

Opportunities for Area-Based Salvage Permits on Volume-Based Forest Licence Areas

Acknowledgements

This document has been prepared and endorsed by members of the North Island – Central Coast (NICC) Forest Management Leadership Team (FMLT). The FMLT is comprised of professionals from licensees, BC Timber Sales (BCTS) and Ministry of Forests, Lands and Natural Resource Operations (FLNRO) working in a team environment to resolve local forest sector issues, to communicate direction and guidance from the Operational Issues Forum (OIF) and Coast Region Implementation Team (CRIT), and to provide a forum to voice local issues and to raise issues to a regional level through OIF or CRIT.

Questions related to this document may be directed to local FMLT members.

Introduction

The salvaging of timber provides an opportunity for operators to utilize merchantable wood volume that is either left on site after harvest operations are complete or to harvest those trees which are at risk of dying or already dead and can be readily removed from an area at a reasonable cost. Salvage timber is typically lower value timber and available in small volume amounts. In order to provide economically feasible operations and to allow small operators access to salvage timber, licensees and Ministry staff should continue to examine further opportunities for salvage operators on the North Island - Central Coast. Efficient and effective operations for salvage will include access to areas with available volume and low administrative costs.

For purposes of this paper, salvage is defined by the Ministry of FLNRO December 2007 publication, Small Scale Salvage Three-Year Strategic Plan as the harvesting of:

1. dead and/or down timber;
2. trees which have been damaged or infested with insects and will die within one year;
and
3. logging residue.

The maximum volume of incidental green timber required for access to the salvage timber or to remove a hazard posed to the operations that must be harvested in association with a small scale salvage operation should be minimized and should not exceed ten percent of the total volume of timber harvested without a strong rationale approved by the district manager.

Under the Small Scale Salvage Program there are a number of methods in which rights to salvage are granted by the Ministry of FLNRO. The Ministry Small Scale Salvage website outlines the Ministry policy and requirements for each type of application whether conventional or professional at <http://www.for.gov.bc.ca/hth/timber-tenures/small-scale-salvage/index.htm>.

Purpose

The purpose of this document is to provide background information and to propose creating an opportunity for licensees to salvage and utilize timber that would otherwise not be harvested. The current permitting system does not allow for volume-based licensees to harvest (salvage) timber that is outside of original harvest areas without applying for a separate permit such as a forestry licence to cut (<2000m³) or (<5000m³) or a Community Salvage Licence (currently no new applications for CSLs are being considered).

The proposed opportunity would be to create an additional clause under an existing Cutting Permit for salvage (Salvage Permit) allowing licensees to harvest this additional small volume of salvage timber, as discussed in the following sections.

An additional purpose of this document is to provide an avenue for those licensees working on volume-based licence areas to have a postharvest salvage permit that covers all or portions of their operating areas. The permit would allow postharvest salvage on those cutblocks that have been harvested and where waste & residue surveys have been completed and approved. The intent of the Salvage Cutting Permit is to include those areas where the original Permit has expired (or has been cancelled) under a volume-based licence and handle those areas in a single licence permit to increase opportunities for Special Forest Products, reduce administrative time and costs to the Licensee and to the Contractor. These areas will promote more efficient salvage opportunities as long as the operations meet with the conditions of salvage under the Forest Stewardship Plan and the Licence documents.

Discussion

The Ministry's objectives for small scale salvage (from the Small Scale Salvage 3-Year Strategic Plan 2007-08 to 2010-11) include the following:

1. Harvest and utilize small, isolated patches of timber that are dead and/or in danger of being significantly reduced in value, lost or destroyed and would otherwise not be harvested.
2. Ensure small scale salvage operations take place within the context of overall, long-term forest stewardship and economic objectives.

3. Reduce the spread of insects and disease and contribute to forest health management. Small scale salvage is to be used judiciously in regard to MPB salvage operations and continue to focus on “leading edge” areas.
4. Exert forest worker safety as a priority. (Ministry staff are exploring how to best implement this important priority for Small Scale Salvage.)
5. Ensure areas harvested are reforested within acceptable timeframes with acceptable species.
6. Small scale salvage is promoted as a tool to use in achieving other ministry and government priorities such as harvesting for safety (public and infrastructure) purposes.
7. Provide a source of opportunities for small independent operators and First Nations.
8. Cost-effective delivery and contributing to government revenues.

