



Evading the Question of British Columbia's Not Stocked Forestlands

PUBLICLY OWNED RESOURCES CANNOT BE responsibly managed on the public's behalf in the absence of broadly accepted baseline information.

If resource managers and the public they serve all agree on what the baseline is, then prospects for responsible resource management increase dramatically.

With that in mind, what is to be made of recently published and starkly different accounts of how insufficiently stocked British Columbia's publicly owned forests are? And what ought to be done about it?

Perhaps, a good place to start is by examining the article titled, "Not Satisfactorily Restocked (NSR) in BC" (**BC Forest Professional**, September/October 2011) in which the forests ministry fails to provide a province-wide not-stocked area (a.k.a. gross inventory NSR) in response to an earlier article titled "NSR and British Columbia's Reforestation Crisis" (May/June 2011).

First, any forest ministry response to the estimated province-wide, not-stocked area in the order of nine million hectares (May-June, 2011) requires that the ministry talk about the same forested land base, some 55 million hectares for which it is responsible. This is the same land base on which it has reported provincial not-stocked area for decades until it conveniently chose not to begin in 2001. This is also the same land base on which carbon dynamics are modelled and the same land base that has been certified by third parties as being sustainably managed for timber.

To focus ministry NSR estimates on a timber harvesting land base (THLB)—some 23 million hectares that has never been gazetted—instead of the 55 million hectares of forested land—changes the question. Most land within the THLB is productive forestland but all productive forestland, all sites included, is not within the THLB. We need to know the province-wide not stocked area for all Crown forestland in timber supply areas and

tree farm licences—not just for the THLB.

Some NSR areas outside the THLB, if reforested, would be important for wildlife habitat and critical to species survival, including riparian forests, which ensure salmon survival. Others, once reforested, would regulate water flows and temperatures at higher elevations, or would serve to re-connect forested ecosystems. All are vital for adaptation to climate change, for carbon accounting and for forest certification.

If any of these NSR areas fail to regenerate naturally to the detriment of salmon, wildlife, soil and water, then the replanting of them would present a genuine carbon financing opportunity to explore with Pacific Carbon Trust and a zero-net-deforestation opportunity to negotiate with the oil and gas industry.

Second, to play politics with the definition of NSR also obfuscates the issue. Gross and net NSR have very different definitions. Not stocked (a.k.a. gross inventory NSR) has a time-honoured definition in ministry annual and periodic reports based on stand density or stocking. It is a derived description of not-stocked Crown productive forestland, all sites included, at a given point in time. It includes NSR and non-commercial brush on all sites including low-productivity sites. Where it is on the forested land base and who is responsible for reforestation are immaterial.

Third, to argue that the forests ministry is unable to identify the area of gross inventory NSR area because it does not yet know how much MPB-killed forest will be harvested is disingenuous. BC's forest inventory has always allowed for the classification of dead potential standing timber volume.

The true reasons that the forests ministry cannot provide the actual province-wide not-stocked area are clear. The ministry has not done the surveys. And its inventory data are embarrassingly out of date. Therefore, if the forests ministry were to produce a province-wide not-stocked area, it would bear little resemblance to reality.

NSR is a recognized indicator of sustainability. So, until the forests ministry has a current inventory from which it is able to derive and aggregate the province-wide not-stocked area (a.k.a. gross inventory NSR) comparable to the not-stocked area published in ministry annual and periodic reports until 2001/02, it should be repeatedly challenged to do so.

In the absence of this not-stocked area, the public can expect more spin than substance from the forests ministry on the critical issue of just how extensive a NSR problem we have on our hands. This, in turn, means that we will be less able to rely on third-party certifiers to provide a credible assessment of whether or not forest management in BC is sustainable. It also means that the task before federal and provincial agencies seeking to understand forest carbon dynamics will lack a complete picture of the challenge before them.

Ultimately, the moral consequences of this self-deception may be lost opportunities on some not-stocked forestlands for genuine mitigation and adaptation projects to offset atmospheric carbon and deforestation, and, possibly, decertification of some interior forestlands.

That said, all that remains is for the government to restore thorough, consistent annual and periodic reporting of forest descriptive statistics on what still remains a publicly owned resource. To do this the government will need to restore funding and staffing to its inventory program. And only with a current, reliable inventory enriched by continuous monitoring of forest health responses to climate change will the forests ministry once again speak with authority on British Columbia's not-stocked forestlands. 🐼

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