

AUDIT OF RANGE PLANNING AND PRACTICES

Douglas Lake Cattle Company
Range Agreement RAN076915
Cascades Natural Resource District

SEPTEMBER 2025
FPB/ARC/274



**Forest
Practices
Board**

BC'S INDEPENDENT
WATCHDOG FOR
SOUND FOREST &
RANGE PRACTICES

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Audit Results

Introduction

The Forest Practices Board (the Board) is the public's watchdog for sound forest and range practices in British Columbia. One of the Board's roles is to audit the planning and practices of range agreement holders to ensure compliance with the *Forest and Range Practices Act* (FRPA).

As part of the Forest Practices Board's 2024 compliance audit program, the Board randomly selected the Cascades Natural Resource District (the district) as the location for a full scope compliance audit. Within the district, the Board selected range agreement (RAN076915) held by the Douglas Lake Cattle Company for audit.

This report explains what the Board audited and the findings for RAN076915. The range agreement area is located southeast of Merritt (see Figure 2). Detailed information about the Board's compliance audit process is provided in [Appendix 1](#).



Figure 1. Overview of the Upper Nicola River and associated wetland complex within the range agreement area (see Figure 2). The Nicola watershed provides important fish habitat and is culturally significant to First Nations.

Background

The 217 556 hectare agreement area is located approximately 15 kilometres southeast of Merritt and is one of the largest range agreements for livestock grazing in BC. The range agreement authorizes 42 026 animal unit months (AUMs)ⁱ for grazing between June 1 and October 15. The agreement area includes 10 range units and 75 pastures.

In 2021, about 21 500 hectares of the range agreement area (approximately 10 percent) was burned by the White Rock Lake wildfire (see Figure 2). As a result, the Ministry of Forests (the ministry) authorized a non-use agreement with the range agreement holder to reduce authorized AUMs for the 2022 and 2023 grazing seasons to allow the area affected by the wildfire to recover.

Central to the range agreement area is the Nicola watershed (see Figure 2). The watershed is culturally significant to First Nations, is a vital fish and wildlife habitat, and is an important source of water used for drinking and agricultural purposes. The range agreement area is within the territories of 19 First Nations and the Board recognizes their deep connection with the land that continues to this day.ⁱⁱ

