



June 4, 2003

Don Wright,  
Deputy Minister,  
Ministry of Forests  
PO Box 9525 Stn Prov Gov't  
Victoria BC  
V8W 9C3

Dear Don                      **Re:   Working Forest Initiative**

We would like to re-affirm our support for government's New Era of Sustainable Forestry to "establish a working forest land base, to provide greater stability for working families and to enhance long-term forestry management and planning". This is the framework essential to "adopt a scientifically-based, balanced and principled approach to environmental management that ensures sustainability, accountability and responsibility".

We promoted and supported the concept of a "working forest" with Garry Wouters as part of the BC Forest Policy Review that resulted in the "Shaping our Future" report. The "Working Forest" is a long-term commitment to the forest industry through land use designation for timber production. The forest industry's future depends on the health and sustainability of the productive forest land in the Province.

We look forward to the creation of the "Working Forest" in upcoming legislation.

Yours truly,  
TOLKO INDUSTRIES LTD.

Randy Chan, RPF  
General Manager, Environment and Forestry

File # 280-30/CEN  
Notes: SPPB  
Date file sent JUL 17 2003  
MINISTRY OF FORESTRY  
**RECEIVED**  
DMRL# 73825  
JUN 10 2003  
DUE DATE: \_\_\_\_\_  
☐ DRAFT REPLY    ☐ REPLY DIRECT  
☐ TENA    ☒ FYI    ☐ FILE

Action: **Wording required**Due: **2003/10/2**Id No: **75071**

s.22

Type: Email Correspondence

Written: 2003/7/24

Office: EDMCSS

Received: 2003/9/18

Entry By: jtberlan

Interim:

Sign By:

Signed:

Batch:

Closed:

Phone:

FAX:

Email:

s.22

File No: 280-30

Subject: British Columbia's forest sector

Subject2:

Other Info: Forwarded from Gordon Campbell's constit. office

Addressed T Gordon Campbell, MLA

Doc Format: Email

Resp. Office: HCP-S. Pol. and Plan

Issue:

Forest Sector

MLA:

Campbell, Gordon (BC Liberal)

Electoral:

Vancouver-Point Grey

**CLOSED RECEIVED**  
SEP 24 2003

STRATEGIC  
POLICY AND PLANNING BR.  
MINISTRY OF FORESTS

### Referrals

From: EDMCSS

Action: Info and file

Due:

To: EMI-MO

Status: Completed

Received:

Completed: 2003/9/18

From: EMI-MO

Action: Wording required

Pending

Due: 2003/9/28

To: EDMCSS

Status: Sent

Received:

Completed:

From: EDMCSS

Action: Wording required

Active

Due: 2003/9/28

To: HCP-S. Pol. and Plan

Status: Sent

Received:

Completed:

### Notes

2003/9/18 jtberlan (EDMCSS) please provide wording.

Email to louise.foster@leg.bc.ca



GORDON CAMPBELL, M.L.A.  
Vancouver-Point Grey

# Fax

To: Ministry of Forests

From: Louise Foster

Constituency Assistant

Fax: 250-953-3862

Pages: 2 inclu cover

Phone:

Date: 25/07/2003

Re: see attached ltr.

CC:

☐ Urgent ☐ For Review ☒ Please Comment ☐ Please Reply ☐ Please Recycle

- Was looking for some info in order to respond

s.22

- Please forward any info to  
louise.foster@leg.bc.ca  
or call me at 604-660-3202 to discuss

Thank You, Louise

Constituency Office:  
3615 West 4th Avenue  
Vancouver, BC V6R 1P2



Phone: 604 660-3202  
Facsimile: 604 660-5488  
E-mail: gordon.campbell.mla@leg.bc.ca  
Website: www.gordoncampbellmla.bc.ca

Campbell.MLA, Gordon

From: s.22  
Sent: July 24, 2003 3:33 PM  
To: Campbell.MLA, Gordon  
Subject: State of the Forest Sector in BC

Call MOF & A re..  
Email this to them  
sent email to Daphne  
Armstrong  
07/08/03

Sir:

I am s.22 a small business owner in the forest consulting sector.

Everybody in our company (about 40 people) is very concerned about the current state of the forest sector in BC. We believe that, while well intended, many of the government initiatives in forestry will be detrimental to our staff, our company, and the entire forest industry. I know other consultants are hurting just as much as we do.

I would appreciate if I could meet with you or one of your representatives to discuss the problems caused by the changes made to the Forest Service and FRBC/FIA funding and suggest simple solutions that would provide a greater future for all British Columbians.

