

**Audit of Timber Harvesting and Road
Construction, Maintenance and Deactivation**

**Ministry of Forests
Small Business Forest Enterprise Program
Boundary Forest District**

FPB/ARC/19

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Table of Contents

A. Report from the Board

B. Forest Practices Board Compliance Audit Process

C. Report from the Auditor

1.0 Introduction

2.0 Audit Scope

3.0 Audit Findings

4.0 Audit Opinion

Report from the Board

A. Report from the Board

This is the Forest Practices Board's report on a compliance audit¹ of the Small Business Forest Enterprise Program (SBFEP)² in the Boundary Forest District (see map). The operations of the SBFEP are conducted in numerous locations around Grand Forks extending north from the Washington-British Columbia border to Big White Mountain, and east from the West Kettle River to Christina Lake.

The audit examined the district's timber harvesting and road practices, including related operational planning, for the period September 1, 1996 to September 15, 1997 to assess compliance with the *Forest Practices Code of British Columbia Act* and related regulations (the Code).

The district's responsibilities and individual SBFEP licensee's responsibilities and performance are closely linked. The district is responsible for managing the SBFEP, including preparing and approving operational plans, much of the road construction, maintenance and deactivation, and meeting silviculture obligations. The licensee is responsible for ensuring that all operations, including harvesting, are carried out in compliance with the Code. The district has a close working relationship with each licensee and an overall responsibility for managing the SBFEP and also ensuring that licensees have met their obligations.

Before completing this report, the Board considered written submissions from Boundary Forest District, as required by section 182 of the Act.

The Board's conclusions are based on an audit of the following plans and practices:

- operational plans, including the Boundary SBFEP's 1996 - 2000 Forest Development Plan, as they relate to harvesting and road practices
- harvesting of 56 cutblocks
- construction of approximately 28.9 kilometers of road
- maintenance of approximately 71.4 kilometers of road
- maintenance of an indeterminate number of kilometers of forest service road for which the Boundary SBFEP is, or was, the primary road user
- deactivation of approximately 40 sections of road, totaling 68 kilometers

¹ Part B of this document provides background information on the Board's audit program and the process followed by the Board in preparing its report.

² The report from the auditor (Part C of this document) provides specifics about the operating areas of the Boundary Forest District Small Business Forest Enterprise Program, the forest planning and field activities of the SBFEP that were the subject of this audit and the audit findings.

Audit Scope Limitation

The district did not differentiate between forest service roads and roads that were SBFEP responsibility to maintain. In addition, there was a lack of information available on forest service roads that accessed SBFEP areas harvested before the audit period. As a result, the district did not have a complete record of the roads that were the responsibility of the SBFEP to maintain.

The scope limitation described by the auditor, although serious, is less serious than others reported to date because it relates only to the maintenance of those roads that access SBFEP areas harvested before the audit period. The limitation is a concern as the Board is unable to comment on the district's compliance with Code requirements to maintain those roads. Without adequate records, there is a risk that adverse impacts could occur to forest resources and road users as a result of inadequate inspection and maintenance.

The district advised the Board that future forest development plans will identify all of the roads that are SBFEP responsibility.

Conclusions

Timber harvesting

The district's timber harvesting generally complied with Code requirements. The audit identified numerous instances of non-compliance related to harvesting activities that did not comply with operational plans and a situation where adequate steps were not taken to assess potential cultural heritage resource values. While the individual instances of non-compliance with operational plans were not significant, the frequency of non-compliance was significant.

In several cases where harvesting activities did not comply with approved operational plans, substantially more trees were cut per hectare than authorized within areas approved for partial cutting. This makes it difficult to achieve the objectives of silviculture prescriptions and can lead to blowdown of the remaining trees. The Board is concerned that such harvesting practices have the potential for greater environmental impacts in the future should they continue. The Board notes that the district had identified the non-compliance prior to the audit and enforcement actions were being considered.

The Board recognizes that the district was being innovative by implementing partial cutting systems and a variety of logging methods in the diverse forest types of the area. Complex silviculture prescriptions associated with partial cutting can be more difficult to achieve and the Board wishes to emphasize the importance of using skilled operators and adequate supervision to ensure practices comply with the prescriptions and achieve the objectives.

The district did not take adequate measures to preserve and protect cultural heritage resource values identified by an archaeologist on an active cutblock. The district did not identify and mark the exact location of the cultural heritage resource values or follow up the archaeologist's concern that additional cultural heritage resource values could be present. The likelihood that damage to cultural heritage resource values occurred in this situation is low to moderate, in part, because the area was being logged using horses. This type of logging is likely to create less disturbance. However, there was the potential for damage to occur.

