



# FRPA GENERAL BULLETIN

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## Wildlife Tree Retention: Guidance for District and Licensee staff

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### **Introduction**

This document provides guidance regarding business rules for Wildlife Tree Retention Area (WTRA) information submission requirements and information management. This guidance has been developed considering the document [Wildlife Tree Retention - Management Guidance](#).

### **Definitions** (from Forest Planning and Practices Regulation)

- “wildlife trees” means a tree or group of trees that provide wildlife habitat and assist in conservation of stand level biodiversity
- “wildlife tree retention area” means an area occupied by wildlife trees that is located
  - in a cutblock,
  - in an area that is contiguous to a cutblock, or
  - in an area that is sufficiently close to the cutblock that the wildlife trees could directly impact on, or be directly impacted by, a forest practice carried out in the cutblock.

Wildlife tree retention established under the Forest Practices Code that meets the above definition is afforded the same protection as WTRA established under FRPA (see table 2). See updated [Bulletin 15](#) for further details.

### **Background**

Clear business rules are needed to enable efficient revenue and Cutting Permit (CP) processing, and to ensure that reported results at harvest completion are comparable to the operational plan (FSP/FDP), appraisal, and CP to enable effective administration of WTRAs. Wildlife tree retention areas are either *patch* retention with intact areas of forest, or *dispersed* retention with single trees or small clumps of trees within a harvested matrix. See Table 1 for a summary of business processes, and Table 2 for information management specifics regarding submission standards and storage for each type of WTRA. Figure 1 illustrates the difference between *internal, contiguous, and external* WTRAs.

Consistent with section 86 of the *Forest Planning and Practices Regulation* (FPPR), licensees are required to report annually the location and approximate size of all associated wildlife tree retention areas in a form and manner satisfactory to the minister.

Though this guidance refers to wildlife tree retention, it is applicable to any long-term stand-level tree retention. In particular the appraisal manuals refer generally to “retention”, rather than specifically to any single objective for treed retention. Stand-level retention that is designated for the full rotation of the cutblock and meets the FRPA definition of a WTRA, whether it is left specifically for riparian retention, wildlife tree retention or other purposes, can be counted to fulfill wildlife tree requirements.

**Figure 1: Dispersed retention and internal, external, and contiguous patch WTRAs**



## **Guidance**

### **Cutting permit application (licensee)**

The Exhibit A (part of the CP application) shows the peripheral boundaries of each cutblock. It does not identify *internal* WTRAs or delineate areas of dispersed wildlife tree retention. It is beneficial to include contiguous retention patches within the bounds of a cutblock. External (non-contiguous) retention patches are not identified or included with a CP application.

### **Business case:**

Having the Exhibit A encompass all areas to be harvested plus the internal and contiguous wildlife tree retention areas will assist in checking for potential conflicts during the statusing process. During the clearance process, potential conflicts are flagged if the proposed cutblock

overlaps any other active CP, areas protected from harvest, or areas with legal right or title (e.g. private land). If contiguous edge WTRA's are **not** included within a CP application, they could inadvertently be included in a proposed neighbouring cutblock. This is particularly a risk in salvage areas where adjacency rules have been relaxed and there are multiple operators.

Once the cutblock and related retention are reported into RESULTS (as per section 86 of the FPPR), there will be potential conflict flagged if a proposed CP overlaps the established retention. It is therefore important, (especially for the final cutblock in a CP), to quickly report post-harvest information into RESULTS. Licensees through their own processes should be able to determine whether there are any conflicts already encumbering a planned external WTRA, though these external areas could be at risk for inadvertent inclusion in a CP prior to the section 86 reporting.

### **Appraisal submission (licensee)**

The appraisal submission (map) shows partial harvest areas (location and partial cut %) and planned retention areas that are *internal* to the peripheral cutblock boundary (a requirement of both the Coast and Interior Appraisal Manuals). Likewise, if contiguous retention patches are included in the exhibit A, they are also included in the appraisal submission.

#### ***Business case:***

Submission of planned WTRA information at the appraisal stage will enable more effective administrative assessments, including C&E risk assessments and post harvest waste assessments.

### **Cutting permit document (district)**

There is no need to identify *internal*, *contiguous*, or *external* WTRAs or to delineate areas of dispersed retention in the Exhibit A map. Internal reserves fall within the Exhibit A boundary: we do not make “donuts” to exclude internal reserve areas. Similarly, contiguous edge reserves may be included within the harvest authority but will not have their internal boundaries delineated. Showing the areas under harvest authority does not exclude any legislative or regulatory requirements for specific reserve areas related to the block.

For CPs issued under FDPs, there should be a clause in the Schedule B of the CP document, describing as reserved timber, the retention areas mapped in the appraisal submission. For CPs issued under FSPs, there is no need for Schedule B to reference WTRAs.