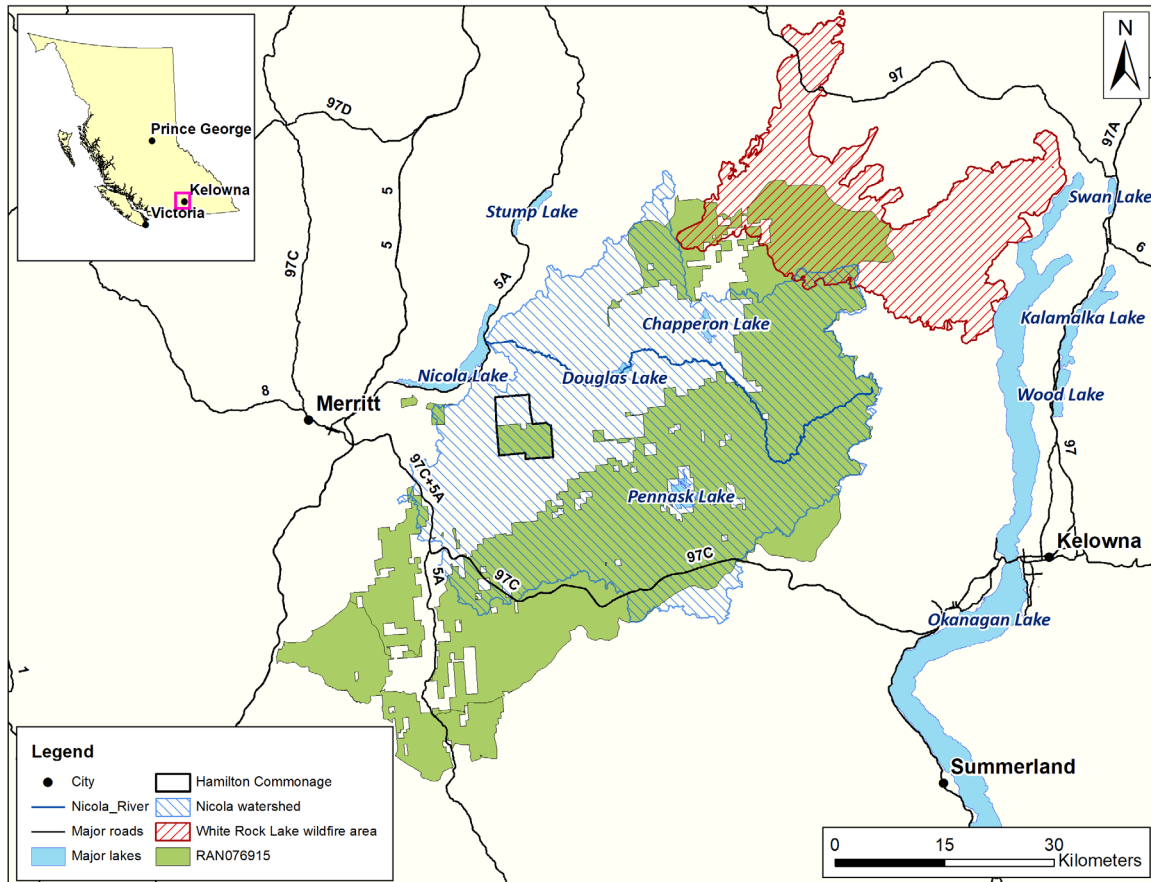


Figure 2. Map of range agreement area audited.

Audit Approach and Scope

The audit examined range planning and practices for compliance with FRPA and the *Range Planning and Practices Regulation* (RPPR). This included an examination of:

- records maintained by the range agreement holder and the ministry;
- compliance with range use plans and any amendments, including maps and the grazing schedule, stubble heights and actions to address issues identified by the minister; and
- compliance with range practice requirements, including:
 - protection of riparian areas and upland areas;
 - general wildlife measures;
 - protection of drinking water quality, licensed waterworks and fish habitat; and,
 - maintenance of range developments.

The standards and procedures used to carry out this audit are set out in the Board's *Compliance Audit Reference Manual, Version 7.1, July 2016*. Auditors' work involved interviewing the range agreement holder's staff and ministry staff, reviewing the range use plans applicable within the two-year audit period of August 1, 2022, to August 23, 2024.

The audit team consisted of two professional agrologists, two professional foresters and a professional biologist. Fieldwork took place between August 19 and August 23, 2024.

The range use plan includes pastures on the agreement holder's private lands as well as public lands licensed to the agreement holder for grazing. The audit team examined range planning and practices on public landⁱⁱⁱ, focusing on pastures with a high proportion of grasslands and riparian areas.^{iv} Twenty-four pastures were examined, totalling 185 249 hectares of public land or 85 percent of the range agreement area.^v

Planning and Practices Examined and Findings

Required Content of the Range Use Plan

Two range use plans were in effect during the August 1, 2022, to August 23, 2024, audit period. The first plan was in effect from 2019 to 2023, and the second came into effect in 2024 and runs until 2028. Both range use plans and minor amendments to the range use plans met the required content specified in section 33 of FRPA^{vi} and section 13 of the RPPR.^{vii}

Compliance with the Range Use Plan

Section 45(1)(b)^{viii} of FRPA requires a range agreement holder to comply with their range use plan. This includes complying with the grazing schedule and, if applicable, range readiness criteria; stubble heights; descriptions of plant communities and actions to maintain them; invasive plant measures; and actions to address issues identified by the minister.

Grazing Schedule

The grazing schedule specifies the number and class of livestock, the period of use, and the number of AUMs for each pasture.

On the 24 pastures examined, auditors identified 4 pastures where livestock (both horses and cattle) were grazing at a time when they were not permitted in accordance with the approved grazing schedule.¹ Overall, there was a low frequency of non-compliance with the grazing schedule across all 24 pastures examined, and none of the non-compliances resulted in impacts to the range resource. Therefore, the non-compliances are not considered significant but are an area requiring improvement.^{ix}

¹ The four pastures include Corral Field, Pothole Range, Powerline Field and West Hamilton.

