

VOIT Comparison for ForCorps 2021
 Analysis by The Society of High Prairie Regional Environmental Action Committee

VOIT #	Objective description (GoA)	Our comments (we reply)	ForCorps response
1	1.1.1.1 Maintain a balanced mixture of tree species and ages across the forest and over time.	The current practice includes spraying glyphosate, which, aside from the human and animal health effects, creates a monoculture. The practice of aerial spraying of glyphosate is opposed to this specific VOIT	We have received consistent negative feedback on the use of herbicides related to a number of concerns. The companies are actively investigating alternatives to herbicides but, at this time, will continue to apply herbicides on a portion of the cutblocks harvested for tree survival and to meet government regeneration standards. The companies are working with communities on a site-specific basis to alter herbicide applications to mitigate impacts on other values. In addition, research is being conducted in Alberta to quantify changes to biodiversity and species present in treated vs. untreated harvest areas.
2	1.1.1.2 Newly harvested areas will vary in size from small to large.	Avoiding fragmentation of the landscape is very important for endangered woodland caribou, but this practice depends on recognizing caribou habitat . In the past three years, while forest companies have been consulting on this document, caribou have been in unprecedented decline. We need to act now to preserve this iconic species in our forests! Leaving a cut block alone for 100 years may have nothing to do with preserving caribou habitat	The proposed approach for harvesting in caribou ranges is based on an aggregated harvest and leave strategy where aggregated patches can only be harvested once every 100 years. This approach was designed to continually maintain patches of caribou habitat over time within each caribou range. These aggregated harvest and leave strategies were developed under a process led by Alberta Environment and Parks. Existing access is to be used when ever possible to avoid new linear disturbance and fragmentation. Cutlines with re-growth shall also be avoided to allow them to better regenerate.

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3	1.1.1.2 Patches of old forest at least 100 hectares (247 acres) in size will be retained across the forest and over time.	How is this important VOIT verified? Can you prove that you are, in fact, leaving large blocks of crucial old growth forest? In our experience, what is written in forest management planning documents, and what contractors do on the landscape are two contradictory things.	Targets for patches of old forest were included in the plan's development. The harvesting plan, the spatial harvest sequence (SHS), keeps large patches intact. The companies are required to follow the SHS and report on how well it was adhered to at 5-year intervals in the Stewardship Report. Progress in achieving all of the VOITs is reported in either the Stewardship Report or the next FMP. If the companies do not meet targets, revisions will be made to avoid that happening again.
4	1.1.1.3 Minimize the amount of permanent all-weather roads that are constructed and maintained by the forest industry	We would like to see documentation to establish: - the previous amount of km road/hectare - the current km road/hectare objectives	Due to high costs, the Companies would rather not construct and maintain permanent all weather roads but acknowledge some all weather roads are required for access. The total length of these roads owned by the forest companies are reported in the new FMP and will be reported in the subsequent stewardship and FMP as noted above. This will provide a history of the status of permanent all-weather forestry roads and how the amount of these roads across the landscape changes over time
5	1.1.1.3 Minimize the amount of temporary roads that are constructed and maintained by the forest industry which are open for 3 years or less.	We would like to see documentation to establish: - the previous amount of km road/hectare - the current km road/hectare objectives	Most of the roads constructed for forestry purposes are temporary roads. As with 1.1.1.2, existing access will be used when ever possible, even if it means increased hauling distance to the mill. Reporting on the status of temporary roads in Stewardship reports and subsequent FMPs is similar to the permanent road reporting.

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6	1.1.1.4 Conduct harvesting and regeneration activities so that rare plant communities are not harmed.	Members of our group have personally witnessed the destruction of rare and medicinal plant communities that are highly valued to us, over a period of decades. How is this important VOIT going to be verified? How can you prove that you are not harming rare and important plant communities when clear-cutting? The forest industry continues to destroy rare plant communities. Can the forest industry re-introduce these important species and recreate ecosystems while spraying glyposate? Lady Slipper, Tiger Lily, Wild Orchids, are all plants we are losing on an ongoing basis.	The current approach for managing uncommon plants is based upon the government's uncommon plant reporting process. The companies recognise that this does not fully address the concerns raised through consultation and that a different process is desired which is reflective of local conditions and concerns. The companies are willing to work with Indigenous communities to understand and mitigate impacts to sensitive plant, wildlife, and traditional/cultural/spiritual sites. This willingness is reflected in an Indigenous derived VOIT developed to address Indigenous values. The additional Indigenous VOIT has been added to the FMP.
7	1.1.1.5 Don't harvest all burnt-over areas and leave some merchantable intact areas undisturbed in their natural post-fire state.	We are aware that this is required: please do it and ensure that is is done.	Thank you for the comment. This process was followed for fire salvaging in the recent Macmillan wildfire complex.
8	1.1.1.5 Don't harvest all blown down areas and leave some merchantable intact areas undisturbed in their natural blown down state.	We are aware that this is required: please do it and ensure that is is done.	Thank you for the comment.