Best Regards,

s.22

Action: **Email response-ADM**Due: **2003/2/14**Id No: **72081**

s.22

Type: Email Correspondence

Written: 2003/1/27

Office: EDMCSS

Received: 2003/2/4

Entry By: jtberlan

Interim:

Sign By:

Signed:

Batch:

Closed:

Phone:

FAX:

Email:

s.22

File No: 280-30

Subject: Working forest proposal - opposed

Subject2:

Other Info: Forwarded from Minister de Jong's constit email address - MOF issue not constit

Addressed T de Jong as MLA

Issue: Working Forest Legislation

Doc Format: Email

MLA:

Resp. Office: HCP-Corp. Pol.

Electoral:

**Referrals**

From: EDMCSS

Action: Info and file

Due:

To: EMI-MO

Status: Completed

Received:

Completed: 2003/2/4

From: EMI-MO

Action: Email response-ADM

Active

Due: 2003/2/14 3

To: EDMCSS

Status: Sent

Received:

Completed:

From: EDMCSS

Action: Email response-ADM

Due: 2003/2/14

To: HCP-Corp. Pol.

Status: Completed

Received: 2002/2/4

Completed: 2003/2/17

To comments: 2003/2/17 LAyres (HCP-Corp. Pol.) response has been approved by Sue and is now  
pasted in response box.

**Notes**

2003/2/4 jtberlan (EDMCSS) email sent

2003/2/17 LAyres (HCP-Corp. Pol.) response has been approved by Sue and is now pasted in response box.

s.22

Dear s.22

Thank you for your email of January 27, 2003, to the Honourable Michael de Jong, regarding the Working Forest Proposal. I have been asked to respond on his behalf.

While I appreciate you sending me your comments on this subject, the Working Forest Proposal falls under the mandate of my colleague, the Honourable Stan Hagen, Minister of Sustainable Resource Management. I have forwarded your email to him to prepare a response. Thank you. *for*

Yours truly,

Bronwen Beedle  
Assistant Deputy Minister, Corporate Policy and Governance Division

Cc: The Honourable Michael de Jong

s.22

Dear

s.22

Thank you for your email of January 27<sup>th</sup> 2003, to the Hon. M. de Jong regarding the Working Forest Proposal. I have been asked to respond.

While I appreciate you sending me your comments on this subject, the Working Forest Proposal falls under the mandate of my colleague, the Honourable Stan Hagen, Minister of Sustainable Resource Management. I have forwarded your email to him to prepare a response.

sp-colleague

Thank you.

Y.T

BB

ADM, CPPG

cc: The Hon. M. de Jong

MRL: 72081E MINISTER CSS EPG-ADM HCP  
CONTACT: Ian Chapman, HCP, 7-0140  
Date typed: 03/02/19 Date revised: 03/02/21 09:23 LT

File: 280-30

FEB 21 2003

s.22

Dear s.22

Thank you for your email of January 27, 2003, to the Honourable Michael de Jong, Minister of Forests regarding the Working Forest Initiative. I have been asked to respond.

The Working Forest Initiative falls under the mandate of the Ministry of Sustainable Resource Management. As such, I have forwarded your email comments to Jon O'Riordan, Deputy Minister for Ministry of Sustainable Resource Management for response.

Thank you again for writing.

Yours truly,

ORIGINAL SIGNED  
BY

Bronwen Beedle  
Assistant Deputy Minister  
Corporate Policy and Governance

pc: The Honourable Michael de Jong, Minister of Forests

Jon O'Riordan, Deputy Minister of Sustainable Resource Management

RECEIVED

FEB 24 2003

CORPORATE  
POLICY AND PLANNING BR  
MINISTRY OF FORESTS



## Executive Division Office, Forests FOR:EX

---

**From:** Executive Division Office, Forests FOR:EX  
**Sent:** Friday, February 21, 2003 3:03 PM  
**To:** s.22  
**Subject:** RE: The Working Forest-72081e

February 21, 2003

Dear s.22

Thank you for your email of January 27, 2003, to the Honourable Michael de Jong, Minister of Forests regarding the Working Forest Initiative. I have been asked to respond.

The Working Forest Initiative falls under the mandate of the Ministry of Sustainable Resource Management.

As such, I have forwarded your email comments to Jon O'Riordan, Deputy Minister for Ministry of Sustainable Resource Management for response.

Thank you again for writing.

Yours truly,

Bronwen Beedle  
Assistant Deputy Minister  
Corporate Policy and Governance

cc: The Honourable Michael de Jong, Minister of Forests

Jon O'Riordan, Deputy Minister of Sustainable Resource Management

-----Original Message-----

**From:** s.22  
**Sent:** Monday, January 27, 2003 10:17 PM  
**To:** deJong, Mike LASS:EX  
**Subject:** The Working Forest-72081

I am strongly opposed to the Working Forest Proposal. It is just another "hare-brained" scheme from this government aimed at maximizing short-term gains from our resources (mainly for corporate gain), with very little consideration for the long-term ecological consequences (or economic consequences, for that matter).

