Talking Logging Working Group
Hazelton, Kispiox and Upper Skeena Areas

January 31, 2020

Government of British Columbia, Panel, and
Ministry of Forests, Lands, Natural Resource Operations, and Rural Development
Attn: oldgrowthbc@gov.bc.ca

Re: Old Growth Strategic Review Engagement Process

The Talking Logging Working Group (TLWG) is a group of Indigenous and settler residents in the Hazelton, Kispiox Village and Kispiox Valley area that live on unceded Gitxsan territories. The group has worked together since December 2018 to act on their concerns regarding forestry practices in the Hazelton, Kispiox and Upper Skeena region. The group includes professionals conducting forestry-related activities (mill owners, woodlot operators, silviculture workers, etc.) as well as community members and title holders who bear the legacy of forest-related activities. Skeena Watershed Conservation Coalition provides facilitation to the TLWG. The TLWG supports local logging contractors moving forward in sustainable forest practices with collaborative leadership that recognizes Gitxsan hereditary governance. Without that, there is no certainty for the forest sector in our region.

On March 5, 2019, during a *Community Conversation Regarding Long Term Management of BC's Forests* in New Hazelton, TLWG submitted a letter of concerns and suggestions regarding forestry activities in the Upper Skeena area. A TLWG representative also attended the April, 2019 conference in Victoria titled *A Forestry Dialogue: Developing a Pathway for the Long-term Management of BC's Forests*. TLWG group members subsequently participated in a July 2019 *Forest Renewal Community Engagement* meeting in Hazelton, plus submitted concerns to the *FLNRORD Interior Forest Sector Renewal Process* in October 2019.

This document summarizes our concerns and suggestions regarding the management of old growth forests in the Hazelton, Kispiox and Upper Skeena region.

Overview

The current state of our forests – and in turn the forestry industry – is a reflection of over 60 years of industrial forestry activities that have hammered ecosystems, the health and future of communities, and the potential for a long term, sustainable forestry industry. Old growth forests are managed abysmally. The provincial focus of considering forests as simply a source of timber has been highly detrimental, and has reduced the area and health of old growth forests in the province to levels that pose high risk to biodiversity, forest resilience, and ecological integrity.

Old growth forests are not renewable. They are structurally complex ecosystems that have never been logged with old living trees, standing dead snags, long-downed logs, multi-layered canopies, canopy gaps that allow understory growth, and hummocky micro-topography. They encompass myriad habitats that support diverse interacting communities of specialists and generalists - from rich soil micro-fauna to unique canopy communities, berry bushes to devil's club, marten to caribou. Once logged, these sensitive systems will not renew, at least not with the current length of rotations.

BC's dwindling intact old growth forests play an indispensable role mitigating climate change (especially through carbon uptake and storage), regulating local climate and hydrology, conserving biodiversity, providing key ecosystem services, strengthening indigenous cultures, and helping maintain human health and well-being. They must be treated as such. However, current forest harvesting policies threaten old growth forests in several ways:

- Provincial policy considers retained old forest as a 'constraint' and limits conservation to 4% across the province.
- Policy encourages retention of 'old growth leave areas' in locations of lower harvest priority or by ensuring that timber supply or harvest operations is not unduly impacted, which means that 'leave areas' could be selected for lower productivity ecosystems and forest harvesting can target the most productive forest. That productive forest is the biggest and oldest trees – old growth areas.
- Management strategies aimed at limiting the impact of conservation efforts to timber supply, lead to conservation of poor productivity old forests in the non-contributing landbase, while allowing harvesting of productive old forests throughout most of the timber-harvesting landbase.
- Policy and legal orders are clear that Old Growth Management Areas are intended to conserve old forests, yet OGMAs are not necessarily comprised of old forests even where old forest is available. This has been proven by government audits. These areas are quite often not ground truthed or too small to preserve interior forest conditions.
- Current harvest rotations are far too short to provide mature growth re-establishment, let alone old growth. They support vast expansions of second growth tree cultivation with limited to no value for biodiversity, resiliency, climate change management, and do not promote an enduring local and stable economy.

These policies and many others must be changed to ensure that healthy, complex old growth forest ecosystems in BC continue in perpetuity. It's imperative that policies embrace the reality that forestry activities need to be very different from the past 60 years, in order to support Indigenous reconciliation, climate change, ecosystem resilience, community wellness, and community economic development, going forward.

The Hazelton, Kispiox and Upper Skeena region is a transitional zone between coastal and interior forests, where many plants exist at the extent of their range. As such, blanket policies for the coastal or interior forests do not always work here and localized solutions are needed.

Our concerns and suggestions regarding proposed old growth forest policies are summarized below.

Conserve Old Growth Forests

1. Old forest stands must be permanently reserved and removed from the timber harvesting land base (THLB). Protection of old growth forests in BC requires legislated protection of remaining old growth forests. This should start with an immediate moratorium on harvesting in the most endangered forests, which include the remaining productive, accessible stands of inland temperate and spruce-fir rainforests. A science-based plan for the protection of all remaining primary forests in the interior should follow this moratorium.
2. Cedar continues to be high-graded from the Kispiox TSA. A cedar management strategy is needed, that targets old cedar for conservation.
3. BC should transition its focus away from harvesting remaining or future old growth forest to a community-based forestry focused exclusively on second-growth. A planned but rapid transition to a sustainable economy that focuses harvesting on areas previously logged must occur. Returning public forests back to communities (within specific management constructs) would enable this transition and would serve human and natural communities better than the existing tenure system.
4. Increase the study and understanding of old growth systems and alternate forestry practices that will support these systems based on proven science and traditional Indigenous understanding of these systems.

