our submissions, suggestions, expectations if what we are calling old growth differs from what they call old growth and that again differs from what industry calls old growth.**

**Everyone is at odds for their own gain. Therefore this review process is doomed to fail before it starts. Secondly, to pull out old growth alone to review form all other forestry issues will again set us up for failure, we cannot remove trees of a certain age, diameter of areas with snags and dead fall from the whole big picture of forestry in BC; a full, in-depth review may need to be done, perhaps like the Commissions of past?**

It could be considered manipulative research that chooses to ignore the well understood importance of ecological integrity in natural forests, and how maintaining that integrity provides for resilience in natural forest ecosystems, from the landscape to the patch if we do not start with a proper definition for OG. This resilience has always been essential for healthy, biologically diverse forests that provide a spectrum of essential ecosystem services for us and all forest life. In the face of the climate emergency, protecting the resilience of intact natural forest ecosystems is particularly important. That resilience is compromised by industrial timber management, including salvage logging of dead trees as "waste." A burned forest is still a forest. Dead trees are not waste. They are essential ecological structures. The composition, structure, and function of the burned area provides for resilience to re-establish the next forest phase.

So do our forests do not need "serious design overhaul" such as the Slone or Pearse commissions of the past? Industrial timber management, and its pervasive timber bias that seems to invade everything from government policy to education and research is what needs a "serious design overhaul." Such an overhaul will require scrapping the "forest" tenure system, and getting the management of public forests back into the hands of public bodies that function with the priority of conserving forests for their intrinsic values and essential ecosystem services. Such an arrangement is an example of ecological and social responsibility, and even economic responsibility in government.

We also do not need to research how to restore ecological integrity in forests degraded by fire suppression. We know how to do that. Nor do we need to research that stable mixed deciduous and coniferous forests provide a variety of ecological and social benefits compared to converting those forests to homogeneous, unstable conifer plantations. We know how to design timber extraction in ways that protect the ecological and social benefits of diverse forest ecosystems. Part of that design knows when to say "no" to logging in order to maintain ecological integrity, respect ecological limits, protect ecosystem services, and facilitate a balanced, diverse economy.

So, the money spent on this research would be much better spent overhauling our relationship with the forests that sustain our needs, which could include thinning of fire-suppressed forests identified by landscape level plans focused on maintaining or restoring ecological integrity.

There is a plethora of scientific research findings that support the need to protect ecological integrity and remaining intact forests, including old-growth and other primary forests, as effective ways to assist in mitigating the climate emergency. I would also add that Indigenous people have been reminding us for decades that their observation-based knowledge tells us that industrial forestry is contributing to global heating, as it degrades biological diversity, water, soil, and overall ecosystem services.

Given the sound knowledge base that exists that is telling us we need to change our relationship with forests and how to make that change, one is tempted to categorize this "research into reversing the growing risk of fire in forests, "to fiddling while Earth burns."

**Making the soft changes around the edges though systemic changes needed is a start but by no means enough, enough engage BC reviews, time to implement the findings.**

A recent Poll shows nine in ten British Columbians support action to protect endangered old-growth forest

Ninety-two per cent of British Columbians support taking action to defend endangered old-growth forests, a new Research Co. poll has found.

The poll, which was commissioned by Sierra Club BC, revealed 62 per cent strongly support taking action.

These views are widely held across the province, with 90 per cent or more in southern B.C. and the Fraser Valley, 87 per cent on northern Vancouver Island and 83 per cent in northern B.C.

British Columbians also overwhelmingly believe it is important for the B.C. government to keep its election promise to take action on old-growth forests, including more protection for old-growth trees, less logging, partnerships with First Nations and support for a more diversified economy. Ninety-two per cent agreed with this statement.

**About four in five British Columbians cited the following reasons to care about defending old-growth forests:**

- \* Old-growth forests are important for First Nations cultural values;
- \* They give us clean water and help clean the air;
- \* Old-growth forests capture and store carbon from the atmosphere, which helps defend communities from the extreme weather caused by climate change;
- \* Many important and rare species depend on old-growth;
- \* Old-growth forests are globally rare and important, and should be protected as a legacy for future generations.

Government, industry, academics and technicians reassure us that they can reconstruct ancient forests. Others don't think so.

“By treating 500 to 1,000-year-old forests as if they were a renewable resource, we are acting out a fiction and thereby making a grave mistake,” wrote Peter Raven, then-director of the Missouri Botanical Garden, in a prescient forward to the book *Ancient Forests of the Pacific Northwest*.

**General:** The PWPA recommends following the process in Nova Scotia, namely Lahey's report. [https://novascotia.ca/natr/forestry/Forest\\_Review/Lahey\\_FP\\_Review\\_Report\\_ExecSummary.pdf](https://novascotia.ca/natr/forestry/Forest_Review/Lahey_FP_Review_Report_ExecSummary.pdf)

An Independent Review of Forest Practices in Nova Scotia Executive Summary Conclusions and Recommendations recommendations on forest practices that would, if implemented, balance environmental, social, and economic objectives, which have been interpreted to include

**values.** His conclusion is that environmental, social, and economic values should be balanced by using forest practices that give priority to protecting and enhancing ecosystems and biodiversity. In other words, Lahye has

concluded that protecting ecosystems and biodiversity should not be balanced against other objectives and values as if they were of equal weight or importance to those other objectives or values. Instead, protecting and enhancing ecosystems should be the objective (the outcome) of how we balance environmental, social, and economic objectives and values in practising forestry in Nova Scotia. A number of reasons are given for this conclusion, but the primary reason is that ecosystems and biodiversity are the foundation on which the other values, including the economic ones, ultimately depend. Start with the forest holding equal values, not only economic as in a continuous supply of 2x4s and we may just save what is left of these forests, enough to supply some jobs, vibrant communities and a future timber supply.

