Old Growth Strategic Review Written Response

This document serves to provide a response from the S'ólh Téméxw Stewardship Alliance (STSA) regarding the Provincial Old Growth Strategic Review. S'ólh Téméxw is the name for our traditional territory, and the STSA is an organization comprised of 15 different First Nations (Chawathil First Nation, Cheam First Nation, Kwaw-Kwaw-Apilt First Nation, Scowlitz First Nation, Skawahlook First Nation, Skwah First Nation, Sumas First Nation, Yale First Nation; and Aitchelitz First Nation, Shxwhá:y Village, Skowkale First Nation, Soowahlie First Nation, Squiala First Nation, Tzeachten First Nation, And Yakweakwioose First Nation as represented by the Ts'elxwéyeqw Tribe Limited Partnership.)

There are two sections in this document. The first part is our opinion of this strategic review, including how it was conducted and our opinions on the current issues of old growth forest management in BC. Secondly, we provided some responses to the online questionnaire. We hope that this written response will be read, and changes will be made to the process, as the STSA would like to have more of a role in managing old growth forests, especially within S'ólh Téméxw. Most of the Chilliwack Natural Resource District and a southern portion of the Sea to Sky Natural Resource District fall within S'ólh Téméxw.

Section I: Feedback on the Old Growth Strategic Review and how old growth forest is currently managed in BC

First and foremost, we believe that the top priority of this strategic review should be the collaboration between Indigenous governments and the provincial government. Information cannot just be collected by provincial employees and then recommendations made based on one data collection session. There needs to be a balance of traditional and western science to manage old growth forests. In order to succeed in this, Indigenous communities need an appropriately funded project with collaboratively developed timelines in a localized approach and with the support of the provincial government and industry stakeholders. In addition, this type of invitation for feedback should have been sent not only to the band offices, but also to the People of the River Referrals Office.

In addition to the process itself, there are issues regarding how old growth forests are managed in BC. Firstly, the question of who gets to define what old growth forest is needs to be considered further. If the definition of old growth forests is determined in a silo by the provincial government, then the response of how to manage old growth from Indigenous communities will not have been done in a true government to government (G2G) relationship. Once that question is answered, then we need to make decisions on how it is managed.

We also believe that old growth management should focus more on landscape level ecology and less on preserving small patches of forests. The entire province should be managed as one connected ecosystem with a 1000-year management plan. Only preserving small patches of old growth forest means that there might not be connectivity between areas of old growth forest for the wildlife who use it. Along the lines of ecosystem-based management, we also believe that old growth should be managed differently along the coast, in the interior, and in the north. There are many different Biogeoclimatic Zones in BC, and old growth forests can look very different throughout the province. Although Old Growth Management Areas (OGMAs) do

have different management requirements along the coast and in the interior, there needs to be more specific requirements for mature landscapes depending on species, site conditions, and other similar factors. Another important pieces of ecosystem-based management would be the consideration of cumulative effects. Forestry, of course, does affect old growth forests, but there are many other human-made disturbances that affect old growth forests such as mining and recreation, and the effects of those industries need to be considered as well.

We also believe that old growth forests should not remain completely untouched by humans. Due to climactic predictions, we need to implement prudent fire management, whether that is through controlled burning of the understory to reduce fuel loading or the thinning of mature stands. These practices should be implemented when needed, with the consultation of Indigenous communities, and should not face the current roadblocks that make it so difficult to manage in OGMAs. There also needs to be a priority to manage cultural and spiritual uses in old growth forests. Indigenous communities have been living in and using old growth forests for millennia, and whether it's harvesting logs for welcome figures or canoes, bark stripping, traditional plant medicines and berry collection, or carrying out spiritual practices, these traditions need to continue to be permitted uninhibited by restrictions set upon OGMAs. These management activities need to be determined with the Indigenous communities that use the old growth forests in their territory to determine how best to manage these areas.

Lastly, the role that British Columbia Timber Sales (BCTS) plays in old growth forests needs to be addressed. This issue transcends that of old growth management, and is relevant to how forestry and unceded Indigenous lands (AKA crown land) is managed in BC, but is specifically important to old growth because of the recent reports of BCTS not adhering to regulations and logging in old growth areas on Vancouver Island and the sunshine coast (Lavoie, 2019; Ancient Forest Alliance, 2019) This behavior is worrisome, since BCTS is a government entity, and they should be role models for forestry in BC, not the rule breakers. This brings up the issue of government and self-regulation, and we believe that if old growth forests are to be managed by the provincial government alone, it will continue to be difficult to monitor and enforce legislation when those breaking the rules are of the same entity i.e., BCTS. This is a further reason why a system of G2G will be essential in the management of old growth forests in BC.

