

CROSSROUTE FOREST

2007 –2012 INDEPENDENT FOREST AUDIT

MANAGEMENT UNIT ACTION PLAN

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Action Plan Signature Page

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INTRODUCTION

In October 2012 an Independent Forest Audit (IFA) was conducted on the Crossroute Forest by ArborVitae Environmental Services Ltd. for the period April 1, 2007 to March 31, 2012. The final audit report was accepted by the Forestry Futures Committee on March 26, 2013 and therefore the action plan is due May 26, 2013.

The final audit report for the Crossroute Forest includes 18 recommendations: 14 recommendations directed to either the SFL holder or the Local MNR District, and 4 recommendations (#4, #5, #6 and #12) directed at corporate MNR. The corporate MNR recommendations will be addressed in a separate 2012 Provincial Action Plan. For each management unit audit recommendation this action plan outlines the actions required, responsibility, timelines, and method of tracking progress of actions.

RECOMMENDATIONS

Recommendation #1:

MNR shall ensure that minutes are kept of Atikokan LCC (RMAC) meetings.

Actions required:

MNR will ensure minutes of each Atikokan LCC (RMAC) meeting are recorded (including any action items and follow up results), distributed to committee members, and retained at the MNR Atikokan Area Office.

Organization and position responsible:

MNR, Fort Frances District - District Manager, and ongoing by Atikokan Area Supervisor.

Deadline date:

Initiated November 2012 and ongoing.

Method of tracking progress:

Draft and approved Minutes for each RMAC meeting. Copies of Minutes retained at the Atikokan Area Office.

Recommendation #2:

MNR shall work with the LCC to offer the Company a larger role on the LCC.

Actions required:

1. MNR Fort Frances District Manager will discuss this recommendation with the Fort Frances LCC (Natural Resource Advisory Committee - NRAC). The

- discussion will outline the IFA findings for R#2 and the level of involvement by Resolute that NRAC would consider suitable. The NRAC minutes will reflect the outcome of the discussion and the LCC's recommendation to the District Manager. NRAC Terms of Reference will be updated if required.
2. In light of the NRAC recommendation and the outcome of action 1, Resolute will detail their desired participation on NRAC in a letter to the Fort Frances District Manager. The District Manager will review and provide a response to the letter. If further discussion is warranted with the company and/or NRAC to facilitate this review and response, the discussion and any resulting decisions by the District Manager will be documented and included with the file.

Organization and position responsible:

1. MNR, Fort Frances District - District Manager.
2. Resolute Forest Products, Thunder Bay - Planning Manager; MNR, Fort Frances District – District Manager.

Deadline date:

1. March 7, 2013 (completed).
2. June 30, 2013 (letter); response, review, discussions ongoing during 2013.

Method of tracking progress:

1. NRAC Minutes.
2. Letter from Resolute. MNR response to letter, documentation on file.

Recommendation #3:

MNR District shall verify with MNR main office the specific requirements for being in conformance with Environmental Assessment Condition 34 (more equal participation in the benefits provided through forest management) and ensure that it retains documentation of its activities related to meeting the requirements.

Actions required:

1. MNR Fort Frances District will send a letter to the Manager, Forest Evaluation & Standards Section, MNR Forests Branch requesting that written interpretation be provided by June 1, 2013, and that a related discussion be held with District staff by June 30, 2013, if necessary, to confirm the specific requirements for being in conformance with Environmental Assessment Condition 34.
2. MNR Fort Frances District will prepare the 2012/13 and subsequent Condition 34 Reports in accordance with the direction provided in action 1 above and will retain documentation of related activities.

Organization and position responsible:

1. Letter - MNR, Fort Frances District - District Manager; discussion with Forest Evaluation & Standards Section (if required) - MNR, Fort Frances District - District Manager, Area Supervisor (lead), Management Forester.
2. Condition 34 Reports – MNR, Fort Frances District – Management Forester (lead), Area Supervisor.

