



File: 97200/Old Growth Review

January 31, 2020

VIA EMAIL: [oldgrowthbc@gov.bc.ca](mailto:oldgrowthbc@gov.bc.ca)

Al Gorley and Garry Merkel  
Old Growth Strategic Review Panel

Dear Al and Garry:

**Re: *Submission to the strategic review of old growth management in BC***

Please accept this submission to the Strategic Review of Old Growth Management in BC you are carrying out. The Forest Practices Board has done a fair amount of work involving old growth management through our audits, complaint investigations and special investigations. We are pleased to share some of the findings of that work, and the issues identified, with you. As you are aware, all of our reports are published on our website ([bcfpb.ca](http://bcfpb.ca)) and available to you should you want more detailed information.

We have tried to keep our submission at a high level, as this is a strategic review. We provide a selection of observations based on findings from our work, largely grouped around two themes: what we don't know and the need for monitoring and research, and observations on the current management approach.

Of most relevance to your review is our 2012 special investigation report, *Conserving Old Growth Forests in BC: Implementation of old-growth retention objectives under FRPA*.<sup>1</sup> The investigation documented progress and challenges with planning and implementing old growth retention across the province. The report made six recommendations to improve old growth management in BC. These can be summarized as improved government oversight of implementation of current legal orders, monitoring and data collection to better understand the old growth estate, and research to assess effectiveness of spatial and non-spatial old growth retention. We followed up on progress implementing these recommendation in 2017 through discussions with ministry staff. We found that, while government has done some work and made progress in old growth management, the recommendations have not been fully implemented and these gaps in management remain.

We have investigated a number of public complaints about old growth management and we continue to receive concerns and complaints from the public involving old growth. We currently have four active complaint investigations that involve the topic. In a 2011 complaint report on Ancient Forests near Port Renfrew,<sup>2</sup> the Board said it "encourages government, forest

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<sup>1</sup> <https://www.bcfpb.ca/wp-content/uploads/2016/05/SIR36-OGMAs.pdf>

<sup>2</sup> <https://www.bcfpb.ca/wp-content/uploads/2016/04/IRC174-Logging-Old-Growth-Forest-Near-Port-Renfrew-WEB.pdf>

professionals, and forest licensees to seek creative means to conserve trees of exceptional size or form, age or historical significance and, where appropriate, the forest stands that contain them.” This past July, government announced measures to protect 54 known big trees. The announcement also refers to permanent regulation changes that may follow the Old Growth strategic review. We draw your attention to this Board report as possibly relevant to those considerations.

Board complaint investigations in the southern portion of the Great Bear Rainforest have highlighted the challenges of applying broad scale goals for conservation of old forest at the site level, especially in areas with little old forest remaining. See Sonora Island<sup>3</sup> and East Thurlow Island.<sup>4</sup> We have also seen examples where goals and objectives for cedar stewardship and old forest retention are being met on Haida Gwaii,<sup>5</sup> which has a unique approach to ecosystem-based management.

Based on all of our work, we offer the following additional observations:

What we don't know and the need for monitoring and research:

- Government needs to ensure the process of incursions into, and replacement of, OGMAs has sufficient rigour, as discussed in our 2012 report on OGMAs. Government does not currently know whether licensees have appropriately replaced harvested areas with other areas having equal or better old growth attributes. Since 2012, government has done some evaluation of this issue, but has not fully implemented the recommendation.
- FREP monitoring has focused on harvested areas, not on what forest is remaining. There is no FREP protocol for landscape level biodiversity. There is also no information available regarding government monitoring of the effectiveness of the existing tools for protection of old growth (OGMA, UWR, WHA). See our report on the Forest and Range Evaluation Program for more detail.<sup>6</sup>
- Government's Cumulative Effects Framework identifies old growth forest as a value, but very little work has been published on the evaluation results and whether targets for old and mature forest are being met.
- Our 2009 special report, *Biodiversity Conservation during Salvage Logging in the Central Interior of BC*<sup>7</sup>, identifies the need for government to address biodiversity conservation across the landscape in the central interior where extensive salvage logging, and more recently wildfires, have occurred. The eight recommendations made are still relevant today.

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<sup>3</sup> <https://www.bcfpb.ca/wp-content/uploads/2016/04/IRC196-Sonora-Island.pdf>

<sup>4</sup> To be published shortly.

<sup>5</sup> <https://www.bcfpb.ca/wp-content/uploads/2019/01/IRC220-Haida-Gwaii.pdf> and <https://www.bcfpb.ca/wp-content/uploads/2019/01/IRC219-Skidegate.pdf>

<sup>6</sup> <https://www.bcfpb.ca/wp-content/uploads/2017/11/SR54-Forest-Range-Evaluation-Program.pdf>

<sup>7</sup> <https://www.bcfpb.ca/wp-content/uploads/2016/04/SR35-Salvage-Logging.pdf>

- In 2014, our special report, *Timber Harvesting in Beetle-Affected Areas*<sup>8</sup>, concluded, “government rarely explicitly states how performance against its expectations should be measured and that there are potentially significant problems with the information available to measure performance. This results in considerable, and sometimes unresolved, debate about how to measure performance and about how to interpret the measurements.” This report was not specifically focused on old growth forests but the challenges identified in this report are still present in 2020 and applicable to the management of old growth.

Current approach to management:

- Action is required to ensure the best available old growth stands and available attributes have been retained consistent with various land use orders. There is also a need to consider the benefits of spatializing old-growth vs. the need for dynamic OGMAs to respond to natural occurrence such as fire and pests. Your review is a good opportunity to review different models for conservation of old growth, and develop models for future old growth management that consider the impacts of climate change.
- Many land use plans are outdated and have not been revisited since the MPB epidemic, extensive forest fires, and now spruce and fir, beetle. Government’s “Modernized Land use Planning” is a positive step, but targets only some areas and will take time. See our special report on Tactical Planning<sup>9</sup> as possible means to update old growth objectives and targets and evaluate and test how it works alongside other forest values (wildfire, timber operations, water, visuals etc.).
- There is limited district manager discretion on cutting permit issuance (see our report on district manager authority)<sup>10</sup> and this has enabled situations where one licensee harvested forest stands that another licensee had conserved.

We hope these observations are of use to the panel and we would be pleased to meet with you to further discuss our reports if you are interested.

Sincerely,



Kevin Kriese  
Board Chair

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<sup>8</sup> <https://www.bcfpb.ca/wp-content/uploads/2016/04/SR44-Timber-Harvesting-in-Beetle-Affected-Areas.pdf>

<sup>9</sup> <https://www.bcfpb.ca/wp-content/uploads/2019/07/SR58-Tactical-Forest-Planning.pdf>

<sup>10</sup> <https://www.bcfpb.ca/wp-content/uploads/2016/04/SR52-Resource-District-Managers.pdf>