



January 31, 2020

Shauna Doll  
Raincoast Conservation Foundation  
PO Box 2429  
Sidney BC VL8 3Y3

Re: Submission for review by the "Old Growth Strategic Review" Panel

To Mistery Garry Merkle & Al Gorley,

I am writing as a representative of Raincoast Conservation Foundation regarding the provincial government's Old Growth Strategic Review.

Since colonization, BC's forests have been over-exploited<sup>1,2</sup> primarily due to the province's old growth liquidation policies. Such policies, established in the first half of the 20th century, enshrined an unsustainable rate of cut that inhibits the development of mature forest characteristics<sup>3</sup> and perpetuates an economic imperative to replace "over-mature, decadent and diseased" old growth with "thrifty" plantations<sup>3,4</sup>.

Studies have shown that historic rates of cut by industrial forestry operations in BC are economically unsustainable due to significant loss of valuable natural capital<sup>4,5</sup>. Such studies contend that continuing with status quo forestry is likely to lead to a collapse of the forestry industry by 2055<sup>4</sup>.

Though the province reports that 23% (132,000km<sup>2</sup>) of forested lands in BC remain in old growth<sup>6</sup>, the Environmental Law Centre (ELC) at the University of Victoria<sup>7,8</sup> in collaboration with Sierra Club BC, recently found this proportion to be closer to 5% (32,000 km<sup>2</sup>)<sup>9</sup>. The province also claims that 55% of old growth in BC's coastal regions is protected<sup>10</sup>; however, this figure is based on the *existing* extent, rather than the *historic* extent of old growth<sup>11</sup>. Since 2005, almost two million hectares of old growth forests have been logged<sup>9</sup>.

In an era where climate change is a modern reality and biodiversity is in crisis the world over, the province's continued support of industrial logging of old growth forests is out of sync with global scientific consensus and policy objectives. This is especially true in the Coastal Douglas-fir (CDF) biogeoclimactic zone (i.e. the traditional territory of Coast Salish Peoples), the smallest and most endangered forest zone in the province.

The CDF covers less than 0.3% of the province, roughly 2,500 km<sup>2</sup>, which represents its entire national (and the majority of its global) extent<sup>12,13</sup>. By current estimates, less than 1% of the CDF remains in old growth and less than 10% is more than 120 years old<sup>14</sup>. In a forest type dominated by evergreen giants like Coastal Douglas-fir (JSÁY) and Western red cedar (XPÁY), trees with life spans of up to 1,000 to 1,500 years respectively, this is a significant loss. Immediate action should be taken to protect the little remaining old, and second-growth forests of the CDF region.

Though the Ministry of Forests, Lands, Natural Resource Operations & Rural Development recently announced a "big tree protection" initiative that seeks to protect the 54 most exceptional and publicly revered "majestic giants" in the province<sup>9</sup>, only 7 of these trees grow in the CDF region. While provincial acknowledgement of these trees is positive, it is a piecemeal protection strategy that will not provide long-lasting ecological integrity or ecosystem resilience and does not instill confidence in the rigour of future old-growth protection.

The University of British Columbia's *Big Tree Registry* on which the province's big tree initiative is based, identifies nearly 350 stems, meaning only 15% are now under temporary protection. Accounting for the 0.01km<sup>2</sup> grove



protected around each of the 54 trees, this results in less than 1km<sup>2</sup> of old growth protection province wide. Further, while the trees chosen are of exceptional size, size of a single stem is not a measure of ecological value, nor is it the best way to identify priority areas for conserving the most biodiversity. Finally, most forest ecologists agree that connectivity is a vital component to conservation planning. In the CDF region where contiguous forest patches are scarce due to significant development, an emphasis on connectivity is especially important.

It is also important to recognize that a considerable shortcoming of old growth protection in CDF forests, particularly throughout the Gulf Islands, is the high proportion of privately-owned lands. To reduce ecologically destructive practices on privately managed forest lands, regulations outlined by the Private Managed Forest Land Act need to be updated (e.g. forest management should prioritise development of old growth characteristics; total allowable cut must be lowered; and clearcutting should be replaced with selective practices that maintain canopy). Additionally, the Islands Trust should be granted greater jurisdiction to implement environmental regulations to fulfill the “preserve and protect” object charged to them via the Islands Trust Act to reduce highly unregulated cutting on private property.