A government press release claims that logging is BC's number one industry. Hello! There are more people currently employed in tourism in BC than there are in logging. The role of timber in the provincial economy is diminishing, as communities attempt to diversify their economies (largely as a result of over logging of first growth forests throughout most of the province).

BC Stats reports that:

- \* The tourism industry has grown by 16 per cent in the past six years, with continued growth forecast. In 1999/00, tourism generated a record \$9.2 billion in British Columbia; with about \$5 billion of this tied to outdoor recreation.

- \* The forest sector currently employs about 6% of BC's work force, considerably less than the 9% of workers employed at the beginning of the 1980s. In 1991, forestry employed one in eleven workers, by 1994 that had dropped to one in sixteen. There are now more people employed in Tourism, and the gap is widening.

Furthermore, forest practices in Provincial forests are already unsustainable! For example, "forestry regulations in BC do not require any protection of small fish streams. On U.S. federal lands in Washington state, a minimum 91-metre no-logging buffer zone is required on each side of a fish-bearing stream." (see [www.davidsuzuki.org](http://www.davidsuzuki.org))

Your working forest proposal is indicative of short-term thinking and British Columbians are looking for long-term sustainable solutions. The current rate of logging is unsustainable and you know it. Tying up half of the provincial land base in mono-culture, disease-prone and unsightly tree farms is simply not economically viable!! I am strongly opposed to such a simplistic solution to our important natural resource and land-use issues!

I strongly urge you to scrap this proposal in favour of sustainable community-based forest solutions, along the lines of the Ministry of Forest Community Forest Pilot Project (see <http://www.for.gov.bc.ca/pab/jobs/community/>) and the BC Community Forest Forum (see <http://www.cf-forum.org/>). Please remember that this letter represents the views of thousands British Columbians who feel writing to you is futile.

s.22

## Donison, Sonia FOR:EX

---

**From:** Anderson, Lisa FOR:EX  
**Sent:** Friday, February 21, 2003 9:26 AM  
**To:** Donison, Sonia FOR:EX  
**Subject:** RE: The Working Forest-72081



72081e.doc

Attached is the revised version that has been approved by Bronwen.

-----Original Message-----

**From:** Donison, Sonia FOR:EX  
**Sent:** Thursday, February 20, 2003 10:46 AM  
**To:** Anderson, Lisa FOR:EX  
**Subject:** FW: The Working Forest-72081

Approval please, update Cliff etc

Thank you! " Di Bohja "!!

Sonia Donison  
Supervisor  
Correspondence Services Section  
(phone) 250-953-3859  
(fax) 250-953-3862  
e-mail - sonia.donison@gems2.gov.bc.ca

-----Original Message-----

**From:** s.22  
**Sent:** Monday, January 27, 2003 10:17 PM  
**To:** deJong, Mike LASS:EX  
**Subject:** The Working Forest-72081

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s.22

# Ministry of Forests

EDMCSS

Feb 4, 2003

Action: **Email response-ADM**

Due: **2003/2/14**

Id No: **72081**

s.22

Type: Email Correspondence

Written: 2003/1/27

Office: EDMCSS

Received: 2003/2/4

Entry By: jtberlan

Interim:

Sign By:

Signed:

Batch:

Closed:

Phone:

FAX:

Email: s.22

File No: 280-30

Subject: Working forest proposal - opposed

Subject2:

Other Info: Forwarded from Minister de Jong's constit email address - MOF issue not constit

Addressed T de Jong as MLA

Issue: Working Forest Legislation

Doc Format: Email

MLA:

Resp. Office: HCP-Corp. Pol.

Electoral:

## Referrals

From: EDMCSS

Action: Info and file

Due:

To: EMI-MO

Status: Completed

Received:

Completed: 2003/2/4

From: EMI-MO

Action: Email response-ADM

Pending

Due: 2003/2/14

To: EDMCSS

Status: Sent

Received:

Completed:

From: EDMCSS

Action: Email response-ADM

Active

Due: 2003/2/14

To: HCP-Corp. Pol.