Road construction

The district's road construction generally complied with Code requirements. During road construction, there were many instances where no culverts were installed or no ditches were constructed or those constructed did not meet the requirements of approved construction plans, or the Code. While the individual instances of non-compliance were not significant, the frequency of non-compliance was significant. There is potential for greater environmental impacts in the future should these road construction practices continue. The district has advised the Board that it was aware of several of these situations and had commenced enforcement action or issued stop work orders.

Road maintenance

The district's road maintenance generally complied with Code requirements. Because of the scope limitation, this opinion relates only to those roads that access current SBFEP operating areas and those SBFEP roads under permit. The Board can not comment on the maintenance of roads used to access SBFEP operating areas harvested before the audit period.

Road deactivation

The district's road deactivation did not comply with Code requirements. Roads that were deactivated were not identified in the district's forest development plan. Because of this deficiency, third parties, including the public, would not know what roads are planned for deactivation and would be unable to comment on the plans. This, along with the lack of signs identifying deactivated roads, could result in safety concerns, loss of access, and confusion about what access is available to forest resource users.

In addition, the deactivation performed on several roads was not adequate to control water flow and stabilize the road prisms because of inadequate cross ditches and failure to remove road berms. Inadequate deactivation resulted in the deposit of sediment into a non-fish stream and two slides, one of which almost reached a fish stream. The Board is concerned that severe impacts can occur if roads are not properly deactivated.

The district has advised the Board that, in response to the audit, the 1997 Forest Development Plan has been amended to ensure full compliance with the Code. The district also issued several stop work orders, and has advised the Board that it has initiated remedial actions and instituted a program to place signs on deactivated roads.

Recommendations

As provided by section 185 of the Act, the Board makes the following recommendations regarding the Boundary Forest District Small Business Forest Enterprise Program.

Recommendation 1 - Timber harvesting

The Board recommends that Boundary Forest District:

- a) ensure that operational plans for partial cutting systems accurately reflect stand conditions;
- b) ensure that all licensees have the necessary skills and equipment to carry out operational plans, particularly where these plans are complex;

- c) review and revise existing procedures to ensure that licensees comply with approved operational plans;
- d) ensure that district monitoring and supervision of operations is appropriate for the complexity of operational plans and the capabilities of the operators; and
- e) investigate and take enforcement actions to address the non-compliance with the operational plans, including the cutting of more trees than permitted and the construction of unauthorized bladed skid trails, described in the report from the auditor.

Recommendation 2 - Unidentified resource features

The Board recommends that Boundary Forest District develop and implement operating procedures so that staff and licensees respond when qualified people identify resource features, such as cultural heritage resources. This will ensure that resource features are protected.

Recommendation 3 - Road construction

The Board recommends that Boundary Forest District ensure that the construction of ditches complies with the Code and that culverts are installed at the time of road construction.

Recommendation 4 - Road Maintenance

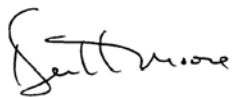
The Board recommends that Boundary Forest District ensure that roads, for which the SBFEP is responsible, are adequately identified in the forest development plan.

Recommendation 5 - Road deactivation

The Board recommends that Boundary Forest District:

- a) ensure that all planned and completed road deactivation is identified in the forest development plan;
- b) ensure that completed deactivation activities are adequate to control water flow and stabilize roads;
- c) ensure that all necessary signs are in place to identify deactivated roads; and
- d) complete remedial actions on those sites where inadequate deactivation was identified.

Under section 186 of the Act, the Board requests that the district advise the Board by September 30, 1999 of the actions taken and the timing to address the above recommendations.



Keith Moore
Chair

June 18, 1999

Forest Practices Board Compliance Audit Process

B. Forest Practices Board Compliance Audit Process

Background

The Forest Practices Board conducts audits of government's and agreement holder's compliance with the *Forest Practices Code of British Columbia Act* and regulations (the Code). The Board is given the authority to conduct these periodic independent audits by section 176 of the Act.

Compliance audits examine forest planning and practices to determine whether or not they meet Code requirements.

The Board undertakes both "limited scope" and "full scope" compliance audits. A limited scope audit involves the examination of selected forest practices (e.g., roads, or timber harvesting, or silviculture) and the related operational planning activities. A full scope audit examines all operational planning activities and forest practices.

The Board determines how many audits it will conduct in a year, and what type of audits (limited or full scope), based on budget and other considerations. The Board audits agreement holders who have forest licences or other tenures under the *Forest Act* or the *Range Act*. The Board also audits government's Small Business Forest Enterprise Program (SBFEP) which is administered by Ministry of Forests district offices. Selection of agreement holders and district SBFEPs for audit is done randomly, using a computer program, to ensure a fair, unbiased selection of auditees.

Audit Standards

Audits by the Forest Practices Board are conducted in accordance with the auditing standards developed by the Board. These standards are consistent with generally accepted auditing standards.

