



File: 135-40/Part 10.1 – C.L.M.A.

October 28, 1999

Gord Rattray  
General Manager  
Cariboo Lumber Manufacturers Association  
Suite 205, 197 North 2<sup>nd</sup> Avenue  
Williams Lake, B.C. V2G 1Z5



Dear Gord Rattray:

Thank you for submitting a preliminary proposal on behalf of the seven piloting partners in the Cariboo Forest Region to pilot test new methods of regulating forest practices, and for participating with staff from the Ministry of Forests (MOF) and Ministry of Environment, Lands and Parks (MELP) in conducting an assessment of the proposal. The Joint Steering Committee (JSC) is of the understanding that the piloting partners and the proposed piloting locations are as follows:

**C.L.M.A. Piloting Partnership**

Forest Company	Forest License(s) Involved	Geographic Area	Est. harvest vol.
Ainsworth	A20002	Murphy Lake	48,000
Lignum	A20018	South Chilcotin	70,000
Riverside	A20015/16	South Chilcotin	100,000
Slocan	A20011	Puntcheskut Lake	38,000
Tolko	A20010	Ernst/Deserters	110,000
Weldwood	TFL #5		117,000
West Fraser	A20020	Williams Lake	150,000

The JSC has reviewed your proposal and sees conceptual merit in you now proceeding to the next step in fully developing your piloting proposal, but requests that you first provide the detail now missing concerning the partnership. So, subject to that request, I am pleased to respond with the following comments. The JSC:

- suggests that given the large number of partners, a carefully thought out implementation plan be developed to ensure that the efforts of the partners and agencies are effectively coordinated.

- wishes to ensure that each partner has a satisfactory internal environmental stewardship management and control system and requests this be demonstrated prior to fully proceeding to the next step.
- believes there is considerable merit in your two phased approach to the pilot, whereby the maximisation of administrative efficiencies is sought in the short term. However, in the interest of seeing the pilot stand the test of public scrutiny, it is suggested the implementation plan carefully consider the scope and timing of each phase, with special attention given to compatibility with the C.C.L.U.P., including approved implementation measures and policy, and the Regional Resources Board.
- wishes to emphasize that part 10.1 of the *Forest Practices Code of B.C. Act* specifically maintains the role of the Forest Practices Board. Your proposal must be developed accordingly.
- suggests that caution be exercised to ensure that there is no compromising of government's fiduciary obligation to consult with First Nations. This is a prime consideration for your proposed new framework for planning and permitting processes.
- suggests that more work is needed in developing effective procedures for notification and referral to third parties, such as trappers, guides and outfitters.

The JSC requests the opportunity to review and comment upon the partnership detail not now provided – i.e. the specific locations and size of AAC proposed for piloting.

Following this, your next specific action should be to present the environmental stewardship documentation to the Regional Manger, MOF and Regional Director, MELP, or their designates, prior to working with them on a comprehensive implementation plan for fully developing your proposal. You should give full consideration to the above points in this plan.

The JSC appreciates having had the opportunity to review and comment on your preliminary proposal. The second step in the process calls for you to fully develop a proposal that achieves the essential purpose of meeting the legislated tests in Section 10.1 of the *Forest Practices Code Act*. Special attention will then need to be given to ensuring adequate review and support of public and agencies, and appropriate methods of information exchange with First Nations. Nothing in this letter should be construed to limit in any way that essential purpose.

The JSC offers its best wishes to you in proceeding with the continuing development of your piloting proposal.

Yours truly,

Guenter Stahl  
Project Manager  
Result Based Code Pilots

p.c. Regional Manager, M.O.F. – Mike Carlson  
Regional Director, M.E.L.P. – Herb Langin  
Joint Steering Committee

Ralph Archibald, Director, Forest Practices Branch – M.O.F.  
Rod Davis, Director, Forest Stewardship Branch – M.E.L.P.