



**Forest
Practices
Board**

Audit of Forest Planning and Practices

*South Island District Woodlots
Woodlot Licences W0011, W0020, W1479, W1526,
W1713, W1902, W1903, W1906*

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Audit Results

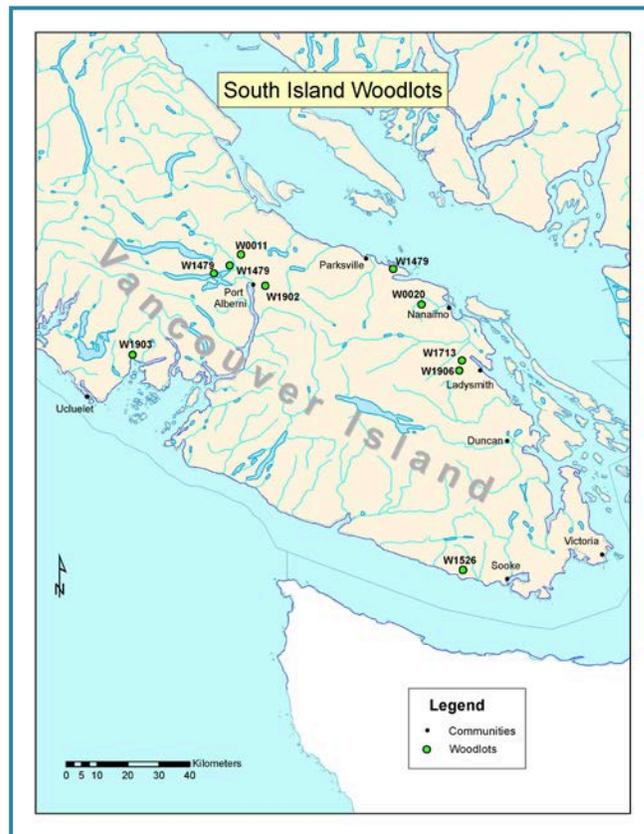
Background

As part of the Forest Practices Board's 2013 compliance audit program, the Board selected the South Island District as the location for a full scope compliance audit. Within the district, the Board selected ten woodlot licences for audit. This is the audit report for eight of the woodlot licences: W0011, W0020, W1479, W1526, W1713, W1902, W1903 and W1906. Results for the other two woodlot licences are provided in separate audit reports.

The Board randomly selected the South Island District and, from the population of licences within the forest district, noted that woodlot licences had not been audited in recent years. The individual woodlot licences were selected based on the level of harvest activity occurring between February 2011 and June 2013, and not on past performance or geographic location. The Board selected all woodlot licences with a cut of greater than 5000 cubic metres since February 2011.¹

The woodlots are located throughout the district, with one woodlot in Toquart Bay near Ucluelet, three woodlots in and around the community of Port Alberni, one woodlot near Nanaimo, two woodlots in and around the community of Ladysmith and one woodlot near Sooke.

Map of South Island Woodlot Licences
W0011, W0020, W1479, W1526, W1713, W1902, W1903, W1906



Woodlot Licence W0011

Woodlot licence W0011, near Port Alberni, was awarded as a Farm Woodlot Licence in 1952 and is now held by the original licensee and his son. The licence has a total area of 418 hectares, of which 33 hectares are private and the remaining 385 hectares are Crown land. The private portion had no activities or obligations subject to audit. The licence is located northwest of Port Alberni, near Beaver Creek. The licence has an allowable annual cut (AAC) of 2678 cubic metres per year. During the two-year audit period,ⁱⁱ the holder of woodlot licence W0011 harvested about 8200 cubic metres of timber.



Planted seedlings on a rehabilitated spur on Woodlot 0011. The licensee debuilt access roads into cutblocks to reduce losses to growing site.

Woodlot Licence W0020



A typical access road into Woodlot 0020. Road widths were kept to a minimum wherever possible as most roads provided access for recreational activities such as mountain biking.

Woodlot licence W0020, near Nanaimo, is managed by Vancouver Island University and provides students with an opportunity to apply their classroom knowledge in a field environment. The woodlot has a total area of 1700 hectares, of which 705 hectares is Crown land and 995 hectares is private land. The private portion had no activities or obligations subject to audit. The licence is located immediately west of Nanaimo near Mt. Benson. The licence has an AAC of 4600 cubic metres per year. During the two-year audit period, the holder of woodlot licence W0020 harvested about 5900 cubic metres of timber.

Woodlot Licence W1479



Recreational trail providing access for local residents through a harvest block on portion of Woodlot 1479 in Nanoose. Planted seedlings have been protected from deer browse with tubes.

