



The Teal-Jones Group

Teal Cedar Products Ltd.

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Messieurs Garry Merkel and Al Gorley
Old Growth Strategic Review Panel
Via e-mail: oldgrowthbc@gov.bc.ca

Dear Panel Members,

RE: Teal Cedar Products Ltd. Comments on Old Growth Strategic Review

Teal Cedar Products Ltd. (Teal) would like to begin by thanking the panel members and their supporting staff for meeting with our Public Advisory Groups (PAGs) in Langley on November 21st and Lake Mesachie on November 22nd. The PAGs clearly enjoyed the topic and had a wide range of ideas on the definition, importance and management of old growth. Teal asserts that the continuation of open and transparent public discussion of this topic is of paramount importance to the goal of an informed public. As discussed at the meetings, an attendance list, as well as, summary points, maps and a copy of the presentation from each of the meetings has been attached to this letter.

The following letter represent some key points that are provided by Teal management and professional staff who work within Teal forest licenses including Tree Farm Licenses 46 on Vancouver Island and Forest Licence A19209 in the Chilliwack Natural Resource District.

Teal supports the management of old growth for a wide range of important values, including species at risk habitat, biodiversity, cultural and environmental; however, our staff have some concerns with the current management regime for old growth; these points are organized into 4 main topics, specifically:

- 1) Clear Objectives for Land Use Designations paired with Consistent Long-Term Monitoring and Evaluation Process;
- 2) Adaptive Management Approach;
- 3) Socio-Economic Impact Assessment Process for Land Use Decisions; and
- 4) Sustainable Economic Contributions of Old Growth Dependent Businesses.

These points are further explained in detail in the following text.

1) *Clear Objectives for Land Use Designations paired with Consistent Long-Term Monitoring and Evaluation Process*

As forest managers and Registered Professional Foresters, we are tasked with balancing social, economic, environmental and cultural values across the landscape. This responsibility would be easier to implement if all current and future land use designations were accompanied by clear objectives for the area and a long-term monitoring and evaluation process. Under the current management regime, there are a number of land use designations that have not been monitored or evaluated and may be inconsistent with the original objective for establishment, some examples from our experience include:

- Marbled Murrelet Wildlife Habitat Area designations based on inaccurately classified habitat, the quality of the habitat information has recently improved but the land use designations have not been revised and there are currently very few options to do so.
- Northern Goshawk Wildlife Habitat Area designations based on a nest location from over 20 years ago, with very little monitoring to establish the presence of birds in the last 20 years; most recent survey was over 12 years ago.
- Old Growth Management Areas were established without the consultation of First Nations so it is unclear if the objective of conservation of cultural resources was achieved.
- Many Old Growth Management Areas were established based on a Biogeoclimatic Ecosystem Classification data base that is outdated. Improved inventories and ground truthing has confirmed ecosystem boundaries are not consistent with the designations. Likewise, other newer information around management factors such as terrain stability, environmentally sensitivity and operability which were originally considered in land use designations have not been adopted into the current management regime.
- Several areas of old growth identified with special biological, geological, social, cultural and heritages significance have been brought forward in the last several decades and there is no easy mechanism to revise Old Growth Management Area locations to prioritize these areas.

2) *Adaptive Management Approach*

Further to the point made above, Teal stresses the need to create flexible management boundaries and locations of designations and a reasonable streamlined process for amendments where appropriate criterion are met and a professional rationale is provided. This technique can result in benefits to the values being protected while mitigating the timber supply impact of constrained management areas. Applying rigid legal boundaries can miss great opportunities beyond the lines. Nature is not static and flexibility for protection would address changes in important values as forests evolve naturally, more information is learned about the forest and/ or other management factors evolve. Closely related to this is the need to optimize the Timber Harvest Land Base, this

can be done through the integrated management of multiple values. Improving incorporation of co-location and other creative means of conservation would lessen the impacts on operations and perhaps provide innovative approaches to old growth management through an adaptive management process.

3) Socio- Economic Impact Assessment Process for Land Use Decisions

Teal understands that minimizing the socio- economic impacts of land use decisions is a goal of the government; however, there is room to improve the current analysis methods. The current method is inconsistent between different branches of ministries and different levels of government. Furthermore, the results of analysis are not communicated in the public realm. A Socio-economic analysis should be done in an open, transparent and where possible, using agreed upon data inputs and parameters. Considering the magnitude of past harvest land base areas and current government objectives for further removals of old growth for Species at Risk, completing socio-economic analysis and clearly communicating the results to the public should be a high priority before the government makes decisions. It is our opinion that the general public does not currently have access to reliable information on the socio-economic impacts of land use decisions and moreover, if the public were provided with the information, there would likely be better support for a healthy forest industry. In recent years, old growth conservation has been a hot topic in the media, and government does not appear to have sufficient socio-economic information to rationalize their past or future decisions regarding the value to society of old growth harvesting.

4) Sustainable Economic Contributions of Old Growth Dependent Businesses

Teal is an old growth dependent business. The foundation of Teal's wood manufacturing business is the Cedar Shake and Shingle mills which were originally established in 1946 by the current owners' father Jack Jones with the purchase of a one-man cedar roofing mill. Teal does not export logs; they produce many different value-added and custom cut products in their local saw mills. Old growth has a significantly higher value than second growth and contributes to more value-added products. Including a component of old growth in the harvest profile allows economic access to the second growth. The Teal Cedar Shake and Shingle Sales and Marketing team are very interested in contributing to the engagement process as they have a unique perspective and experience in an industry that is completely dependent upon old growth. I encourage you to contact me to arrange a call or meeting.

Teal does have a second growth small log mill; however, it generally produces dimension lumber in competition with the large interior mills, the economics of which are very challenging due to the high cost of logs on the coast. Teal also has an old growth - large log mill for solid wood products. Old growth provides for a variety of niche markets and some examples of value-added products include tone wood (i.e., music instruments

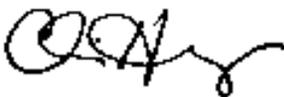
such as guitar tops), and top-quality shingles. Teal's contribution to the local economics is approximately 1000 direct jobs through their harvesting tenures and sawmills.

For the foreseeable future, there will always be a component of old growth available for harvest in the working forest. Current harvesting restrictions, such as those related to cutblock size and adjacent previous harvesting, visual landscape design constraints, and rate of cut constraints in Fisheries Sensitive Watersheds are just a few examples of why the remaining old growth harvest will be spread out over a substantial period of time. If the harvesting profile were limited to the harvest of second growth it would not currently be economically viable. By continuing to harvest old growth, a significant amount of second growth is currently left to mature therefore allowing the stands to grow to contain a greater component of higher quality wood which adds to the value and economic viability. Allowing second growth to grow to a larger size before harvesting also will increase the proportion of volume harvested which can be used to produce longer lasting wood products.

It is important to note, many second growth areas that are in the working forest will never be logged again due to improvement in environmental practices over past practices, such as retention of riparian areas on fish streams. In many cases the mainlines, which were built during historic logging, are located on the valley bottom within riparian areas of rivers and lakes. These areas will never be harvested again under today's environmental standards and therefore the areas will develop quickly into stands with very large trees and eventually old growth that is highly accessible to the general public, immediately adjacent accessible mainlines. In some cases, these areas almost qualify as old growth today and certainly meet the values and characteristics that some folks define as 'old growth'.

Thank you again for the opportunity to provide comments on this important process. Please feel free to contact me if you would like any clarification of our concerns.

Sincerely,
TEAL CEDAR PRODUCTS.LTD



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