



Reference: 271159

November 25, 2022

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

Re: Forest Practices Board August 2022 Audit Recommendations - Terrace Field Unit Portion of the Skeena BA
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This letter is in response to the Forest Practices Board (FPB) audit report of August 2022 which contained a request to respond to the Board's recommendation: "BCTS should identify the actions it will take to improve performance on crossing construction in the Coast Mountains Natural Resource District portion of the BCTS Skeena Business area. Actions may include education of TSL holders and professionals, clarification of standards and requirements, changes to EMS and improved monitoring and enforcement."

The Skeena Business Area (TSK) accepts the Board's recommendations to improve performance on crossing construction in their portion of the Coast Mountains Natural Resource District.

Pursuant to the Audit recommendations, TSK created an action plan to address the auditors' 'findings of significance' and notified Compliance & Enforcement of the finding of non-compliance with FPPR sections 72, 77 and 79.

The action plan consists of the following two components:

- A) TSK will investigate Audit 'findings of significance' to determine root cause and take steps to improve Licensee crossing construction performance.
- B) TSK will review present Timber Sale License (TSL) administration, monitoring, and training practices with respect to improving Licensee crossing safety and compliance with forest legislation in the Skeena Coast Mountain BCTS Operating areas.

As a result of the preliminary findings from our investigation and reviews, TSK will be implementing the following recommendations:

1. Provide TSK field staff awareness training on the [Guidelines for Professional Services in the Forest Sector – CROSSINGS V.2 \(pdf\)](#) , and general best practices for culvert and bridge construction and inspections.

2. Amend Environmental Management System (EMS) EOP 2 to include time bound criteria for submissions of Construction Conformance, As-Built statements, and a requirement of a regional professional engineer's review.
 - When road, bridge, major culvert or engineered structures are involved, obtain drawings and documentation of professional conformance prior to industrial use. (e-mail from Professional of Record is acceptable for construction activities)
 - Construction conformance and As-built drawings to be sent to Regional P. Engineer for quality assurance.
3. Provide additional safety awareness training with regards to BCTS safe certification standards (Chapter 18-23 Dealing with external parties) and obligations with the administration, planning, implementation, and monitoring of TSL's, Road permits and RUP's. (This also covers off passing along the information to Licensee's and contractors at pre-work meetings). The training will include BCTS reporting obligations for alleged non-compliance under section 72, 77 and 79.
4. Where applicable, Coordinating Registered Professional (CRP) and/or Coordinating Member (CM) clauses will be added to TSM issued road permits.

SPECIAL CONDITIONS

[The CRP and/or CM clauses in red below are optional and may be deleted, if not required]

- 8.01 In this Part, "Coordinating Registered Professional" or "CRP" and "Crossing" have the same meaning as in the "Guidelines for Professional Services in the Forest Sector – Crossings V.2" published by the Association of British Columbia Forest Professionals and the Association of Professional Engineers and Geoscientists of British Columbia.
- 8.01 Prior to initiating construction of a bridge or engineered culvert (Crossing), the Licensee will submit in writing to the Timber Sales Manager the contact information for the Licensee's CRP for the Crossing.
- 8.02 In this Part, "Member", "Coordinating Member", and "Forest Road Activities" have the same meaning as in the "Guidelines for Professional Services in the Forest Sector – Forest Roads" published by the Association of British Columbia Forest Professionals and the Association of Professional Engineers and Geoscientists of British Columbia.
- 8.03 Prior to initiating Forest Road Activities that require the involvement of a Member, the Licensee will submit in writing to the Timber Sales Manager the contact information for the Licensee's Coordinating Member for the respective Forest Road Activities.

5. TSK will review existing bridges and wood box culvert crossing construction conformance on active TSL's and road permits and where warranted take corrective actions to ensure crossings are safe prior to continued industrial use.

TSK respects the FPB audit report findings and appreciates the opportunity to learn and improve TSL holders and the business area planning and practices performance. As an additional action, we will share this information across BCTS so other Business Areas's can benefit from TSK

learnings. We continue to investigate the audit findings of significance related to crossings and may implement further recommendations upon completion of the reports.

Yours truly,

A handwritten signature in black ink that reads "S. Gillanders". The signature is written in a cursive, flowing style.

Shasta Gillanders
Timber Sales Manager
BC Timber Sales
Skeena Business Area



Forest Practices Board

February 7, 2023

Shasta Gillanders
Timber Sales Manager
BC Timber Sales
Skeena Business Area
200-5220 Keith Ave
Terrace, B.C. V8G 1L1

Dear Shasta Gillanders:

**Re: Response to the Board's audit report for BC Timber Sales and Timber Sale Licence Holders
Terrace Field Unit Portion of the Skeena Business Area FPB/ARC/253**

Thank you for your letter of November 25, 2022, identifying the actions BCTS will take to improve performance on crossing construction.

The Board has reviewed your response to the recommendations in our audit report, titled Forestry Audit: BC Timber Sales & Timber Sale Licence Holders Skeena Business Area Terrace Field Unit.

In its response, BCTS commits to a comprehensive action plan that addresses the specific non-compliances identified by the audit and is a positive step towards remediation. The Board is encouraged that BCTS is working towards revising policies, procedures, and guidance to improve performance on crossing construction in their portion of the Coast Mountains Natural Resource District.

The Board expects that this plan will remediate our crossing structure construction concerns. In the future, the Board will continue to assess crossing construction practices and enforcement through its various audits and investigations.

I want to thank you and the many staff involved in this file for their cooperation throughout the audit. The Board will now close this file.

Yours sincerely,

Bruce Larson,
Acting Chair