Woodlot licence W1479, near Port Alberni and Parksville, was awarded in 1995 and has a total area of 397 hectares on 3 separate sections, all of which is Crown land. The licence is owned and managed by Island-Roots Forestry Services Ltd. and High Lead Forest Management Ltd. The major part of the woodlot (2 sections), is located west of Port Alberni, near the Alberni Valley airport. Another section (approximately 47 hectares) of the woodlot is located in the Nanoose area. The licence has an AAC of 3180 cubic metres per year. During the two-year audit period, the holder of woodlot licence W1479 harvested about 11 600 cubic metres of timber.

Woodlot Licence W1526



Typical retention in a second growth harvest block on Woodlot 1526. Retention practices tended to be in clumps rather than single trees which provided protection from potential damaging winds.

Woodlot licence W1526, near Sooke, was awarded to T'Sou-ke Limited Partnership in 2008 and has a total area of 673 hectares, all of which is Crown land. The licence consists of three blocks, 2 are located just west of Sooke and 1 is located just north of Sooke. The licence has an AAC of 2400 cubic metres per year. During the two-year audit period, the holder of woodlot licence W1526 harvested about 12 100 cubic metres of timber.

Woodlot Licence W1713

Woodlot licence W1713, near Ladysmith, was awarded to Stz'uminus First Nation in 1999 and has a total area of 1003 hectares, of which 777 hectares is Crown land and 226 hectares is private land. The licence consists of 9 blocks and is located west of Ladysmith. The licence has an AAC of 6100 cubic metres per year. During the two-year audit period, the holder of woodlot licence W1713 harvested about 27 500 cubic metres of timber. The private land had no activities or obligations subject to audit.



De-stumping is a form of site preparation to address root rot, a forest health issue that affects Douglas-fir seedlings - used on Woodlot 1713.

Woodlot Licence W1902

Woodlot licence W1902, near Port Alberni, was awarded to Hupacasath First Nation in the late 1990s and has a total area of 521 hectares, of which 392 hectares is Crown land and 129 hectares is private land. The licence consists of 4 blocks; all located near Port Alberni: 1 to the west; 1 to the south; and 2 Crown blocks located just east of the Port Alberni city limits. The licence has an AAC of 2185 cubic metres per year. During the two-year audit period, the holder of woodlot licence W1902 harvested about 7600 cubic metres of timber.



Free-to-grow opening on Woodlot 1902.

Woodlot Licence W1903

Woodlot licence W1903, near Ucluelet, was awarded to the Toquaht First Nation in 2001 and has a total area of 295 hectares, all of which is Crown land. The licence is located near Toquart Bay. The licence has an AAC of 1103 cubic metres per year. During the two-year audit period, the holder of woodlot licence W1903 harvested about 4900 cubic metres of timber.



Looking through a functioning culvert on a spur road built to access timber on Woodlot 1903.

Woodlot Licence W1906

Woodlot licence W1906, near Ladysmith, was awarded to Chemainus First Nation in 2008 and has a total area of 673 hectares, all of which is Crown land.

The licence is located approximately four kilometres west of Ladysmith. The licence has an AAC of 5400 cubic metres per year. During the two-year audit period, the holder of woodlot licence W1906 harvested about 9600 cubic metres of timber.

Two forestry professionals and a chartered accountant made up the audit team. Field work was carried out from May 20 to June 6, 2013.



Retention in a second growth harvest block with reforestation in the foreground (tubes to protect seedlings from deer browse) on Woodlot 1906.

Details about the audit of each individual woodlot are provided in Appendix 1. Additional information about the Board's compliance audit process is provided in Appendix 2.

Audit Approach and Scope

The audit examined each woodlot licensee's planning, field activities and obligations related to:

- operational planning (including woodlot licence plansⁱⁱⁱ and pre-harvest maps^{iv})
- timber harvesting
- road construction, maintenance and deactivation
- silviculture activities and obligations
- fire fuel hazard management
- fire prevention practices where applicable

These activities were assessed for compliance with the *Forest and Range Practices Act* (FRPA), the *Wildfire Act* (WA) and related regulations, in particular, the *Woodlot Licence Planning and Practices Regulation*. All activities, planning and obligations for the period February 1, 2011, to June 6, 2013, were included in the scope of the audit.

The audit work for each woodlot included an evaluation of records and plans, and ground-based inspections of roads and cutblocks.

The Board's audit reference manual, *Compliance Audit Reference Manual, Version 7.0, September 2012*, sets out the standards and procedures that were used to carry out this audit.

Planning and Practices Examined

Planning

All of the woodlots are located at least partly in established scenic areas, two include areas of established ungulate winter range, two include areas that are designated as community watersheds, and one includes a fisheries sensitive watershed.

The eight audited woodlot licences had approved woodlot licence plans that covered the licence areas.