The audits determine compliance with the Code based on criteria derived from the *Forest Practices Code of British Columbia Act* and its related regulations. Audit criteria are established for the evaluation or measurement of each practice required by the Code. The criteria reflect judgments about the level of performance that constitutes compliance with each requirement.

The standards and procedures for compliance audits are described in the Board's *Reference Manual—Compliance Audits*.

Audit Process

Conducting the Audit

Once the Board selects an audit and decides on the scope of the audit (limited scope or full scope), the staff and resources required to conduct the audit and the period covered by the audit are determined. Board staff also meet with the party being audited to discuss the logistics of the audit before commencing the work.

All the activities carried out during the period subject to audit are identified. This includes activities such as the sites harvested or replanted and road sections built or deactivated during the audit period. The items that comprise each forest activity are referred to as a “population.” For example, all sites harvested form the “timber harvesting population.” All road sections constructed form the “road construction population.” The populations are then sub-divided based on factors such as the characteristics of the sites and the potential severity of the consequences of non-compliance on the sites.

The most efficient means of obtaining information to conclude whether there is compliance with the Code is chosen for each population. Because of limited resources, sampling is usually relied upon to obtain audit evidence, rather than inspecting all activities.

Individual sites and forest practices within each population have different characteristics, such as the type of terrain or type of yarding. Each population is divided into distinct sub-populations on the basis of common characteristics (e.g., steep ground vs. flat ground). A separate sample is selected for each population (e.g., the cutblocks selected for auditing timber harvesting). Within each population, more audit effort (i.e., more audit sampling) is allocated to the sub-population where the risk of non-compliance is greater.

Audit work in the field includes assessments from helicopters and intensive ground procedures such as the measurement of specific features like road width. The audit teams generally spend two to three weeks in the field.

Evaluating the Results

The Board recognizes that compliance with the many requirements of the Code is more a matter of degree than absolute adherence. Determining compliance requires the exercise of professional judgment within the direction provided by the Board.

Auditors collect, analyze, interpret and document information to support the audit results. The audit team, comprised of professionals and technical experts, first determines whether forest practices are in compliance with Code requirements. For those practices considered to not be in compliance, the audit team then evaluates the degree to which the practices are judged not in compliance. The significance of the non-compliance is determined based on a number of criteria including the magnitude of the event, the frequency of its occurrence, and the severity of the consequences.

As part of the assessment process, auditors categorize their findings into the following levels of compliance:

Compliance – where the auditor finds that practices meet Code requirements.

Not significant non-compliance – where the auditor, upon reaching a non-compliance conclusion, determines that a non-compliance event, or the accumulation and consequences of a number of non-compliance events, is not significant and is not considered worthy of reporting.

Significant non-compliance – where the auditor determines that the event or condition, or the accumulation and consequences of a number of non-compliance events or conditions, is significant and is considered worthy of reporting.

Significant breach – where the auditor finds that significant harm has occurred or is beginning to occur to persons or the environment as a result of the non-compliance. A significant breach can also result from the cumulative effect of a number of non-compliance events or conditions.

Identification of a possible significant breach requires the auditor to conduct tests to confirm whether or not there has been a breach. If it is determined that a significant breach has occurred, the auditor is required by the *Forest Practices Board Regulation* to immediately advise the Board, the party being audited, and the Ministers of Forests, Energy & Mines, and Environment, Lands & Parks.

Reporting

Based on the above evaluation, the auditor then prepares the “Report from the Auditor” for submission to the Board. The party being audited is given a draft of the report before it is submitted to the Board so that the party is fully aware of the findings. The party is also kept fully informed of the audit findings throughout the process, and is given opportunities to provide additional relevant information and to ensure the auditor has complete and correct information.

Once the auditor submits the report, the Board reviews it and determines whether any party or person is potentially adversely affected by the audit findings. If so, the party or person must be given an opportunity to make representations before the Board decides the matter and issues a final report to the public and government. The representations allow potentially adversely affected parties to present their views to the Board.

At the discretion of the Board, representations may be written or oral. The Board will generally offer written representations to potentially adversely affected parties, unless the circumstances strongly support the need for an oral hearing.

The Board then reviews both the report from the auditor and the representations before preparing its final report, which includes the Board’s conclusions and may also include recommendations, if appropriate.

If the Board’s conclusions or recommendations result in newly adversely affected parties or persons, additional representations would be required.

Once the representations have been completed, the report is finalized and released: first to the auditee and then to the public and government.

Report from the Auditor

C. Report from the Auditor

1.0 Introduction

As part of the Forest Practices Board's 1997 compliance audit program, the Small Business Forest Enterprise Program (SBFEP) in the Boundary Forest District was selected for audit. The district's SBFEP was selected randomly from the population of district SBFEP programs within the province, and not on the basis of location or level of performance.

