

October 14, 1999

Mr. F. A. Baxter
Regional Manager
Kamloops Forest Region
515 Columbia Street
Kamloops, B.C. V2C 2T7

Dear Fred Baxter:

Re: Riverside's September 13, 1999 request to designate our Sustainable Total Resource Management Project as a pilot project in accordance with Part 10.1 of the Forest Practices Code of B.C. Act (FPC)

I am writing to you regarding the level of detail provided in our Project proposal and Guenter Stahl's and Craig Sutherland's request that we provide the regional assessment working group with the additional information needed to ensure that the working group and the Joint ADM Steering Committee have a clear understanding of the Project's objectives and strategies for proceeding with the pilot. As you are aware, our assessment session with the working group is scheduled for October 21, 1999 in Kamloops.

Before addressing Guenter Stahl's and Craig Sutherland's request, I would like to thank you and Guenter Stahl for your cooperation in addressing our request to reduce the time frame for initiating our Project by 'fast tracking' the approval of our Project as a pilot project. As you are aware from our briefing sessions with you and John Thompson, we have been working on our Project for over seven months and believe it more than adequately meets all of the criteria required for a pilot. It provides the opportunity to explore and field assess practical options for total resource planning, balancing competing values, and exploring practical solutions for reducing the complexity of the Forest Practices Code which should lead to reduced costs and less red tape while maintaining/enhancing environmental protection and forest stewardship achievements.

With respect to our interpretation of Guenter Stahl's and Craig Sutherland's request, following is a tentative list of the innovations and initiatives that we will be sharing with the Advisory Panel to achieve our objectives of developing a dynamic ecosystem based sustainable total resource management model and a more performance driven management regime based upon clearly defined results.

A. Dynamic Ecosystem Based Sustainable Total Resource Management Model

- Through the use of zoning or other approaches that reflect the range and biodiversity of biophysical features and local interests, examine new ways of balancing and managing competing forest and non forest resource values and interests to achieve sustainable total resource management, and
 - Put in place enhanced management strategies, including clear objectives, management criteria, and variable standards at the forest level, that will maintain or enhance the productivity of the land base, the future quantity and quality of timber, habitat and water supplies, and prepare the industry for tenure reform and certification in the most cost efficient manner possible.
- B. Improving the Regulation of Forest Practices
- Assess practical options for shifting the FPC from a prescriptive and process oriented Code to an operational model that is focused on objectives and results.
 - Reduce the number, size and complexity of operational plans.
 - Streamline the scope and nature of agency reviews of operational plans to ensure that the planned results are consistent with management objectives.
 - Establish evaluation timelines for plan approvals.
 - Establish provisions for professional foresters to exercise judgment and accountability in developing harvesting and silviculture prescriptions and strategies.
 - Assess the merits of using fixed or default ‘rules’ and the concept of licensees submitting variance requests to deviate from pre-established requirements.
 - Assess the benefits of incorporating mandates within the FPC to harvest sufficient volumes to maintain employment and community stability.
 - Review the merits of eliminating stand management prescriptions.
 - Clarify or define the criteria for determining consistency between plans and streamline plan amendments.
 - Review the use of guidebooks as de facto standards and the current practice of using them as best management practices.
 - Determine which quality monitoring and auditing systems and processes should be put in place and identify the opportunities available for the use of incentives and professional accountability rather than the use of enforcement and penalties to ensure that management objectives and forest practices are being achieved.

These innovations and initiatives and potentially others will be included in the Project Management Plan for the Project which will be prepared following the designation of our Project as a pilot and after the appointment of the local Advisory Panel. Proceeding in this way will ensure that we do not fetter the mandate of the Advisory Panel. In this regard, as you can see item 4.a) on page 3 of the attached terms of reference for our Project requires that the Project Management Team prepare a Project Management Plan in conjunction with the local Advisory Panel at the outset of the Project.

We look forward to our assessment meeting with the working group on October 21, 1999 in Kamloops and the timely approval of our Project as a pilot..

Yours truly,

RIVERSIDE FOREST PRODUCTS LIMITED

John Marritt
Vice-President Woodlands

c.c. Guenter Stahl
Project Manager
Results Based Code Piloting