Two of the eight woodlot licences provided pre-harvest maps for areas harvested during the audit period. The other six woodlots provided site plans or similar documents (pre-harvest prescriptions) that contained additional information beyond the FRPA requirements.

Practices and Obligations

Table 1 – Activities subject to audit during the two-year audit period

Audit Activity	W0011	W0020	W1479	W1526	W1713	W1902	W1903	W1906
Harvested cutblocks	7 - 20.4 ha	3 - 21.3 ha	6 - 27.3 ha	10 - 45.5 ha	5 - 47.8 ha	15 - 14.6 ha	1 - 17.7 ha	2 - 15.0 ha
Road construction	3.7 km	5.5 km	2.7 km	2.5 km	1.6 km	1.3 km	1.6 km	0.5 km
Road maintenance	6.2 km	10.7 km	8.3 km	4.5 km	3.4 km	6.9 km	3.1 km	1.7 km
Road deactivation	0.7 km	0.3 km	0.5 km	0.4 km	0.2 km	None	None	None
Bridge construction / maintenance	1 new bridge	None	1 new bridge	None	None	None	None	1 bridge inspection
Planting cutblocks	8 - 17.6 ha	6 - 64.7 ha	5 - 25.3 ha	10 - 45.5 ha	5 - 47.8 ha	26 - 21.5ha	1 - 17.7 ha	6 - 23.0 ha
Brushing cutblocks	2 - 3.7 ha	7 - 87.7 ha	None	None	None	19 - 13.0 ha	None	None
Cutblocks with site preparation	5 - 16.4 ha	3 - 21.3 ha	None	None	None	None	None	2 - 3.0 ha
Cutblocks with regeneration due	2 - 4.5 ha	1 - 9.1 ha	1 - 5.2 ha	None	None	8 - 8.8 ha	1 - 10.6 ha	4 - 8.0 ha
Cutblocks with free-growing	2 - 6.5 ha	2 - 16.3 ha	3 - 6.2 ha	None	4 - 17.4 ha	None	None	None
Active cutblock – fire tools	No activity	No activity	No activity	No activity	No activity	One	No activity	No activity

All of these activities and obligations were audited and no concerns were noted.

Audit Opinion

In my opinion, the operational planning; timber harvesting; road construction, maintenance and deactivation; silviculture; and fire protection activities carried out under woodlot licences W0011, W0020, W1479, W1526, W173, W1902, W1903 and W1906 between February 1, 2011, and June 6, 2013, complied in all significant respects with the requirements of the *Forest and Range Practices Act*, the *Wildfire Act* and related regulations, as of June 2013. No opinion is provided regarding fire tools for any of the woodlots except W1902, where they were found to be adequate on the one active block. For woodlot licences W1902, W1903 and W1906, no opinion is provided for road deactivation.

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.

The *Audit Approach and Scope* and the *Planning and Practices Examined* sections of this report describe the basis of the audit work performed in reaching the above conclusion. The audit was conducted in accordance with the auditing standards of the Forest Practices Board. Such an audit includes examining sufficient forest planning and practices to support an overall evaluation of compliance with FRPA and WA.



Christopher R. Mosher CA, EP(EMSLA)
Director, Audits

Victoria, British Columbia
November 13, 2013

Appendix 1: Individual Woodlot Audit Results

W0011 – 564736 BC Ltd. (doing business as Acacia Acres Farm)

Operational Planning

The 2012-2022 Woodlot Licence Plan (WLP) identified the activities in W0011. The WLP was consistent with legislated requirements. Planning at the stand level was consistent with the WLP and legal requirements.

Pre-harvest maps were provided for all harvest population blocks. The maps had all required content and also accurately showed stream locations, wildlife tree patches and proposed road locations.

Timber Harvesting

The licensee harvested 7 cutblocks covering 20.4 hectares during the audit period. The auditors examined all 7 cutblocks as part of the audit. Harvesting practices were consistent with the WLP and pre-harvest maps. Soil disturbance was well managed and within FRPA limits and natural drainage patterns were maintained. Wildlife tree retention consisted of patches and was preserved as planned.

Road Construction, Maintenance and Deactivation

The road population for W0011 included 3.7 kilometres of construction, 0.7 kilometres of deactivation and 6.2 kilometres of maintenance. The auditors examined all of the construction and deactivation and 5.6 kilometres of the maintenance. No concerns were identified with road construction, maintenance or deactivation. Roads were stable and stream crossings were well maintained and in good condition.



The woodlot owner upgraded the Logging Train Trail to allow access to the woodlot in a manner that maintained the integrity of the Trail while providing operational access.

One bridge was constructed during the audit period. This bridge was examined and no concerns were noted.

