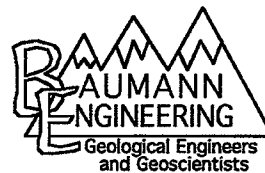


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George Matheson, P.Eng.  
Worker's Compensation Board  
6951 Westminster Highway  
Richmond, B.C.  
V7C 1C6

May 16, 2007  
File Number: WSBC070516

**Re: Comments on the Proposed Changes to the WCB Regulations**

Dear Mr. Matheson,

I don't believe we have ever met- I am a very busy geological engineer in Squamish, B.C., and I would like to express my strong support for the proposed changes to the WCB Safety Regulations that would require a Registered Qualified Professional (P.Eng., P.Geo. or in some cases, an RPF) to take professional responsibility for, and sign off on, snow avalanche safety management plans.

I have a varied practice, which includes specialized work in slope hazard assessments, including the evaluation of snow avalanche hazards. I have been involved in snow avalanche work for many years after taking my initial training with Peter Schaerer, P.Eng. in the late 1960's and then serving as the Training Officer for the Mountain Rescue Group (MRG), the Province's first volunteer mountain rescue organization. In 1974, I successfully completed my Ski Guides training through the Association of Canadian Mountain Guides, and was involved in starting a heli-ski guiding company at Whistler, for which I also guided part-time.

During the 1970's, I was a member of the volunteer First Aid Ski Patrol at Whistler and became involved in the presentation of avalanche courses for the ski patrol, community organizations, the British Columbia Mountaineering Club (of which I was a long time member), as well as for the B.C. Corrections Branch, and other professional groups. In 1979, I developed the Province's first Recreational Avalanche Course (RAC) for the Federation of Mountain Clubs of BC, and this course was then taught for many years before it was given over to the private sector.

Professionally, my current avalanche work involves the completion of avalanche safety plans and avalanche runout analysis, mainly for industrial operations in B.C., work in the analysis of fatal commercial avalanche incidents for the Province's Chief Coroner's Office, and work on terrain analysis for Forestry and other industrial operations. I have given numerous presentations on avalanche issues- including one at the Association of Professional Engineers and Geoscientists Annual General Meeting, and two at the International Snow Science Workshop in Jackson Hole two years ago.

At the present time, my projects include managing avalanche hazard for the Squamish Forest Service, Ledcor's Ashlu hydroelectric project, EPCOR'S Miller Creek hydro project, Squamish Mill's logging operations, and Advanced Energy Systems South Cranberry hydro project near Revelstoke. These are all industrial projects that clearly fall under the jurisdiction of WorksafeBC.

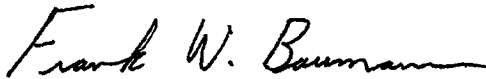
My reason for writing is to provide you with some comments regarding the proposed changes to the Worksafe BC regulations and policies regarding the management of snow avalanche hazard. I apologize for not communicating earlier- I had discussed this matter some time ago with my long time friend and colleague, Terry Rollerson (senior scientist at Golder Associates), but have just not had a chance to respond yet. Anyway, here are my specific comments regarding the proposed changes.

In my opinion, it is important that all snow avalanche safety management plans that would come under the jurisdiction of WorkSafe BC be signed and sealed by a Professional Engineer, Professional Geoscientist, or, in some cases, a Registered Professional Forester, who then takes full professional responsibility for the plan. My reasons for this are as follows:

1. The assessment of avalanche hazard clearly comes under the Engineering and Geoscience Act- it involves terrain analysis, runout analysis, an assessment of snow stability and snow avalanche terrain, and an assessment of risk involving potentially life-threatening events.
2. Even the most qualified member of the Canadian Avalanche Association (a Level II Professional) gains that status with only two weeks of training and one season of working under the supervision of another professional member. The training also covers a very small range of skills- snow test pitting, weather data collection, avalanche rescue, etc.. The training and experience requirements for a P.Eng./P.Geo. are much more lengthy and rigorous (minimum 4 years of training and 4 years of experience).
3. Only a P.Eng./P.Geo. is eligible to obtain Errors and Omissions Insurance- a very good universal test of how well standards and skills are recognized.
4. Only a P.Eng./P.Geo. is accountable to a legislated professional standard, which includes standards of training, experience, and professional development, and includes investigative and disciplinary functions (some of which are available to the public). The standards also incorporate a Code of Ethics which requires, among other things, that the P.Eng./P.Geo. keep the safety of the public paramount, and that he/she only work on assignments for which they are qualified. This means that a P.Eng./P.Geo. MUST retain someone with sufficient avalanche expertise to help them if they are themselves not qualified, BUT must be prepared to take full professional accountability for the work of the avalanche sub-professional.
5. There **may** be a shortage of trained P.Eng.'s/P.Geo.'s right now to do this work, but this should not be used as a justification to delay making much-needed changes meant to better maintain worker safety. If surveys find that a shortage does indeed exist, then the Association of Professional Engineers and Geoscientists should organize courses to provide the necessary training.

If you have any questions regarding this matter, please do not hesitate to get in touch with me.

Yours truly,



Frank W. Baumann, P.Eng.  
Geological Engineer



**From:** Frank Baumann [mailto:fwbaumann@shaw.ca]  
**Sent:** Friday, May 18, 2007 1:58 AM  
**To:** Matheson, George  
**Cc:** Shaw, Richard (Dick)  
**Subject:** Worksafe BC changes regarding snow avalanche hazard

I would like to express my strong support for the proposed changes to the Worksafe BC regulations and policy that will require a Registered Qualified Professional to sign off and take professional responsibility for snow avalanche safety management plans.

My reasons for this are outlined in the attached letter.

2007/06/08