Status: Sent

Received:

Completed:

**Berlando, Joy T FOR:EX**

**From:** s.22  
**Sent:** Monday, January 27, 2003 10:17 PM  
**To:** deJong, Mike LASS:EX  
**Subject:** The Working Forest

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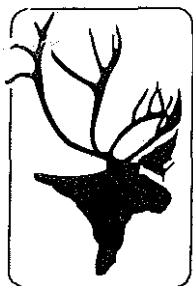
Furthermore, forest practices in Provincial forests are already unsustainable! For example, "forestry regulations in BC do not require any protection of small fish streams. On U.S. federal lands in Washington state, a minimum 91-metre no-logging buffer zone is required on each side of a fish-bearing stream." (see [www.davidsuzuki.org](http://www.davidsuzuki.org))

Your working forest proposal is indicative of short-term thinking and British Columbians are looking for long-term sustainable solutions. The current rate of logging is unsustainable and you know it. Tying up half of the provincial land base in mono-culture, disease-prone and unsightly tree farms is simply not economically viable!! I am strongly opposed to such a simplistic solution to our important natural resource and land-use issues!

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s.22

MINISTRY OF FORESTS	
CORRESPONDENCE SERVICES SECTION	
RECEIVED	
72081	
MRL #	
FEB - 3 2003	
DUE DATE:	
<input type="checkbox"/> DRAFT REPLY	<input type="checkbox"/> DRAFT DIRECT
<input type="checkbox"/> FNA	<input type="checkbox"/> FYI
<input type="checkbox"/> FILE	



C · A · R · I · B · O · O

REGIONAL DISTRICT

OFFICE OF THE CHAIRMAN

Suite D, 180 N. Third Ave., Williams Lake, B.C. V2G 2A4 • Phone (250) 392-3351 or 1-800-665-1636 • Fax (250) 392-2812

Please visit our web site at [www.caribood.bc.ca](http://www.caribood.bc.ca)



YOUR REFERENCE: APR - 8 2003

OUR REFERENCE: 0510-26  
POLICY AND PLANNING  
MINISTRY OF FORESTS

February 28, 2003

The Honourable Stan Hagen, Minister  
Ministry of Sustainable Resource Management  
PO Box 9054, STN PROV GOVT  
Victoria, BC V8W 9E2

Dear Mr. Hagen:

Re: Working Forest Initiative

MINISTER OF FORESTS <b>RECEIVED</b>	
MRL #: _____	
MAR 10 2003	
DUE DATE: _____	
<input type="checkbox"/> DRAFT REPLY	<input type="checkbox"/> REPLY DIRECT
<input type="checkbox"/> FNA <input checked="" type="checkbox"/> FYI	<input type="checkbox"/> FILE

Thank you for the opportunity to review the discussion paper titled "A Working Forest for British Columbia". The Cariboo Regional District Board of Directors reviewed the document at their regular meetings held February 7<sup>th</sup> and 21<sup>st</sup>, 2003.

The Board recognizes that the Ministry is striving to achieve the following *New Era* commitment:

*"Establish a working forest land base to provide greater stability for working families and to enhance long-term forestry management and planning."*

The discussion paper may in fact accomplish that particular goal. However, in our view, accomplishment of that goal is at the detriment of the interests of other stakeholders interested in utilizing crown land.

The proposed "working forest" is broader, larger, and more encompassing than the policy statement in the *New Era* document. The proposed policy will make all potential users of crown land including agriculture, local government, and private individuals, subservient to the interests of the forest industry.

.../2

- MUNICIPALITIES -

QUESNEL • WELLS • WILLIAMS LAKE • 100 MILE HOUSE

- ELECTORAL AREAS -

A - Red Bluff-Quesnel South • B - Quesnel West-Bouchie Lake • C - Barlow-Barkerville • D - Commodore Heights-McLeese Lake  
E - South Lakeside-Dog Creek • F - 150 Mile House-Horsefly-Likely • G - Lac La Hache-108 Mile • H - Canim Lake-Forestry  
I - Narcosli-Nazko • J - West Chilcotin • K - East Chilcotin • L - Lone Butte-Interlakes

SNR 2014-00232  
Page 15





**Ted Armstrong, Letter of February 28, 2003**  
**Re: Working Forest Initiative, Page 2 of 2**

The proposed policy removes a local government's right and duty to designate potential uses of land, removing our ability to designate suitable land for agricultural development. We in the Cariboo-Chilcotin recognize the importance of agriculture in our communities.

We feel that in striving to provide certainty, the government has provided uncertainty to all other sectors (mining excluded).

Yours truly,

Ted Armstrong, Chairman  
Cariboo Regional District Board

c: The Honourable Michael de Jong, Minister, Ministry of Forests

The Working Forest Initiative  
Ministry of Sustainable Resource Management  
PO Box 9532, Stn Prov Gov't  
Victoria, BC V8W 9M1



# Ministry of Forests

EDMCSS

Feb 18, 2003

Action: **Info and file**

Due:

Id No: **72321**

R. Boswell  
President  
B.C. Wildlife Federation

Type: Email Correspondence

Written: 2003/2/17

Office: EDMCSS

Received: 2003/2/18

Entry By: jtberlan

Interim:

Sign By:

Signed:

Batch:

Closed: 2003/2/18

Phone:

FAX:

Email: dwalker@bcwf.com

File No:

Subject: Working forest paper

Subject2:

Other Info: pc: Minister de Jong

Addressed T Hagen

Issue: Working Forest Legislation

Doc Format: Email

MLA:

Resp. Office: HCP-Corp. Pol.