The Ministry has included strategies set out to meet the objectives listed above, including "continually improve and adapt policies and processes to address newly evolving opportunities and challenges". The proposal outlined in this paper does not conflict with any of the Ministry objectives listed above.

The current administrative rules for removing timber from areas outside of cutblocks under cutting authority are set out as stated below:

From the Cutting Permit and Road Tenure Administration Manual pp 67, 69):

1. Incidental Cutting Outside Cutblock

Harvesting without *cutting authority* is considered unauthorized harvest and subject to compliance and enforcement actions. The effect of the dangerous trees optional clause actually expands the *cutting authority area* beyond the marked cutting boundary. However, **there is no endorsed method of allowing other incidental cutting for purposes such as beetle sanitation, salvage, etc.**

2. Danger Trees etc Outside Boundaries (p.69)

There are several optional clauses for Schedule A (See section 2.8.2) which can be used to authorize cutting of trees outside the Exhibit A boundary. The clauses either allow the removal of a safety hazard or removal of newly discovered damaged trees. The clauses specify a maximum distance beyond the cutblock boundary.

3. Note that typical status checks will provide clearance information for an area 20 metres beyond the cutting authority boundary. If the Cutting Permit will authorize cutting further than 20 metres, status clearance should be sought for at least that distance. Also, if the cutblock is adjacent to encumbered land (private, Indian Reserve, park, etc.), the clause will need to be modified to prohibit cutting on the encumbered land.

4. The Schedule A clauses cannot authorize harvesting within reserves designated under the *Forest and Range Practices Act*. Practice requirements are separate from permit requirements. For example, there is no flexibility for danger trees to be taken from wildlife tree retention areas (WTRAs) Although many wildlife trees could be considered dangerous trees, they cannot be cut (*removed*) unless a forest stewardship plan has approved results and strategies that specifically enable cutting of danger trees in WTRAs.

Proposal for Damaged Timber Salvage Cutting Permit

The NICC FMLT members have discussed the inability of forest licence holders and small scale salvage operators to utilize timber that has become a candidate for salvage outside the areas harvested under Cutting Permit or Road Permit authority. Members of the NICC FMLT have expressed concern that the small patches of timber or individual trees that are found to be dead and/or dying outside of areas under harvest authority will not be harvested.

This paper proposes allowing for an area-based salvage Damaged Timber Cutting Permit that would allow a licensee to salvage timber from areas within their own operating areas, but outside of areas under specific harvest authority under certain circumstances.

One method for allowing this is to create an opportunity for a blanket-style cutting permit for salvage with conditions set out, as described below, and covering the licensee operating area. Conditions for harvesting and marking green salvage timber would be described in the cutting permit document.

The FMLT proposes the following criteria for harvesting salvage timber under a blanket salvage (cutting) permit that is within licensee operating areas, in particular, those within an area under Forest Licence:

1. In cases where newly discovered trees that are damaged, dead and down, diseased or otherwise at risk and not under harvest authority, licensees may utilize these trees where they:
 - a. are dead due to windthrow, disease or fire but have not been felled,
 - b. are not within a Riparian Reserve or Wildlife Tree Retention area
2. The Licensee would not construct new roads to obtain the timber
3. The timbermark and permit would allow the utilization of the "green" timber or logs that are salvaged outside old cutblocks or road clearing widths.
4. Volume would be limited to a maximum of 5% of the annual harvest volume on the licence.

References:

1. Small Scale Salvage Three-Year Strategic Plan 2007/08 to 2010/11. Ministry of Forests, Lands and Natural Resource Operations Publ., December 21, 2007.
2. South Island Natural Resource District (SINRD) Guidelines for Professional Salvage Applications: Small Scale Salvage Program. Found at http://www.for.gov.bc.ca/dsi/MTenures_Salvage.htm
3. FRPA General Bulletin (Number 19) - Options for Harvesting Dead and Dying Trees Along Road Permit Roads. Ministry of Forests, Lands, and Natural Resource Operations. November 2008.
4. Cutting Permit and Road Permit Administration Manual. Version 3.0. March 1, 2010.