



**To: Old Growth Strategic Review Committee:**

Comments regarding Old Growth from the perspective of the Qala:yit Community Forest.

**History:** For approximately 20 years the Cowichan Lake Community Forest Cooperative (CLCFC) managed a Non-Replaceable Forest License until its expiry. In 2017, the Minister invited the CFCLC and the Pacheedaht First Nation (PFN), to make application for a Community Forest in lands located between Lake Cowichan and Port Renfrew.

July 16, 2018 the Community Forest (K5U) was granted to Qala:yit Forestry Limited Partnership. The Community Forest contains some 8000 Ha of Land and has an AAC of 31,498M3 of which 7296M3 is the 'reduced volume cut' allocated to BC Timber Sales.

The land base of the CFA is composed of 5 blocks containing a mix of second growth and old growth timber types. The Timber Supply Analysis states that "The proposed area is predominantly forested but large areas, covering approximately 44% of the proposed area, were completely reserved from harvesting."

Old Growth (250+) and older (141 – 250) years totaled ~2205 hectares or 28% of the CFA area. 43% (946 ha) of these older and old growth areas are unavailable for harvest because of OGMA's, UWRs, WHAs, and MaMu. In addition, there are other constrained areas due to terrain stability or visual quality.

The Community Forest is managed for the benefit of the CLCFC and PFN with revenues being split between these partners. Harvesting has occurred in both second growth and old growth on the Community forest and under the terms of an MOU negotiated with BCTS, a Timber Sale will be advertised during 2020 to provide for the allocation of 'reduced volume cut'.

In the short history of the Qala:yit Community Forest, the partners have received substantial monetary benefits which they are employing to the benefits of their respective communities.

As your committee is mandated to engage the public to hear perspectives on the ecological, economic and cultural importance of old-growth trees and forests in order to inform a new approach to old-growth management for British Columbia Qala:yit would like to provide some comments for your consideration.

**Map of Qala:yit Community Forest (K5U):** From the map and statistics above it is evident that Old Growth is a significant part of the Community Forest and is very much a part of ongoing management.

**Ecological aspects** of Old Growth are recognized and are accommodated through the maintaining of biodiversity and ecological integrity within the area. There is recognition of Wildlife Habitat Areas in both second growth and old growth timber. This is largely supported through OGMAs, WHAs, UWRs and MaMu habitat that occupy significant Old Growth areas.

**Cultural significance** within the Community Forest includes the First Nations interests in the area as part of their Traditional Territory (the entire CFA is within the PFN Traditional Territory). While we have not identified CMTs in our operating areas in our short history, there is an FN interest in access to cedar for various cultural purposes as well as various herbs and vegetation of cultural importance. Qala:yit works to accommodate these interests and needs and during harvest of the first Old Growth area a canoe log was set aside for PFN use. We have committed to planting and encouraging a cedar component as appropriate during reforestation in consideration of future First Nation needs.

The Community Forest also holds cultural significance in that a WWII bomber crash site is located in old growth within the Bolduc block. Many people have hiked the short trail off a Forest Service road to access the site over the years.

**The economic significance** of the Community Forest is the foundation that allows pursuit of other interests and values both on and off the lands within the forest boundaries. Road construction, timber harvesting and silviculture activities have provided direct local employment in the woods, and in manufacturing including sawmilling, veneer production, chipping, and poles. Other logs are sold further abroad depending on supply, pricing and markets etc.

The Crown benefits directly in the form of revenues from stumpage, taxes etc.

The Communities (CLCFC and PFN) share the revenues from the sale of timber harvested from the Community Forest.

An added benefit is that some old growth cedar is made available to the Pacheedaht for use in their sawmill, employing locals from Port Renfrew. Pacheedaht do not support reductions to the availability of old growth timber as there would be negative impacts to their operations in two ways; less available old growth for their mill and/or less revenue coming in from the Community Forest that could be used to purchase wood from other tenure holders who would presumably also have less available timber.