The SBFEP is a program within which the Ministry of Forests awards timber sale licences to small business licensees. The Ministry of Forests, through the district manager, and the individual licensees each have separate but interrelated roles and responsibilities within the program.

The district manager is responsible for the overall managing and undertaking of the SBFEP, including preparation and giving effect to the forest development planⁱ, preparation and giving effect to silviculture prescriptionsⁱⁱ, the majority of road construction, maintenance and deactivation, and meeting silviculture obligations. The district manager can also choose to prepare the logging plansⁱⁱⁱ as well as giving effect to logging plans that small business licensees must follow.

The individual small business licensees who have been awarded timber sale licences (TSL holders) through the SBFEP have a number of legal responsibilities, as reflected in their timber sale licence and other permits (road permits and road use permits), including obtaining approval of the logging plan, some road construction, maintenance and deactivation, and ensuring that all operations, including harvesting, are carried out in compliance with the *Forest Practices Code of British Columbia Act* and the related regulations.

The district responsibilities and individual TSL holder responsibilities and performance are closely linked. The planning done by the district directly affects the TSL holders' abilities to adequately carry out their responsibilities. The quality of a licence holder's timber harvesting activities can affect a district's ability to adequately carry out its work, such as silviculture obligations, after logging is completed.

The Boundary Forest District SBFEP has an allowable annual cut of 176,000 cubic metres, within the Boundary Timber Supply Area, as shown on the attached map. The SBFEP operates within an area of approximately 657,000 hectares and lies north of the Washington-British Columbia border to Big White Mountain and east of the West Kettle River to Christina Lake.

2.0 Audit Scope

The audit examined the planning and field activities related to timber harvesting and road construction, maintenance, and deactivation. These activities were assessed for compliance with the *Forest Practices Code of British Columbia Act* and related regulations (the Code), including the transitional provisions of the Code.

All timber harvesting and road construction, maintenance, and deactivation activities and obligations for the period September 1, 1996 to September 15, 1997, were included in the scope

of the audit. The audit included examining all aspects of operational planning—such as forest development plans, silviculture prescriptions, and logging plans—that supported the activities examined.

The SBFEP field activities and associated operational plans that were carried out during the audit period, and were therefore subject to audit, are:

- the harvesting of 56 cutblocks;
- the construction of 19 road sections totaling 29 kilometres, including 2 bridges;
- the maintenance of 12 roads totaling 62 kilometres under road permit; the maintenance of access roads under cutting permit; and maintenance of an undetermined length of forest service roads providing access to current SBFEP activities, involving activities such as surfacing and the cleaning of culverts and ditches; and
- the deactivation of 30 road sections totaling 58 kilometres.

Additionally, there were 29 silviculture prescriptions, 29 logging plans, and 11 road layout and design plans approved during the audit period but not implemented.

Section 3 describes the results of the audit. The Board's audit reference manual, *Reference Manual - Compliance Audits, Version 2, May, 1997*, sets out the standards and procedures that were used to carry out this audit.

2.1 Audit Scope Limitation

For road maintenance purposes the district does not differentiate between forest service roads and SBFEP roads not under permit to agreement holders. As the primary purpose of a number of these forest service roads relates to SBFEP activities that were completed, underway, or planned for in the future, these forest service roads must be attributed to the district SBFEP. In addition to SBFEP roads under permit, only forest service roads relating to SBFEP harvesting within the audit period were examined for maintenance requirements. Complete information was not available on forest service roads accessing SBFEP harvesting areas previous to the audit period.

3.0 Audit Findings

Planning and practices examined

The audit included a review of 33 silviculture prescriptions and logging plans, of which 25 silviculture prescriptions and logging plans were examined as part of the timber harvesting practices audited below.

The audit work on selected roads and cutblocks included assessments from the air using helicopters and ground-based procedures. The audit examined:

- timber harvesting practices on 25 cutblocks;

- the construction of 12 road sections totaling 16.3 kilometres, including 2 bridges;
- the maintenance of 41.9 kilometers of road on selected sections of 9 roads under road permit; the maintenance of 10 access roads up to one kilometre in length; and an undetermined portion of four forest service roads providing access to current SBFEP operations;
- the deactivation of 8 road sections totaling 9.7 kilometers and 10 on-block roads of up to a kilometre in length each; and
- the layout and design of 4 road sections where construction had not started.

Findings

Timber harvesting - The audit identified non-compliance related to harvesting activities that did not comply with operational plans and a situation where adequate steps were not taken to assess potential cultural heritage resource values.

Road construction - The audit identified non-compliance related to drainage structures that were not installed at the same time as roads were constructed. In all other respects, the road construction activities were in compliance, in all significant respects, with Code requirements.

