



File: 36460-01/UWR Exemptions

July 23, 2018

**To:** All persons authorized to carry out primary forest activities within the Cariboo Region

**Re: Phase 2 Exemption from Mule Deer Winter Range Orders in the Cariboo Region for purposes of salvaging timber damaged by 2017 wildfire disturbances.**

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This is the second of two exemptions issued to facilitate a phased post-wildfire timber salvage strategy that must also address forest health factors such as fir beetle infestation. This Phase 2 exemption is applicable to stands damaged by variable intensity ground fire.

The first exemption issued on November 21, 2017 was designed to address stands comprised of the “black, and the brown”, with no green crown, generally characterized in burn severity mapping and ortho-photography as the moderate and high intensity burn areas. The Phase 1 exemption addressed stands disturbed by higher Rank 4 through Rank 6 wildfire behaviour with considerable to intensive crown fire.

The post-wildfire condition of MDWR areas requires specific attention to protecting the remaining supply of suitable winter habitat. This habitat supply is represented by trees likely to survive the fire disturbance; generally those with less than 75% crown scorch. Planning for post-wildfire salvage and sanitation must prioritise retention of all stand attributes that have reasonable potential to survive the disturbance. Fire damage markedly increases susceptibility to bark beetle infestation. However, aggressive sanitation of all trees that may be at risk of beetle infestation would create an unacceptable negative impact on the supply of suitable winter habitat for deer. Sanitation must focus only on infested trees.

Outside of the CCLUP Grassland Benchmark, it is important that conversion of Douglas fir-leading stands to pine or other species not occur. To the fullest extent practicable, the objective of primary forest practices in dry belt Douglas fir ecosystems is regeneration of Douglas fir-leading stands.

Under this Phase 2 exemption, which puts high emphasis on stand retention, there should be fewer challenges in meeting free-to-grow standards for reforestation of dry belt Douglas fir ecosystems. In many cases, the emphasis on protection of trees with limited fire damage may result in a stocked stand after salvage is complete, though some larger patches (greater than 0.1 hectares) will require reforestation.

**Exemption (FPPR s.92):**

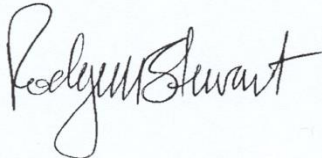
A conditional exemption from the requirement to comply with General Wildlife Measures (FPPR s.69) is granted to all authorized persons carrying out primary forest activities for salvage of timber damaged by wildfire within MDWR established in the Cariboo Region.

**Conditions of exemption (FRPA s. 112):**

1. The exemption applies in respect of all General Wildlife Measures where primary forestry activities are carried out for timber salvage and fir beetle sanitation, on areas of MDWR that are within the perimeter of 2017 wildfires, and where greater than 50% of the trees in a forested area have experienced wildfire damage. [Interpretive note 1]
2. Within the area to which this exemption applies, primary forestry activities will harvest only those trees that:
  - a) have greater than 75% crown scorch,
  - b) have died as a result of wildfire damage (generally a red or yellowed canopy),
  - c) are infested with fir bark beetles (green and red attack), or
  - d) have a combination of a) through c).
3. Site Plans that describe measurable and verifiable methods for compliance with Condition 2, and describe access measures and practices to avoid impacting green or lightly damaged trees, will be available upon request of the District Manager or Director, Resource Management.
4. Old Growth Management Areas within MDWR will be managed consistent with the region's Land Use Order and its implementation policy (Biodiversity Update #14).
5. Prior to commencement of timber salvage in openings greater than 0.1 hectare, a Reforestation Strategy describing tactics for dry belt Douglas fir regeneration by Biogeoclimatic sub-zone and site series, will be submitted to the District Manager with copy to the Director, Resource Management. [Interpretive note 2]
6. Subject to the Reforestation Strategy required under Condition 5, primary forest practices on salvage and sanitation openings greater than 0.1 hectare will re-establish Douglas fir-leading stands on sites ecologically capable of growing Douglas fir.
7. Despite Condition 6, reforestation need not be carried out on areas of MDWR that are within the CCLUP Grassland Benchmark
8. Primary forest activities within salvage openings will retain
  - a) well distributed coarse woody debris, and
  - b) patches of trees or stems consistent with stand level biodiversity objectives set out by the region's Land Use Order, and
  - c) subject to safety requirements, patches of non-merchantable stems and all oversize trees.
9. To the extent practicable, and subject to required site preparation treatments, primary forest activities will avoid exacerbating the impact of wildfire disturbance on soil attributes.

10. Roads and trails will be designed and constructed in a manner that:
  - a) does not require harvesting of lightly damaged or green trees, and
  - b) allows for effective de-activation immediately upon completion of salvage operations, and
  - c) would enable eventual permanent deactivation and reforestation of the road prism and right of way.
  
11. Road and trails will be:
  - a) temporarily deactivated immediately upon completion of salvage operations.
  - b) permanently deactivated once silviculture obligations are met.

