

January 31, 2020

Al Gorley, RPF and Garry Merkel, RPF  
Old Growth Strategic Review Panel

Via e-mail: [oldgrowthbc@gov.bc.ca](mailto:oldgrowthbc@gov.bc.ca)

**Re: Old Growth Strategic Review Submission**

Dear Mr. Gorley and Mr. Merkel:

Thank you for the opportunity to meet with you on October 16, 2019 and November 8, 2019 to discuss Western Forest Products Inc. (Western's) approach to Sustainable Forest Management (SFM), old growth conservation, and how it relates to the broader coastal context.

In Coastal British Columbia, 70% of the public forest land base is conserved.<sup>1</sup> This provides an important context for the remaining 30% of the forest sustaining our many coastal communities, families and livelihoods.

It is therefore critically important that the remaining working forest be sustainably managed as part of a balanced forest portfolio. We can take pride in our global recognition as leaders in SFM with an estimated 83%<sup>2</sup> of British Columbia's forests now certified to internationally recognized standards compared to a global average of only 11%<sup>3</sup>.

As part of this commitment to SFM and the responsible management of area-based tenures, significant research, adaptive management monitoring, and implementation experience has occurred across the coastal forest. Collaborative work by researchers, academics, communities, and practicing professionals has demonstrated that it is possible to sustain biodiversity, grow resilient forests, and supply the most renewable and sustainable building materials on the planet.

A consolidated summary of recommendations pertaining to the conservation of old growth in coastal British Columbia is located below with the details supporting each recommendation following.

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<sup>1</sup> Source: COFI 2016 compiled dataset for coastal British Columbia

<sup>2</sup> <https://www.naturallywood.com/sustainable-forests/certified-forests>; <https://canadaslogpeople.com/about/bc-forest-facts>

<sup>3</sup> <http://www.earth-policy.org/indicators/C56/>;  
<https://www.sciencedirect.com/science/article/pii/S0378112715000560>

## **Recommendation Summary**

### **Sustainable Forest Management Vision Supported by Area-Based Forest Management**

1. *Develop a clear, consistent and stable SFM vision supported by a balanced forest portfolio of conservation and management growing the understanding of the economic, social, cultural, carbon and biological values of British Columbia's working forests.*
2. *Support increased Indigenous ownership through reconciliation processes that keep area-based tenures intact, better including Indigenous values, and maintain functioning forest management systems.*

### **A Balanced Forest Portfolio**

3. *Maintain a balanced forest portfolio aligned with the SFM vision, that considers the broad coastal context, where forested ecosystems are sustained through an effective matrix of conservation and management.*

### **A Proven Science-Based Approach to Sustaining Biodiversity**

4. *Maintain forest structures and enhance biodiversity through the principles of variable retention, which is based on science and adaptive management results specific to the coastal forest.*
5. *Conserve stand-level forest structure by utilizing the retention silviculture system on ecologically appropriate sites.*
6. *Conserve iconic big trees and black bear dens as biological anchors as part of variable retention.*
7. *Invest in research and adaptive management monitoring to ensure we continue to learn from what we do in a robust and scientific manner.*
8. *Consider management strategies for the CWHxm2 based on High Quality Element Occurrences for the ecosystem.*

### **Align Old Growth Conservation with British Columbia's Species at Risk Implementation Plans**

9. *Align British Columbia's Species at Risk implementation plans with old growth conservation to sustain species while minimizing further impacts to coastal communities.*

### **Support the Global Climate Change Solution as Part of the Balanced Forest Portfolio**

10. *Create positive global momentum for SFM by taking a leadership role in promoting British Columbia's wood products and SFM practices as key components of the global climate change solution.*
11. *Embed climate change adaptation as a core value for British Columbia's forests with targeted investments in tree breeding programs focused on climate resiliency.*

### **Follow the Management Plan to Maintain Stability and Predictability During the Transition**

12. *Follow a structured transition in harvesting from old growth to second growth as defined in the Management Plans as this is foundational to maintaining stability and predictability for coastal communities, families, and industry.*

## **Sustainable Forest Management Vision Supported by Area-Based Forest Management**

- 1. Develop a clear, consistent and stable SFM vision supported by a balanced forest portfolio of conservation and management growing the understanding of the economic, social, cultural, carbon and biological values of British Columbia's working forests.*

A critical foundation for the successful and lasting implementation of SFM is predictability and stability. This can be achieved through a clear, consistent, and stable SFM vision supported by a balanced forest portfolio that recognizes the economic, social, cultural, carbon, and biological values of British Columbia's forests. Once a clear vision is in place, a functioning forest management system can deliver the desired results for the long-term.

