

## Old Growth Management Review - Yellowstone to Yukon Conservation Initiative, Wildsight, and West Kootenay EcoSociety Joint Submission

As non-governmental organizations familiar with the on-the-ground realities facing BC's forests, in particular in BC's inland temperate rainforest (interior wet-belt) region, we provide these comments on your government's Old Growth Strategic Review.

We look forward to discussing our ideas and recommended approach with you and your staff in the coming months as amendments to Old Growth management are developed.

Sincerely,

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### Introduction

For more than four decades scientists, environmental groups, many Indigenous Nations, and the public have been calling for the protection of old growth forests in BC. A recent poll commissioned by the Sierra Club of BC suggests that over 90 percent of British Columbians support the protection of old growth forests. Current management of old growth is not effectively protecting this increasingly rare and extremely valuable resource. **If old growth forests are to have a future in BC, drastic action is required now.**

### Recognizing the true value of old growth forests

The management of old growth forests in British Columbia must reflect the true value of these forested ecosystems. Healthy old growth forests represent resilience in the face of the current global climate and biodiversity crisis.

Ecosystem services are all of the benefits that nature contributes to our well being while existing as functioning ecosystems; these services can be categorized as provisioning, regulating, and cultural. Provisioning services include: timber resources, recreational opportunities, habitats for plants and animals and medicinal products. Regulating services include: water filtration, flood water storage, carbon sequestration, food production for plants and animals, climate regulation and the production of oxygen. Cultural services include the intrinsic value of old growth existence and the spiritual connection that groups or individuals have to old growth. In many cases, the cost of reproducing the environmental services provided by old growth forest far exceeds the benefit of logging (ECONorthwest, 2006).

Too often timber harvesting is the only value associated with old growth ecosystems. It is time to start considering all of the other values that are present beyond timber extraction. Caribou rely on old forests in the interior wet-belt for many different life stages (Serrouya,

McLellan, Apps, & Wittmer, 2008). The reported 4.6% of old forest remaining in the wet-belt is reflected in the struggling and extirpated caribou herds in the region. There are approximately 376 different species of wildlife known to inhabit the inland temperate rainforest (ITR); this does not include the vast abundance of different types of vegetation and vegetation communities. With further loss of old growth forest, the state of caribou is just the start of species decline.

## **Protection of biodiversity and low elevation productive forests**

The inland temperate rainforest (ITR) extends from the Headwaters of the Fraser River, south through the Kootenay-Columbia and into Montana and Idaho. It is one of the rarest ecosystems on earth. Recent research has determined that current forest management practices have reduced the ITR to less than 5% old growth forest with a remainder of 66% being young and immature forest and 30% as harvested cutblocks (Coxson, Goward, & Werner, 2019). In the ITR, old growth trees are typically anything older than 140 years old. Globally significant areas of old growth continue to be logged throughout the ITR. In the Kamloops and Nelson Forest Districts 43% and 53% of the ICH wet cool subzone is managed for low biodiversity emphasis (Stevensen 2003). Increased protection and a conservation vision for the ITR is desperately needed. Protection should be focussed on low elevation productive forests.

In other areas of the province such as the Elk Valley, the Arrow, and Kootenay Lake TSAs, recent research is showing severe deficits in old growth forest compared to under historic natural disturbance types (MacKillop 2018). These deficits make it clear that business as usual cannot continue and we have to protect the remaining old growth on the landscape.

## **Current management is inadequate and even illegal**

The current management of old growth forests is leading to deficits of old growth compared to historic natural disturbance regimes in many areas of the province. It should also be noted that very little or no effectiveness monitoring has taken place to evaluate old growth management even though Higher Level Plans in places like the Kootenay Boundary commit government to effectiveness monitoring (BC FPB 2012). As such, very little is known by government about old growth management areas, their status, condition, and whether OGMAs are achieving desired outcomes.

