

Post Wildfire Fibre Recovery Guidance

Phase 5 of the Wildfire Timber Salvage Planning and Administration Guidance

January 2025

Information contained in this guidance does not constitute legal advice. Where appropriate, users within government should seek legal advice from the Ministry of Attorney General and users outside government should seek independent legal advice. All users should refer to the relevant section(s) of current legislation or other regulatory requirements referred to in this bulletin for the exact legal wording of any authorizations, requirements, restrictions, or obligations.

1.0 Introduction

This document provides details for two wildfire salvage fibre recovery processes described in Phase 5 of the provincial Wildfire Timber Salvage Planning and Administration Guidance - 2025 to address the longer-term and non-economic fibre component of wildfire timber salvage and recovery of wildfire-damaged areas. For clarity, these tools and procedures are not to extract timber that is to be moved to a primary timber processing facility (i.e., sawlogs).

The objective of this phase is to recover remaining fibre, ensure good stewardship of the land, promote timely regeneration of harvested areas, and reduce wildfire impact on future timber supply. Ecological recovery principles remain as important at this stage as they were immediately post-fire. Additional harvesting activities that may hinder site recovery should be carefully evaluated, with a focus on enhancing the forest's future resilience (e.g., through species selection during reforestation). By the end of this phase, the harvest of economically viable fibre should be complete, and stands should be reforested. Prompt timber removal (carbon source) and regeneration (carbon sink) will contribute to climate change mitigation following a wildfire.

The goals for this phase are to:

- Salvage economically low-value timber remaining in wildfire-damaged forests after the
 primary forest tenure holders have removed timber through primary forest operations,
 including short-term tenures enabled by Wildfire Salvage Opportunity Agreements
 (WSOAs).
- 2. Target rehabilitation and harvest in areas that do not negatively impact the BC Timber Sales (BCTS) Innovative Timber Sale Licence (ITSL) program, other forest tenure holder operations, land use objectives, forest stewardship principles, and First Nations values.
- 3. Mitigate future timber supply impacts and climate impacts through timber salvage and reforestation rather than continued live timber harvest.
- 4. Facilitate forest and hydrological recovery with fuel management and reforestation treatments.
- 5. Ensure silviculture investments align with government objectives and best forest management practices.



6. Reduce future wildfire risk and pest infestations.

2.0 Time Period for Post Wildfire Fibre Recovery

Fibre recovery and utilization in this phase should occur 2-3 years after the wildfire is declared extinguished and the timber in salvage areas has significantly decreased in economic value. The predominant focus of the fibre recovery is now focused on processing lower-value products such as chips and pellets.

This timeline is highly variable and dependent on species, topography, and burn severity. Three years was generally accepted as the limit for sawlog recovery from wildfire-impacted areas, and after which licensees and BCTS are not interested in further development. If it is known that licensees and BCTS are not interested in areas immediately after a fire (i.e., identified in Phase 3), it is still preferred to wait 2-3 years post fire to allow for natural regeneration to express.

To start this timber salvage and recovery phase in year three, it is recommended that layout, development, surveys, and First Nation engagement start in year two.

3.0 Planning Considerations

The use of salvage harvesting after a catastrophic wildfire should be part of a larger strategy for landscape recovery. It is unlikely that all burnt timber can be salvaged and there will be many areas that will have stands recovered by natural processes. During Phase 5 (3 years post wildfire) timber salvage, identification of live damaged timber and dead damaged timber is simplified. The critical elements when planning post wildfire fibre recovery are:

- 1. Ensure human safety and maintain existing infrastructure.
- 2. Collaborate with First Nations to address Indigenous values and knowledge.
- 3. Working with other agencies, sustain, restore, or enhance the capacity of impacted ecosystems for values such as water quality, wildlife habitat, and soil conservation.
- 4. Recover value from the burnt timber before the wood quality deteriorates.
- 5. Facilitate the adaptation of forested landscapes to improve resiliency to climate change (e.g., species selection in reducing future wildfire risks through species more adapted to fire, or reducing remaining fuels that may contribute to future fires occurring on the landscape).

Land base recovery during wildfire timber salvage harvesting will prioritize human safety. It is acknowledged that fibre recovery and subsequent reforestation can help mitigate long-term timber supply impacts and may provide economic benefits without compromising ecological site recovery. Professionals must balance the benefits of fibre extraction and timber supply mitigation with natural land recovery processes.

