



File: 36460-01/UWR Exemptions

November 21, 2017

To: All authorized persons carrying out primary forest activities within the Cariboo Region

Re: Exemption from Mule Deer Winter Range Orders in the Cariboo Region for purposes of salvaging timber damaged by 2017 wildfire disturbances.

Extensive wildfire disturbance during summer 2017 created circumstances where salvage of timber is required to support post-wildfire land base recovery in the Cariboo Region. A portion of the timber salvage requirement lies within Mule Deer Winter Ranges (MDWR) designated under the Government Actions Regulation, consistent with the Cariboo Chilcotin Land Use Plan.

This is the first of two exemptions that will be issued supporting a phased timber salvage strategy that must also address forest health factors such as fir beetle infestation. This first exemption is designed to address stands comprised of the “black, and the brown”, no green crown – generally characterized in burn severity mapping and ortho-photography as the moderate and high intensity burn areas. A second blanket exemption will be issued during break-up 2018, in order to inform assessments and layout during early summer following beetle flights. Stressed trees remaining on MDWR after initial salvage this winter are expected to absorb a portion of the 2018 beetle flight.

Outside of the CCLUP Grassland Benchmark, it is important that conversion of Douglas fir-leading stands not occur. To the fullest extent practicable, the objective of primary forest practices in dry belt Douglas fir ecosystems is regeneration of Douglas fir-leading stands. For some salvage sites, it will be challenging to meet free-to-grow standards where reforestation of dry belt Douglas fir ecosystems is expected. After review of applied forest regeneration strategies and stand development results, there may be consideration given to exemption from obligations considering diligent implementation of reforestation strategies. Reforestation strategies are expected to include variances and innovations designed to favour Douglas fir regeneration, such as micro-site planting tactics and higher stem densities at reduced inter-tree spacing.

Exemption (FPPR s.92):

A conditional exemption from the requirement to comply with General Wildlife Measures (FPPR s.69) is granted to all authorized persons carrying out primary forest activities for salvage of timber damaged by wildfire within MDWR established in the Cariboo Region.

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Conditions of exemption (FRPA s. 112):

1. The exemption applies in respect of all General Wildlife Measures where primary forestry activities are carried out for timber salvage, on areas of MDWR that are within the perimeter of 2017 wildfires, and where 100% of the timber to be salvaged has at least 75% crown scorch. [Interpretive note 1]
2. Old Growth Management Areas within MDWR will be managed consistent with the region's Land Use Order and its implementation policy (Biodiversity Update #14).
3. Prior to commencement of timber salvage, a Reforestation Strategy describing tactics for dry belt Douglas fir regeneration by Biogeoclimatic sub-zone and site series, will be submitted to the District Manager with copy to the Director, Resource Management. [Interpretive note 2]
4. Subject to the Reforestation Strategy required under Condition 3, primary forest practices activities will re-establish Douglas fir-leading stands on sites ecologically capable of growing Douglas fir, at levels of representation at least equivalent to the composition of pre-wildfire stands. [Interpretive note 3]
 - a. Despite Condition 4, reforestation need not be carried out on areas of MDWR that are within the CCLUP Grassland Benchmark

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5. Where undertaken to initiate reforestation, planting must be carried out through all patches of trees retained under Condition 6. [Interpretive note 4]
6. Primary forest activities will retain within salvage openings well distributed coarse woody debris and patches of trees or stems consistent with stand level biodiversity objectives set out by the region's Land Use Order. In addition, and subject to safety requirements, patches of non-merchantable stems and all oversize trees will be retained.
7. To the extent practicable, and subject to required site preparation treatments, primary forest activities will avoid exacerbating the impact of wildfire disturbance on soil attributes, such as compaction of fine textured soils.
8. Roads and trails will be designed and constructed in a manner that:
 - a) does not require harvesting of lightly damaged or green trees, and
 - b) allows for effective de-activation immediately upon completion of salvage operations, and
 - c) would enable eventual reforestation of the road prism and right of way.

Sincerely,

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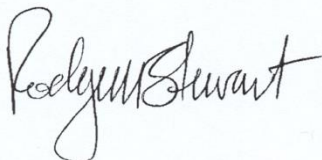
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Rodger Stewart
Director, Resource Management
Cariboo Region
Ministry of Forests, Lands, Natural Resource Operations and Rural Development

Interpretive notes, provided as information:

1. The extent of crown scorch is meant to differentiate between the salvage of dead trees prioritized under this exemption, as compared to salvage intended to be carried out under the second exemption. The second exemption will enable selective salvage of trees with less than 75% crown scorch after absorption of fir beetles by dying and stressed trees.

Examinations of post-wildfire stand conditions in field, and by using ortho-photography with burn severity mapping, reveal that the stand selection criteria for this exemption offer salvage latitude beyond initial priorities. Priority salvage actions as described by the forest sector will target high intensity (burnt black through crown) and medium intensity (all needles scorched brown) burn areas. Review of fire damage

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Extensive wildfire disturbance during summer 2017 created circumstances where salvage of and the prospective location of salvage boundaries for the initial salvage priorities reveal that there will be no need for take of trees with less than 75% crown scorch.

This exemption supports the first of two phases of salvage action. The second phase is expected to extend out from the boundaries of initial priority areas into low intensity burn areas, selectively taking trees expected to die through the combination of crown scorch and fir beetle infestation.

2. The Reforestation Strategy is meant to provide a reference during monitoring of post-salvage reforestation progress on treatment units within each cutting permit. These strategies are required in advance of salvage operations to support potential future considerations in respect of possible exemption from obligations on a treatment unit basis.

The Reforestation Strategy should describe reforestation tactics applicable to the Biogeoclimatic sub-zones and site series across each impacted MDWR including consideration of site characteristics (eg; soils, slope position, aspect) that typically influence regeneration progress. Ideally the forest licensees operating across common areas and ecosystems would collaborate in development of common Reforestation Strategies by MDWR.

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3. It is acknowledged that even where fir was substantively dominant (> 70%) in a stand pre-fire, the ability to increase fir representation post-wildfire may be diminished. There will be localities within what was previously a fir dominated stand that may not now be capable of supporting fir due to drought, frost, or changes to soil characteristics. Where such influences are identified within treatment units, notations should be made within the Reforestation Strategy for future reference.
4. Monitoring of trials on previous fires has revealed that Douglas fir regeneration is often most successful under vertical structure, be it dead, damaged or alive, and it need not be mature trees. Where an area of retention is not planted, fir regeneration is often not found unless the site was pre-disposed to high success of natural regeneration. Well distributed coarse woody debris, particularly stumps and larger stems, are found to provide micro-sites favourable to Douglas fir regeneration.

References, provided as information:

1. Best Management Practice Guidelines for Harvesting Treatments on CCLUP Grassland Benchmark Sites (2007, Cariboo-Chilcotin Grasslands Strategy)
2. Silvicultural Strategies to Restore Severely Burned Mule Deer Winter Range in the IDFdk3/xm (May 2011, UBC Research Forest)

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3. Regional Mule Deer Winter Range Strategy - Information Note #1: Guidance for Fire-damaged Stands. June 2014.
 - **Note:** The information set out in section 3.3 Silviculture respecting planting of pine species in the IDFxM has changed since this report was released. Planting pine on this ecosystem or on other drought prone sites is not recommended if the intent is to regenerate a Douglas fir leading stand.