Electoral:

RECEIVED

FEB 19 2003

POLICY AND PLANNING BR  
MINISTRY OF FORESTS

## Referrals

From: EDMCSS

Action: Info and file

Due:

To: EMI-MO

Status: Completed

Received:

Completed: 2003/2/18

From: EMI-MO

Action: Info and file

Due:

To: HCP-Corp. Pol.

Status: Completed

Received:

Completed: 2003/2/18

Please copy to Brian  
Farber -  
Thanks.

done

## Donison, Sonia FOR:EX

**From:** Denis, Louise L FOR:EX  
**Sent:** Monday, February 17, 2003 4:14 PM  
**To:** Donison, Sonia FOR:EX  
**Subject:** BC Wildlife Federation



Working Forests Paper

Feb 17, ...

Over to you.

-----Original Message-----

**From:** Doug Walker [mailto:dwalker@bcwf.com]  
**Sent:** February 17, 2003 2:09 PM  
**To:** dwalker@bcwf.com  
**Subject:**

Here is the B.C. Wildlife Federation Response to the Working Forest Paper.

The original was sent via mail and email to Minister Hagen, and copied to Minister de Jong.

A copy will be sent to all clubs and committee Chairs as well.

Doug

MINISTRY OF FORESTS	
CORRESPONDENCE SERVICES SECTION	
RECEIVED	
MRL #	70321
FEB 18 2003	
DUE DATE:	
<input type="checkbox"/> DRAFT REVIEW	<input type="checkbox"/> LETTER BY DIRECT
<input type="checkbox"/> FNA	<input checked="" type="checkbox"/> FNA

February 17, 2003

Stan Hagen  
Minister of Sustainable Resource Management  
PO Box 9354 Stn Prov Govt.  
Victoria BC  
V8W-9E2



**B.C. Wildlife Federation**

#303 - 19292 - 60th Avenue  
Surrey, B.C. V3S 3M2  
Tel: (604) 533-2293  
Fax: (604) 533-1592  
Email: [wildlife@bcwf.com](mailto:wildlife@bcwf.com)  
Website: [www.bcwf.bc.ca](http://www.bcwf.bc.ca)

Dear Minister Hagen:

In response to your letter of January 22<sup>nd</sup> 2003 requesting comments on the Discussion paper titled "A Working Forest for British Columbia" the B.C. Wildlife Federation offer the following comments.

The BCWF has studied and considered the positive and potentially negative impacts that could result from the creation of the Working forest proposed in the discussion paper: "A Working Forest For British Columbia". The positive aspect is of course the ability for forest dependent communities to continue to exist, prosper, and to maintain their current rural lifestyle and economic viability. This is indeed a goal that we can strongly support; however, we also see the possibility of some negative impacts, which are discussed below.

Approximately 75 million Ha of BC lies within the Provincial Forests Designation, however, only about 23 million Ha of that is actually operable forest. The proposed 45 million Ha of the Working Forest includes a great deal of land that is currently not harvested for a variety of reasons, and effectively results in a major increase in land base being made available to industry.

Harvesting in Provincial forests must be done in accordance with the Forest Practices Code, and land identified as ungulate winter range, riparian habitat, visual quality areas, etc., must only be harvested following specific guidelines laid out in the code. All types of forest tenures on Crown lands were subject to code requirements in the past. Under the new Results Based Code there are some exceptions, such as the woodlot program, that are excused from some of these code requirements. Additionally the new code will be based on landscape unit goals and objectives, which at this time have not been established in many parts of the province. **We fear the expansion of the Working Forest land base without these landscape unit plans in place, as well as allowing any type of forest tenure exemptions from code requirements, as being potentially dangerous to wildlife and environmental values**

Page 1 of 7  
B.C. Wildlife Federation:  
Response to "A Working Forest for British Columbia"

*Honorary Patron: Her Honour Iona V. Campagnolo, PC, CM, OBC Lieutenant-Governor of British Columbia*

