

Dear Mr. Merkel and Mr. Gorley,

I'm a Registered Professional Forester in British Columbia. I manage forests on a CSA certified area-based tenure on Vancouver Island and a SFI certified area-based tenure on the Mainland Coast.

I value old growth forests. As an environmentalist and a forester, I believe the retention of old growth is essential in providing a strong foundation for landscape level biodiversity management. As an avid hiker and sea kayaker, I enjoy recreating in old growth areas and see tremendous potential in the tourism sector on BC's Coast. As a forester, old growth pays my salary and provides me with an amazing job. As a resident of BC, I appreciate that stumpage from old growth logging funds vital social services like education and health care.

Overall, I believe British Columbia does an impressive job at managing its forests, including old growth. The Sierra Club is calling BC's government to "immediately halt industrial logging in endangered old-growth ecosystems and hotspots" and to "create good long-term forestry jobs in sustainable, value-added, second growth forestry that creates more jobs and leaves less damage, phasing out raw log exports." I struggle with these statements for several reasons:

- Old growth forests are not endangered. With 70% of Coastal Crown forests in the non-harvestable land base, there is significant area of untouched old forests (approx. 2.8 million hectares), with good representation across BEC zones. The remaining 30% is managed under the Forest and Range Practices Act (FRPA), which identifies and protects eleven resource values to help balance social, ecological, and economic values.

- An immediate halt of old growth logging would not provide good, long term forestry jobs. If old growth logging was stopped, it is projected that the Coast's AAC would drop from ~16million to 7 million m3. Approximately 4500 direct jobs and 10,000 total jobs would be lost. This would have devastating impacts on small rural communities on the Coast.

- It will not be possible to maintain local manufacturing if there is a sudden moratorium on old growth logging. Manufacturing facilities are aligned to the profile of the forest. Most coastal mills work with larger diameter, old growth logs. There would need to be a structured, planned transition to second growth volume.

- There is a shortage of 61-100 year stands, and the Coast is not competitive with younger second growth. The 41-60 age class tends to get exported due to high delivered mill costs. Without old growth logging, it may be difficult to phase out raw log exports.

There are clearly many opposing views, and any new approach to old-growth management in BC needs to balance environmental, social, and economic values. I believe it's possible with regulatory changes and compromise.

I'd support the following:

- Adopt a retention silvicultural system in areas of old growth logging to enhance connectivity and provide old habitat through time, where ecologically suitable.

- Protect concentrated areas of large cultural cedar for First Nations.

- Protect big trees meeting provincial thresholds, as they are discovered. Change the provincial thresholds to include abnormally tall trees.
- Develop provincial targets and protect high quality element occurrences of red or blue-listed ecosystems.
- Review VILUP's enhanced forestry zone. Limit cutblock size to 40ha in old growth forests.
- Where using the Landscape Unit Planning Guide to set old forests targets, use an intermediate or high biodiversity emphasis.
- Provide legal protection to bear dens.

I take pride in my job and want to remain part of Canada's greenest workforce. As a silviculture forester, I'm growing forests that will be resilient to changes in climate, pathogens, and drought, using the best science available. With genetic gain stock and aerial fertilization programs, I'm helping maximize growth to sequester more carbon, part of BC's climate change strategy. The public needs wood, and BC's Coast provides regulated, sustainably managed products.

Thank you for your consideration,

Taisa Brown, RPF