Section II: Responses to the Online Questionnaire

We believe that old growths forests are just that: forests, and not individual trees. They have rich biodiversity including habitat diversity and a rich understory. They can support habitat for wildlife and fish and are spaces to go to for cultural and spiritual practices. Old growth forests are not monocultures and they are not crop trees. We recognize that forests that have not been logged since before colonization are not very abundant in BC, and that it is impossible to turn back time and get those forests back, but the old growth forests that we do have need to be maintained, and if more land is to be set aside to become old growth forests, they need to meet these aforementioned requirements.

We also believe that we should be weighing environmental, social, cultural and economic interests equally when managing old growth forests. However, we do not believe that economic

interests should solely be equated with monetary wealth. Within Indigenous communities and outside, wealth can be measured as health, a connection to the environment, ability to perform spiritual practices, familial connections, sustainability and many others. Forest management in BC cannot be done on a scale that only measures the value of forests in price per cubic meter of lumber today. More thought needs to be put into the forests of future generations and what the landscape will look like for them considering climate change and how our forests will regrow under current legislation. We need to consider that sustainable forestry practices are necessary if there is to be a forest to manage in 7 generations (150 years) from now. From this perspective, economics, social, cultural and environmental factors are interchangeable, because if you leave one aspect out of the management equation, you won't have the others.

One of the potential risks to old growth forests include climate change, which is expected to increase drought conditions in S'ólh Téméxw and increase fire risks. There are also many mining practices throughout S'ólh Téméxw and they leave the small amount of old growth forests we have left at risk, such as on Sumas Mountain. We believe that Provincial Parks can be a very important part of managing old growth in BC. However, they cannot be the excuse not to include more old growth forest in BC outside of those parks. Old growth outside of parks will be an important part of connecting reserves, and old growth forests need to be distributed well throughout BC. Land use plans are also a very important part of managing old growth forests. They can be used as high level documents that inform what finer-scale protection mechanisms for old growth forests need to achieve.

Protection measures for old growth forests built into forestry practices and other activities are very important if the practices are monitored, evaluated, audited, and enforced. Measures need to include mandatory actions, not optional best management practices. Protecting defined patches of old growth forests on the landscape is important, if they are not moved once they are defined. However, these patches cannot be managed in a silo. There needs to be a landscape level plan to manage all areas of old growth forests with a spatial analysis component. We also believe that qualified professionals will be an important part of managing old growth forests, but there needs to be a definition of who is a professional first. Will they be registered professional foresters or First Nation Elders? In addition, who will monitor these professionals, and what legislation will they be acting under? Professionals can only work within the confines of the legislation given to them and that needs to be considered as well. Lastly, ecosystem-based management is a very important part of managing old growth forests in BC. We need to use indicators from western science and Indigenous knowledge, cumulative effects assessments, and studies of baseline data from pre-contact to inform these management decisions.

There are several initiatives that we think could be considered in junction with an old growth strategy. We believe that the Old Growth Management Database is one that could be more widely used and publicly available so that locations of old growth forests can be found by everyone, and everyone can stay up to date on the amount of old growth forest in BC every year. Also, existing Indigenous cultural protocols need to be acknowledged, other than for just culturally modified trees. There are so many others and they range from region to region, and they need to be built into and recognized more in legislation regarding old growth forests.

We also feel that the decision-making process on old growth forests legislation in BC should be solely G2G. We believe that all players listed in this question on the questionnaire are important stakeholders to consult, but First Nations and the provincial government should be the ones making the decisions.

We would also like to highlight the work that the Collaborative Stewardship Framework has been doing since 2018 in BC. There are 5 Forums throughout the province that are working in G2G relationships to come to solutions for resource stewardship throughout the province. We think that following their protocols for collaborative decision making would be a great way to strategize on the future of old growth management in BC rather than this current process.

References

Ancient Forest Alliance. (2019, October 7). *BC Timber Sales Continues Old-Growth Logging in Nahmint Valley Despite Government Investigation Showing Nearly Two Decades of Non-Compliance*. Retrieved from Ancient Forest Alliance: https://www.ancientforestalliance.org/bcts-non-compliance-nahmint-valley/

Lavoie, J. (2019, October 7). *'Indicative of a truly corrupt system': government investigation reveals BC Timber Sales violating old-growth logging rules*. Retrieved from The Narwal: https://thenarwhal.ca/indicative-of-a-truly-corrupt-system-government-investigation-reveals-bc-timber-sales-violating-old-growth-logging-rules/