The definition of the working forest is stated as being all Crown Land that currently has trees on it and also includes Crown Land capable of growing commercial forests. It must be considered that such a definition will also include the majority of all wildlife habitats within BC. We have very great concerns regarding this land base that is not currently operable, but which will be included in the Working Forest. A very large part of this land is wildlife habitat, for example the deciduous stands that are the major portion of moose and deer habitat in BC. Will the new designation make it easy for forest industry companies to slash and burn this habitat and plant marketable conifer species on that land base? If so, this could be very hard on our ungulate populations in BC. **We are quite concerned about including large amounts of wildlife habitat into the Working Forest if commercial values will be considered as the highest priority on that land base.**

- For example, will the new results based code be able to protect land identified as ungulate winter range to the same degree of effectiveness as the old code did, considering the priority for managing land in the Working Forest will have commercial priority?
- Will forest in-growth areas which historically were grasslands habitat, become un-recoverable once they are part of the working forest, and to what degree will the working forest designation have on the ability for conservation organizations to complete controlled burns and other such habitat restoration activities if these lands now have commercial forest priority?
- Will there be a concerted effort to bring the 22 million Ha not currently available to industry into productive forest, which could easily be at the expense of other values?

**Recommendation 1:**

**The BCWF recommends that the government take advantage of this opportunity to put in place a long-term strategy to restore traditional grasslands habitat, ungulate winter ranges, and other important habitat features that fall within the Working Forest to historical wildlife production levels. Additionally there must be a commitment to manage the Working Forest in such a way as to not cause damage to, or erosion of the total of wildlife habitats, or declines in wildlife population in BC. Because industry must have certainty and long-term guarantees, they should be willing to enhance wildlife by accommodating their needs (habitats and food sources) in development plans.**

We also feel that allowing forest industry companies to develop landscape unit objectives will not provide equal concern for wildlife habitat. We strongly feel that landscape unit planning must include a broad range of forest stakeholders, including recreation, ranching, and conservation concerns. We also feel that relying on industry to develop and build data warehouses and provide monitoring without input from recreation, ranching, and conservation concerns will inevitably place these other values at a much lower priority.

We ask, if industry is going to be allowed to identify priority areas for timber management, how will this impact the other values in these areas, and will other interests be also allowed to identify priority areas for their particular interests?

**Recommendation 2:**

**The BCWF recommends that MOF and MWLAP should develop criteria for identification of areas of critical fish and wildlife habitat within the Working Forest and to determine specific requirements that must be met in order to protect these habitats, and that these areas must be identified before timber management planning for these areas takes place.**

**Recommendation 3:**

**The BCWF recommends that the government identify areas of importance for recreation purposes within the Working Forest and to determine specific requirements that must be met in order to protect these values. (UREPs for example)**

Non-forestry uses in the Working forest such as recreation, hunting and angling must be accommodated; these all exist at the present time and must continue. With a Working Forest there may be a tendency by industry to assume ownership and restrict other uses.

On page 13 of the discussion paper conversion of ALR lands within the Working Forest to private status is discussed. We are concerned about the actual amount of this land, and what would be the potential loss for public access if this were to occur. The BCWF will also not be supportive of any initiative that may lead to any large-scale conversion of Crown Land to private ownership.

**Recommendation 4:**

**The BCWF recommends that applications for conversion of public ALR land to private agricultural land should be subject to public and stakeholder group consultation.**

The BCWF needs complete and absolute assurance from government that unrestricted public access to Crown Lands will be honored and protected, and reduced in no way what-so-ever due to the establishment of the Working Forest. This must apply to all lands within the Working Forest with no exceptions related to special sub-categories or any other special land designations except those deemed necessary for conservation or public safety. Our members will not give up public access to Crown Lands to provide certainty to industry.

**Recommendation 5:**

**The BCWF recommends that un-restricted public access be maintained in all parts of the Working Forest.**

On page 14 of the discussion paper, much is said regarding tenures (leases and licenses) issued under the Land Act. We have concerns in this regard for maintaining public access and for the current level of environmental assessment used by LWBC to evaluate the potential impacts to fish, wildlife, and resident recreation opportunities caused by these licenses and tenures.

**Recommendation 6:**

**The BCWF would like to recommend that a more accountable method to issue tenures under the Land Act should be developed to replace the current system used by LWBC within the proposed Working Forest land base.**

**Elements of the Working Forest Policy:**

**Element 1 – Defining the Working Forest.**

The BCWF is very pleased to note the governments resolve to manage parts of the working forest for biodiversity, environmental, and social benefits and that portions of the working forest will be dedicated to these purposes over the short and long term. However, we believe that, especially during periods of economic weakness in the forest products marketplace, there will be considerable pressure from the forest industry companies to weaken that resolve. For this reason we would prefer to see lands that are dedicated to other purposes not included, or removed from the working forest. These would most likely be lands that are not in the 23 million Ha. that are of current commercial interest

to the forest industry. In this manner there would not be any pressure from industry to convert lands dedicated to other values to conifer plantations, etc. We also have a concern that decisions for withdrawals of land from the Working Forest will be by Order In Council, which may result in political, rather than science (urban versus rural) based decisions being made.