The basis for Western's long-term SFM vision is area-based tenures managed consistent with the associated Management Plan. The stability of these tenures has supported investment in all aspects of the forest management lifecycle. This includes a secure seed supply, seedling nursery, science-based forest management program, research and adaptive management monitoring, modernized manufacturing facilities, and an aligned harvesting equipment complement.

- 2. Support increased Indigenous ownership through reconciliation processes that keep area-based tenures intact, better including Indigenous values, and maintain functioning forest management systems.*

Through the co-development of progressive new business models, Western is supporting reconciliation efforts by working with First Nations to bring them into the business through equity ownership in our tenures. The TFL 44 Limited Partnership, established in 2019 with Huu-ay-aht First Nations, provides a model for how this transition to shared tenure ownership can occur. In that partnership, a company beneficially owned by Huu-ay-aht First Nations purchased a 7% interest in a new Limited Partnership that owns and manages TFL 44. Through further negotiation, an incremental interest in the business can be purchased by Huu-ay-aht or other First Nations over time. This model keeps area-based tenures intact and provides a role in sustainable forest management and decision-making for its First Nation owner. Western looks forward to exploring this and other mutually beneficial models with First Nations.

### **A Balanced Forest Portfolio**

- 3. Maintain a balanced forest portfolio aligned with the SFM vision, that considers the broad coastal context, where forested ecosystems are sustained through an effective matrix of conservation and management.*

Currently, 70% of the coastal public forest is excluded from the Timber Harvesting Land Base (THLB)<sup>4</sup>. This portion of the forest has been conserved for a wide variety of reasons, ranging from extensive planning processes through to the detailed, site-level management of important biological features. This extensive level of conservation provides the coastal context for the sustainable management of the working forest.

It is important to recognize that most coastal communities and majority of the coastal forest industry, with all its associated benefits, are sustained from only 30% of the public forest. Since 1990, the Allowable Annual Cut (AAC) from public coastal forest has declined by 30% largely as the result of conservation efforts and land use changes. It is therefore very important that the remaining working forest is well managed to realize its full potential. There is a real risk associated with the continued erosion of the working forest to

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<sup>4</sup> Source: COFI 2016 compiled dataset for coastal British Columbia

the point where thresholds are crossed, and a viable industry can no longer be sustained for coastal British Columbia.

As described in the following section, an effective matrix of conservation and management can be achieved across the working forest.

### **A Proven Science-Based Approach to Sustaining Biodiversity**

4. *Maintain forest structures and enhance biodiversity through the principles of variable retention, which is based on science and adaptive management results specific to the coastal forest.*
5. *Conserve stand-level forest structure by utilizing the retention silviculture system on ecologically appropriate sites.*
6. *Conserve iconic big trees and black bear dens as biological anchors as part of variable retention.*
7. *Invest in research and adaptive management monitoring to ensure we continue to learn from what we do in a robust and scientific manner.*

A proven multi-scale approach for conserving old growth, is outlined in Bunnell and Dunsworth (2009)<sup>5</sup>. This approach is implemented through variable retention and includes forest ecosystems, old growth, forest structure and wildlife habitat. Aligned with the scientific principal of not doing the same thing everywhere<sup>6</sup>, an important benefit of variable retention is that it enables integration of unique forest attributes from the site level to be incorporated into the broader forest matrix. This level of detailed management by forest professionals enables the full potential of the working forest to be realized for both conservation and the sustainable supply of forest products. Variability develops across the forest through time as the long-term retention of forest structures mature creating a pattern more closely resembling that of natural disturbance.