Range Readiness Criteria, Stubble Heights, Descriptions of Plant Communities and Actions to Establish or Maintain Them and Invasive Plant Measures

The agreement holder's range use plan specifies range readiness criteria and stubble heights for certain grass, sedge and forb species. Range readiness criteria indicate a stage of plant growth when the range is ready to be grazed by livestock. Auditors were not present on the range agreement area when livestock were turned out onto any given pasture, therefore, auditors did not assess compliance with range readiness criteria.

Auditors examined compliance with stubble heights specified in the range use plan at the same time as they examined compliance with the requirement to protect riparian and upland areas. Auditors found that, at the time of the audit, the agreement holder complied with the stubble height requirements specified in their range use plan for the 24 pastures examined.

The agreement holder's range use plan includes a description of 42 plant communities and actions that the agreement holder will take to establish or maintain them. The plan also includes four measures to prevent the introduction or spread of invasive plants. However, Board auditors did not assess compliance with actions to establish or maintain plant communities, or measures to prevent the introduction and spread of invasive plants, because they were not written in a measurable or verifiable way and therefore, not enforceable (see Table 1 for examples).

TABLE 1. Examples of actions and measures in the plan that are not enforceable.

Component of Range Use Plan	Action/Measure in the Range Use Plan	Enforceability
Plant communities and actions to establish or maintain them. Example plant community in the plan: "hard-stemmed bulrush".	In addition to the grazing schedule and the other special conditions identified in the 'Management Comments' section, special efforts should be directed to managing livestock away from these areas.	Not enforceable. <ul style="list-style-type: none">• There are no "special conditions" identified in the Management Comments section of the plan.• "Special efforts" is not measurable or verifiable because it does not state the actions that will be undertaken by the agreement holder.
Measures to prevent the introduction or spread of invasive plants	Range management practices will be implemented so as to foster healthy plant communities that are more resistant to weed invasion.	Not enforceable. <ul style="list-style-type: none">• The phrase "range practices will be implemented" does not state a measurable or verifiable action that will be undertaken by the agreement holder.

Actions to Address Issues Identified by the Minister

The current range use plan identifies actions to address the following five issues identified by the minister:

- Williamson's sapsucker
- Great Basin spadefoot
- Mule deer winter range
- Moose winter range
- American badger

Williamson's sapsucker and Great Basin spadefoot

Table 2 describes the auditor's assessment of compliance or non-compliance with actions in the range use plan to address Williamson's sapsucker and Great basin spadefoot. For both species, the ministry provided the range agreement holder with a map of known habitat within the range agreement area.

TABLE 2. Assessment of compliance or non-compliance with actions in the plan for Williamson's sapsucker and Great basin spadefoot.

Minister's Issue	Action(s) in the Range Use Plan	Auditor Assessment of Compliance or Non-compliance with the Action(s)
Williamson's sapsucker	Adhere to browse levels to help in the recruitment of nesting trees. ²	Browse use by livestock in identified Williamson's sapsucker habitat did not exceed 25 percent. The agreement holder complied with the action in the range plan.
Great Basin spadefoot	Avoid draining wetland habitat and maintain water levels to the extent possible.	Board auditors did not observe any evidence where the agreement holder interfered with the natural water levels of wetlands within spadefoot habitat. The agreement holder complied with the action in the range plan.
	Maintain or remediate riparian and aquatic habitats to a proper functioning condition.	Auditors identified one wetland in the Corral Field pasture and one wetland in the West Hamilton pasture where approximately 850 metres of the riparian area surrounding the two wetlands was in a not-functional condition due to livestock use. The agreement holder did not comply with the action in the plan and is therefore in significant non-compliance with section 45(1)(b) of FRPA.

² The range plan refers to maximum browse use by livestock of 25 percent as stated in section 29(1)(c)(ii) of the RPPR.

Mule deer winter range, moose winter range and American badger

For reasons described in Table 3, auditors did not assess compliance with the agreement holder's actions for the minister's issues of mule deer winter range, moose winter range and American badger.

TABLE 3. Reasons that auditors could not determine compliance or non-compliance with actions in the range use plan for mule deer winter range, moose winter range or American badger.