When we apply full cost accounting to forestry in BC, to include:

1. The immense degradation of forest ecosystems and biodiversity
2. The natural services forests provide and climate change mitigation
3. The privatization of the public forests by the TFL system and low resource rents
4. The major job loss and dislocation of forest-dependent communities
5. Significant contribution to flooding and wildfires and;
6. Compromising of community drinking watersheds, the conclusion is inescapable that **forestry, as practiced in BC, is operating at a net loss to the economy, the environment and social values.**

**We can see it is indeed in need of an overhaul.**

If MFLNRORD published **Annual Reports** this would be public knowledge, as it was before Premier Gordon Campbell in 2003 terminated these reports. A start would be republishing.

It is becoming clear that our livelihood has been sold out from under us. And now, because the demand for timber is so high, the provincial government appears to have no plan to secure new major parks for the future, and they are desperately logging people's watersheds, critical caribou habitat, and ancient forests that should be left to maintain climate resilience.

Time for a change. The solution is not to give the forest industry what it is now asking for. That has been done multiple times before, and has given us what we have.

The solution is for the elected officials to identify the high level purposes and policies (outcomes) required in our public forests that will provide operational direction to staff and the industry.

Licensees are the tenants. Citizens are the owners.

- This will, at some indefinite time in the future, be followed by further changes; who knows what they will be!?
- The new Professional Governance act is being implemented, extremely slowly over the next few years. Ditto the above query.
- The new Coast Revitalization Plan is still in its infancy and may never be realized---ever!

- The new Interior Revitalization Plan is waiting production of its final report--of "What We Heard"!
- We can expect a new Interior Revitalization Program to emerge; who knows what the new program will entail let alone when it will be implemented and when it might actually be fruitful. If ever!
- They are working on new Waste & Residue methods and policies to be implemented across BC.
- They have embarked on saving about 75 old growth trees.
- They have now established yet another panel to review the Old Growth situation in BC
- They have embarked, many, many months ago, on a Cumulative Impacts study of the Boundary TSA largely as a result of last year's catastrophic flood. Who knows when this report will be completed yet alone what measures might be made to ensure such a flood does not occur again.
- They appointed a new Parliamentary Secretary to, once again, travel around BC and listen to people in the communities most affected by the mill closure. What long-term good will actually come from this endeavor?
- Other things I've almost certainly missed or am unaware of.

## Conclusions

One step might be, as the Province has done with threatened grizzly bears, to boldly declare an immediate moratorium on logging the remnants of the ancient forest until we can gather the best science to determine what we *should* preserve, what we *can* preserve, and what we *must* preserve. Where to start? Perhaps with all trees still standing that were here before Europeans arrived—say 300 years old.

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"Once they have been removed from a particular area, the ancient forests...will never appear again, given the human activities in the contemporary world and their consequences," Raven wrote. "We not only kill the trees that are cut, but we annihilate the possibility of such trees for all time. No manifestation of the anthropomorphic causes of tree death could be more permanently fatal than this."

"To continue logging the last giants is akin to slaughtering the last herds of elephants or harpooning the last great whales," Wu has written. "It's unnecessary and unethical, given

that second-growth forests dominate more than 80 percent of BC's productive forest lands and can be sustainably logged.

"Indeed," he continues, "the rest of the Western world is focused on logging 50- to 100-year-old second- or third-growth trees. BC is one of the very last jurisdictions on Earth that still supports the large-scale logging of 500-year-old trees. On Vancouver Island alone, about 10,000 hectares of productive old-growth forests are logged each year while only 8 percent of the original is protected."

WILL WE CONTINUE BUSINESS AS USUAL OR IMPLEMENT 'WISE USE'?

Here are the points PWPA presented to the OGMA Review panel at our December 19 in person meeting in Peachland at the little School House 7:00 pm:

1. Obviously, more old growth needs to be protected
2. All OGMA should be spatial and mapped and kept tracked of
3. LRMP tables need to be revived to allow for review and revisions and continuous dialogue
4. The non-grassland parks in the Okanagan that were held up due to the grasslands initiative need to be designated (eg. Snowy and Brent Mtn.) We hope you also stress the importance of finally declaring the parks that the LRMP agreed upon and the government of the day supported



LRMP\_Directed\_Protected\_Areas\_Mar\_20

5. Interior rainforests are especially significant and there is a book about them (they did not know about the book)

[\[https://www.ubcpres.ca/british-columbias-inland-rainforest\]](https://www.ubcpres.ca/british-columbias-inland-rainforest)

6. Parts of the Ministry of Environment that were transferred to FLNR should be returned) water and wildlife management were transferred from MOE to FLNR by the con-Liberals and the NDP seems fine with it

7. Old growth forests help resist fires and are key to watershed protection (massive clear cutting caused the Grand Fork floods and contributed to Okanagan Lake flooding and is impacting water quality for Peachland)

8. The Merritt TSA needs planning and parks

9. **For years foresters have assumed that old trees have stopped growing and in many cases are decadent**

<https://www.theguardian.com/environment/2014/jan/15/trees-grow-more-older-carbon>

**Findings contradict assumption that old trees are less productive and could have important implications for carbon absorption.**

In Sloan I (1945, Royal Commission on Forestry ), and Sloan II (1956, Royal Commission on Forestry) the Provincial Government of BC, willingly gave up control of our public forests to companies, by granting private rights to public timber, including all our old growth.

If the Province wants to revoke these rights, these private licensees must be compensated, as they were in the 2003 twenty percent take back, under the BC Liberal Coastal Revitalization Plan, which failed.

We now know the consequence of this 1945 sustained yield experiment - it was, to manage to zero.

Citizens need to take back full control, or there will be no old growth or any growth to manage.

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Board of Directors