Deadline date:

1. Letter by April 30, 2013 requesting written confirmation be provided by June 1, 2013 and a discussion held by June 30, 2013, if necessary.
2. 2012/13 Condition 34 Report due November 15, 2013, and subsequent reports due annually.

Method of tracking progress:

1. Letter, direction provided, record of discussion.
2. Condition 34 Reports and related documentation on file at MNR Fort Frances District.

Recommendation #7:

The Company, in consultation with MNR, shall identify and implement measures for reducing the frequency of FMP amendment requests and AWS revision requests that are processed for the Forest.

Actions required:

MNR District and Resolute staff will conduct an FMP amendment and AWS revision process-mapping exercise to determine process bottlenecks within and between both organizations. The exercise will identify and explore review practices, approval channels, information requirements, and causes of delay. This exercise will also determine measures to be implemented to address identified issues including methods of minimizing process time. This review will consider the limitations of staff workloads, available resources, prescribed consultation/review FMPM requirements, and responsibilities prescribed under the delegation-of authority.

Organization and position responsible:

Resolute Forest Products, Fort Frances - Planning Superintendent.

MNR, Fort Frances District - Management Forester (lead), Area Supervisor.

Deadline date:

December 31, 2013 and implementation ongoing.

Method of tracking progress:

Documentation of process-mapping exercise including measures to be implemented.

Recommendation #8:

MNR shall devise a simple system for documenting reviews of minor amendments undertaken by the LCCs and record comments the Committees may offer for such amendments.

Actions required:

The District developed and implemented a system late in 2011 to specifically document the District Manager's decisions regarding the classification of amendment requests in accordance with the requirements of the Forest Management Planning Manual and Forest Information Manual. The Documentation includes a section that formally records comments and/or recommendations made by the LLC.

Prior to this, decisions were considered documented when noted in the Minutes for LCC meetings. However, the Auditors had difficulty finding Minutes for the minor amendments approved during the audit period and, as a result, developed this Recommendation. In light of comments made by the Auditors, the District has moved the LCC review/classification documentation to the amendment binder. In this way all documentation pertaining to an amendment will be in one location and readily accessible.

Organization and position responsible:

MNR, Fort Frances District – Management Forester (lead), District Manager.

Deadline date:

January 1, 2012 (completed and implemented).

Method of tracking progress:

LCC minutes, documentation noting decisions and comments retained on file for each amendment.

Recommendation #9:

The Company and MNR shall work collaboratively to overcome the technical challenges that are preventing all FMP amendment and AWS revision documentation from being made available for public inspection on the MNR website. Other technical issues with the existing information posted on the MNR website shall also be resolved. Both organizations shall ensure that the planning document submissions meet all FIM requirements and its associated technical specifications.

Actions required:

1. The Company confirmed with MNR there were no technical challenges preventing FMP amendment and AWS revision documentation from being available on the MNR website.
2. The Company will collect required documentation, compliant with the Forest Information Manual Technical Specifications, and upload outstanding 2007-2012 amendments (from the 2007-2017 FMP) and AWS Revisions through

the Forest Information Portal. FMP amendments and AWS revisions since April 1, 2012 have been submitted by the company through the Forest Information Portal and have been processed by MNR Fort Frances District so that they are available for public inspection on the MNR website.

Organization and position responsible:

1. Resolute Forest Products, Fort Frances – Planning Superintendent.
2. Resolute Forest Products, Fort Frances - GIS Analyst.

Deadline date:

1. April, 30, 2013 (completed).
2. September 1, 2013 (completed).

Method of tracking progress:

1. Telephone conversation – note to file.
2. 2007-2012 FMP Revision and AWS Amendments found on FMP website for public availability.

Recommendation #10:

MNR shall deal with the amendment related to the Charles Road on the schedule to which it originally committed.