**Recommendation 7:**

**The BCWF feels that it would be appropriate to not include lands specifically dedicated to highly valued conservation values in the Working Forest, and that when ever such new parcels are thus identified and dedicated, they should be removed from the Working Forest.**

**Element 2 – Working forest Policy Goals.**

1. We are disappointed that wildlife conservation values and resident recreation values are not mentioned in this paragraph as these do provide economic and social benefits.
2. We are pleased to see wildlife, biodiversity and recreation listed as lands which may be identified for specific priorities. We note that further planning may lead to a special land use class to minimize potential shifts away from specific timber investment areas. We think it would also be appropriate to give similar protection to conservation, wildlife, and recreation areas to minimize the shift away from these values and towards fiber supply areas. Conservation areas should also be considered investment areas since considerable funds may be expended in these areas for wildlife habitat enhancement for example.
3. Land use decisions must include an adequate public consultation process.
4. We appreciate the commitment towards the concepts of eco-system based management and the retention of high conservation forest values. This should have positive benefits for wildlife like woodland caribou.

### **Element 3 – Land-Use Planning and the Working Forest.**

Many of the members of the BCWF have a considerable amount of time and energy invested in Land and Resource Management Plans, and we need reassurance that these planning efforts were not in vain and that these plans will continue to be the base for future "on the ground" planning. These planning processes must involve extensive public stakeholder consultation. The BCWF has always supported planning processes and will continue to do so, but only if decisions are implemented and upheld.

#### **Recommendation 8:**

**The BCWF recommends that all decisions involving the establishment and the operations of the Working Forest must be consistent with higher level land use plans developed through LRMP, SRMP, and CORE processes, and this must include the special priority status of Special Management Zones created in these plans.**

### **Element 4 – Information and Monitoring for the Working Forest.**

The government plan to work in partnership with industry to maintain the data warehouse and to provide monitoring of the working forest may, in our opinion, not be entirely workable. We feel that public involvement through public advisory boards, or some such mechanism may be required to ensure proper identification of such critical items as endangered species and endangered species habitat that may be difficult to get forest industry companies to identify because of the great economic harm it could cause them.

#### **Recommendation 9:**

**Monitoring of the Working Forest must include the general public and other stakeholder groups.**



**Element 5 – Administering the Working Forest.**

**Land Designation:**

It is stated in this section that inside the Working Forest designation there should be an opportunity to identify sub-categories for land of significant importance to the forest industry as priority timber management areas. We would like to see a similar opportunity to identify sub-categories for land of significant importance to conservation or wildlife management, where priorities for these purposes would be put in place. Examples would be for critical wildlife habitat areas or for managing ungulates at the production level for economic and recreation purposes. **(See recommendations 2 and 3 above).** On page 12 it states: "existing Provincial Forest designations will be rescinded". This does not specifically state which designations will be rescinded. Does this include UREPs and SMZs for example?


**Recommendation 10:**

**We recommend sub-categories similar to UREPS that pertain to recreation values, and Special Management Zones created for conservation values should be maintained.**

**Improved Decision Making:**

We would not support the removal of Crown Land from the Working forest specifically for conversion to private status. We would also expect public involvement in the making of all major decisions, and that the goals and objectives of previously established LRMPs and SRMPs would be strictly followed unless similar public processes were utilized to reverse these goals or objectives. It appears that MSRM is going to be the lead Ministry in planning for the Working forest. We feel that MOF and MWLAP must also be involved in the decision-making role so all scientific data is considered in the planning processes. We also feel that a decision making process that will be science based rather than politically based should be put in place.

Yours in Conservation  
B.C. Wildlife Federation



R. Boswell  
President

# Ministry of Forests

EDMCSS

Apr 2, 2003

Action: **Info and file**

Due:

Id No: **72981**

Lorne Bradley  
Seymour Arm Community Association  
Box 18  
RR2  
Sicamous BC V0E 2V0

Type: Correspondence

Written: 2003/3/21

Office: EDMCSS

Received: 2003/3/31

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Sign By:

Signed:

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Subject2:

Other Info:

Addressed T Minister de Jong

Issue: Working Forest Initiative

Doc Format: Letter

MLA: Abbott, George Malcolm (BC Liberal)

Resp. Office: HCP-S. Pol. and Plan

Electoral: Shuswap

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POLICY AND PLANNING BR  
MINISTRY OF FORESTS

## Referrals

From: EDMCSS

Action: Info and file

Due:

To: EMI-MO

Status: Completed

Received:

Completed: 2003/4/2

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Action: For necessary action

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To: HCP-S. Pol. and Plan

Status: Completed

Received:

Completed: 2003/4/2

## Notes

2003/4/2 plclayto (EDMCSS) To branch for Info and File.