Sincerely,



Rodger Stewart  
Director, Resource Management  
Cariboo Region, South Area  
Ministry of Forests, Lands, Natural Resource Operations and Rural Development

**Interpretive notes, provided as information:**

1. This Phase 2 exemption facilitates selective salvage within stands of trees damaged by variable intensity ground fire and active fir beetle infestation. Over 50% of the stand must be damaged by fire in some manner, and will frequently include considerable fir bark beetle infestation.

Both salvage and sanitation is expected to extend out from the boundaries of initial Phase 1 priority areas into ground fire areas, selectively taking dead trees, those expected to die through excessive crown scorch, and those harbouring fir beetle infestation.

Bark beetle sanitation is already clearly enabled by the established General Wildlife Measures and does not need exemption. For purposes of clarity only, such sanitation is cited within this exemption to reflect the expectation that sanitation will occur concurrently with salvage of fire damaged timber.

2. This condition of exemption was established for the Phase 1 exemption and remains in effect for all salvage and sanitation openings greater than 0.1 hectare.

**Special Notes**

**1.0 Reforestation Strategies**

As wildfire salvage operations ramp up in pace and volume, only two reforestation strategies required under the conditions of the Phase 1 exemption have been received by the District Managers and Director, Resource Management. It is strongly encouraged that these strategies be submitted as soon as possible, it being obvious that salvage and sanitation under both exemptions is about to commence.

At present the forecast result of the reforestation strategies viewed to date reflects inconsistency with the conditions of exemption. Most sites will grow Douglas fir, but it is acknowledged that re-establishing fir leading stands within standard free-to grow timelines is a difficult proposition in dry belt fir ecosystems. The results of tactics selected for most sites are headed toward pine leading stands, as compared to the fir-leading stands required for suitable MDWR habitat.

The reforestation strategies viewed to date do not offer a clear explanation of why stands will be pine leading at free-to-grow. Further, there is not yet an explanation in those strategies of what will be needed as a crop management regime to advance the progress of stand succession to fir leading conditions, at a time after reforestation obligations have been met.

In order that we collectively maintain a documented record that explains how our post-wildfire salvage and sanitation activities account for wildlife habitat requirements, it is important that the reforestation strategies explain the factors behind the inevitability of pine leading stands on many site types, and explaining what will be needed as a crop management regime post free-growing to encourage fir ingrowth faster than natural succession.

It should be noted that the impact of wildfire and salvage/sanitation operations will lead to revisions of the MDWR orders in order to direct future rehabilitation of MDWR and rebuild the supply of suitable winter habitat. The reforested areas will require new and specialized General Wildlife Measures to direct the management of regenerating stands established after wide scale salvage and sanitation.

## **2.0 Measures to ensure proper retention during sanitation and salvage**

Salvage and sanitation under terms of this Phase 2 exemption will require special diligence to ensure retention of trees that comprise what remains of suitable habitat supply on many impacted MDWRs. What is retained during salvage and sanitation will be the anchors upon which MDWR rehabilitation will be founded.

The exemption has refrained from prescribing how it is that persons carrying out primary forest activities will ensure proper retention during post-wildfire salvage and sanitation operations. That said there remains deep concern that retention requirements will be compromised should consummate care not be taken by those planning and carrying out salvage and sanitation. There remains as pressing need for due diligence in establishing measures that will clearly differentiate salvage/sanitation targets from the trees that should not be harvested. To that end, compliance with the conditions of this exemption makes it a requirement to prepare site plans that describe how salvage and sanitation will be limited to the parameters of Condition 2.

Please expect deliberate monitoring activities by ministry authorities to assess performance on this important topic. These measures described in site plans must be maintained on file, be made available on request, and be used to instruct practitioners and operators.

## **3.0 MDWR conditions**

Winter reconnaissance surveys identified several winter ranges that are in very poor condition after the 2017 wildfires added to extensive cumulative effects. Further detailed assessments are underway and will imminently reveal habitat supply conditions across impacted MDWRs.

Certain winter ranges are severely impacted such that little habitat supply remains at present. In these cases, salvage may not be justifiable.

The ministry is expediting completion of these assessments, and will circulate the information as it comes available. It is forecast that this Phase 2 exemption may have to be rescinded in some specific areas within severely impacted MDWRs.

**References, provided as information:**

1. Best Management Practice Guidelines for Harvesting Treatments on CCLUP Grassland Benchmark Sites (2007, Cariboo-Chilcotin Grasslands Strategy)
2. Silvicultural Strategies to Restore Severely Burned Mule Deer Winter Range in the IDFd3/xm (May 2011, UBC Research Forest)
3. Regional Mule Deer Winter Range Strategy - Information Note #1: Guidance for Fire-damaged Stands. June 2014.
  - **Note:** The information set out in section 3.3 Silviculture respecting planting of pine species in the IDFx3m has changed since this report was released. Planting pine on this ecosystem or on other drought prone sites is not recommended if the intent is to regenerate a Douglas fir leading stand.