Silviculture Activities and Obligations

The silviculture obligations on W0011 during the audit period included regeneration delay on 2 cutblocks covering 4.5 hectares and free growing on 2 cutblocks covering 6.5 hectares. Silviculture activities during the audit period included planting in 8 cutblocks, site preparation in 5 cutblocks, and brushing in 2 cutblocks. Auditors examined all planting, site preparation, and brushing activities. Auditors also confirmed silviculture obligations were met on 2 blocks for regeneration delay and 2 blocks for free-growing.

All blocks were reforested promptly. All seedlings met the Chief Foresters Standards for Seed Use and there were no concerns with planting.

Fire Protection

Auditors examined hazard assessment and abatement activities on 7 cutblocks in conjunction with harvest auditing. Fire tool inspections were not conducted since there were no active operations. No concerns were identified with respect to hazard assessment and abatement. Fire hazard was assessed at the completion of harvesting and slash was either piled or piled and burned on all blocks.

Findings

The audit found the planning and forest activities undertaken by 564736 BC Ltd. on woodlot licence W0011 complied with the requirements of *Forest and Range Practices Act*, the *Wildfire Act* and related regulations, as of May 2013.

W0020 – Vancouver Island University

Operational Planning

The 2008-2018 WLP identified the activities in W0020. The WLP was consistent with legislated requirements. Planning at the stand level was consistent with the WLP and legal requirements.

Pre-harvest maps were provided for all harvest population blocks. The maps had all required content and also accurately showed stream locations, wildlife tree patches and proposed road locations. Additional information on the protection of resource values was included in a “Harvesting Prescription” document.



Timber Harvesting

The licensee harvested 3 cutblocks covering 21.3 hectares during the audit period. The auditors examined all 3 cutblocks as part of the audit. Harvesting practices were consistent with the WLP, pre-harvest maps and the harvesting prescription. Soil disturbance was well managed and within FRPA limits and natural drainage patterns were maintained. Wildlife tree retention consisted of patches, dispersed retention, and in some cases, retained trees from a commercial thinning prescription. Retention was preserved as planned. There were few streams in or adjacent to the blocks, where these occurred no impacts were observed from harvesting.

Road Construction, Maintenance and Deactivation

The road population for W0020 included 5.5 kilometres of construction, 0.3 kilometres of deactivation and 10.7 kilometres of maintenance. The auditors examined all of the construction and deactivation and 10 kilometres of the maintenance. No concerns were identified with road construction, maintenance or deactivation. Roads were stable and stream crossings were well maintained and in good condition.

No bridges or major structures were constructed or were located on roads for which the woodlot licence holder is responsible for maintenance.

Silviculture Activities and Obligations

The silviculture obligations on W0020 during the audit period included regeneration delay on 1 cutblock covering 9.1 hectares and free growing on 2 cutblocks covering 16.3 hectares. Silviculture activities during the audit period included planting in 6 cutblocks, brushing in 7 cutblocks and site preparation in 3 blocks. Auditors examined planting in 4 cutblocks, brushing in 3 cutblocks, and site preparation in 3 blocks. Auditors also confirmed silviculture obligations were met on 1 cutblock for regeneration delay and 2 cutblocks for free-growing.

All blocks were reforested promptly. Aside from a very small amount of western larch (less than 1 percent), all seedlings met the Chief Foresters Standards for Seed Use and there were no concerns with planting.

Fire Protection

Auditors examined hazard assessment and abatement activities on 3 cutblocks in conjunction with harvest auditing. Fire tool inspections were not conducted since there were no active operations. No concerns were identified with respect to hazard assessment and abatement. Fire hazard was assessed at the completion of harvesting and slash was either piled or piled and burned on all blocks.

Findings

The audit found the planning and forest activities undertaken by Vancouver Island University on woodlot licence W0020 complied with the requirements of *Forest and Range Practices Act*, the *Wildfire Act* and related regulations, as of June 2013.

W1479 – Island-Roots Forestry Services Ltd. and High Lead Forest Management Ltd.

Operational Planning

The 2006-2016 WLP identified the activities in W1479. The WLP was consistent with legislated requirements. Planning at the stand level was consistent with the WLP and legal requirements.

Pre-harvest maps were provided for all harvest population blocks. The maps had all required content and also accurately showed stream locations, stream classifications, wildlife tree patches and proposed road locations. Site plans (not required) were provided for 1 block only. The Nanoose block of the woodlot is located in the Coastal Douglas-fir moist marine biogeoclimatic subzone (CDFmm). One of the harvest blocks is located in this area. A detailed “Conservation Evaluation” and rationale was done for this area with respect to harvesting in the CDFmm.

Timber Harvesting

The licensee harvested 6 cutblocks covering 27.3 hectares during the audit period. The auditors examined all 6 cutblocks as part of the audit. Harvesting practices were consistent with the WLP and pre-harvest maps. Soil disturbance was well managed and within FRPA limits and natural drainage patterns were maintained. Wildlife tree retention consisted of patches and dispersed retention and was preserved as planned.