**Going Forward:** As Government has a desired outcome from your work to inform a new approach to old-growth management for British Columbia, we think it is imperative that consideration be given to the following;

- There needs to be an accepted definition of Old Growth. Is it determined by age class (241+ years?), is it only from 'productive' forests? How many old growth trees per hectare constitutes an old growth stand (1, 5, 20, or)?

- Consideration of existing parks and reserve areas need to be fully accounted for in old growth planning.
- Consider recruitment of old growth that will result from existing practices such as riparian reserves.
- Forest health considerations need to be considered in proposing various forest management options like spread of hemlock mistletoe.
- Tree improvement and seed transfer rules are ongoing ways to better adapt forests to climate change.
- Impacts of reducing, eliminating and/or significantly modifying harvest approaches of old growth from the Timber Harvesting Land Base need to be assessed with respect to the economic impacts (short and long term) as well as the impacts of rapidly shifting to more second growth harvesting. (ie, impact on AAC and piece size/values).
- Government needs to coordinate its action, internally and with the Federal Government with respect to species at risk and resulting forest management policy decisions. MaMu habitat areas, Big Tree Protection, Goss Hawk.....
- Government needs to share some of its analysis with affected licensees (ie socio economic analysis of MaMu habitat withdrawing from THLB).
- Consider the multi-stakeholder agreements that already exist – ie) Vancouver Island Land Use Plan.
- Qala:yit is embarking on a pilot program with Teal Jones to look at a Stewardship THLB Stabilization Project in the Gordon River Watershed using best available information guide future management on reserves and maintenance of the THLB.
- Government should be inspiring confidence for the forest tenure holders and managers that are faithfully and responsibly managing their tenure.



## Pacheedaht First Nation

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October 23, 2018  
Ministry of Forests, Lands, and Natural Resources  
Operations  
District Manager  
South Island Natural Resource District  
4885 Cherry Creek Rd.  
Port Alberni, B.C. V9Y 8E9  
Attention: Rhonda Morris  
Dear Rhonda

I regret that due to other commitments I am unable to attend the meeting Friday to discuss the recently proposed wildlife initiatives that negatively impact Pacheedaht's recently acquired forestry tenure. Pacheedaht feel strongly enough about the potential impacts that I have asked those attending, that through this letter, our concerns be communicated to the Forest Ministry.

The Province of BC and Canada has without compensation de facto expropriated the 164,000 hectares of Pacheedaht's Traditional Territory and subsequently carved it up and distributed it to TFL licenses, BCTS, Federal and provincial parks with only 134 ha remaining under Pacheedaht ownership. Pacheedaht, once resource rich has become a pauper in their own land. Pacheedaht has started down the long road of addressing this inequity. It is apparent to us that treaty will fail to address this disparity of resources. To survive/prosper and remain an intact entity we will require other sources of income. The resources of our land are from the forest and oceans surrounding us.

Pacheedaht is deliberately embarking on a long term process of acquiring the tenures and licences within our Traditional Territory. The CFA is one of these tenures. The BC and Canadian governments have designated 14,000 hectares of our territory to be old growth wilderness Parks. These are highly suited for the wildlife conservation initiatives the government is currently forcing onto the small tenures we have been able to acquire. We take great exception to this initiative and in the light of history believe this to be unjust considering all that has been taken from us. This adds to the insult heaped upon our people when the Canadian Government (SARA) proposed to establish wildlife habitat areas for two nesting pairs of Goshawk totaling over 14000 ha of our territory. This proposal eclipsed the treaty land offer to our people by the same government by 800%. Are we to infer from this that current governments value 4 birds more than the Pacheedaht Nation. I would hope not and that this is the result of a departmentalized government working in isolation. . . .

There are MAMU areas within the CFA area already and considerable suitable old growth areas for such wildlife initiatives already conserved within our territory. . We do not support this initiative and condemn them for their potential impacts on Pacheedaht's financial well being when compared to what we perceive to be very questionable results regarding MAMU habitat..

Yours truly

Pacheedaht First Nation  
Jeff Jones, Chief Councillor.