



File: FOR-11300-20/1519F  
Cliff: 258781

October 28, 2020

VIA EMAIL: Dave.Clarke@bcfpb.ca

Dave Clarke, Executive Director  
Forest Practices Board  
PO Box 9905 Stn Prov Govt  
Victoria, British Columbia  
V8W 9R1

Dear Dave Clarke:

On behalf of the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD), please accept this letter as government's response to the Forest Practices Board's recommendations in its *Follow-up Investigation of Bridge Planning, Design and Construction* (April 2020).

We appreciate the important role and efforts of the board in conducting such investigations, myself and ministry staff are committed to continually improving forest safety.

We appreciate the board's recognition of the improvements to bridge safety issues due to the collective efforts of government, the forest industry, the Association of BC Forest Professionals (ABCFP) and Engineers and Geoscientists BC (EGBC) subsequent to the 2014 report.

The following actions have been undertaken by the ministry related to the board's follow-up report:

- The ministry confirmed with the board that there were no outstanding safety issues
- Board staff were invited to present their findings to ministry staff via webinar
- Engineering Branch and BC Timber Sales (BCTS) continue to collaborate with EGBC and ABCFP to develop guidance associated with professional reliance for bridges and roads; and
- Engineering Branch has revised its crossing assurance forms to be consistent with EGBC/ABCFP practice guidance requiring both a Construction Assurance Statement signed-off by a POR and a Crossing Assurance Statement signed-off by a CRP.

I provide the following responses to the board's recommendations:

***Recommendation 1 & 2.***

1. The Joint Practice Board of ABCFP and EGBC should review the professional practice guidelines for crossing with an eye towards improving clarity to help their members understand their responsibilities for bridge planning and design.
2. The ABCFP should subsequently review its guidance for forest professionals to ensure it is clear and consistent with professional practice guidelines for bridge planning and design

***Government response:***

Although these recommendations have been directed to the EGBC and ABCFP, government continues its collaboration with EGBC and the ABCFP to promote and improve upon professional practice relating to resource roads and bridges.

The Engineering Branch and BCTS worked with the two associations and help fund the development of professional reliance guidance for responsibilities for the lifecycle of a forest bridge. When the matrix was released by the associations in August of 2019, you commented that it was a very good document, and a step up to the next generation of guidance for professionals. Following on the success of the professional reliance roles and responsibilities matrix for forest road crossings, Engineering Branch and BCTS are currently working with the EGBC and ABCFP to develop an analogous professional reliance roles and responsibilities matrix for forest roads.

The associations will be providing their own response to these recommendations to the Forest Practices Board.

***Recommendation 3.***

The Ministry of Forests, Lands, Natural Resource Operations and Rural Development confirm how it intends to undertake ongoing compliance monitoring and, if necessary, enforcement, of bridge planning, design and construction.

***Government response:***

The Forest Practices Board has raised this issue of ministry compliance monitoring and enforcement in several reports. I can advise that I have requested staff to undertake a review of the ministry role for compliance monitoring and process for enforcement as may be required for forest roads and bridges. It is anticipated that roles and responsibilities will be identified for staff for the next field season.

Currently the Compliance and Enforcement Branch (CEB) 2020-21 Operational Priority direction document identifies enforcement response for resource road issues (including bridges and other major structures) on active and high-risk roads as one of the top priorities. CEB does engage in targeted inspections for industrial safety, protection of environmental values and to ensure appropriate authorizations are in place as a part of its priority framework and resource allocation.

In addition to liaising with Engineering Branch, CEB has initiated (first meeting in September 2020) a Joint Management Team with BCTS in order to provide increased communication and explore avenues for joint action on priority issues which includes resource roads.

**Summary:**

The ministry recognizes the importance of the board's investigation and recommendations as we move forward with improving resource road management and safety in British Columbia.

Please contact Peter Wyatt, Director, Engineering Branch, at [Peter.Wyatt@gov.bc.ca](mailto:Peter.Wyatt@gov.bc.ca), if you would like to further discuss or have any questions about this response.

Yours truly,



Sarah Fraser  
A/Assistant Deputy Minister

cc: Diane Nicholls, Chief Forester, Assistant Deputy Minister  
Kevin Edquist, Executive Director, Integrated Resource Operations  
Peter Wyatt, Director, Engineering Branch  
Ray Luchkow, Executive Director, BCTS



File: 97325-20/2019-17

December 14, 2020

Sarah Fraser  
A/Assistant Deputy Minister  
Ministry of Forests, Lands, Natural Resource Operations and Rural Development  
4<sup>th</sup> Floor – 545 Superior St.  
Victoria BC V8V 1T7

Dear Sarah Fraser:

**Re: Response to Board recommendations**

Thank you for your letter of October 28, 2020 regarding government's response to recommendations the Board made in its "Follow-up Investigation of Bridge Planning, Design and Construction" special investigation.

In April 2020, the Board requested the Ministry confirm how it intends to undertake ongoing compliance monitoring and, if necessary, enforcement, of bridge planning, design and construction.

Government has stated that enforcement response on active and high risk roads is a priority. In addition, CEB have recently initiated a joint management team with BCTS to increase communication and is liaising with Engineering Branch to help focus on priority issues. These actions appear to meet the intent of the recommendation. In order to provide more meaningful information to the public on the response to our recommendations, the Board will report of recommendations are accepted, partially accepted, or not accepted. For this recommendation, our interpretation is that the recommendation is accepted.

The Board will now close this file.

Bridge safety has been, and continues to be a key component of forest management in British Columbia. While the Board is encouraged with the improvement noted in the follow-up investigation, we will continue to assess bridge planning, design and construction through our audits and complaint investigations across British Columbia.

Thank you for your cooperation throughout the special investigation.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Kriese", followed by a horizontal line.

Kevin Kriese  
Chair