Road maintenance - Except for the scope limitation, which did not allow the testing of the maintenance of forest service roads providing access to SBFEP activities previous to the audit period, as described in section 2.1, the road maintenance activities examined were in compliance, in all significant respects, with Code requirements.

Road deactivation - The audit identified non-compliance with the road de-activation requirements of the Code where deactivation activities were either not identified in the forest development plan or the de-activation work did not comply with Code requirements.

3.1 Timber harvesting

In 16 of the 25 cutblocks examined, harvesting activities did not comply with the requirements of operational plans approved by the district manager.

Examples of harvesting activities that did not comply with operational plans include:

- skidding of trees by conventional ground-based methods when plans required cable or helicopter yarding;
- use of feller bunchers when hand falling was prescribed;
- construction of skid trails not authorized in operational plans that, in some cases, went through reserves;
- skid trails constructed in different locations, or to different sizes, than those authorized in plans; and
- use of larger harvesting equipment than authorized.

Additionally, trees required to be left standing were harvested on a number of cutblocks. This resulted in the requirements of the silviculture prescriptions not being achieved on three cutblocks where large numbers of trees required to be left standing were harvested. As well, the risk of blow down of residual trees was increased. On one of the three cutblocks approximately half of a 1.5 hectare riparian management zone was clearcut when the plan required a partial cut. Prior to the audit, district staff had identified the non-compliance on the three cutblocks and enforcement actions were being considered.

The non-compliance with operational plans is considered significant because of the harvesting of large numbers of trees required to be left standing and the frequency of the non-compliance.

The main area of the Code that the above non-compliance relates is Section 67 of the *Forest Practices Code of British Columbia Act*, which requires persons carrying out forest practices to do so in accordance with approved operational plans.

Inadequate steps taken to assess cultural heritage resource values

On a timber sale involving horse logging, an archeologist identified a potential archeological site (found ungulate bones) while carrying out tests on a small area of the timber sale licence. The archeologist promptly informed the district of the finding and advised that other potential cultural heritage resource values could be present in the adjacent area within the timber sale licence.

The audit concluded that adequate measures were not taken to protect the newly identified potential resource features or to follow up the archeologist's concern that other potential cultural heritage resource values could be present. Other than a temporary stop work order, little or no measures were taken to:

- identify and mark the exact location of the area containing the potential cultural heritage resource values identified by the archeologist; and
- follow up the archeologist's concern that additional potential cultural heritage resource features could be present.

The main area of the Code that this non-compliance relates to is section 51(2)(a) of the *Forest Practices Code of British Columbia Act*. The section requires that upon finding a previously unidentified resource feature, a person carrying out the forest practice must modify or stop any forest practices in the immediate vicinity of the previously unidentified resource feature to the extent necessary to refrain from threatening it.

3.2 Road Construction

On 9 of the 12 road construction sections examined, the audit identified non-compliance related to drainage structures not being constructed or those constructed were inadequate and did not meet the requirements of approved construction plans. Drainage structures, comprised primarily of ditches and culverts, are designed to move water across roads with minimal disturbance to the environment and the roads. Timber harvesting had already occurred on several road sections lacking adequate drainage structures.

The risk to forest resources from the inadequate drainage structures was not high. However, the nature and frequency of the problem was considered significant because of the potential for greater environmental impacts should inadequate drainage structures continue to be constructed.

The main areas of the Code that the non-compliance relates to are sections 11 and 12 of the *Forest Road Regulation* requiring the construction of drainage systems.

Other than inadequate construction of drainage systems, road construction practices were in compliance, in all significant respects, with Code requirements.

3.3 Road Deactivation

The roads deactivated during the audit period were not identified for deactivation in the forest development plan.

These non-compliance items relate to section 15(5) of the *Operational Planning Regulation*. The section specifies that the forest development plan must identify road deactivation operations, including the level of deactivation, that are to be conducted in each of the first three years of the forest development plan. The deficiencies were considered significant because they prevent adequate assessment of the planned deactivation activities by third parties, including the public.

In addition, the following non-compliance items regarding road deactivation practices were identified:

- three roads were deactivated without the approved deactivation prescriptions (as required by section 64 of the Act);
- deficient deactivation measures, such as inadequate cross ditches; and
- lack of signs to identify deactivated roads.

Some of the environmental impacts that resulted from deficient deactivation practices are:

- two slides caused by inadequate deactivation measures on two roads;
- erosion of ditches; and
- sediment entering a non-fish stream.

In the situations involving the slides, one resulted in the movement of approximately 100 cubic metres of material that almost reached a fish stream. The other slide resulted in approximately 20 cubic metres of material being moved for about 200 metres downhill. Sections 20, 21, and 22 of the *Forest Road Regulation* are the main areas of the Code related to the non-compliance - inadequate deactivation measures.