Actions required:

1. MNR will meet with the Natural Resource Advisory Committee (NRAC) to present the amendment proposal, rationale, and past history of the Loonhaunt area, and obtain their recommendation on the amendment classification.
2. MNR will send a letter to NRAC confirming the amendment classification will be a major amendment to the Crossroute 2007-2017 FMP, which differs from the NRAC recommendation of minor amendment with enhanced consultation.
3. MNR will send a letter to Resolute outlining a timeline to initiate and complete a Major amendment process. The timeline would result in the amendment, if approved, being completed in time for the inclusion of the road in the 2014/15 AWS. The letter will indicate that approval of the amendment would be subject to, and contingent on, the results of an economic and ecological analysis, a determination of impacts by MNR, significant concerns expressed by the public and/or other agencies/organizations, or request to elevate this proposal to an Individual Environmental Assessment. The letter will also outline additional information required by MNR to assess this proposal.
4. MNR will arrange a meeting with Resolute planning staff to discuss the MNR letter regarding the proposed amendment, including the additional information required by MNR and the schedule to initiate the amendment process.

5. Resolute and MNR will process the major amendment in accordance with the amendment schedule. If approved, the amendment will be implemented with the 2014/15 AWS.

Organization and position responsible:

1. MNR, Fort Frances District - District Manager (lead), Area Supervisor, Management Forester.
2. MNR, Fort Frances District - District Manager.
3. MNR, Fort Frances District - District Manager.
4. MNR, Fort Frances District - Area Supervisor (lead), Management Forester.
5. MNR, Fort Frances District - District Manager, Area Supervisor (lead), Management Forester.

Deadline date:

1. November 19, 2012 and January 14, 2013 (completed).
2. December 11, 2012 (completed).
3. January 18, 2013 (completed).
4. February 15, 2013 (completed).
5. February 15, 2014 (forecast amendment completion date); if approved, implementation beginning April 1, 2014 during 2014/15 AWS.

Method of tracking progress:

1. NRAC Minutes, including documentation of NRAC recommendation of minor amendment with enhanced consultation; documentation filed in amendment binder.
2. MNR letter to NRAC.
3. MNR letter to Resolute.
4. Record of meeting.
5. Major amendment documentation including consultation; 2014/15 AWS.

Recommendation #11:

The Company and MNR shall collaboratively decide whether blocks planned for operations in the western portion of the Forest have had sufficient review for deer habitat concerns. If the blocks have not been reviewed for this, such a review shall be undertaken and the planned harvest shall be revised appropriately based on agreement between the Company and MNR.

Actions required:

1. MNR will undertake a review of blocks in the western portion of the Crossroute Forest, consistent with the Featured-Species Area for White-Tailed Deer. The review will focus on the stand-level prescriptions (e.g. size and species composition) of the allocated harvest blocks and impacts, if any, on the amount of available deer winter habitat. The spatial distribution stand-level characteristics of the planned and contingency blocks will also be assessed as it relates to changes in habitat guideline requirements from 2007

- (Deer Habitat Guidelines) to 2012 (Stand and Site Guide). The results of the review/analysis will be discussed with Resolute.
2. Based on the results of the review/analysis and discussion with Resolute referred to in action 1 above, MNR will confirm whether any revisions to the planned harvest are required. MNR and Resolute will process any necessary amendment to the FMP.

Organization and position responsible:

1. MNR, Fort Frances District - Area Biologist (lead), Management Forester, Area Supervisor. Resolute Forest Products, Fort Frances - Planning Superintendent.
2. MNR Fort Frances District Area Biologist (lead), Area Supervisor. Resolute Forest Products, Fort Frances - Planning Superintendent.

Deadline date:

1. & 2. June 30, 2013.

Method of tracking progress:

1. Report filed at District Office regarding status of harvest blocks and deer winter habitat in the deer featured species zone. Report will be shared with Resolute.
2. Documentation of determination of whether any revisions to the planned harvest are necessary, including any FMP amendment.