In the Kootenay Lake and Arrow TSA a recent analysis suggests:

- Legal requirements under the Higher Level Plans are not being met in many Landscape units.
- OGMAs are often not composed of old growth forests. 82% and 83% of OGMAs in the Kootenay Lake and Arrow TSAs are composed of early, mid, and mature seral forests. This equates to a shortfall of 76,000 ha of old forest in OGMA and nearly 36,000 ha in Kootenay Lake TSA (MacKillop 2018).
- Low elevations and the most productive ecosystems are at the highest risk.
- OGMAs are not effectively capturing old growth forests (MacKillop 2018)

This management regime leaves many of the most biologically important ecosystems in the province at greatest risk. The Arrow and Kootenay TSAs are two of the only areas of the province where effectiveness monitoring of old growth has taken place. Similar issues exist in other parts of the province. The mismanagement of old growth is leading to severe conservation deficits of old forest.

## Removal of the 2/3rd drawdown

Only 10 percent of the provincial forested landbase is being managed for high biodiversity while 45 percent of the forested landbase is being managed for low Biodiversity Emphasis (BEO) (MSRM 2004). This has likely resulted in a significant reduction in overall landscape connectivity and habitat values. This risk was acknowledged in the original Biodiversity Guidebook as in low BEO areas “the pattern of natural biodiversity will be significantly altered, and the risk of some native species being unable to survive in the area will be relatively high.” (MOF 1995).

These already low old growth retention levels were further reduced with the adoption of the drawdown policy in which low biodiversity emphasis retention targets could be reduced by up to two thirds. This policy of high risk land management has allowed old growth retention in certain landscape units to be as low as 3 percent (FPB 2012) threatening the persistence of biodiversity and wildlife connectivity. Throughout the province the drawdown policy must be removed and mature and old targets must be updated using ecosystem based management.

## Recommendations

To be effective, old growth management must include the following:

- A moratorium on old growth logging while changes to old growth management are being developed and implemented.
- Re-assess existing OGMA layer and redistribute OGMAs to represent all forest types by BEC subzone/variant and elevation in each landscape unit. Retain the best, most representative, productive old growth and replace OGMAs that have burnt, have incursions, or exceed acceptable thresholds of anthropogenic disturbance (roads, ROWs, etc.).
- Old and mature stands should be assessed for old growth characteristics. All high quality stands, old and mature, must be reserved regardless of “budgets.”
- Emphasize protection of those ecosystems at highest risk (low elevation productive forests).
- OGMAs have to be substantial in size; preserving single trees does not preserve ecosystem functions.
- OGMAs must be spatially protected for the long-term, not aspatially traded when harvest opportunities arise.
- Remove 2/3rds drawdown. This policy currently applies to as much as 45 percent of the province.
- Re-establish mature targets in all areas across the province.
- Re-establish connectivity targets (FENS).

- Government oversight needs to return to ensure the effectiveness of OGMA preservation; the current professional reliance model under FRPA is not working. Mark Haddock's 2018 independent review of the professional reliance system provides the pathway and recommendations to strengthen regulatory regimes and protect the public interest.
- OGMA's must be replaced when lost by disturbance (fire) on the landscape.
- OGMA's cannot be doubled as Wildlife Tree Patches, these reserve requirements must be separate.
- All industries and Crown land tenure holders should be required to protect or mitigate their activities in OGMA's.
- Changes must be made to the Forest and Range Practice Act (FRPA) to reflect the true value of old growth forest ecosystem services.

## Conclusion

In this era of climate change, BC's old growth forests are more valuable left standing. Current management is very much at odds with needed approaches. A paradigm shift is needed. British Columbia must manage our forests with a priority on their role in addressing the climate and biodiversity crisis. A tenure system that continues to allow profit-driven corporations to manage the province's legacy must be dismantled. While we do not expect this panel to recommend changes at the scope and scale necessary, citizens of British Columbia are clearly ready for significant changes to how old growth is protected and managed.

## Resources

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