Road Construction, Maintenance and Deactivation

The road population for W1479 included 2.7 kilometres of construction, 0.5 kilometres of deactivation, and 12.7 kilometres of maintenance. The auditors examined all of the construction and deactivation and 8.3 kilometres of the maintenance. No concerns were identified with road construction, bridge construction, road maintenance or deactivation. Roads were stable and stream crossings were well maintained and in good condition.



One bridge was constructed during the audit period. This bridge was examined by the auditors.

Silviculture Activities and Obligations

The silviculture obligations on W1479 during the audit period included regeneration delay on 1 cutblock covering 5.2 hectares and free growing on 3 cutblocks covering 6.2 hectares. Silviculture activities during the audit period included planting in 5 cutblocks. Auditors examined planting in 5 cutblocks. Auditors also confirmed silviculture obligations were met on 1 cutblock for regeneration delay and 3 cutblocks for free-growing.

All blocks were reforested promptly. All seedlings met the Chief Foresters Standards for Seed Use and there were no concerns with planting.

Fire Protection

The auditors examined hazard assessment and abatement activities on 6 cutblocks in conjunction with harvest auditing. Fire tool inspections were not conducted since there were no active operations. No concerns were identified with respect to hazard assessment and abatement. Fire hazard was assessed at the completion of harvesting and slash was either piled or piled and burned on all blocks.

Findings

The audit found the planning and forest activities undertaken by Island-Roots Forestry Services Ltd. and High Lead Forest Management Ltd. on woodlot licence W1479 complied with the requirements of *Forest and Range Practices Act*, the *Wildfire Act* and related regulations, as of May 2013.

W1526 – T'Sou-ke Limited Partnership

Operational Planning

The 2007-2017 WLP identified the activities in W1526. The WLP was consistent with legislated requirements. Planning at the stand level was consistent with the WLP and legal requirements.

Pre-harvest maps and site plans were provided for all harvest population blocks. The maps provided used orthophoto imagery (an aerial photograph) and had all required content. Although not a requirement, additional information was provided in the site plans.

Timber Harvesting

The licensee harvested 10 cutblocks covering 45.5 hectares during the audit period. The auditors examined all 10 cutblocks as part of the audit. Harvesting practices were consistent with the WLP and pre-harvest maps. Soil disturbance was well managed and within FRPA limits and natural drainage patterns were maintained.

Road Construction, Maintenance and Deactivation

The road population for W1526 included 2.5 kilometres of construction, 0.4 kilometres of deactivation and 4.5 kilometres of maintenance. The auditors examined all of the construction, deactivation and maintenance obligations. No concerns were identified with road construction, maintenance or deactivation. Roads were stable and stream crossings were well maintained and in good condition. Spurs accessing cutblocks were deactivated, natural drainage patterns maintained and culverts were removed.

No bridges were constructed during the audit period and no major structures or bridges were located on roads subject to maintenance by the licensee.

Silviculture Activities and Obligations

There were no silviculture obligations with due dates during the audit period. Silviculture activities during the audit period included planting in 10 cutblocks. Auditors examined planting in all 10 cutblocks. All blocks were reforested promptly and there were no concerns with planting.

The auditors could not confirm seedlings against the Chief Foresters Standards for Seed Use as the information of the recent planting had not yet been entered into the government database (RESULTS^v).



Fire Protection

Auditors examined hazard assessment and abatement activities on 10 cutblocks, in conjunction with harvest auditing. Fire tool inspections were not conducted since there were no active operations. No concerns were identified with respect to hazard assessment and abatement. Fire hazard was assessed at the completion of harvesting and slash was either piled or piled and burned on all blocks.

Findings

The audit found the planning and forest activities undertaken by T'Sou-ke Limited Partnership on woodlot licence W1526 complied with the requirements of *Forest and Range Practices Act*, the *Wildfire Act* and related regulations, as of June 2013.

W1713 – Stz’uminus First Nation

Operational Planning

The 2011-2021 WLP identified the activities in W1713. The WLP was consistent with legislated requirements. Planning at the stand level was consistent with the WLP and legal requirements.

Pre-harvest maps were provided for all harvest population blocks. The maps had all required content and also accurately showed stream locations, stream classifications, wildlife tree patches and proposed road locations. Site plans (not required) were also provided. One harvest block was located in the Coastal Douglas-fir moist maritime biogeoclimatic subzone, a conservation evaluation was done, and the block was rated as fair. Harvesting was rationalized on this basis.