All the above considered, I write you today to urge the following measures for old growth protection:

- Place a moratorium on old growth logging in BC’s most intact and endangered old growth forests, including those growing on private land—particularly within the CDF zone
- Develop a science-based plan for old growth protection
  - including a prioritization model to guide where, when, and how protection will be implemented
  - emphasizing the protection of contiguous forest patches
- Consider the implementation of an *Old Growth Forest Act* as recommended by the ELC<sup>8</sup>
- Recommend revisions to the Local Government Act and Islands Trust Act to grant the Islands Trust greater jurisdiction to implement conservation-focused legislative tools
- Recognize the ecological significance of second growth forests, specifically in the CDF zone, to support the growth of multi-successional forests and safeguard the old growth of the future
- Commit to transparent reporting on conservation initiatives, clearly communicating challenges and celebrations with the public

Finally, it is essential for the panel to recognize the importance of pursuing reconciliation with First Nation communities. As such, a final recommendation is to engage First Nations in equitable decision-making to identify pathways toward forest protection and economic diversification.

I trust that in this era of climate change, the outcome of this strategic review will be scientifically based, ecologically motivated, reconciliatory, and immediately actionable. The time for strong and substantive forest protection is now.

Sincerely,

A handwritten signature in black ink, appearing to read "S Doll".

Shauna Doll  
BA, MREM  
Research Analyst, Gulf Islands Forest Conservation Project

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- <sup>1</sup> British Columbia Ministry of Environment, Lands, & Parks. (1999) Ecosystems at risk in British Columbia: *Coastal Douglas-fir Ecosystems*. Retrieved from [https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/species-ecosystems-at-risk/brochures/coastal\\_douglas\\_fir\\_ecosystems.pdf](https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/species-ecosystems-at-risk/brochures/coastal_douglas_fir_ecosystems.pdf)
- <sup>2</sup> Lower, A.R.M. (1938). The North American assault on the Canadian forest : a history of the lumber trade between Canada and the United States. Toronto: Ryerson Press.
- <sup>3</sup> Wilson, J. (1998). Talk and Log: Wilderness politics in British Columbia, 1965-96. Vancouver: UBC Press.
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- <sup>5</sup> Green, T.L. (2000). Confusing liquidation with income in BC's forests: economic analysis and the BC forest industry. *Ecological Economics* 34 (1), 33-46. DOI: 10.1016/S0921-8009(00)00134-8
- <sup>6</sup> British Columbia. (n.d.). Old growth forests: How much old growth is in BC? Retrieved from <https://engage.gov.bc.ca/oldgrowth/how-much-old-growth-is-in-b-c/>
- <sup>7</sup> Hennig, C. (2019, July 13). Old-growth forest should be returned to 30% of original level, researchers say. *CBC News*. Retrieved from <https://www.cbc.ca/news/canada/british-columbia/uvic-report-old-growth-forest-1.5207730>
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- <sup>10</sup> Ministry of Forests, Lands, Natural Resource Operations & Rural Development. (2019, July 17). *Government takes action on old growth, protects 54 groves with iconic trees* [Press release]. Retrieved from <https://news.gov.bc.ca/releases/2019FLNR0189-001452>
- <sup>11</sup> Wieting, J. (2019, Sept 10). Debunking old-growth forest claims in British Columbia. *National Observer*. Retrieved from <https://www.nationalobserver.com/2019/09/20/opinion/debunking-old-growth-forest-claims-british-columbia>
- <sup>12</sup> Egan, B. (1999). The ecology of the Coastal Douglas-fir Zone. Retrieved from Ministry of Forests, Lands, Natural Resource Operations & Rural Development Research Branch: <https://www.for.gov.bc.ca/hfd/pubs/docs/bro/bro30.pdf>
- <sup>13</sup> Madrone Environmental Services Ltd. (2008). Terrestrial ecosystem mapping of the Coastal Douglas-fir biogeoclimatic zone. Retrieved from [http://bvcentre.ca/files/research\\_reports/07-17\\_TEM\\_4522\\_rpt\\_only.pdf](http://bvcentre.ca/files/research_reports/07-17_TEM_4522_rpt_only.pdf)
- <sup>14</sup> Islands Trust. (2018). Protecting the Coastal Douglas-fir zone & associated ecosystems: An Islands Trust toolkit. Retrieved from <http://www.islandstrust.bc.ca/media/346674/cdf-toolkit-final-web.pdf>