Minister's Issue	Action(s) in the Range Use Plan	Reason that Auditors did not Determine Compliance or Non-compliance with the Action(s)
Mule deer winter range	Maintain or establish late seral shrub communities within deer winter range.	The ministry did not provide the agreement holder with a map showing the location of mule deer winter range.
Moose winter range	Maintain or establish late seral shrub community within moose winter range.	The ministry did not provide the agreement holder with a map showing the location of moose winter range.
American badger	During construction of range developments, do not destroy badger dens.	No new range developments were constructed within the audit period.
	Manage livestock grazing to maintain suitable habitat for prey species such as ground squirrels and yellow-bellied marmots.	The ministry did not provide the agreement holder with a map showing the location of American badger habitat. Also, the action is not measurable or verifiable because there is no commonly understood definition of "suitable habitat".

Compliance with Practice Requirements

Board auditors examined compliance with FRPA's requirements to protect riparian areas, upland areas, fish habitat, water quality, licensed waterworks, to comply with general wildlife measures, and to maintain range developments.

Riparian Areas

Section 30 of the RPPR^x requires a range agreement holder to protect riparian areas by ensuring range practices^{xi} do not result in a material adverse affect on the ability of riparian areas to:

- withstand normal peak flow events without accelerated soil loss, channel movement or bank movement;
- filter runoff;
- store and safely release water; and
- conserve wildlife habitat values in the area.

The RPPR defines a 'riparian area' as land adjacent to a stream, lake or wetland and contains vegetation that, due to the presence of water, is distinctly different from the vegetation of adjacent upland areas.

Board auditors completed a riparian health assessment where riparian areas appeared to be impacted by livestock use. This assessment is used to determine if the current condition of a riparian area is functional, functional at risk, functional at high risk, or not-functional. If a riparian area is not-functional, the Board considers that there has been a material adverse effect on each of the riparian functions listed as (a) through (d) under section 30 of the RPPR. When a material adverse effect is identified, the agreement holder is in non-compliance with section 30 of the RPPR.

In the 24 pastures where riparian areas were examined, auditors found 9 wetlands in 6 pastures where the riparian area, or a portion of the riparian area, was in a not-functional condition as a result of livestock use. There is 1 wetland each in the Powerline (Figure 3), Corral Field, West Hamilton and Vinson pastures. The Pothole Range pasture has 2 wetlands, and the Davis pasture (Figure 4) has 3. None of the 9 wetlands have fish present or provide drinking water for humans.

Overall, approximately 6760 metres of riparian area surrounding the nine wetlands were found to be in a not-functional condition. Livestock use at each of the nine wetlands has resulted in a material adverse effect in relation to the four functions of a riparian area identified in section 30 of the RPPR.

The extent of damage at each of the nine wetlands, as well as the cumulative damage across all nine, is significant. Therefore, the agreement holder is in significant non-compliance with section 30 of the RPPR.



Figure 3. About 50 percent (750 metres) of the riparian area of this wetland in the Powerline pasture is in a not-functional condition as a result of livestock use.



Figure 4. Approximately 950 metres of the riparian area surrounding this wetland in the Davis pasture is in a not-functional condition as a result of livestock use.

Other than the 9 wetlands identified above, the Board examined numerous streams, lakes and wetlands in each of the 24 pastures assessed and found the associated riparian areas to be compliant with FRPA's requirements.

Upland Areas

Although not defined by FRPA, 'upland areas' are grasslands and forestlands outside of riparian areas.

Section 31 of the RPPR^{xii} requires a range agreement holder to not carry out range practices that would result in a material adverse effect on an upland area by substantially:

- a) accelerating the rate of soil loss from the area;
- b) diminishing infiltration of water on the area;
- c) reducing moisture storage on the area; or
- d) decreasing stability of the area.

Auditors examined upland areas in 24 pastures over the range agreement area with a focus on uplands containing open grasslands. This is because grasslands are generally preferred by livestock for forage and are important areas for biodiversity.

Board auditors completed an upland health assessment where upland areas appeared to be impacted by livestock use. This assessment is used to determine the current condition of an upland area as functional, functional at risk, functional at high risk, or not-functional. If an upland area is not-functional, the Board considers that there has been a material adverse effect on each of the upland functions listed as (a) through (d) under section 31 of the RPPR. When a material adverse effect is identified, the agreement holder is in non-compliance with section 31 of the RPPR.