Planning includes consideration of annual readiness planning (Phase 1), coordinated timber salvage planning (Phase 3), critical infrastructure, legal objectives, land use designations, conserving and/or protecting cultural heritage resources, stand and landscape level retention,



watershed integrity, forest health, soil conservation, and riparian management described in the <u>Post Natural Disturbance Restoration Guidance</u>, <u>2023</u>. Therefore, planning goals for this phase are to identify areas important to reserve, areas ideal for salvage harvesting, and site-specific practices (i.e., retention of all live timber) required to maintain forest stewardship objectives.

4.0 Key Tools and Resources

The two methods described in this guidance to remove marginal and non-economic fibre are:

- 1. Government-funded stand rehabilitation under the Forest Investment Program (FIP) Competitive Contract and Forestry Licence to Cut (FLTC) process, authorized under the Licence to Cut Regulation, section 4.
- 2. Direct award to First Nations: 2 Billion Trees (2BT) Special Use Permit-Occupant Licence to Cut /Forest and Range Practices Act (FRPA) section 52.1 process, which is funded by a third party such as the 2BT Program, that will fund the reforestation of wildfire-damaged areas.

It is important to note that these tools are not intended for major forest tenure licence holders. Fibre recovery is intended for secondary fibre uses and reforestation goals. Forest agreement holders who are granted allowable annual cut (AAC) can blend secondary fibre opportunities within cutting permit applications. Forest Investment and Reporting Branch (FIRB) determines FIP funding eligibility and stand criteria, and the federal government determines 2BT funding eligibility.

Currently, the 2BT funding agreement, between the provincial government and the federal government, does not allow the funds to be used for reforestation where a free-growing obligation is incurred due to the harvesting of trees (including wildfire timber salvage).

It is possible that biotic (beetles) or abiotic (wind) agents may damage timber adjacent to an area either under review or in the process of being harvested. First consider these areas for removal under BCTS or a cutting permit of a major licence holder. Secondly, the timber can be removed under Small Scale Salvage for minor volumes (<2,000 m³ direct award or up to 5,000 m³ competitive award). Adding adjacent impacts such as biotic or abiotic factors presents risks to provincial revenue, obtaining funding, and silviculture obligations.

4.1 Government-Funded Stand Rehabilitation - FIP Competitive Contract and FLTC process.

Funding for contracts comes from the <u>Forest Investment Program (FIP)</u> through an application to the <u>FIP Annual Operating Plan</u>. Applications that fit the funding criteria are submitted in October to



November of each year. Projects must meet the stand selection criteria and have eligibility assessments completed to confirm that the site is not satisfactorily restocked (NSR) and meets the required incremental rate of return (IRR). Additionally, projects must support fibre utilization of the fibre (i.e. pile and burn site preparations treatments are not supported under Post Wildfire Fibre Recovery), and other funding sources must be explored prior to application to the Annual Operation Plan (i.e., Forest Enhancement Society of BC (FESBC)). FIP also funds the BCTS ITSL program so there is limited additional funding exclusively available for stand rehabilitation projects (see section 6.00 of this guide for funding options).

As per the Wildfire Timber Salvage and Planning Administration Guidance, the districts, licensees and First Nations will develop a wildfire timber salvage strategy that identifies areas that may fit the post-fire fibre recovery objectives. These coordinated salvage plans may be incorporated or part of the new FRPA 108 catastrophic reforestation plans or ecological wildfire recovery assessments. Areas approved for funding will be posted on BC Bid for opportunities to interested parties. Successful parties will receive a contract and FLTC to complete timber harvesting. It is expected that the bid for the contract will account for the expected economic value from the stand.

4.2-Direct Award to First Nations: 2BT-SUP-OLTC/FRPA section 52.1 process Alternatively, the federal 2BT program may provide funding to reforest wildfire-impacted areas following the removal of wildfire-damaged timber using provincial authorizations. 2BT funding awarded to First Nations independent of the provincial program may be applied to reforest sites where a silviculture obligation has not been incurred (i.e., through an OLTC). Using provincial authorizations such as a Special Use Permits (SUPs) and an Occupant Licence to Cut (OLTC), the holder can harvest the damaged timber and plant the area delineated in the SUP and the *Forest and Range Practices Act* (FRPA) section 52.1 specifications.

The OLTC is issued without free-growing obligations, allowing the use of the 2BT program to fund the reforestation without having ongoing free-growing obligations. The issuance of a SUP and OLTC/FRPA section 52.1 (without obligations) allows for direct award of wildfire timber salvage opportunities to First Nations without the use of Forest Tenure Opportunity Agreements (FTOAs) or Wildfire Salvage Opportunity Agreements (WSOAs), both of which can result in free-growing obligations. For further information Ministry of Forests (FOR) staff can consult the Admin Guidelines for Externally Funded 2BT Projects (internal to FOR).