Variable retention was developed and implemented on the foundation of a strong and collaborative adaptive management program. This has proven to be critical to the success of variable retention as the practice has now been studied for more than 20 years. As with any adaptive management program, there is always more work to do in support of continual improvement. Given this experience, variable retention is now recognized as a proven and viable approach to sustaining biodiversity. Beese et al (2019)<sup>7</sup> state that “over two decades of experience applying variable retention harvesting to industrial-scale management of forest lands in BC suggests that it is possible to balance production of wood with biodiversity conservation.”

8. *Consider management strategies for the CWHxm2 based on High Quality Element Occurrences for the ecosystem.*

An important aspect of biodiversity conservation is the management of rare ecosystems. With 70% of the public coastal forest unavailable for harvest, most coastal ecosystems are very well represented. The exception to this is the drier Coastal Douglas-fir (CDF) and CWHxm2. To address this, a management approach has been developed for rare ecosystems by three expert ecologists. This approach focuses on conserving a representative number of High Quality Element Occurrences (HQEOs). The important benefit of this approach is that focusing on HQEOs ensures representative ecosystems with the highest conservation

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<sup>5</sup> Bunnell, F.L. and G.B. Dunsworth (eds). 2009. Forestry and biodiversity: learning to sustain biodiversity in managed forests. UBC press, Vancouver BC. 349 pp

<sup>6</sup> Beese, W.J., J.A. Deal, B.G. Dunsworth, S.J. Mitchell and T.J. Philpott. 2019. Two decades of variable retention in British Columbia: a review of its implementation and effectiveness for conserving biodiversity. Ecological Process 8:33.

<sup>7</sup> Beese, W.J., J.A. Deal, B.G. Dunsworth, S.J. Mitchell and T.J. Philpott. 2019. Two decades of variable retention in British Columbia: a review of its implementation and effectiveness for conserving biodiversity. Ecological Process 8:33.

value are retained across the forest. Variable retention then serves an effective tool to further increase representation in these ecosystems by retaining portions of the existing forest which grow and develop through time.

### **Align Old Growth Conservation with British Columbia Species at Risk Implementation Plans**

- 9. Align British Columbia's Species at Risk implementation plans with old growth conservation to sustain species while minimizing further impacts to coastal communities.*

Species at Risk habitat management will further increase the amount of old forest conserved on the South Coast and Vancouver Island. In February 2018, British Columbia released the implementation plans for the recovery of Northern Goshawk and Marbled Murrelet. A Marbled Murrelet suitable habitat gap analysis conducted by FLNRORD in 2019 indicated a 30,000 hectare gap between the current level of protected suitable habitat and the minimum habitat thresholds for the combined Southern Mainland Coast and West and North Vancouver Island Regions. On East Vancouver Island, all remaining suitable nesting habitat will be protected. Over 90% of Marbled Murrelet suitable habitat is old growth, while the remainder is between 140 and 250 years old. Planning for Marbled Murrelet conservation will commence in 2020 after a Land Use Objectives Regulation Order and the revised *FRPA* section 7 notice are finalized.

The Northern Goshawk implementation plan calls for an additional 95 new Wildlife Habitat Areas, averaging 200 hectares each, in the short term, with more to follow later. This initial implementation equates to 19,000 hectares. Coastal goshawks use both old growth and second growth greater than 50 years old for nesting purposes.

These changes will further increase conservation of the forest beyond the current 70%. Aligning British Columbia's old growth management strategies with the British Columbia Species at Risk implementation plans will be important in order to minimize further impacts on coastal communities and families.

### **Support the Global Climate Change Solution as Part of the Balanced Forest Portfolio**

- 10. Create positive global momentum for SFM by taking a leadership role in promoting British Columbia's wood products and SFM practices as key components of the global climate change solution.*

The United Nations Intergovernmental Panel on Climate Change notes that SFM is part of the global climate change solution<sup>8</sup>. Forests are not static, and with 70% of the coastal public forest now conserved, it is critical that the remaining forest is carefully and proactively managed to mitigate climate change risks for future generations. As a leader in SFM certification, British Columbia is uniquely positioned to take a global leadership role as a sustainable supplier of wood products while growing healthy forests adapted to a changing climate.

