BRITISH COLUMBIA

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December 16, 2004

«Address»

Dear «Dear»:

This letter is in reference to wildlife tree retention in cutblocks that exceed 60 hectares.

Quesnel Forest District has been subject to an increasing mountain pine beetle (MPB) population since 1991, and the beetle has reached unprecedented epidemic proportions in recent years. In the beginning, aggressive harvesting and single tree treatments were viewed as a reasonable strategy to deal with this epidemic. At this stage, it is neither desirable nor possible to harvest all of the impacted pine forests, and the nature of the epidemic has lead to an emphasis on salvage operations. In the current situation, it is appropriate to manage for a variety of forest values, such as biodiversity, in addition to timber extraction.

In the recent Annual Allowable Cut determination for the Quesnel Timber Supply Area, the Chief Forester modelled an increase in the amount of retention to an average of 20 percent (%) in moderately and severely infested pine stands. The way this increased retention will be applied is still being determined, but there is a need for this guidance to clarify district expectations of licensees for wildlife tree retention in cutblocks greater than 60 hectares or contributing to non-greened-up areas greater than 60 hectares.

Currently under the *Forest Practices Code of British Columbia Act* (the Act), the provisions of Section 11(3)(b)(i)(A) of the Operational and Site Planning Regulation (OSPR) must be met in blocks greater than 60 hectares. These provisions require that the cutblock incorporate structural characteristics of natural disturbance wherever possible. The same requirement is found in Section 6 of the Timber Harvesting and Silviculture Practices Regulation. In order to meet the "adequately manage and conserve" test of Section 41 (1)(b) of the Act, planners should consider the following when submitting harvest proposals:

- A level of retention greater than the district default of 9% is expected for blocks creating openings greater than 60 hectares. The acceptable level of retention depends on the size of the opening; from a minimum of 9% for 60 hectares, up to 25% for very large blocks (i.e., 1 000 hectares). I expect prescribing foresters to locate wildlife trees in the most appropriate areas, but in these larger blocks, retention above the 9% requirement should be within the block.

Ministry of Forests

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- Specific wildlife tree retention strategies that were contained in silviculture prescriptions should be part of the Forest Development Plan (FDP). This means Wildlife Tree Patches (WTP) must be mapped and coarse woody debris strategies specific to the block must be part of the FDP.

- Guidance for wildlife tree retention is found in several documents, including, the Biodiversity Guidebook, the "*Stand Level Biodiversity Guidelines for the Quesnel Forest District*", printed March 5, 1999, and the "*Provincial Wildlife Tree Policy and Management Recommendations*", printed February 2000. Considering that an unprecedented mountain pine beetle infestation situation exists within the district, all of the eleven ecological guiding principles of the "*Provincial Wildlife Tree Policy and Management Recommendations*" should be considered to the fullest extent possible. If any of the principles cannot be met, a licensee should provide a rationale explaining why this is the case in its FDP and/or amendments. Ecological principle #4 ("Those trees/areas chosen for wildlife tree retention should be designated for a minimum of one rotation.") may not be supported by this district as we are not managing in this way under the Cairboo-Chilcotin Land Use Plan (CCLUP). Under the CCLUP Integration Report dated April 6, 1998, there is the assumption that 50% of each wildlife tree patch will be available for harvesting over one rotation in the long term.

- Generally, the most appropriate areas for retention will be associated with riparian features, will include retention or stubbing of species other than pine, and will incorporate some representation of the unlogged natural forest. Ecological principle #11, mentioning that distances between wildlife tree patches should not exceed 500 metres, is a science-based principle, but it is not intended to be applied to the exclusion of other ecological considerations.

- There are several landscape units with seral stage concerns. Planners should review the latest information provided by the Quesnel Forest District and the Ministry of Sustainable Resource Management (MSRM) and indicate in their FDP how the harvesting proposals will affect the seral condition.

- The CCLUP supports the expectation that, over time, harvesting will move towards the patch size distribution recommended in the biodiversity guidebook. Planners should review MSRM's patch size analysis and indicated in their FDP how the proposed harvesting will affect patch size targets.

- Some recommendations on management practices appropriate for large scale harvesting operations in our area can be found in a recent report by Fred Bunnell *et al* entitled Evaluating Effects of Large Scale Salvage for mountain pine beetle on Terrestrial and Aquatic Vertebrates. Additional references are appended.

In the case where final WTP locations cannot be provided at the time of the FDP plan and/or FDP amendment submissions because further fieldwork is necessary to determine their location, then the licensee may request a conditional approval. The condition will require that a minor amendment under Section 7.3(e) of the OSPR containing an updated map of the cutblock and WTP location(s) be submitted for district manager approval. Updated digital

linework and a paper copy map at 1:10 000 scale are required for the minor amendment submission.

This guidance is considered interim and it intended to lead into a "professional reliance" model consistent with the spirit and intent of the results-based FRPA regime.

I have directed my staff to consider the above criteria when they are reviewing FDP plans and amendments.

Yours truly,

Gerry Grant, R.P.F.
District Manager
Quesnel Forest District

References

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Ministry of Forests – Quesnel Forest District Policy. Stand Level Biodiversity Guidelines for the Quesnel Forest District. February 25, 1999. 8pp.

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http://www.for.gov.bc.ca/hfp/mountain_pine_beetle/stewardship/index.htm