

TROUT LAKE FOREST

2015 INDEPENDENT FOREST AUDIT MANAGEMENT UNIT

ACTION PLAN

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Action Plan Signature Page

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Introduction

In June 2015 an Independent Forest Audit (IFA) was conducted on the Trout Lake Forest for the period April 1, 2009 to March 31, 2015. The final audit report was received October 27, 2015 and the Forestry Futures Committee accepted the report being final on October 29, 2015. The action plan is due December 29, 2015.

The audit makes 13 recommendations, plus a recommendation that the license be extended. The license extension recommendation plus five corporate recommendations are included in a separate 2015 provincial action plan. The eight recommendations directed to the Sustainable Forest Resource License (SFL) Holder and the Ministry of Natural Resources and Forestry (MNRF) Red Lake District are addressed in this action plan. Two of the recommendations are directed to Domtar Inc., three to the MNRF Red Lake District and three to Domtar and MNRF jointly. This action plan outlines the actions required, responsibility, timelines, and method of tracking progress of actions.

The audit included recommendations for five out of the eight IFA Principles (Principles 2, 3, 4, 5, and 6) and therefore the remaining IFA Principle headings have not been included in this action plan.

Recommendations

Principle #2: Public Consultation and Aboriginal Involvement

Recommendation #1:

MNRF District in collaboration with Domtar shall engage the local tourism outfitters in efforts to develop a long-term strategy for the coexistence of tourism and forest management industries on the Trout Lake Forest.

Action(s) required:

1. An information session for Resource Based Tourism Operators (RBTO) on caribou habitat and forest management planning requirements will be held at the onset of planning for the next FMP, after the caribou tract analysis and strategic planning but before operational planning.
2. Individual RBTO long term management strategy meetings will be held with interested RBTO's to identify interests and mitigate forest management/tourism conflict.

Organization and position responsible:

1. Domtar Inc. - SFL Forester (Plan Author - lead), MNRF Red Lake District - Management Forester, MNRF Northwest Region (NWR) - Regional Biologist and Planning Forester.
2. Domtar Inc. - SFL Forester (Plan Author- lead), MNRF Red Lake District Management Forester, MNRF NWR - Regional Biologist.

Deadline date:

1. March 2019.
2. March 2019.

Method of tracking progress:

1. FMP public consultation documentation.
2. FMP public consultation documentation.

Principle 3: Forest Management Planning

Recommendation #3:

The Company shall review the Phase II plan text regarding clear-cut size and Table FMP-12 and correct any errors in the text and table and amend the plan as necessary.

Action(s) required:

Domtar will review and update Table FMP-12 to reflect all planned clearcuts in the final phase II 2014 FMP that are greater than 260 ha. The plan text will then be updated to reflect the maximum and average size of planned clearcuts that correspond to the updated Table FMP-12. Once completed, a plan amendment request will be submitted for review and approval.

Organization and position responsible:

Domtar Inc. - SFL Forester (Plan Author - lead) and SFL Team Leader.

Deadline date:

July 31, 2016.

Method of tracking progress:

Plan amendment documentation.

Recommendation #4:

Domtar must ensure that a more thorough analysis and discussion is provided in the next FMP regarding any age-class substitution or under-allocation. The analysis and

discussion should focus on the effect on plan objectives, future wildlife habitat and sustainability.

Action(s) required:

1. The 2015 IFA audit report recommendation #4 audit findings outlines reasons for and issues associated with the age class substitution in the previous plan. During production of the 2019 FMP this information will be considered and issues will be addressed including: slivers are not recognized in FIM, this data management issue will be corrected; unattainable areas will not be included as available.
2. Achievement of plan objectives, future wildlife habitat and sustainability will be the priorities during the selection of areas for harvest in the 2019 FMP and therefore age-class substitution will be minimized to avoid significant differences in age classes as was the case for some age classes in the previous 2009 plan. Under allocation will also be minimized to follow the plan objectives, future wildlife habitat and sustainability. The plan text will then include the analysis as stated in the audit recommendation should any age class substitution or under allocation occur.

Organization and position responsible:

1. Domtar Inc. - SFL Forester (Plan Author).
2. Domtar Inc. - SFL Forester (Plan Author).

Deadline date:

1. March 2019.
2. December 31, 2019.

Method of tracking progress:

1. Planning inventory in accordance with FIM Technical Specifications.
2. Actual allocations in 2019 FMP, plan text.

Recommendation #5:

District MNRF shall ensure that: amendment documentation includes all approval pages, all amendments are posted to the e-FMP website, LCC input into the amendment categorization and approval is documented with the amendment package, and a complete amendment summary is maintained and available on the e-FMP website as per the requirements of the 2009 FMPM.

Action(s) required:

1. For each approved amendment: upon approval the District will take the amendment approval page and file it with all of the amendment documentation that is retained in the District file.

2. The District will lead a review of the documentation for all amendments to the 2009 FMP together with Domtar Inc. to ensure all documentation is on file and to confirm the status of the amendment i.e. approved or not approved.
3. The LCC input into the amendment categorization (minor and major) and approval will be documented in the LCC meeting minutes and a copy of this input will be included with the amendment package. The LCC has previously agreed that administrative amendments do not require LCC review individually but that they will be provided to the LCC once a year for their information.
4. An up-to-date list of all approved amendments will be available on the e-FMP website and will include the amendment number, the reason for the amendment, the amendment category, and the amendment approval date.

Organization and position responsible:

1. MNRF Red Lake District – Forestry Technical Specialist.
2. MNRF Red Lake District – Forestry Technical Specialist (lead), SFL Operational Forester.
3. MNRF Red Lake District – Forestry Technical Specialist.
4. MNRF Red Lake District – Forestry Technical Specialist.