4.0 Audit Opinion

Timber harvesting, road construction and maintenance

In my opinion, except for the significant non-compliance described below and the scope limitation described in section 2.1, the timber harvesting, road construction and maintenance activities of the Small Business Forest Enterprise Program (SBFEP) of the Boundary Forest District from September 1, 1996 to September 15, 1997, were in compliance, in all significant respects, with Code requirements as of September 1997. The scope limitation restricts the opinion regarding compliance with the Code's road maintenance requirements to forest service roads accessing SBFEP activities that occurred during the audit period and SBFEP roads under permit.

As described in section 3, the audit identified the following situations of significant non-compliance:

Timber harvesting - One or more instances of non-compliance were noted on 16 of the 25 cutblocks examined, where timber harvesting practices did not comply with plans. Examples of the non-compliance include the cutting of trees required to be left standing, use of equipment that differed from that required in plans, construction of unauthorized skid trails that in some cases went through reserves. On three cutblocks, the cutting of trees required to be left standing was excessive. A situation was also identified where adequate steps were not taken to assess potential cultural heritage resource values.

Road construction - On 9 of 12 road construction sections examined, drainage structures were not constructed or those constructed were not adequate and did not meet the requirements of approved construction plans. Although the risk to forest resources from these non-compliance was not high, there is potential for greater environmental impacts should the practices continue.

Road deactivation

In my opinion, the road deactivation practices of the Boundary Forest District SBFEP for the period September 1, 1996, to September 15, 1997, were not in compliance with the road deactivation requirements of the Code as of September 1997. As described in section 3.3, road deactivation activities were either not identified in the forest development plan or the deactivation work did not comply with Code requirements, which in two situations resulted in small slides.

In reference to compliance, the term "in all significant respects" recognizes that there may be minor instances of non-compliance that either may not be detected by the audit, or that are detected but not considered worthy of inclusion in the audit report.

Sections 2 and 3 of this report from the auditor describe the basis of the audit work that formed the basis for reaching this qualified opinion. The audit was conducted in accordance with the

auditing standards of the Forest Practices Board. Such an audit includes examining sufficient road and timber harvesting practices to support an overall evaluation of compliance with the Code.

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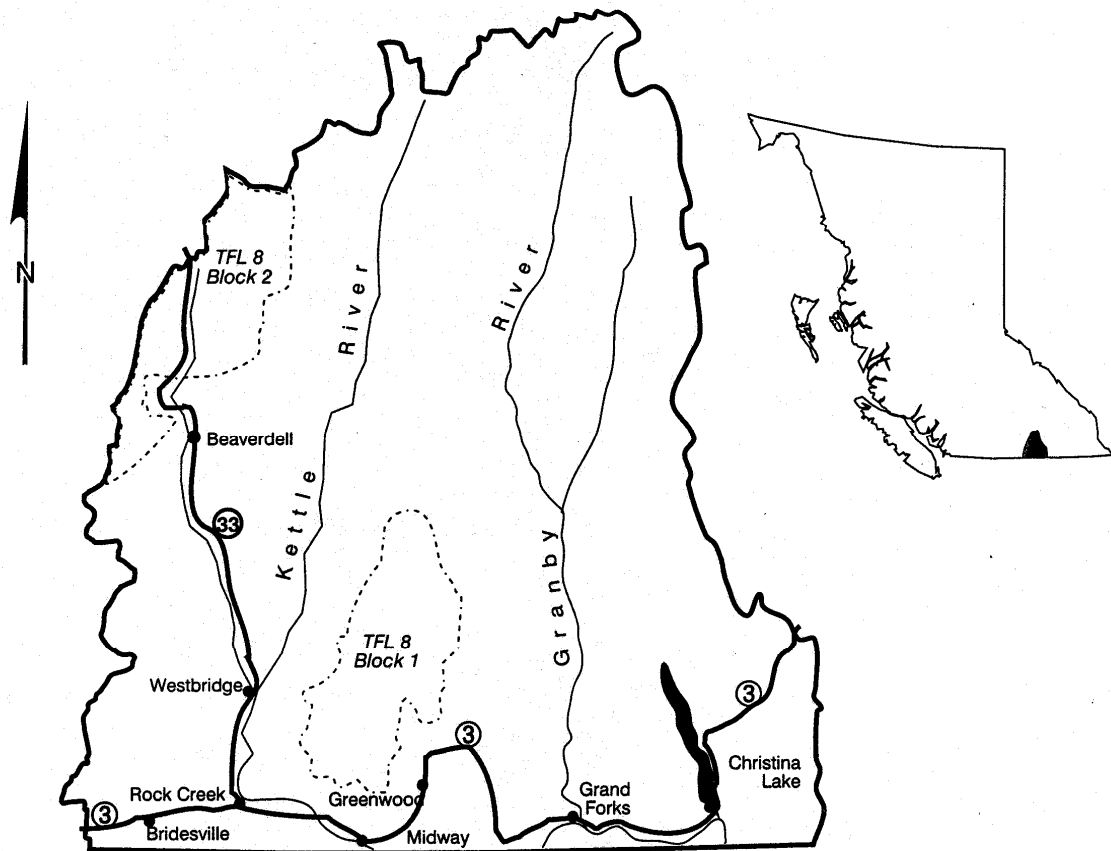
Sucha More, CA