SEYMOUR ARM COMMUNITY ASSOCIATION,  
Forestry Committee,  
Box 18, R.R. #2,  
Sicamous, B.C., V0E 2V0

March 21, 2003.

Mr Michael De Jong, Minister of Forests  
P.O. Box 9049 Stn Prov Govt,  
Victoria, B.C., V8W 9E2



15PM 15542  
to CPP for info

MINIST...	
MRL #:	72981
F 23 2003	
DUE DATE:	
<input type="checkbox"/> DRAFT REPLY	<input type="checkbox"/> REPLY DIRECT
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Dear Mr. De Jong:

We are enclosing a copy of the submission we sent in on the Working Forest Initiative outlining some of our concerns, questions and suggestions on this proposal. We hope that that this process will continue to be an open process and we will hear back on our concerns in a meaningful way and not just a **"thank you for your interest"** reply.

It appears to us that while this document puts forward some very interesting concepts, it does not have any real substance on how this will be attained, what the long term impact will be, and will this really be a positive initiative regarding Soft Wood lumber issues with the U.S.A. and getting good stewardship certification for our forests? We feel the focus of you Ministry should be maximizing the value to B.C of the forest products presently being harvested, maximizing the employment opportunity of the products being harvested, especially locally, and giving much more weight to the other values the forests have for all of us, economic, environmental and social.

We live in a forested community and while we have seen some improvement of some of the problems in the forest industry and some of your staff are dedicated and very professional, we continue to see evidence of ongoing erosion, landslides, and poorly established plantings--actually this seems to be getting worse not better. None of the initiatives proposed by your government or industry groups tackle any of the problems that are showing up--they only address cutting a greater amount of our forests, importing non nature forest cover species for faster regrowth with no regard to what the value of these species will be in the future market or what pest and environmental problems this will bring, exporting jobs from smaller communities to large centres or shipping the raw product out of the country and making it even more difficult for local input into the management of our forests.

We look forward to hearing from you on any comments you have on this submission.

Yours truly,

SACA Forestry Committee

# SEYMOUR ARM COMMUNITY ASSOCIATION

## Forestry Committee

Box 18, R.R.#2, Seymour Arm, Sicamous, B.C., V0E 2V0

March 13, 2003

Working Forest Initiative,  
Ministry of Sustainable Resource Management,  
P.O. Box 9352 Stn Prov Govt.,  
Victoria, B.C., V8W 9M1

### **RE: Working Forest Discussion Paper of January 2003**

We have read the Working Forest Discussion Paper and have comments, concerns and suggestions on this paper as follows:

#### COMMENTS:

- a new approach to Forest management is definitely needed
- This discussion paper put forward many good ideas but provides no substance on how these might be implemented or the effect they will have in the long term.

#### CONCERNS:

- This document seems to give further power to large corporations when already small communities and individuals are increasingly squeezed between big unions, big corporations and big government..
- will this designation mean that corporations **given tenure** to the forests be allowed compensation if this tenure has to be modified in the future?
- will this designation result in B.C.'s forest being subject to regulation under NAFTA or GATS?
- will there be increased commitment to value added processing?
- will there be increased ability for local communities to have a meaningful say in the forests surrounding them or will they be heard and ignored?
- will this result in greater employment or will it contribute to the downward spiral of increasing amounts of forests being processed by fewer and fewer people?
- is there any guarantee that short term gains in Allowable Cut will not be followed by a downward period and that this gain will not be the result of introducing non native species i.e. dry belt trees into wet belt areas to provide fast regrowth figures?

#### SUGGESTIONS:

- local communities should have more input in the forests surrounding them.
- more emphasis needs to be placed on Value-added forest products instead of our current trend of just increasing volume.
- more weight needs to be given to "acceptable risks" in timber harvesting planning: i.e. what may be an acceptable risk to a large corporation with a large lawyer team behind them is not an "acceptable risk" to the people actually affected especially as we are

increasing our harvest of timber in more marginal terrain.

-Forest companies should be bidding for the wood on an open market with a licence to bid on up to a maximum quantity.

-B.C. Forest products should be processed in B.C.

We look forward to a timely reply.

Yours truly,

Lorne Bradley  
for SACA Forestry Committee

c.c: Mr. Darrel Stinson, M.P.  
Mr. Michael De Jong, Minister of Forests  
Mr. George Abbott, MLA  
Mr. Tom Coombes, Regional Director CSRD Area "F"