Figure 5. This open grassland in the Lauder Meadow pasture is in a proper functioning condition.

In all 24 pastures examined, Board auditors found that the range agreement holder ensured that livestock use did not result in a material adverse effect on upland areas (see Figure 5 for an example of an upland in proper functioning condition). Therefore, the agreement holder is compliant with section 31 of the RPPR.

Protection of Fish Habitat and Water Quality

Section 32 of the RPPR^{xiii} requires a range agreement holder to protect fish habitat by ensuring range practices are conducted at a time and in a manner that is unlikely to harm fish, have a material adverse effect on fish passage, or destroy, damage, or harmfully alter fish habitat.

Section 33 of the RPPR^{xiv} requires an agreement holder to protect the quality of water used for human consumption and to ensure the protection of a licensed waterworks (that is, a location where surface water is diverted for a variety of licensed uses including human consumption or irrigation).

In the 24 pastures examined, Board auditors did not observe any instances of livestock use impacting fish habitat, the quality of water used for drinking by humans, or licensed waterworks. Therefore, the agreement holder complied with sections 32 and 33 of the RPPR.

General Wildlife Measures

Section 36(1)(a)^{xv} of the RPPR requires a range agreement holder to ensure that range practices are consistent with a general wildlife measure.

In 2008, the BC Minister of Environment established a wildlife habitat area (WHA) and general wildlife measures for Great Basin spadefoot through Order #3-126 (the order).^{xvi} This WHA is mostly located within the Corral Field pasture. Most of the WHA is within the range agreement area held by Douglas Lake Cattle Company. The location of the WHA is appropriately shown on the range use plan map.

The general wildlife measures (#7 and #8 as stated in the order for range) include:

7. Plan livestock grazing to minimize livestock use of WHA.
8. Do not place livestock attractants within the WHA.³

Appendix 1 of the order provides non-legal direction to assist with implementing the general wildlife measures. For general wildlife measure #7, 'plan livestock grazing' includes the following goals:

1. minimize disturbance during the breeding season (April to July);
2. minimize access;
3. maintain water quality and levels;
4. minimize soil disturbance and trampling of burrows;
5. maintain important habitat features (i.e. small mammal burrows, riparian and emergent vegetation and non-compacted soils); and
6. maintain or remediate riparian and aquatic habitats to a properly functioning condition.

Auditors examined whether the agreement holder was complying with the general wildlife measure to plan livestock grazing to minimize livestock use of the WHA. As part of examining compliance, auditors considered the goals in Appendix 1 of the order but also considered the placement of range developments. Auditors also examined whether livestock attractants were placed within the WHA.

Auditors completed a riparian or upland health assessment form where livestock use appeared to be causing impacts to riparian areas or upland areas within the WHA.

³ The order defines a livestock attractant as, "a substance or structure that draws livestock, including salt/minerals, supplements, water developments [such as dugouts and watering troughs] and cattle oilers."

General wildlife measure #7

Within the WHA, Board auditors found that livestock grazing in both the upland areas and the riparian areas of two wetlands was carried out in a way that minimized livestock use of the areas. However, at one wetland in the Corral Field pasture, auditors found that livestock use had caused extensive damage to 400 metres of the riparian area to the extent that it is in a not-functional condition (see Figure 6).

Goals #2, #4, #5 and #6 from Appendix 1 of the order have not been achieved in the area where the riparian area is deemed as not-functional. The agreement holder did not ensure their practices were consistent with general wildlife measure #7 and therefore, is non-compliant with section 36(1)(a) of the RPPR. The non-compliance is considered significant because of the extent of damage to a riparian area, which is a key habitat component for a species at risk.



Figure 6. This wetland is located within WHA #3-126 established for the protection of Great Basin spadefoot. Livestock use has resulted in a 400-metre section of the wetland to be in a not-functional condition (indicated by the white line).

General wildlife measure #8

At the same wetland in the Corral Field pasture, auditors found a dugout within the wetland's riparian area that attracts livestock to the wetland. This has likely led to greater use and subsequent damage to the riparian area surrounding the wetland.

Since 2008, when the WHA was legally established, it is not permitted to “place” a livestock attractant within the WHA. However, evidence obtained by using historical imagery from Google Earth shows that the dugout was “placed” within the WHA before 2008. Therefore, for general wildlife measure #8, the agreement holder is compliant with section 36(1)(a) of the RPPR.