Deadline date:

1. November 2015 and ongoing with any future amendment requests.
2. September 2016 and ongoing for all future amendments.
3. November 2015 and ongoing with any future amendment requests.
4. September 2016 and ongoing for all future amendments.

Method of tracking progress:

1. Amendment approval page filed with amendment.
2. Complete amendment documentation including approval pages or documentation indicating why an amendment request was not approved.
3. LCC meeting minutes and record filed with each amendment package.
4. Up-to-date amendment list on e-FMP website.

Principle 4: Plan Assessment and Implementation

Recommendation #9:

MNRF shall complete inspections of the roads that Domtar has identified as decommissioned and respond to Domtar's request for formal acknowledgement that the decommissioned roads are no longer the Company's responsibility.

Action(s) required:

1. District MNRF and Domtar Inc. to discuss this audit recommendation and confirm the priority road networks for decommissioning and MNRF inspections.

2. Assess the priority road networks (Sidace, Rita Lake and Mountain Road areas) via ATV and helicopter to facilitate the road transfer process.
3. Review public comments and assess the Eagle Road/Cramp Road network via ATV and or helicopter to facilitate the road transfer process as per Domtar's August 2013 request letter.

Organization and position responsible:

1. MNRF Red Lake District - Management Forester (lead) and Domtar Inc. – SFL Forester (Plan Author - lead) and Operational Foresters.
2. MNRF Red Lake District - Management Forester (lead), IRM Technical Specialist, Management Biologist.
3. MNRF Red Lake District - Management Forester (lead), IRM Technical Specialist, Management Biologist.

Deadline date:

1. October 29, 2015.
2. Starting November 2015, completed by April 2016.
3. April 1, 2017.

Method of tracking progress:

1. Records of discussion.
2. Priority Report. MNRF District response letter to SFL's request.
3. Future Appendix to Red Lake District Annual Compliance Operations Plan (ACOP). MNRF District response letter to SFL's request.

Principle 5: Information Management Systems

Recommendation #6:

The MNRF District and the Company shall ensure that all signed approval pages for relevant planning documents are kept on file in their respective offices.

Action(s) required:

1. When signed the District MNRF will retain on file in their office, together with the relevant document, the approval pages for Annual Work Schedules and any revisions, FMP amendments, and the year three Annual Report that requires the Regional Director's endorsement.
2. When signed, the District MNRF will scan and e-mail to Domtar Inc. the approval pages for Annual Work Schedules and any revisions, FMP amendments, and the year three Annual Report that requires the Regional Director's endorsement.
3. Domtar Inc. will retain on file in their office the approval pages referred to in action 1 above together with the related document. Domtar Inc. will also retain on file in their office all other Annual Report Title and Certification pages signed by the planned author together with the related Annual Report.

Organization and position responsible:

1. MNRF Red Lake District – Forestry Technical Specialist.
2. MNRF Red Lake District – Forestry Technical Specialist.
3. Domtar Inc. - SFL Forester (Plan Author).

Deadline date:

1-3. AWS approvals March 31, 2016 and ongoing annually; AWS revisions and amendments beginning October 2015 and ongoing when they occur; year 7 Annual Report by February, 2017.

Method of tracking progress:

1-3. Pages filed together with relevant documents.

Principle 6: Monitoring**Recommendation #11:**

With the support of Corporate MNRF, the MNRF District and the Company shall consider making the appropriate adjustments to the annual compliance plans to adopt the new risk management approach to compliance planning based on risk analysis and management strategies.

Action(s) required:

1. The risk-based compliance requirements of the MNRF Forest Compliance Handbook, Forest Management Directives and Procedures FOR 07-02-03 and FOR-07-02-04, will be applied to the Trout Lake Forest FMP through a plan amendment and to the Trout Lake Forest AWS during the development of the 2016 AWS.
2. Annual Compliance Operating Plans (ACOPs) will be developed that outline timing and frequency of monitoring activities and sampling intensities (related to compliance inspections) based on the SFL's proposed operations described in the Annual Work Schedule. The MNRF Forest Compliance Handbook, Forest Management Directives and Procedures FOR 07 02 04 and FOR 07 02 03 and the MNRF Regional Operations Division Compliance Delivery Strategy provide direction which will be utilized when developing ACOP content.

Organization and position responsible:

1. Domtar Inc. - SFL Forester (Plan Author).
2. MNRF Red Lake District - IRM Technical Specialist (lead), Forestry Technical Specialist, Management Forester.

Deadline date:

1. March 31, 2016 and ongoing annually with each subsequent AWS.
2. March 31, 2016 and ongoing annually with each subsequent ACOP.

Method of tracking progress:

1. Phase II 2014 FMP text amendment and 2016-2017 AWS.
2. District ACOPs.

Recommendation #12:

MNRF shall collate and summarize SEM survey information related to free-to-grow assessments conducted both before and during the audit periods so that its value in supporting future planning requirements is optimized.

Action(s) required:

1. The District will compile all of the District SEM survey information for the Trout Lake Forest including data, reports and summary tables together in one electronic District file. This information will be shared with the NWR Office.
2. The District, with the assistance of the NWR Office, will review the SEM information towards reviewing calibration of the SFL surveys and reviewing assessments conducted by the SFL. SEM survey information will be further summarized for supporting future planning requirements.

Organization and position responsible:

1. MNRF Red Lake District – Resource Management Technician.
2. MNRF Red Lake District – Management Forester (lead), MNRF NWR – Regional Science Specialist, Regional Forest Operations Specialist.

Deadline date:

1. June 2016.
2. December 2016.

Method of tracking progress:

1. Electronic file with all SEM information, NWR Office access to file.
2. Records of calibration and assessment reviews.