Recommendation #13:

The Company shall track the level of by-pass and the primary causal factors over Phase II of the FMP, and report on these figures in the Annual Reports during the term. Should the high level continue, the Company and MNR shall review the allocation process in order to reduce the amount of by-pass.

Actions required:

1. Residual forest, including by-pass, will be delineated during the depletion mapping process, in preparation for summarizing data for Annual Reports. The annual reports will include a discussion about the amount of this residual forest including the primary causes of by-pass.
2. The amount of residual forest, including by-pass and its causes, will be assessed in the Year-7 Annual Report, to determine if 2007-2017 FMP projections were appropriate or to make adjustments for the 2017-2027 FMP assumptions.

Organization and position responsible:

1. Resolute Forest Products, Fort Frances - Planning Superintendent.
2. Resolute Forest Products, Fort Frances - Planning Superintendent.

Deadline date:

1. November 15, 2013 for 2012/13 Annual Report and ongoing annually.
2. November 15, 2015 for Year-7 Annual Report.

Method of tracking progress:

1. Residual discussion included in Annual Reports.
2. Residual discussion included in 2014/15 Annual Report.

Recommendation #14:

The Company, with the collaboration of District MNR, shall assess the amount of forest area converted to primary and branch road during the audit term, and the area within harvest blocks that is unlikely to regenerate so as to contribute to the next harvest. Based on this analysis, if necessary, the Company shall revise as appropriate the factors used in the determination of the LTMD in the 2017 FMP to model the conversion to non-forest land.

Actions required:

1. The area lost to primary/branch road construction will be assessed in the Year-7 Annual Report, to determine if 2007-2017 FMP projections were appropriate.
2. Make adjustments, if necessary, for the 2017-2027 FMP assumptions.

Organization and position responsible:

1. Resolute Forest Products, Fort Frances - Planning Superintendent.
2. Resolute Forest Products, Fort Frances - Planning Superintendent.

Deadline date:

1. November 15, 2015 for Year-7 Annual Report.
2. April 1, 2017.

Method of tracking progress:

1. Land losses due to road discussion included in 2014/15 Annual Report.
2. Documentation of factors used in determination of LTMD and model assumptions.

Recommendation #15:

The Company shall continue to monitor and review its grinding operations with the aim of identifying measures that can be implemented to reduce the thickness of the remnant slash beds and improve their renewability.

Actions required:

1. Slash piles removed through grinding operations will continue to be assessed for renewal success, and silviculture treatments will be identified in accordance with the FMP.

2. Operational procedures will be adjusted, as required, to minimize loss of productive land in accordance with the Regional Direction incorporated into the Phase II Operations Plan.

Organization and position responsible:

1. Resolute Forest Products, Fort Frances - Renewal Forester.
2. Resolute Forest Products, Fort Frances - Biomass Forester.

Deadline date:

1. Currently occurring and ongoing annually.
2. April 1, 2012, ongoing annually.

Method of tracking progress:

1. Records of regeneration assessment.
2. Record of operational procedure review/adjustment.

Recommendation #16:

The Company shall ensure that all stands that were harvested during the 2002-2007 FMP term are classified with the appropriate silvicultural treatments based on previously completed FOP surveys, and any stands that have not been previously reported shall be reported in the Annual Report for 2013/2014. If during the assessment of these areas any stands were not associated with approved Forest Operations Prescriptions, the appropriate prescriptions should be determined and implemented.

Actions required:

1. Areas harvested during 2002-2007 will be assessed for non-reporting and classified.
2. Silviculture treatments, mostly natural regeneration, not previously reported, will be reported in the 2011/12 Annual Reports.

Organization and position responsible:

1. & 2. Resolute Forest Products, Fort Frances - Planning Superintendent.