Maintenance of Range Developments

Under section 40(1) of the RPPR,^{xvii} a range agreement holder must maintain any range development located on an area that is subject to the agreement in an 'effective operating condition'. FRPA defines a 'range development' as a structure (such as a fence), an excavation, livestock trail or an improvement to forage quality or quantity. The term 'effective operating condition' is not defined in FRPA. However, the Board considers that compliance is achieved when the range development is maintained in a manner that functions as intended.

Board auditors identified six sites in five pastures⁴ where range fences were not being maintained in an 'effective operating condition'. All six sites are shown as range developments on the range use plan map. At five of the six sites, the lack of fence maintenance does not appear to have significantly altered livestock use on the range agreement area.

At one of the six sites, on the boundary of the Vinson and Pothole Range pastures, auditors identified a pasture fence that was not being maintained in an 'effective operating condition' (see Figure 7). At the site, Board auditors observed approximately 250 metres of fence that was lying on the ground. This resulted in livestock being able to access a wetland in an adjacent pasture for most of the grazing season.



Figure 7. Approximately 250 metres of range fence between the Vinson and Pothole pastures is not being maintained in an effective operating condition.

Overall, the length of fence that was found to be in non-compliance is not significant in relation to the total length of fence being maintained as required on the range agreement area. The lack of fence maintenance at the six sites is a non-compliance with section 40(1). However, the non-compliance is not significant and, therefore, is an area requiring improvement.

⁴ One site in Davis, Hastings, One Mile and Vinson pastures, and two sites in the Pothole Range pasture.

Audit Opinion

In my opinion, except for the non-compliances described below, the range planning and practices carried out under range agreement RAN076915 held by Douglas Lake Cattle Company, between August 1, 2022, and August 23, 2024, and assessed by the auditors complied in all significant respects with the requirements of the *Forest and Range Practices Act* and the *Range Planning and Practices Regulation*, as of August 2024.

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

Without further qualifying my opinion, I draw attention to the [Compliance with the Range Use Plan](#) and [Compliance with Practice Requirements](#) sections of the report that describe three significant non-compliances related to ‘Actions to address issues identified by the minister’ (such as, for Great Basin spadefoot), ‘General wildlife measures’ and ‘Riparian areas’. I also draw attention to the ‘Grazing schedule’ and ‘Maintenance of range developments’ sections of the report, which describe areas requiring improvement.

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, including adherence to the auditor independence standards and the ethical requirements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour. Such an audit includes examining sufficient range planning and practices to support an overall evaluation of compliance with the *Forest and Range Practices Act*.



Francis Njenga, PAg.
Director of Audits
Victoria, British Columbia
September 2, 2025

Appendix 1: Forest Practices Board Compliance Audit Process

Background

The Forest Practices Board conducts periodic audits of government and licensees to determine compliance with Parts 2 to 5 of the *Forest and Range Practices Act* (FRPA), and Parts 1 and 2 of the *Wildfire Act*, and associated regulations and standards.

Selection of Auditees

The number, type and scope of audits to be conducted each year are established by the Director of Audits in accordance with the Board's strategic priorities and budget. Once a licence has been audited, it is removed from the audit selection pool for five years.

The Board randomly selects districts or timber supply areas (TSAs) from each of the three natural resource areas of BC (North, South and Coast). The auditors then review the forest resources, geographic features, activities, and operating conditions in the district or TSA selected, as well as past Board audits in that district or TSA. These factors are considered with the Board's operational and strategic priorities, and the type of audit is determined. At this stage, the Board chooses the auditee(s) that best suits the selected risk and priorities. This is considered a qualified random approach of selection.

In addition, each year, the Board randomly selects at least 1 of the 31 BCTS field units for audit.

Audit Standards

Audits are conducted in accordance with auditing standards developed by the Board and described in the Board's *Compliance Audit Reference Manual*. The standards are based on Canadian generally accepted auditing standards and relevant ethical requirements. This includes those pertaining to independence, as published by the Chartered Professional Accountants of Canada, and consistent with the *Canadian Standards on Assurance Engagements* (CSAE) 3001, the *Conformity assessment – Requirements for bodies providing audit and certification of management systems* (ISO 17021-1:2011), and the CPA *Code of Professional Conduct* (CPABC Code – June 2015).