Support Whole Ecosystems

5. Old growth forests support wild salmon which the provincial and federal governments agree require protection and support. However, current forestry permit and tenure processes directly contradict and

infringe on the Wild Salmon Policy. Hence we suggest and strongly support FLNRORD request and work with the federal government to operationale the Wild Salmon Policy, especially with regards to habitat indicators and thresholds. This should be applied to

6. non-fish bearing streams which are critical to salmon as cold water refugia thus vital to salmon survival during drought or heat conditions as seen in 2017 and 2018. These streams are often highly impacted by forestry operations. Employ effective and economical partial cut systems that preserve complex forest structure and maintain old growth forest benefits. These cutting systems should be applied in different ecosystems, in areas of varying ecological values and watershed sensitivities identified by an adaptive land planning process.
7. Address Climate Change Now:
    a. Protecting old, carbon-rich forests that have potential to succeed and thrive over the coming decades and centuries, is imperative to help prevent catastrophic climate change. There is an urgency and opportunity to avoid creating more carbon emissions now, rather than rely on increased rates of carbon sequestration as planted trees mature 30 to 80-plus years from now. Forest management that ensures the sustainability of forests (often referred to as 'timber') and parts of forest ecosystems that are not trees (often referred to as 'non-timber forest resources') will affect our regions' resilience in the face of climate change, and our global contribution to climate change. Establishing 'carbon buffer forests' or 'carbon protection forests' in selected areas of wet coastal, wet subalpine, and interior wet-belt forest land is needed. It's prudent to include adjacent secondary forests that have been logged or that have experienced stand-replacing natural disturbances in the 'carbon buffer' area. Replant them if necessary and allow them to regrow, become old, and realise their carbon bank potential. Essentially, if they are unlikely to burn, leave them alone.
    b. Carbon – such as that stored in old growth forests - must be recognized as a valued component in land-use planning and legalized LRMP's need to be updated to include carbon values.
    c. Conserving old growth forests will significantly contribute to the goal of sequestering carbon. Despite rhetoric, wood products do not sequester carbon - living trees do. Less than 35% of a logged tree becomes an actual product and the waste is generally burned as slash. From a carbon and climate change mitigation perspective, it's significantly better to leave trees standing.
    d. Swamps, peatlands, and wetlands – which often surround areas where the oldest trees grow - are all important for carbon storage. While these areas in themselves do not generate saleable timber, they are often subject to road building and other kinds of disturbance, hence these areas must be strongly protected by legislation, which will further assist in ensuring healthy old growth forests continue in perpetuity. For example, the legalized Gitanyow Land Use Plan has deemed such areas as "water management units."

Collaboration is Key

8. The BC Government needs to genuinely implement the Declaration of the Rights of Indigenous Peoples Act (DRIPA).
9. The government cannot simply consult with Indigenous communities anymore. Indigenous nations, or in the case of our region, Gitxsan Wilps, must be at the table as statutory decision-makers.
10. There are many missed opportunities when ministries don't collaborate on strategies or take a silo-ed approach. FLNRORD needs to collaborate with the Ministry of Social Development & Poverty Reduction and the Ministry of Indigenous Relations and Reconciliation to build long-term solutions to achieve the stated objectives of resilient communities and workforce, reconciliation with Indigenous communities, and sustainable forest management. This renewal process will be substantially more effective by involving other ministries.
11. Collaboration with loggers that employ partial cutting systems is key to ensure their knowledge and experience is included and shared with decision makers (provincial and Indigenous).

12. Forests are complex ecosystems that are not solely the purview of foresters. Ecologists, biologists, conservation groups, naturalist groups, elders and youth must be included in ongoing old growth forest policy development and forest stewardship planning.

Conclusion

The state of British Columbia's forests reflect over 60 years of industrialized activity, much of which is still occurring, every day, in the Hazelton, Kispiox, Upper Skeena areas on unceded Indigenous territories. This must stop. Policies that support reconciliation, climate change, ecosystem resilience, community wellness, and community economic development are long overdue. All new policies must be viewed through these lenses, to ensure a long-term sustainable future for our ecosystems, people, and communities. Thank you for the opportunity to contribute to this process.

Sincerely,

Shannon McPhail,
Talkin Loggin Facilitator
Executive Director, Skeena Watershed Conservation Coalition Signing on behalf of:

Sharon Priest-Nagata - MEd, Kispiox Valley Farmer/Resident
Gene Allen - Retired logger, rodeo stock contractor, guide outfitter, owner Bear Claw Lodge, Kispiox Valley
Len Vanderstar - Conservation Biologist, R.P.F., R.P.Bio, B.Ed., Royal Canadian Geographic Society Fellow Richard Wright - Wilp Luutkudziiwus - Xsi Gwin Hauums, Madii Lii
Kevin Stevens - Wilps Gwii Yeehl/Xantxw representative
Jim Allen - Woodlot Owner/Operator, Sawyer & Angling Guide Outfitter, Kispiox Valley
Kasia Kistowska - Biologist, BIT
Tania Millen - Environmental Scientist
Brian Larson - Woodlot & Mill Owner/Operator, Lucky Six Forest & Farm
Gord Wadley - Principal, Fisheries Specialist - Nortec Consulting
Kirby Muldoe - Hup-Wil-Lax-A, Skeena Wild Conservation Trust
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Ian Johnston – President Chicago Creek Community Environmental Enhancement Society, Silviculturist