



Forest Practices Board

File: 97250-20/21036

July 5, 2021

VIA EMAIL

Dear Participants:

Re: Complaint File 97250-20/21036 - Colocation

On March 29, 2021, the Forest Practices Board received a complaint about colocation within Tree Farm Licence (TFL) 44 near Port Alberni.

Colocation is the practice of overlapping wildlife tree retention in cutblocks with adjacent wildlife habitat areas or other areas reserved from harvest. On the ground, colocation means that an area reserved from harvest can serve more than one purpose, and this reduces the amount of habitat that is actually reserved from harvest. The complainant believes that colocation results in diminishing biodiversity. She identified six cutblocks within TFL 44 where she believed colocation had occurred, and she wanted the practice to stop.

Background

TFL 44 Limited Partnership (TFL 44 LP) is the forest licensee responsible for the cutblocks identified in the complaint. TFL 44 LP is a joint partnership between Western Forest Products Inc. (Western) and Huumiis Ventures Limited Partnership, a limited partnership beneficially owned by the Huu-ay-aht First Nations¹.

¹ The cutblocks identified in this complaint were planned and harvested by Western Forest Products Inc. before TFL 44 LP was formed.

Wildlife tree retention areas (WTRA) are typically made up of old or mature trees, including snags, which are retained as part of the cutblock to provide for stand level biodiversity. The *Forest Planning and Practices Regulation* (FPPR) requires at least 7% of the total area of all cutblocks harvested in a year be retained in WTRA, and at least 3.5% of any single cutblock be retained as WTRA.

Wildlife habitat areas (WHA) are legally designated areas with suitable habitat for species at risk where harvesting may be restricted or prohibited.

Since 1996, government has encouraged licensees to collocate WTRA and areas reserved from harvest to reduce the impact on timber supply. The most current guidance regarding the practice is the 2006 *Wildlife Tree Retention - Management and Guidance*.² The practice of collocation is not prohibited by the *Forest and Range Practices Act*.

Investigation

Initial investigation revealed that three of the cutblocks identified in the complaint were harvested before adjacent WHAs were established in 2015. The WTRA for these cutblocks are now located within present-day WHAs. For the remaining three cutblocks, a total of 2.8 hectares of WTRA were collocated within existing WHAs.

The Board reviewed the details of the six cutblocks to determine whether or not the WTRA requirements of the FPPR were met, and all exceeded the requirements for wildlife tree retention.

Resolution Efforts

The Board encourages parties to try to resolve complaints at any time and, to their credit, TFL 44 LP and the complainant were interested in doing so. At a presentation also attended by Board staff, TFL 44 LP and Western professional staff discussed past collocation practices and stewardship approaches that had been applied for old growth retention on TFL 44. This included planning for marbled murrelet habitat that was not already legally protected.

The complainant was encouraged by the presentation and the stewardship practiced in TFL 44, including the status of the six blocks she identified. However, she wanted to know how widespread the practice of collocation was in TFL 44, and she remains concerned that government allows, and in fact encourages, the practice of collocation across the province.

Western and LP 44 staff offered to further discuss collocation with the complainant, including an offer from Western to speak with their Chief Forester. The Board encourages the complainant to take advantage of the offer to help address her concerns.

² <https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/conservation-habitat-management/wildlife-conservation/wildlife-tree-committee/wt-guidance-05-2006.pdf>

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Conclusion

Although the complainant was satisfied with the licensees' stewardship practices regarding colocation in TFL 44, she remains concerned about the practice elsewhere in the province and government guidance that encourages it. While colocation can limit impacts to the timber supply by designing retention areas that overlap, the complainant feels it does not address other FRPA objectives for biodiversity and species at risk values. She is considering her options to pursue this issue further with government.

Under FRPA, the effectiveness of stand level biodiversity practices is intended to be evaluated through the Forest and Range Evaluation Program [Forest and Range Evaluation Program monitoring protocols](#). The Board has commented in the past on the importance of monitoring to support the continuous improvement of forest practices.

This concludes the Board's involvement in this file. If you have any remaining questions or concerns, please contact Astrid van Woudenberg, RPBio at (250) 213-4715.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Kriese', followed by a horizontal line.

Kevin Kriese,
Chair