Audit Process

Conducting the Audit

Once the Board selects a licence or BCTS field unit for audit, the next step is to determine the scope of the audit (timeframe, activities). For the timeframe, the Board normally examines activities that took place over a one or two-year time period up to the start of the audit fieldwork (i.e., looking back two years). This is referred to as the audit period.

For a full-scope compliance audit, all activities carried out during the audit period are identified, which may include harvest, silviculture, fire protection and road-related activities. These activities form the population.

From the population, the auditors select a sample of each activity to examine in the field. Generally, auditors will concentrate on sampling where the risk of impacts to forest resources is deemed to be high. This is called the *inherent risk*. It can be a function of site conditions, natural circumstances, and the particular forest or range practices involved. Proportionally, more sampling occurs where the inherent risk is high because the higher the risk, the higher the likelihood of significant non-compliance or failure to achieve specified results.

For smaller audits, the sample may include the full population. Auditors also consider factors such as geographic distribution and values potentially affected by activities to ensure an adequate sample size.

Auditors' work includes interviewing licensee staff, reviewing the auditee's applicable plans, and reviewing applicable legal orders, observations, inspections and assessments in the field.

Evaluating the Results

The Board recognizes that compliance with the requirements of FRPA and the *Wildfire Act* 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 legal 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 *Wildfire Act* requirements.

Unsound Practice – where the auditor identifies a practice that complies with FRPA or the *Wildfire Act* but may adversely affect a forest resource.

Areas Requiring Improvement (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. In certain circumstances, these events 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 more non-compliance events.

If an auditor identifies a probable significant breach of the legislation, the auditor is required by the *Forest Practices Board Regulation* to immediately advise the Board, the party being audited, and the responsible minister(s).

Reporting

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

The Board reviews the draft report and may make recommendations and/or provide commentary on the audit findings. The Board must, prior to publishing a report or recommendation, consider whether or not it may adversely affect a party or person. The Board must give any affected party or person the opportunity to review, rebut or clarify the information before the Board publishes its report. The final report is released to the auditee first and then to the public and government seven days later.

ENDNOTES

ⁱ Animal unit month (AUM) is defined in the *Range Act* and means 450 kg of forage, measured on a dry matter basis, being the amount of forage that would sustain

- (a) for one month, an average cow of the genus *bos* with an unweaned calf born in the current calendar year, or
- (b) for a period longer or shorter than one month, an animal within a class or species of animal described in the definition of "livestock", depending on the type of animal, its stage of development, or both;

ⁱⁱ Range agreement RAN076915 is partially or entirely within the territories of the following First Nations:

Ashcroft Indian Band	Lytton First Nation	Siska First Nation
Boothroyd Indian Band	Nicomen Indian Band	Skuppah Indian Band
Boston Bar First Nation	Nooaitch Indian Band	Spuzzum First Nation
Coldwater Indian Band	Okanagan Indian Band	Upper Nicola Band
Cook's Ferry Indian Band	Oregon Jack Creek Band	Upper Similkameen Indian Band
Lower Nicola Indian Band	Penticton Indian Band	
Lower Similkameen Indian Band	Shackan Indian Band	

ⁱⁱⁱ The Forest Practices Board does not have the authority to examine range planning and practices on private land.

^{iv} Pastures with a high proportion of grasslands and riparian areas were selected as a priority for assessment because these ecosystems types are known as being important for biodiversity.

^v The 24 pastures examined by Board auditors on the range agreement area include:

Barton	Moir	Paradise
Beaver Lake	Moir Burn	Pothole Range
Corral Field	Moir Reservoir	Powerline Field
Davis	Mystery	Salmon
Dorothy's	Nash	Upper Seller's
Gott	North Wilson	Upper Wasley
Hastings	Old Dry farm (Spring)	Vinson
Lauder Meadows	One Mile	West Hamilton

^{vi} **Section 33(1) FRPA—Content of a range use plan for grazing**

A range use plan for grazing of livestock must

- (a) include a map of a scale and format satisfactory to the minister that
 - (i) shows the area for the agreement under the Range Act that pertains to the plan,
 - (ii) specifies the location and type of range developments in that area, and
 - (iii) specifies the pastures that are in that area,
- (b) include a schedule that describes for each pasture to be used for grazing of livestock,
 - (i) the livestock class,
 - (ii) the number of livestock, and
 - (iii) the period of use,
- (c) specify actions to be carried out in the area under the plan to deal with issues identified by the minister,
- (d) conform to prescribed requirements, and
- (e) be consistent with objectives set by government and other objectives that are established under this Act and that pertain to all or part of the area subject to the plan.