Timber Harvesting

The licensee harvested 5 cutblocks covering 47.8 hectares during the audit period. The auditors examined all 5 cutblocks as part of the audit. Harvesting practices were consistent with the WLP and pre-harvest maps. Soil disturbance was well managed and within FRPA limits. Natural drainage patterns were maintained. Wildlife tree retention consisted of both patches and dispersed retention, and was preserved as planned.

Road Construction, Maintenance and Deactivation

The road population for W1713 included 1.6 kilometres of construction, 0.2 kilometres of deactivation and 3.4 kilometres of maintenance. The auditors examined all of the construction, deactivation and maintenance. No concerns were identified with road construction, maintenance or deactivation. Roads were stable and stream crossings were well maintained and in good condition.

No bridges were constructed during the audit period and no major structures or bridges were located on roads subject to maintenance by the licensee.

Silviculture Activities and Obligations

The silviculture obligations on W1713 during the audit period included free growing on 4 cutblocks covering 17.4 hectares. Silviculture activities during the audit period included planting 5 cutblocks. Auditors examined planting in 5 cutblocks. Auditors also confirmed silviculture obligations were met on 4 cutblocks for free-growing.

All blocks were reforested promptly. All seedlings met the Chief Foresters Standards for Seed Use and there were no concerns with planting.

Fire Protection

Auditors examined hazard assessment and abatement activities on 5 cutblocks in conjunction with harvest auditing. Fire tool inspections were not conducted since there were no active operations.



Fire hazard was assessed at the completion of harvesting and slash was either piled or piled and burned on all blocks. The only concern with hazard abatement was that the 2 blocks located within the Town of Ladysmith had been piled, but not burned, due to opposition to burning by the town. The licensee was looking at other options to address the potential hazard.

Findings

The audit found the planning and forest activities undertaken by Stz'uminus First Nation on woodlot licence W1713 complied with the requirements of *Forest and Range Practices Act*, the *Wildfire Act* and related regulations, as of May 2013.

W1902 – Hupacasath First Nation

Operational Planning

The 2009-2019 WLP identified the activities in W1902. The WLP was consistent with legislated requirements. Planning at the stand level was consistent with the WLP and legal requirements.

Pre-harvest maps were provided for all harvest population blocks. The maps had all required content and also accurately showed stream locations, stream classifications, wildlife tree patches and proposed road locations. Additional details were provided in a pre-harvest prescription document for each block.

Timber Harvesting

The licensee harvested 15 cutblocks covering 14.6 hectares during the audit period. The auditors examined all 15 cutblocks as part of the audit. A strategy of smaller openings was used primarily to address concerns about windthrow potential in the woodlot.



Harvesting practices were consistent with the WLP and pre-harvest maps. Soil disturbance was well managed and within FRPA limits. Natural drainage patterns were maintained. Wildlife tree retention consisted of patches, and was preserved as planned. Very little windthrow was observed.

Road Construction, Maintenance and Deactivation

The road population for W1902 included 1.3 kilometres of construction and 6.9 kilometres of maintenance. There was no deactivation done during the audit period. The auditors examined all of the construction and 6.4 kilometres of the maintenance. No concerns were identified with road construction or maintenance. Roads were stable and stream crossings were well maintained and in good condition.

No bridges were constructed during the audit period and no major structures or bridges were located on roads subject to maintenance by the licensee.

Silviculture Activities and Obligations

The silviculture obligations on W1902 during the audit period included regeneration due on 8 cutblocks covering 8.8 hectares. Silviculture activities during the audit period included planting 26 cutblocks (11 full planting blocks and 15 fill plants) and brushing 19 cutblocks. Auditors examined planting in 11 cutblocks (all of the full planting blocks) and brushing in 13 cutblocks. Auditors also confirmed silviculture obligations were met on 8 cutblocks for regeneration due.

All blocks were reforested promptly. With the exception of a small amount of hemlock in the regeneration due blocks, all seedlings met the Chief Foresters Standards for Seed Use and there were no concerns with planting.

Fire Protection

Auditors examined hazard assessment and abatement activities on 15 cutblocks in conjunction with harvest auditing. A fire tool inspection was conducted on the one machine that was in use at the time of the audit. No concerns were identified with respect to hazard assessment and abatement. Fire hazard was assessed at the completion of harvesting and slash was either piled or piled and burned on all blocks. Adequate fire tools were found on the site that was active at the time of the audit.

Findings

The audit found the planning and forest activities undertaken by Hupacasath First Nation on woodlot licence W1902 complied with the requirements of *Forest and Range Practices Act*, the *Wildfire Act* and related regulations, as of May 2013.

W1903 – Toquaht First Nation

Operational Planning

The 2010-2020 WLP identified the activities in W1903. The WLP was consistent with legislated requirements. Planning at the stand level was consistent with the WLP and legal requirements.