Wood products are now consistently recognized as an important component of the global climate change solution. Wood products not only store carbon, they also displace the use of carbon-intensive products like cement and steel. The world requires wood which will continue to be sourced from forests around the world. British Columbia's SFM practices are in stark contrast to the degradation that is taking place around the globe at an unprecedented scale. British Columbian's can celebrate their forests and be a model for the world creating positive momentum for SFM around the globe.

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<sup>8</sup> [https://www.ipcc.ch/site/assets/uploads/sites/4/2019/12/02\\_Summary-for-Policymakers\\_SPM.pdf](https://www.ipcc.ch/site/assets/uploads/sites/4/2019/12/02_Summary-for-Policymakers_SPM.pdf) (Section B.5.4)

11. *Embed climate change adaptation as a core value for British Columbia's forests with targeted investments in tree breeding programs focused on climate resiliency.*

Many climate change models are predicting significant changes over the next 40 years and well adapted regeneration programs are becoming an increasingly important component of healthy and resilient forests. Through these programs, climate-based seed transfer aligns the climate under which the parents thrived with the climate in which the regeneration is established. Forests acclimated to the changing climate also deliver increased pest resistance and improved growth further increasing carbon sequestration and resiliency across the forest. A balanced forestry portfolio that includes trees adapted to the changing climate is a critical component of managing the risks associated with climate change.

### **Follow the Management Plan to Maintain Stability and Predictability During the Transition**

12. *Follow a structured transition in harvesting from old growth to second growth as defined in the Management Plans as this is foundational to maintaining stability and predictability for coastal communities, families, and industry.*

The structured transition from old growth to second growth harvesting for area-based tenures is guided by Management Plans which have a 250-year planning horizon. These plans define the THLB and guide the volume of trees to harvest and how long they need to grow until they can be harvested again. This planned and measured transition is designed to provide stability and predictability for communities, families, and industry. It is critical that the structured transition continues to be followed for the benefit of present and future generations.

Forests grow through time and require disciplined long-term management. Abrupt deviations from well-established plans result in material consequences. With only 30% of forested area available for harvesting, even small changes in direction can have a significant impact. Coastal British Columbia needs to let existing second growth trees grow concurrent with the planned transition to maintain a sustainable long-term harvest level of approximately 16 million m<sup>3</sup> of AAC. An end to old growth logging on the THLB is predicted to have a reduction to the coastal AAC of more than 50%<sup>9</sup>.

Western has made significant investments of more than \$400 million since 2013, including the largest investments in coastal sawmilling in decades. These investments are strategically aligned with the Management Plans for each area-based tenure. Investments have included the seed orchard and nursery at Saanich, 6 sawmills and 1 remanufacturing plant on Vancouver Island. Continuing to follow the structured transition for the working forest is foundational to the ongoing strategic alignment that facilitates a long-term vision, plan and action for investing in mills, seed supply, seedling nurseries, logging equipment and manufacturing facilities in coastal BC.

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<sup>9</sup> Source: Timber supply modelling for representative management units extrapolated to the coast.

## Concluding Remarks

British Columbians have reason to be proud of their sustainably managed forests.

With a balanced forest portfolio, British Columbia is a global leader in SFM. British Columbia has conserved 70% of the coastal public forest while carefully managing the remaining 30% to sustain our many coastal communities, families and livelihoods.

Experience has shown that all generations can benefit from the coastal forest.

This can be achieved by:

- SFM – through area-based tenures and forest management
- Balanced forest portfolio – an effective matrix of conservation and management
- Proven science-based approach to sustaining biodiversity – variable retention
- Adaptive management – learn from what we do in a robust and scientific manner
- Climate change adaptation – well adapted forests and a stable supply of wood products
- Community stability – the structured transition to second growth as outlined in the Management Plan

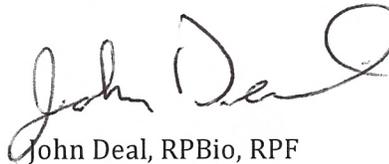
We can be proud of our coastal forests. They are biologically rich providing us with a sustainable way of life.

We appreciate the opportunity to meet and provide input as part of the engagement process and are happy to answer any further questions relating to the information provided.

Sincerely,



Stuart Glen, RPF  
Manager, Forest Stewardship



John Deal, RPBio, RPF  
Senior Biologist