^{vii} **Section 13 RPPR—Content of range use plans**

(1) The minister may, in writing, require a range agreement holder who is required to prepare a range use plan to ensure that the plan contains, for one or more portions of the area, any of the following that are identified or specified by the minister:

- (a) descriptions of plant communities and of the actions that will be taken to establish or maintain them;
- (b) range readiness criteria;
- (c) stubble heights.

(2) The minister may specify only range readiness criteria under subsection (1)(b) that are

- (a) described in the Schedule, or
- (b) consistent with the objectives set by government.

^{viii} **Section 45(1)(b) FRPA—Compliance with a range use plan**

A person who grazes livestock, cuts hay or carries out or maintains a range development on Crown range must do so in accordance with

- (a) this Act, the regulations and the standards, and
- (b) the applicable range use or range stewardship plan.

^{ix} On January 27, 2025, the range agreement holder amended the grazing schedule of their range use plan. As it pertains to the Corral field, Powerline and West Hamilton pastures, effective January 27, 2025, the amended grazing schedule enables livestock grazing at times when it was not previously permitted.

^x **Section 30 RPPR – Protection of riparian areas**

A range agreement holder must not carry out a range practice if it would result in a material adverse affect on the ability of the riparian area to

- (a) withstand normal peak flow events without accelerated soil loss, channel movement or bank movement,
- (b) filter runoff,
- (c) store and safely release water, and
- (d) conserve wildlife habitat values in the area.

^{xi} A 'range practice' is defined by FRPA and means:

- (a) a prescribed activity that is carried out on Crown range by
 - (i) the holder of an agreement under the *Range Act*, or
 - (ii) a person in a prescribed category of persons, and
- (b) the activities related to constructing, modifying or maintaining a range development that are carried out on Crown range by a person other than the holder of an agreement under the *Range Act*.

^{xii} **Section 31 RPPR—Protection of upland areas**

A range agreement holder must not carry out a range practice on an upland area if the range practice would result in a material adverse effect on the upland area by substantially

- (a) accelerating the rate of soil loss from the area,
- (b) diminishing infiltration of water on the area,
- (c) reducing moisture storage on the area, or
- (d) decreasing stability of the area.

^{xiii} **Section 32(1) RPPR—Protection of fish**

A range agreement holder who carries out a range practice must ensure that the range practice is conducted at a time and in a manner that is unlikely to

- (a) harm fish,
- (b) have a material adverse effect on fish passage, or
- (c) destroy, damage or harmfully alter fish habitat.

^{xiv} **Section 33 RPPR—Protecting water quality**

(1) A range agreement holder who carries out a range practice must ensure that the range practice does not cause material that is harmful to human health to be deposited in, or transported to, water that is diverted for human consumption by a licensed waterworks.

(2) A range agreement holder who carries out a range practice that could have a material adverse effect on a licensed waterworks must ensure that the range practice does not

- (a) damage the licensed waterworks, or
- (b) alter the vegetation, soil or terrain around the licensed waterworks, if the alteration could materially increase the risk of subsequent damage to the licensed waterworks.

^{xv} **Section 36(1) RPPR—General wildlife measures**

By January 1 following the establishment of a general wildlife measure for an area, a range agreement holder who carries out a range practice in the area must ensure that the range practice is consistent with

- (a) the general wildlife measure, or
- (b) a proposal approved under subsection (3).

^{xvi} The order is available for download at: https://www.env.gov.bc.ca/wld/documents/wha/SPIN_3-126_ord.pdf

^{xvii} **Section 40(1) RPPR—maintenance of range developments**

A range agreement holder must maintain any range development located on an area that is subject to the agreement in an effective operating condition.



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