In addition, FESBC funding may be needed to offset costs. Currently, FESBC can be used under limited circumstances. Most commonly, FESBC may be able to fund non-sawlog fibre hauling. Further review is required to determine the feasibility of using FESBC funding differently, as well as other possible funding sources to support the wildfire fibre and land base recovery phases. See Appendix 1 for more information on the roles and responsibilities to approve 2BT-SUP-OLTC authorizations.

¹ <u>FIP Funding criteria</u> and Online AOP Intakes forms will determine where funding is allocated. District Managers are expected to follow through on reforestation activities related to these contracts.



5.0 AAC and Pricing Considerations

Volumes harvested in a district must be accounted for under an AAC allocation. Typically, volumes harvested under a FLTC or OLTC are counted under the district Forest Service Reserve (FSR). FSR volumes are typically very low (about 1% of the total AAC), which may raise concerns from professionals about over-cutting the FSR apportionment. The Office of the Chief Forester (OCF) is supportive of exceeding the FSR reserve by 5% AAC on an annual basis. This increase is only for minor tenures, wildfire salvage, and tenures to support further fibre recovery of the wildfire to mitigate timber supply.

For example, Kamloops FSR is 23,000 m³/year (1.1% of the TSA AAC). TSA AAC is 2,100,000 m³/year. Increase of the FSR to 5% of TSA AAC for minor tenures could be increased to 105,000 m³/year – again only in wildfire salvage area and only if the other fibre extraction has not managed the wildfire salvage through Phase 2 and 3 of the Wildfire Timber Salvage Planning and Administration Guidance. Beyond that limit, a separate Briefing Note would be required to garner agreement at the various approval levels. This step may not be sufficient everywhere but may provide one less step in moving salvage.

Other AAC options for volume include unused volume or temporary AAC reductions specified under the *Forest Act*. Engagement with Regional Tenures staff can support forest tenure issuance.

5.1 Pricing

Timber pricing staff at the regional offices have the authority to determine stumpage rates. While the decision-makers will consider the tenure type, they will ultimately rely on the actual timber characteristics to set the rate in cases of discrepancy. To ensure certainty regarding the stumpage rate, it is recommended that the appraisal data submission (e.g., short form) be made prior to tenure issuance. The following information is for general information, but it may be determined differently.

Pricing policies can be found in the appraisal manuals. Non-production sawlog cutting authorities are typically priced according to the miscellaneous pricing policy outlined in Chapter 6 of the Interior Appraisal Manual and Chapter 7 of the Coast Appraisal Manual.

For reference, interior projects have requirements for the type of tenure. Average stumpage rates (table rates) are published monthly. If your project involves chipping, then pre-approval from regional and district scaling staff is required before any harvested material is chipped. The chipping in conjunction with a OLTC or FLTC under this program will likely be conducted through the concurrent residual harvesting system.

Coast Area average stumpage rates (<u>table rates</u>) are published monthly. Coastal rates are more dependent on volumes and timber types rather than tenure type.

Please contact your respective pricing team for more information.



6.0 Resourcing options:

The following is a list of potential funding sources in British Columbia. Some of the options in section 4 of this guidance are dependent on receiving one or more of these funding sources prior to tenure issuance. In some cases, an endorsement letter may be required to an interested party in that tenure will be issued if funding is obtained.

- Forest Enhancement Society of BC (FESBC): Funds the utilization of uneconomic fibre that would otherwise be piled and burned and allows more biomass to be delivered to secondary facilities like bioenergy plants and pulp mills. In general, it provides for assistance with the non-sawlog component of a tenure. (e.g. incremental haul or additional harvesting costs). In addition, the use of FESBC funding under the appraisal can be found in section 6.11 of the Interior Appraisal Manual. Potential proponents are encouraged to reach out to their regional FESBC manager to learn more about 6.11 opportunities or to visit the funding guidebooks on the FSEBC website.
- <u>2BT Program</u>: A federal cost-sharing program with provincial governments or
 independent groups such as First Nations or other recognized organizations. This
 funding can be applied to replanting in wildfire affected areas. The process described
 above must be carried out with an obligation-free tenure (i.e., OLTC with no free-growing
 obligations).
- <u>Forest Investment Program</u> (FIP): Funds incremental government-led silviculture activities, largely targeting reforestation and forest nutrient management, and there is funding for associated stand rehabilitation activities. This funding would apply to the Contract-FLTC process.
- BC Wildfire Service <u>Wildfire Land-Based Recovery</u> and funding opportunities under the Ecosystem Wildfire Recovery program.
- Wildfire Risk Reduction (WRR): <u>Crown Land Wildfire Risk Reduction</u> funding should be considered whenever operating near communities or other interface areas, as there may be a need for the removal of dead fuels post wildfire.
- FRPA 108: Funds impacted forest tenure silviculture obligations. Under the new FRPA 108(4), in areas designated as catastrophic damage, the Minister may create a silviculture plan which may use funding that would have gone to the impacted plantations to other areas more suitable or successful within the wildfire-impacted area.