Pre-harvest maps and a site plan were provided for the harvest population block. The map had all required content and also accurately showed stream locations, stream classifications, wildlife tree patches and proposed road locations. Additional details were provided in the site plan document.

Timber Harvesting

The licensee harvested 1 cutblock covering 17.7 hectares during the audit period. The auditors examined the 1 cutblock as part of the audit.

Harvesting practices were consistent with the *Woodlot Licence Planning and Practices Regulation* and pre-harvest maps. Soil disturbance was well managed and within FRPA limits. Natural drainage patterns were maintained. Wildlife tree retention consisted of patches and dispersed retention, and was preserved as planned.



Road Construction, Maintenance and Deactivation

The road population for W1903 included 1.6 kilometres of construction and 3.1 kilometres of maintenance. There was no deactivation activity in the audit period. The auditors examined all of the construction and 2.9 kilometres of the maintenance. No concerns were identified with road construction or maintenance. Roads were stable and stream crossings were well maintained and in good condition.

No bridges were constructed during the audit period and no major structures or bridges were located on roads subject to maintenance by the licensee.

Silviculture Activities and Obligations

The silviculture obligations on W1903 during the audit period included regeneration due on 1 cutblock covering 10.6 hectares. Silviculture activities during the audit period included planting 17.7 ha in 1 cutblock. Auditors examined planting in 1 cutblock. Auditors also confirmed silviculture obligations were met on the 1 cutblock for regeneration due.

All blocks were reforested promptly. All seedlings met the Chief Foresters Standards for Seed Use and there were no concerns with planting.

Fire Protection

Auditors examined hazard assessment and abatement activities on one cutblock in conjunction with harvest auditing. Fire tool inspections were not conducted since there were no active operations. No concerns were identified with respect to hazard assessment and abatement. Fire hazard was assessed at the completion of harvesting and slash was piled.

Findings

The audit found the planning and forest activities undertaken by Toquaht First Nation on woodlot licence W1903 complied with the requirements of *Forest and Range Practices Act*, the *Wildfire Act* and related regulations, as of June 2013.

W1906 – Chemainus First Nation

Operational Planning

The 2008-2018 WLP identified the activities in W1906. The WLP was consistent with legislated requirements. Planning at the stand level was consistent with the WLP and legal requirements.

Pre-harvest maps and a pre-harvest prescription document were provided for the harvest population blocks. The maps had all required content and accurately showed stream locations, stream classifications, wildlife tree patches and proposed road locations. Additional details were provided in the pre-harvest prescription document.

Timber Harvesting

The licensee harvested 2 cutblocks covering 15.0 hectares during the audit period. The auditors examined both cutblocks as part of the audit. Harvesting practices were consistent with the WLP and pre-harvest maps. Soil disturbance was well managed and within FRPA limits. Natural drainage patterns were maintained. Wildlife tree retention consisted of patches and dispersed retention, and was preserved as planned.

Road Construction, Maintenance and Deactivation

The road population for W1906 included 0.5 kilometres of construction and 1.7 kilometres of maintenance. There was no road deactivation done during the audit period. The auditors examined all of the construction and maintenance. No concerns were identified with road construction or maintenance. Roads were stable and stream crossings were well maintained and in good condition.

One bridge was inspected during the audit period. This crossing was on a fish stream and the licensee established proper controls to address any potential site disturbance and sedimentation. No issues were noted during the inspection.



Silviculture Activities and Obligations

The silviculture obligations on W1906 during the audit period included regeneration due on 4 cutblocks covering 8 hectares. Silviculture activities during the audit period included planting 6 cutblocks. Auditors examined planting in all 6 cutblocks. Auditors also confirmed silviculture obligations were met on the 4 cutblocks for regeneration due.

All blocks were reforested promptly. All seedlings met the Chief Foresters Standards for Seed Use and there were no concerns with planting.

Fire Protection

Auditors examined hazard assessment and abatement activities on 2 cutblocks in conjunction with harvest auditing. Fire tool inspections were not conducted since there were no active operations. No concerns were identified with respect to hazard assessment and abatement. Fire hazard was assessed at the completion of harvesting and slash was piled and burned.

Findings

The audit found the planning and forest activities undertaken by Chemainus First Nation on woodlot licence W1906 complied with the requirements of *Forest and Range Practices Act*, the *Wildfire Act* and related regulations, as of May 2013.

Appendix 2:

Forest Practices Board Compliance Audit Process

Background

The Forest Practices Board conducts audits of government and agreement-holders under the *Forest and Range Practices Act* (FRPA), section 122, and the *Wildfire Act* (WA). Compliance audits examine forest or range planning and practices to determine whether or not they meet FRPA and / or WA requirements.

