



**To: WorkSafeBC  
Workers' Compensation Board of British Columbia  
Prevention Policy & Regulation Review Department  
Policy and Research Division**

**RE: Proposal to Amend Part 26, Forestry Operations  
Section 26.11, Dangerous trees**

With the current magnitude and intensity of the mountain pine beetle infestation and the recent wildfires in the interior of BC, relaxing regulations regarding Danger Trees is ill advised.

A recent report that was prepared for the Ministry of Forests and Range, Forest Practices Branch (E. Todd Manning, A. Deans and D Rowe Manning, Cooper and Associates, 2005) cautioned about working around danger trees when wind speeds exceed 20 km/h.

Recommendation #2 stated: *"For silviculture activities (except mechanical site prep.) in MPB-killed stands on moist sites (mh, mw, mm, mk, mc or wetter subzones), the WDTAC standards for level 1 disturbance are adequate and should be followed **with this provision:** i) based on the incidence off dangerous trees in the 10+ yrs. TSD cohort, for stands > 15 years TSD on moist or wetter sites, either cease work activities when wind speeds exceed 20 km/h, or reassess the site to level 3 disturbance".*

If the stated intent of this proposed amendment is to make section 26.11 consistent with the Wildlife/Danger Tree Assessors' (WDTA) guidelines for danger tree assessment, then I suggest that the WDTA guidelines change to harmonize with Part 26, Forestry Operations Section 26.11, Dangerous trees.

Respectively submitted by,  
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Health, Safety & Environment Coordinator