Auditor
Forest Practices Board
Victoria, British Columbia

January 22, 1999

Operating Areas of Forest Licence

Boundary TSA



Endnotes

ⁱ A forest development plan is an operational plan which provides the public and government agencies with information about the location and scheduling of proposed roads and cutblocks for harvesting timber over a period of at least five years. The plan must specify measures that will be carried out to protect forest resources (including water, fisheries, and other forest resources). It must also illustrate and describe how objectives and strategies established in higher level plans, where they have been prepared, will be carried out. Site specific plans are required to be consistent with the forest development plan.

ⁱⁱ A silviculture prescription is a site specific operational plan that describes the forest management objectives for an area to be harvested (a cutblock). The silviculture prescriptions examined in the audit are required to describe the management activities proposed to maintain the inherent productivity of the site, accommodate all resource values including biological diversity, and produce a free growing stand capable of meeting stated management objectives. Silviculture prescriptions must be consistent with higher level plans that encompass the area to which the prescription applies.

ⁱⁱⁱ A logging plan is an operational plan that details how, when, and where timber harvesting and road construction activities will take place in a cutblock, in accordance with the approved silviculture prescription and forest development plan for the area. Information about other forest resource values, plus all current field information for the area, must be clearly shown in the logging plan.



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NEWS RELEASE

For Immediate Release
June 29, 1999

Audit of Boundary Forest District's small business program shows improvements necessary to meet Forest Practices Code

VICTORIA- Forest practices in the Ministry of Forests' Small Business Forest Enterprise Program (SBFEP) in the Boundary Forest District complied with most requirements of the Forest Practices Code, but there was poor performance in several important areas. These results are reported in a Forest Practices Board audit released today.

The district's road deactivation activities did not meet Forest Practices Code requirements. Roads that were deactivated were not identified in the district's forest development plan, and there was a lack of signs on the roads. "The public would not know which roads are planned for deactivation or were actually deactivated. This could result in safety issues, loss of access and confusion about what access is available," said Keith Moore, Chair of the Forest Practices Board.

In addition, deactivation performed on several roads was not adequate to control water flow and stabilize the roads. Inadequate deactivation resulted in the deposit of sediment into a stream and caused two slides. "The Board is concerned that severe impacts can occur if roads are not properly deactivated," said Moore.

Timber harvesting practices generally complied with Code requirements, however the audit identified numerous instances of non-compliance. In several cases, harvesting activities did not comply with operational plans.

In several areas approved for partial cutting substantially more trees were cut than authorized. In another instance, the district did not take adequate measures to ensure identified cultural heritage resource values were protected during harvesting.

"The district was being innovative by implementing partial cutting systems and a variety of logging methods," said Moore. "However, plans must reflect the forest conditions and be achievable. It is also important that the district closely supervise operations to ensure the objectives are met and the planned number of trees are left. Operators need to have the right skill, experience and equipment to carry out the complex plans."

During road construction, there were many instances where culverts were not installed or ditches were not constructed, or those constructed did not meet the requirements of approved construction plans or the Code. While the individual instances of non-compliance were not significant, the frequency of the non-compliance was.

The district's road maintenance activities generally complied with the Code. However, the Board's opinion in this part of the audit applies to those roads that access current SBFEP operating areas because the district could not identify all roads that are the responsibility of the SBFEP to maintain.

In its report, the Board makes a number of recommendations to the district to improve its procedures and ensure that operations under the SBFEP comply with the Code in the future. The Board also recommended that the district investigate and take enforcement action to address non-compliance.

The operations of the Boundary SBFEP are conducted in numerous locations around Grand Forks extending north from the Washington-British Columbia border to Big White Mountain, and east from the West Kettle River to Christina Lake.

The audit examined the district's timber harvesting and road practices, including related operational planning for the period September 1, 1996 to September 15, 1997.

The Boundary SBFEP was randomly selected for audit from the Small Business Forest Enterprise Programs in each forest district in the province. The SBFEP is a program under which the Ministry of Forests awards timber

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Boundary Forest District SBFEP

The audit examined the district's timber harvesting and road practices, including related operational planning, for the period September 1, 1996, to September 15, 1997.

