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**Submission to the Independent Panel Review of Old Growth Management
Attention: Al Gorley, RPF and Garry Merkel, RPF
Submitted by Chris Laing, RPF, Forest Manager, Powell River Community Forest**

The forests surrounding Powell River are highly valued by our community. They are an integral part of the economy, the recreational activities, the cultural activities, and the area's identity. Logging and its supporting industries provide employment to many people in our community and the Powell River Community Forest (PRCF) is a great example of the benefits of Community Forest tenures. Please refer to our Annual Report to the Community for further details (<https://prcommunityforest.ca/wp-content/uploads/2020/01/PRCF-2019-Annual-Report.pdf>).

Powell River Community Forest's area is limited to one Landscape Unit (Haslam Lake) in the Sunshine Coast. Because of an extensive history of logging and fires, there is not a lot of old growth forest in our area. The few remnant patches of old growth that are located outside of parks and protected areas and are in the Timber Harvesting Land base are already protected by either the Order Establishing Provincial Non-Spatial Old Growth Objectives, or draft OGMA's. OGMA recruitment areas have also been identified in the current version of our draft OGMA's. These draft OGMA's have been agreed to by our local stakeholders, yet ministry appears to be paralyzed and unable to finalize them. If managing Old Growth is a government priority, these draft OGMA's should be approved in a timely manner.

One major concern to the Powell River Community Forest is the opening survey question which seems to be tailored to redefining "Old Growth". Our concern is that Old Growth will be redefined with a younger age criterion (such as the rumored 140 years old). This would have a devastating impact to PRCF, as increasing restrictions on the harvesting of older second growth stands (potential redefined as "old growth") would reduce PRCF's viability and affect the local economy negatively.

PRCF is blessed with an amazing second growth forest with most of our stands averaging 100 years old as identified in our latest forest inventory. PRCF made a management decision to maintain and increase our average harvest age by reducing our AAC compared to the base case modeled in our timber supply analysis with the goal of increasing our average harvest age to over 110 years.

This older than normal rotation age will provide benefits to multiple values such as: increasing the amount of older serial forests and its associated habitat for wildlife and ecosystems, providing for a more attractive forest structure for recreational activities, reducing risks associated with cumulative impacts from harvesting on our community watershed (88% of our tenure area is located in our community watershed), providing for opportunities to grow higher value timber products with a higher percentage of clear wood produced.

If government continues to erode our working forest area (i.e. THLB) with all of the additional measures being proposed at this time (i.e. increasing OGMA requirements, establishing Ecosystem at Risk encumbrances for late serial forests, increasing Visual Quality Objectives, imposing static Wildlife Habitat Areas for dynamic wildlife species such as the Northern Goshawk), PRCF's strategy to increase our rotation age will fail.

For PRCF, erosion of our THLB will result in reduced AAC levels or more intensive harvesting on a smaller THLB (i.e. reduced rotation ages). Neither of these options are attractive to PRCF and a reduced rotation age is entirely counter to many of the government's objectives.

Our forests are dynamic. Establishing fixed areas for one purpose ignores the fact that forests change over time and the values that were originally aimed to be protected may no longer be there. The concept of compartmentalizing forest values is outdated and does not fit well with the emerging philosophy of interconnected wholistic land management.

At the provincial level, many of the current challenges the government is struggling with related to forestry, could be resolved with one simple action. A government driven expansion to the community forest program, to increase the size of existing community forests, and creation of new community forests. This action would give local communities full control of the multitude of values provided by our forests, including Old Growth management.

On behalf of Powell River Community Forest Ltd.

Yours Sincerely,



Chris Laing, RPF
Forest Manager - Powell River Community Forest Ltd.