Aside from the above funding options, staff resourcing must be considered. Districts are not sufficiently staffed for extensive timber salvage operations, under the two processes described in section 4, in terms of planning, contracting, authorizing, harvesting and monitoring. For FIP-funded work an option is to utilize recipient agreement holders (i.e. PricewaterhouseCoopers) to complete all, or portions, of this work or hire auxiliary staff through funds in the delivery allowance.



7.0 District Roles and Responsibilities

District staff will be required to be operationally involved in these projects to:

- Achieve the objectives set out in this guidance and the Wildfire Timber Salvage Planning and Administration Guidance.
- Collaborate with Ministry programs under the Office of the Chief Forester (Forest Investment and Reporting Branch or Forest Science, Planning and Practices Branch), Recipient Agreement holders (PricewaterhouseCoopers) and the BC Wildfire Service.
- Coordinate with other district projects such as Wildfire Risk Reduction, Wildfire Rehabilitation projects, and Range.
- Issue contracts and authorizations.
- Monitor harvest, planting and FRPA requirements.

8.0 Legislative, Guidance and Policy references

8.1 Legislation

- Forest Act
- Provincial Forest Use Regulation Part 3

8.2 Policy

- Interior Appraisal Manual section 6.1 and 6.7 (OLTC table rates and chip/hog fuel rates)
- Coastal Appraisal Manual
- Licence to Cut Administration Manual, 2020
- Logging Residue and Waste Management Procedures Manual

8.3 Guidance

- Special Use Permit Administration Guide Issuance (2021) (PDF 593KB)
 - Special Use Permit Application Form (PDF, 405KB)
 - SUP Plan Companion Guide (DOCX, 74KB)
- RESULTS Interim Information Submission Specification FIP Edition 4 (August 2024)
- Admin Guidelines for Externally Funded 2BT Projects (internal FOR)
- Wildfire Timber Salvage Planning and Administration Guidance (<u>internal FOR</u>; <u>public</u> <u>website</u>)



Appendix 1

1.0 General overview and Interim Guidance for Wildfire Timber Salvage Processes Using the 2BT Program, SUP, OLTC and FRPA s52.1 authorization

Interested First Nations can expect the following to initiate projects funded by the 2BT Program.

- 1. Prior to funding application, communication between the District and First Nation about potential areas that would fit under the Post Wildfire Fibre Recovery Objectives.
- 2. Interested First Nations must apply for and receive 2BT Program funding through the federal government on proposed sites.
- 3. Districts may review proposed site(s) and determine the appropriateness of the proposed activity and underlying encumbrances (e.g., land use designations, licences). The Chief Forester's Guidelines and higher-level plans where they exist should be followed unless exempted/modified and authorized by the District Manager. Districts will refuse green tree harvesting. Areas to be planted will be reviewed according to current ecological principles, climate adaptation, and stocking standards.
- 4. If supported, the District provides an endorsement letter to allow the First Nation to secure 2BT Program funding commitments from the federal government.
- 5. Approved 2BT recipient completes First Nations information sharing and stakeholder referrals.
- 6. Approved 2BT recipient applies to the District Manager for authorizations. (SUP, OLTC, Planting authorizations (FRPA 52.1)).

2.0 Required Supporting Documents and Authorizations

The following documents are required to meet legislative requirements:

- 1. Funding approval by the federal government, that the area(s) chosen are approved under the 2BT Program.
 - Interested First Nations may need a letter of endorsement from ministry staff
- 2. A SUP that authorizes the approved 2BT recipient to occupy public land for silviculture treatments purposes. This may include a Site Plan or Silviculture Prescription to be added as part of the plan under the SUP. <u>SUP Application FORM</u>
- 3. A SUP that permits construction and use of non-status roads if existing authorized road access is not available. The general purpose of these projects is to rehabilitate and recover the land. As such, new road building should be minimized within wildfire-affected areas, and all roads rehabilitated before the project wraps up.
- 4. A FRPA section 52.1 authorization signed by the District Manager that authorizes the planting of the site, stocking standards, and reporting requirements for the area defined by the SUP. (District led authorizations)
- 5. An OLTC with an appraisal rate form that authorizes the cut and remove (cut, process and remove) the damaged timber and <u>has no free-growing obligations</u>. Area staff will be involved in stumpage rate determinations. <u>OLTC Application FORM</u>