

Put in Your Two Cents

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Letters

True NSR Comparison Not Provided

In the article titled "Not Satisfactorily Restocked (NSR) in BC" (**BC Forest Professional**, September/October 2011), the forests ministry fails to provide a comparable, province-wide, not-stocked area in response to the 9.1 million hectares estimated in an earlier article titled "NSR and British Columbia's Reforestation Crisis" (**BC Forest Professional**, May/June 2011).

In its response, the forests ministry begs the question in part by confusing the NSR area it deems suitable and economic for "treatment" (715,000 hectares with "potential" to increase by a further 775,000 hectares) with the full extent of BC's not-stocked lands, which, when it last reported on this not-stocked area in its 2000-01 annual report, stood at 2.8 million hectares before the 17.5-million hectare infestation by the mountain pine beetle and before the bad fire years of 2003, 2004 and 2006.

Meanwhile, the gulf between estimates of the province-wide extent of not-stocked land within the 55 million hectares of publicly owned forest-land, of which 53 million are certified as being sustainably managed, may explain in part why the Forest Practices Board decided in September 2011 to launch a special investigation to clarify the status of BC's not-stocked forestlands—a welcome decision in the public interest.

The terms of reference for the Board's special report are posted at: http://www.fpb.gov.bc.ca/WorkArea/DownloadAsset.aspx?id=5881

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Re: "The Inherent Neutrality of Appraisals"

I agree with Mr. Waatainen's comment that "...neither Government nor industry is disinterested" in the appraisal process. In fact, they both have much to gain or lose, and so we can relegate all of the pressures inherent in the system to the fact that it's just business between a buyer and a seller. The government and industry folks tasked with submitting or reviewing appraisals want to follow either a strict or loose interpretation of the rules when it suits their needs to gain the best advantage for their employer, and in my past experience, it was industry that applied pressure from both the operational level and the management level to have appraisals reviewed and amended to better suit their desire of zero stumpage timber.

On the idea of licensee neutrality, I admit I have difficulty understanding how a neutral valuation of the timber cannot include the actual activities of specific licensees and the conditions they face in different parts of, say, the Interior. For example, through the MoF Engineering manual used by both parties to generate road building cost estimates, an engineered cost estimate includes consideration of the specifics of a certain road building project, including an analysis of borrow pit classification, cycle times based on that, and haul distances based on a road design. This results in an estimate to build that specific road in the specific conditions normally encountered in that area of the province.

Lastly, I'm not sure government can always be seen to be wielding a greater influence in the appraisal system than industry ("Government... expropriating the value of a licensee's efficiency.") Admittedly, my experience is limited, but in my past experience with appraisals in the Fort Nelson area, it was the local licensee that lobbied for and received a shipping differential as well as a manufacturing differential, to account for their higher actual shipping costs to market and higher actual local operating costs, and they also made sure to include the 10% operating cost add-on for heavy equipment permitted in the Blue Book for activities north of Pink Mountain, BC.

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