Selection of auditees

The Board conducts about eight or nine compliance audits annually. Most of these are audits of agreement holders. The Board also audits the government's BC Timber Sales Program (BCTS). This section describes the process for selecting agreement holders to audit.

To begin with, auditors randomly select an area of the Province, such as a district. Then the auditors review the forest resources, geographic features, operating conditions and other factors in the area selected. These are considered in conjunction with Board strategic priorities (updated annually), and the type of audit is determined. At this stage, we choose the auditee(s) that best suits the selected risk and priorities. The audit selections are not based on past performance.

For example, in 2007, the Board randomly selected the Robson Valley Timber Supply Area as a location for an audit. After assessing the activities within that area, we discovered that two licensees had recently closed operations due to financial problems. As the Board has expressed concern in the past about financially strapped companies failing to meet outstanding obligations, such as reforestation and road maintenance, the audit focused on the status of the outstanding obligations of these two licences.

For BCTS audits, a district within one of the 12 business areas within the province is selected randomly for audit.

Audit Standards

Audits by the Board are conducted in accordance with the auditing standards developed by the Board. These standards are consistent with generally accepted auditing standards. The standards for compliance audits are described in the Board's *Compliance Audit Reference Manual*.

Audit Process

Conducting the Audit

Once the Board randomly selects an area or district and determines the scope of audit to be conducted and the licensee(s) to be audited, all activities carried out during the period subject to audit are identified (such as harvesting or replanting, and road construction or deactivation

activities). Items that make up each forest activity are referred to as a population. For example, all sites harvested from the timber harvesting population and all road sections constructed form the road construction population.

A separate sample is then 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 areas where the risk of non-compliance is greater.

Audit fieldwork includes assessments of features using helicopters and ground procedures, such as measuring specific features like riparian reserve zone width. The audit teams generally spend one to two weeks in the field.

Evaluating the Results

The Board recognizes that compliance with the many requirements of FRPA and WA, is more a matter of degree than absolute adherence. Determining compliance, and assessing the significance of non-compliance, requires the exercise of professional judgment within the direction provided by the Board.

The audit team, composed of professionals and technical experts, first determines whether forest practices comply with legislated requirements. For those practices considered to not be in compliance, the audit team then evaluates the significance of the non-compliance, based on a number of criteria, including the magnitude of the event, the frequency of its occurrence and the severity of the consequences.

Auditors categorize their findings into the following levels of compliance:

Compliance – where the auditor finds that practices meet FRPA and WA requirements.

Not significant non-compliance – where the auditor, upon reaching a non-compliance conclusion, determines that one or more non-compliance event(s) is not significant and not generally worthy of reporting. However, in certain circumstances, events that are considered not significant non-compliance may be reported as an area requiring improvement.

Significant non-compliance – where the auditor determines a non-compliance event(s) or condition(s) is or has the potential to be 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 one or many non-compliance events.

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 Minister of Forests, Lands and Natural Resource Operations.

Reporting

Based on the above evaluation, the auditor then prepares a draft audit report. The party being audited is given a draft of the report for review and comment before it is submitted to the Board.

Once the auditor submits the draft report, the Board reviews it and determines if the audit findings may adversely affect any party or person. 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. The representations allow parties that may potentially be adversely affected to present their views to the Board.

The Board then reviews the draft report from the auditor and the representations from parties that may potentially be adversely affected before preparing its final report. Once the representations have been completed, the report is finalized and released: first to the auditee and then to the public and government.

Endnotes

ⁱ Although most woodlots have a relatively small allowable annual cut, it is possible for woodlot holders to harvest 120 percent of their five-year cut control cycle in just one or two years, creating the appearance of a larger than actual allowable annual cut.

ⁱⁱ The audit period is February 1, 2011, to June 6, 2013.

ⁱⁱⁱ Under the *Forest and Range Practices Act*, a woodlot licence plan replaces the woodlot forest development plan and site plans. The woodlot licence plan must be consistent with government's objectives for values such as water, soils and cultural heritage resources. The woodlot licence plan must address the entire woodlot licence area and performance requirements, such as the obligation to reforest a site after logging and the requirements set out in the *Woodlot Licence Planning and Practices Regulation* 21/2004. The term of a woodlot licence plan is 10 years.

^{iv} Under the *Woodlot Licence Planning and Practices Regulation*, Pre-harvest mapping, Section 33(2) Before a woodlot licence holder harvests timber from an area where the holder is required to establish a free growing stand, the holder must prepare a map for the area according to the standards set under subsection (1), showing (a) the biogeoclimatic ecosystem classification, including the site series listed within that classification, for the area, and (b) the stocking standards that apply to the area.

^v RESULTS (Reporting Silviculture Updates and Land status Tracking System) - RDD007-Planted Species Report. This report produces a summary of the tree species and seedlot planted based on the parameters specified by the user.



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