BRITISH COLUMBIA

File: 18040-03
Ref: 191590

October 1, 2012

Al Gorley
Forest Practices Board
3rd Floor, 1675 Douglas Street
P O Box 9905 Stn Prov Govt
Victoria, British Columbia
V8W 9R1

Dear Al Gorley:

RE: Special Investigation Report 42 – How much of British Columbia's forest is not satisfactorily restocked and what should be done about it?

On behalf of the Ministry of Forests, Lands and Natural Resource Operations (FLNRO), please accept this letter as government's response to the recommendations and findings in the Forest Practices Board's Special Investigation Report 42 – *How much of British Columbia's forest is not satisfactorily restocked and what should be done about it? (June 2012)*

Recommendation 1:
Government confirm its assumptions about how much additional area will be salvage harvested by the forest industry and develop a monitoring system to track whether those assumptions are being borne out.

Response by Government
The ministry has reviewed its salvage harvest projections and found them, with minor refinement, to be reasonable given the many market variables that will influence the actual amount of Mountain Pine Beetle (MPB) impacted stands that will be salvage harvested. As the Board states in the report there is "substantial uncertainty on how much...area will be salvaged harvested".

In order to reduce the uncertainty associated with projected salvage harvesting, the ministry has established two possible scenarios: the low is based on projections of 10 years beyond the peak attack as determined by the model BCMPB v.09 and the high is based on 15 years past peak attack but not going past 2024. In both cases, the current average salvage harvest level from the period 1999 to 2010 was projected to each of these future dates to determine the low and high potential salvage harvest.

Ministry of Forests, Lands and Natural Resource Operations Deputy Minister's Office
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Through the continuation of the change detection mapping process as part of FLNRO forest inventory updating process, the assumptions regarding the contribution of salvage harvesting to the rehabilitation of areas impacted by MPB will be refined as the ministry reforestation response progresses.

Recommendation 2:
Government use the best information and projections currently available to conduct a broadly framed cost-benefit analysis of options to restock or not restock areas that may be NSR in the beetle-affected region.

Response by Government
The ministry is nearing the completion of a project to update our estimates of the stocking status and potential investment opportunities in areas impacted by pine beetle and wildfire. An initial report is expected later this fall.

Recommendation 3:
Government carry out the survey and inventory work necessary to inform the future decisions that must be made; particularly, those related to determination of the allowable annual cut in the beetle-affected region.

Response by Government
The report's recommendation regarding forest inventory is being addressed. Major inventory projects are underway in each region of the province, with an emphasis on forests impacted by the mountain pine beetle.

In addition to approximately 150,000 hectares (ha) ground and aerial surveyed and assessed each year for reforestation potential, the ministry is also taking advantage of new tools using satellite technology for improved forest inventory information, as well as to reduce inventory costs. In that light, the ministry will convene a meeting to (1) review the state of knowledge about assessing and classifying beetle-damaged stands; (2) consider what new technology and approaches might be able to contribute (LiDAR, high resolution air photos, etc), and on the basis of this; (3) determine the most cost-effective means of assessing and classifying these stands. The outcome of the report referenced under the ministry response to recommendation 2 will also assist in narrowing the area for survey and assessment.

Finally, the ministry would like to thank the Forest Practices Board for preparing this report, which helps clarify some of the complexities around the Not Satisfactorily Restocked (NSR) issue. We were pleased to see that the report acknowledged several ministry programs and projects that are directly addressing the NSR issue.

We trust the Board will be satisfied with the initiatives and action plans we have in place to address the key issues identified by the Board.

If the Board has any questions regarding this response or requires more information, please contact Allan Powelson at (250) 812-5054.

Yours truly,

Doug Konkin
Deputy Minister

Forest Practices Board

File: 97350-20/2011-02

November 13, 2012

Doug Konkin
Deputy Minister
Ministry of Forests, Lands and Natural Resource Operations
780 Blanshard Street
Victoria, BC V8W 2H1

Dear Doug Konkin:

Re: Special Report *FPB/SR/42 How much of British Columbia's forest is not satisfactorily restocked? And what should be done about it?*

Thank you for your letter of October 1, 2012, responding to recommendations in the above report. The Board appreciates the timely reply and is pleased to see the Ministry is working on this issue. Following are specific comments in regard to your response to our recommendations in the report.

Recommendation 1 - The Board's first recommendation was for government to confirm assumptions about the area that would be salvage logged. Your response provides added assumptions regarding shelf-life and projected harvest levels. The Board believes a more spatially explicit projection of areas that might be salvage harvested is also required.

We are concerned about the strength of current assumptions for shelf-life and salvage harvest. We also have reservations about the ability of the mapping process to adequately track harvesting (please refer to report FPB/SIR/33 - *Reporting the Results of Forestry Activities* for details) and distinguish salvage logging from harvesting of green timber. Perhaps the report referred to in your response to recommendation 2 will address this.

Recommendation 2 - We are pleased that this work is being done, and we look forward to seeing the report you refer to before the end of the calendar year 2012. We trust the report will address our request for a broadly framed cost-benefit analysis of options for restocking NSR land.

Recommendation 3 - We are aware that the ministry has major inventory projects underway and are encouraged to know that you are planning additional work to assess the nature of beetle killed stands. The Board will follow up on progress that has been made on this recommendation in November 2013.

Yours truly,

R. A. (Al) Gorley, RPF
Chair