

File: 97250-20/20023

September 8, 2020

VIA EMAIL

Dear Participants:

Re: Complaint File 97250-20/20023 – Wildlife Tree Retention

On June 3, 2020, the Forest Practices Board received a complaint from Elphinstone Logging Focus, an environmental group based on the Sunshine Coast.

The complainant asserted that several good candidates for wildlife trees in Timber Sale Licence (TSL) A93884 were cut down, while others retained as wildlife trees were of poorer quality. The complainant believes that this practice will result in diminishing biodiversity.

The complainant would like BCTS to retain all good quality wildlife trees and wants government to amend the *Forest and Range Practices Act* (FRPA) to require a two to three tree-length buffer around dead standing wildlife trees.

The Board considered two questions to address this complaint:

1. Did BC Timber Sales (BCTS) meet legal requirements for wildlife tree retention?
2. Was BCTS' approach to wildlife tree retention reasonable?

Background

BCTS auctioned TSL A93884 in 2019, and it was logged in 2020. The TSL is comprised of two cutblocks, but only block, G042C3MY, is relevant to this complaint. Block G042C3MY is located in the Chapman Landscape Unit (LU) near Sechelt, BC. The block is 26.9 hectares in seven openings, and it includes 7.8 hectares of wildlife tree retention areas (WTRAs).

The Biodiversity Guidebook states that wildlife trees are any live or dead tree with special characteristics that provide valuable habitat for conservation or enhancement of wildlife. Maintaining existing wildlife trees can be ecologically beneficial because they provide habitat for many species. Retaining standing green trees can also provide for future wildlife tree recruitment. Wildlife tree retention is intended to protect some specific ecological attributes in the near term, but also to ensure there is structural diversity in managed forest stands,

contributing to maintenance of ecosystem function across broad landscapes over the longer term. The value of wildlife tree retention as a strategy is widely accepted and the overall benefits and risks need to be monitored and evaluated over large areas (i.e. landscapes) and long periods of time.

Legal Obligations to Retain Wildlife Trees

The *Forest Planning and Practices Regulation* (FPPR) requires licensees to maintain a minimum seven percent of a cutblock in WTRAs. BCTS's forest stewardship plan (FSP) requires that a minimum of ten percent of the cutblock be retained as WTRAs in the CWHdm ecosystem of the Chapman LU, where cutblock G042C3MY is located. The FSP also states that WTRAs must include larger trees from the stand and any existing moderate to high value wildlife trees, excluding dangerous trees, if present.

Dangerous trees are defined in the *Occupational Health and Safety Regulation* and dead wildlife trees (snags) are classified as dangerous trees. Dangerous trees within a cutblock must either be felled, or a risk assessment of the tree must be undertaken and recommendations made and implemented to eliminate or minimize the risk before work starts. Working around dangerous trees in a cutblock generally requires at least a one and a half tree length no work zone or buffer.¹

Aside from the requirements noted above to retain WTRAs, there are no legal obligations to retain all dead wildlife trees in a cutblock, and no obligations with respect to the quality of wildlife trees retained. There is, however, guidance available to managers on managing wildlife trees, including the Forest Practices Code Biodiversity Guidebook (1995), Provincial Wildlife Tree Policy and Management Recommendations (Ministry of Environment, 2000), Wildlife Tree Retention: Management Guidance (Wildlife Tree Committee, May 2006), Managing Wildlife/Dangerous Trees (Work Safe BC, June 2008) and Managing Wildlife/Dangerous Trees (BC Forest Safety Council, March 2018).

BCTS's Wildlife Tree Management

Forest professionals prepare stand level operational plans that consider worker safety in addition to addressing biodiversity, timber and other resource objectives. BCTS prepared two stand level operational plans for block G042C3MY: a site plan and a harvest plan. These plans are consistent with legislation and the FSP. The site plan shows that BCTS retained 28.8 percent of the cutblock in WTRAs. The WTRAs have been designed to help maintain stand level biodiversity, enhance the riparian protection of a fish bearing stream adjacent to the cutblock and to protect tailed frog habitat. The site plan also states that the designated WTRAs have similar timber characteristics and site series as the cutblock.

¹ https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/conservation-habitat-management/wildlife-conservation/wildlife-tree-committee/dt_lod3_feb08.pdf

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The harvest plan for the cutblock identifies an additional 96 live trees marked for retention in addition to the WTRAs; 65 trees within the Crown Treatment Special Management Zone and 31 trees for dispersed retention within the block. BCTS retained these trees to help mitigate blowdown along a WTRA, and for dispersed retention within the block. BCTS did not prescribe or retain dead wildlife trees (dangerous trees) in the harvest area.

Conclusion

The investigation determined that BCTS exceeded its legal obligations for WTRAs. BCTS retained 28.8 percent of the cutblock as WTRA, which exceeded the FPPR minimum requirement of seven percent and the Chapman LU target of ten percent specified in its FSP.

The investigation also found that BCTS's wildlife tree retention strategy is reasonable. The site plan stated that WTRAs are representative of the harvested area. The WTRAs were designed to help maintain stand-level biodiversity, enhance the riparian protection of a fish bearing stream adjacent to the cutblock, and to protect tailed frog habitat.

In addition, BCTS retained 96 trees internal to the cutblock boundary. The retained stems may not have the same immediate wildlife tree value as the danger trees removed during harvesting. However, the retained stems provide some immediate wildlife tree value and some of them may become snags and/or higher value wildlife trees, and increase structural diversity in the future. This is consistent with the Biodiversity Guidebook, which recognizes that retaining standing green trees to provide wildlife tree recruitment is an acceptable management strategy.

Finally, the complainant requested that two to three tree length buffers be left around dead wildlife trees. I note that buffer requirements are addressed through the *Occupational Health and Safety Regulation*.

This concludes the Board's involvement in this file. If you have any remaining questions or concerns, please contact Cameron Leitch, RPF at (250) 213-4728.

Yours sincerely,



Kevin Kriese,
Chair

cc Derek Lefler, District Manager, Sunshine Coast Natural Resource District
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