Deadline date:

1. October 2012 (completed).
2. November 15, 2012 (completed).

Method of tracking progress:

1. & 2. Accepted 2011/12 Annual Report.

Recommendation #17:

The Company shall review assumptions used for the modeling of PCT area, with due consideration of operational factors and historical achievements, and make appropriate revisions in the next FMP. The Company shall also make best efforts to increase the pre-commercial thinning program if this is warranted by silvicultural needs.

Actions required:

1. The Company will endeavour to increase PCT within the 2012-2017 term to meet FMP targets.
2. Determine PCT criteria and practicality of achievements based on forest conditions and past achievements.
3. Based on the report from action 2 above, modeling assumptions for PCT will be reviewed to determine if 2007-2017 FMP projections were appropriate or to make adjustments for the 2017-2027 FMP assumptions.

Organization and position responsible:

1. Resolute Forest Products, Fort Frances - Renewal Forester.
2. Resolute Forest Products, Fort Frances - Renewal Forester.
3. Resolute Forest Products, Fort Frances - Planning Superintendent.

Deadline date:

1. Annually, prescribed in AWS.
2. April 1, 2016.
3. April 1, 2017.

Method of tracking progress:

1. Annual Reports, for 2012/13 to 2016/17 indicate PCT achievements in relation to FMP targets.
2. Report of PCT criteria and GIS assessment of operable areas.
3. Documentation of PCT modeling assumptions used in production of 2017-2027 FMP e.g. analysis package.

Recommendation #18:

MNR shall conduct a review of its forest compliance monitoring program to rationalize staffing and resource requirements needed to meet its compliance monitoring mandate. MNR shall submit compliance reports completed by its staff on schedule.

Actions required:

1. District staff will review the compliance monitoring program to meet its mandate, including a review of the Annual Compliance Operation Plan (ACOP) reporting format to determine if it still fulfills the required function.
2. The District Management Team will review staff priorities for the 2013/14 operating year to meet the MNR's compliance mandate. A staff member in each of the Fort Frances and Atikokan MNR Offices will be assigned to coordinate compliance efforts and reporting. There are currently 7 certified

- forest compliance inspectors available in the Fort Frances and Atikokan Areas to undertake compliance monitoring efforts on the Crossroute Forest. Some of these inspectors also have compliance commitments on the Sapawe Forest.
3. District will revise the annual Fort Frances District Compliance Plan (if necessary), implement the Plan through inspections/audits, and compliance staff will submit compliance reports on schedule in accordance with the District Compliance Plan, MNR policy, and Forest Operations Inspection Program (FOIP) commitments.
 4. District staff will review the compliance program on or about March 31, 2014 to assess achievement of District goals and this Audit recommendation (i.e. review of annual Compliance Plan, summary of activities, staffing/resource requirements, submission of compliance reports on schedule). The review will be used to further refine the annual Compliance Plan, compliance priorities, and staff resources, as necessary.

Organization and position responsible:

1. MNR, Fort Frances District – Fort Frances and Atikokan Area Supervisors (lead), Management Foresters, Compliance Technicians.
2. MNR, Fort Frances District – District Manager, Area Supervisors (lead).
3. MNR, Fort Frances District - Compliance Technicians.
4. MNR, Fort Frances District - Area Supervisors (lead), Compliance Technicians.

Deadline date:

1. January 1, 2013 (completed for 2013-2014 annual Compliance Plan).
2. April 1, 2013 (completed) and ongoing annually.
3. April 30, 2013 (in progress) and ongoing annually.
4. March 31, 2014 and ongoing annually.

Method of tracking progress:

1. Revised annual District Compliance Plan.
2. DMT minutes reflecting decision and assignment of staff to coordinate District compliance program.
3. Submission of compliance reports by MNR on time as required by the annual District Compliance Plan, MNR policy, and FOIP timelines.
4. Documentation of review e.g. meeting record, annual compliance summary, and subsequent annual District Compliance Plans.