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sale licences to small business licensees. The Ministry of Forests and the individual licensees each have separate but interrelated roles and responsibilities within the program. The district is responsible for managing the SBFEP, including preparing and approving operational plans, much of the road construction, maintenance and deactivation, and meeting silviculture obligations. The district has a close working relationship with each licensee and an overall responsibility for managing the SBFEP and also ensuring that licensees have met their Code obligations.

Created in 1995, the Forest Practices Board is BC's independent watchdog for sound forest practices. The Board provides British Columbians with objective and independent assessments of the state of forest planning and practices in the province, compliance with the Code, and the achievement of its intent. The Board's main roles are: auditing forest practices, undertaking investigations in response to public complaints, undertaking special investigations of any Code related forestry issues, participating in administrative reviews and appeals and providing reports on Board activities, findings and recommendations.

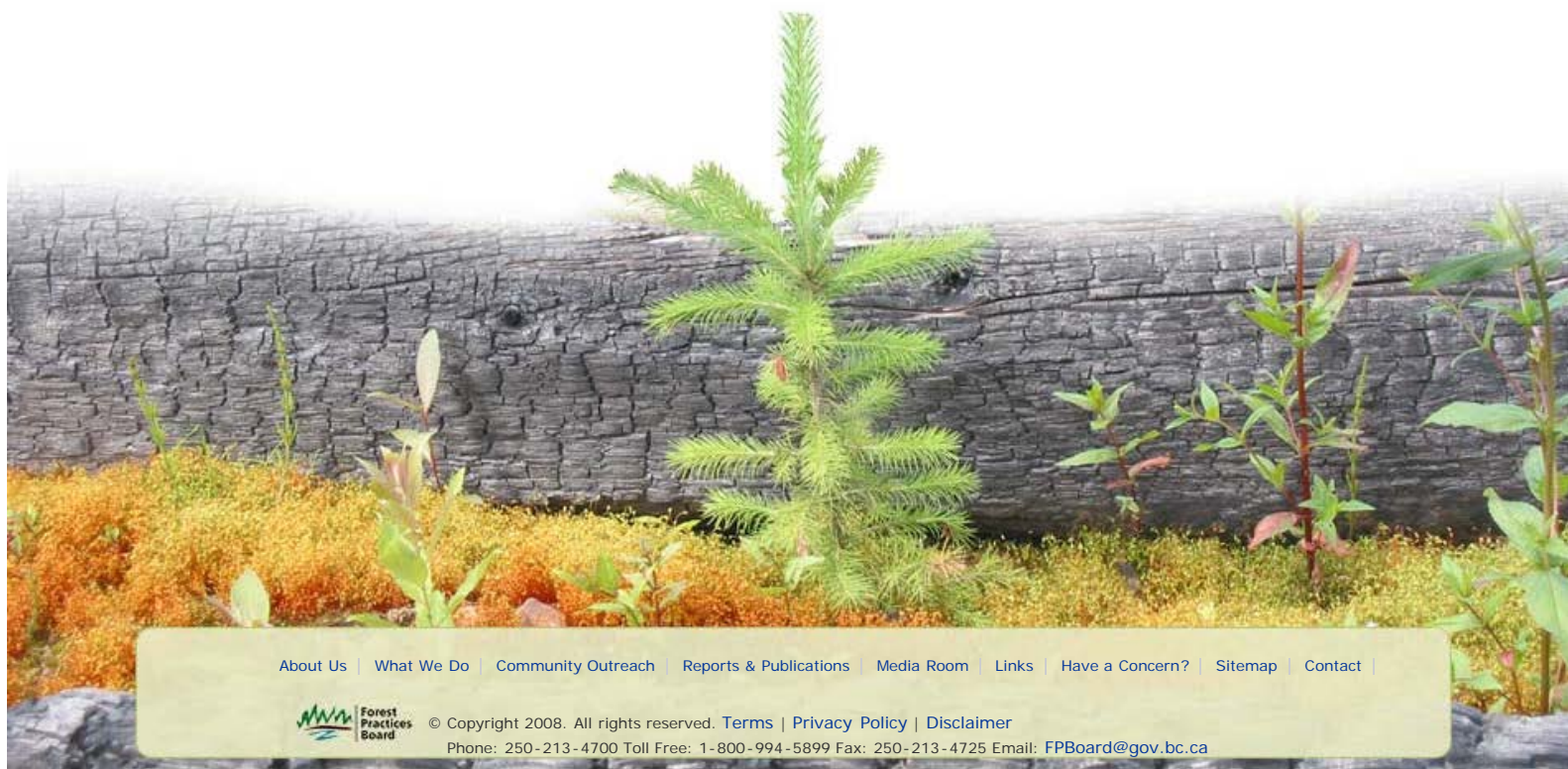
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