#### ***Business case:***

There continues to be a need for wording in Schedule B of CPs issued under FDPs, describing WTRAs as reserved timber. Under FRPA there is no need to reference WTRAs in Schedule B, and forest management results are assessed through reporting requirements in section 86 (3)(a)(iv) and 86(5)(a)(ii) of the FPPR. See Table 2 for more information.

## **RESULTS submissions (licensee)**

Annual report submissions through RESULTS (**R**eporting **S**ilviculture **U**ppdates and **L**and status **T**racking **S**ystem) require mapping of actual *internal*, *contiguous*, and *external* wildlife tree retention areas as part of the forest cover update. Actual WTRAs will be registered in the LRDW (Land and Resource Data Warehouse), and will indicate a conflict when statusing subsequent tenure applications. This conflict is not necessarily a legal conflict and therefore the CP may still be issued, with due consideration to the Forest Stewardship Plan and requirements for replacement under FPPR section 91(2).

Each *contiguous* WTRA may relate to only one cutblock. Each *external* WTRA may relate to one or more cutblocks; however, a WTRA may only relate to more than one cutblock if all of the cutblocks that relate to the WTRA collectively meet the applicable requirements of regulation, or if it meets the results and/or strategies contained in the applicable FSP. However, for purposes of reporting, an area of WTRA must apply to only a single cutblock.

Dispersed wildlife tree retention is indicated in RESULTS submissions as a layer of reserve trees (Layer 1).

### ***Business case:***

The final WTRAs are used by district staff for actual-to-plan comparisons (if there is a difference, there also may be Revenue or compliance implications), and by Licensees and Tenures staff for statusing and adjudication for future CP applications; and other government staff for adjudicating other portions of FRPA.

Following the RESULTS harvest completion submission, WTRAs are assessed for compliance with section 66 of the FPPR or for compliance with licensees' results and/or strategies by calculating the amount of WTRAs as a proportion of the disturbed area (including internal reserves) plus contiguous reserves plus external reserves.

**Table 1: Business process summary table**

	Planned		Actual
	Exhibit A	Appraisal map	RESULTS reporting
Internal patch WTRA	No reference or mapping is needed.	Mandatory mapping, submitted via ECAS	Mandatory mapping in forest cover submission. Will show as an encumbrance in subsequent statusing
Contiguous patch WTRA	Mapping (i.e. opening footprint inclusive of the patch) is recommended.	Mandatory mapping if included in CP document, optional mapping otherwise. Submitted via ECAS	Mandatory mapping in forest cover submission. Will show as an encumbrance in subsequent statusing.
External patch WTRA	No mention or mapping is needed	No reference is needed	Mandatory mapping in forest cover submission. Will show as an encumbrance in subsequent statusing.
Dispersed WTRA	No mention needed.	Mandatory delineation of areas by harvest type, with partial cut percent, in appraisal submission.	Mandatory mapping, as a layer of reserve trees in forest cover submission. Will show as an encumbrance in subsequent statusing.

**Table 2: Legislative provisions for wildlife tree retention and guidance for Cutting Permits**

	<b>FSP (FRPA)</b>
<b>WTRA – patch and dispersed</b>	<p><i>Forest Planning and Practices Regulation:</i></p> <ul style="list-style-type: none"> <li>- Section 66(1) Default practice requirement for 3.5% related to a cutblock and 7% of the total area of cutblocks over a 12 month period</li> <li>- Section 86(3) (a)(iv): the location and approximate size of all associated wildlife tree retention areas are reported annually to government (before June 1)</li> <li>- Section 67, which states: “An agreement holder must not harvest timber from a wildlife tree retention area unless the trees on the net area to be reforested of the cutblock to which the wildlife tree retention area relates have developed attributes that are consistent with a mature seral condition.”</li> <li>- Section 12.5 gives exemptions to sections 66 and 67 for licensees/BCTS who write their own results or strategies for WTRAs in their FSP.</li> <li>- Section 91(2) allows for exemption to section 67 with replacement of the retention area with other suitable habitat in the nearest possible location</li> </ul> <p><b>Guidance:</b> no reference needed in CP (rely on reporting requirements in section 86 of the FPPR)</p>
<b>WTRA - Dispersed wildlife tree retention</b>	<p><i>Forest Planning and Practices Regulation:</i></p> <ul style="list-style-type: none"> <li>- Section 16 requires that stocking standards be specified in the FSP.</li> <li>- Section 34(1) requires that Site Plans identify standards units and stocking standards that apply to those SUs.</li> </ul> <p><b>Guidance:</b> no reference needed in CP. Section 66(1) area contribution from dispersed WTRA may be calculated as basal area equivalency.</p>

## ***Summary***

The bulletin provides a clear set of business rules that will facilitate the efficient preparation and subsequent processing of cutting permit applications, and outlines the basic reporting structure requirements to ensure effective compliance monitoring and the assessment of results under the FRPA legislative framework regarding WTRA's.

## ***Contacts:***

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