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9	1.1.1.6 Create no-harvest buffers next to streams, rivers and lakes to protect water quality.	We are aware that these buffers already exist (30 m and 100 m), and they are not always honoured. Additionally, with increasing wind speeds due to climate change, we see current buffers being blown down. How will you ensure that these buffers are in fact in place? How will you ensure they last through time?	The companies strive to fully achieve all requirements and commitments in their forestry operations. Harvest plans are developed under a rigorous quality control process and approved by the government. Post harvest review and final cut block boundaries are developed for all harvested areas and compared to plans in order to ensure all commitments are achieved. The GOA has a separate monitoring process and reports infractions
10	1.1.2.1 Leave small patches or individual trees standing within harvested areas	We have examples of specific requests that members of our group made regarding a stand of Tamarack south of Driftpile, that were ignored by the harvester. This is not good enough; once the request has been made and ignored, precious Traditional areas are lost. How will you ensure that trappers, and other land users requests are respected? Also because of increasing wind speeds, many smaller stands simply get blown over. How will you ensure these small stands, and especially individual trees last over time?	In addition to the in-block retention required by the GOA and areas retained under the Operating Ground Rules, the Companies are currently working with Indigenous communities to create a structure retention strategy to address line of sight, wildlife corridors and movement and nontimber values at the block and compartment level.
11	1.1.2.1 Leave a mixture of larger timber pieces on the forest floor after harvesting.	We have consistently witnessed all timber being piled and burned, which is a complete and utter waste. How will you verify that you are doing this?	Coarse woody debris is left in cutblocks during harvesting operations and is not all debris or dead materials are brought to roadside. Debris piles at roadside are burned as required under fire regulations to reduce wildfire risks

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12	1.1.2.2 Establish no-harvest buffers around sensitive sites such as mineral licks, raptor nests, bear dens, etc.	Please include caribou trails, migratory bird habitat during nesting, and migration, and other important features of the forest in consultation with local First Nations.	As noted above, the Companies are willing to work with Indigenous communities to understand and mitigate impacts to sensitive plant, wildlife, and traditional/cultural/spiritual sites that are not already protected through existing processes
13	1.1.2.3 Follow water crossing construction standards to minimize impacts of roads on creeks and streams.	How do you verify these important goals? Please also put berms around your clear cut areas so the soil and debris doesn't continue to wash away into creeks, and lakes, sometimes causing flooding.	Included in the Operating Ground Rules directing forestry operations around water and fish bearing streams are best management practices which exceed GOA requirements. This includes runoff mitigation controls such as retention that is left along watercourses and rapid revegetation requirements. Crossing are expensive and are minimized to limit impacts. To address legacy crossings, the companies have a program to replace older stream crossings with new crossings to newer standards. The companies have worked with Indigenous communities to upgrade inadequate, older stream crossings that would impact grayling and are willing to continue this process
14	1.2.1.1 Maintain habitat conditions over time to support wildlife which are indicators of healthy forests (grizzly bear, caribou, American marten, barred owl, song birds)	How do you verify that your people in the field respect these goals? We have seen time and time again where the planners have great VOITS, but the harvestors and contractors you hire do not comply. Do you have any system of fines for not complying?	As noted above, the companies strive to fully achieve all requirements and commitments in their forestry operations. Harvest plans are developed under a rigorous quality control process and approved by the government. Post harvest review and final cut block boundaries are developed for all harvested areas and compared to plans in order to ensure all commitments are achieved. The GOA has a separate monitoring process and reports infractions.

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15	1.3.1.1 Identify and protect specially chosen areas to preserve the genetics (gene pool) of the naturally occurring tree species for each seed zone	How do you verify that contractors in the field respect these goals? We have seen time and time again where the planners have great VOITS, but workers in the do not comply. Do you have any system of penalties for not accomplishing these crucial VOITs? With the advancement of climate change, we can't afford to lose forest genetics.	Maintaining a wide variety of genetic populations is important for the long-term health and resilience of the forest. Management of tree genetics, seed stocks, and planting of trees from seeds is accomplished through government policies on seed collection, storage and deployment. This process (which includes government assigned Protective Notations) is separate from harvesting and reforestation field operations
16	1.3.1.2 Establish seed banks to maintain the natural genetic diversity of the trees species included in tree improvement programs.	Who (which company or companies) is going to accomplish this?	Ex-situ conservation sites are identified by the GOA. They are related to Controlled Parentage Programs (CPP) which are industry and GOA cooperatives
17	1.4.1.1 Consider the impacts harvesting may have on areas adjacent to the forest management area.	We have seen that once a block is cut, there is more access. Berms around the edge of a cut could form multiple purposes: decrease ATV traffic and prevent soil and debris from being lost. It's very important to control ATV access into cutblocks. How are you going to accomplish this?	This is a very difficult issue to address involving multiple industries and many users with differing opinions. The companies acknowledge the importance of sharing conversations regarding access and to work together on integration. Access management through integration between industries can assist in reducing access for example by reducing parallel roads. The companies have begun more detailed conversations with First Nations regarding managing and tracking forest access.

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18	2.1.1.1 Demonstrate that all harvested areas are properly reforested according to the Government of Alberta's Reforestation Standard of Alberta	<p>We are aware that this is going on, and that there have been challenges maintaining the newly growing forest, in part because of current practices, including top soil and subsoil mixing, glyphosate spraying, and inadequate protection from wind.</p> <p>Have you considered changing procedures to account for our increased wind speed and longer drought periods?</p>	Thank you for the comment.
19	2.1.1.2 Demonstrate that all harvested areas are properly growing at the rates specified in the Government of Alberta's Reforestation Standards	<p>We are aware that this is going on, and that there have been challenges maintaining the newly growing forest, in part because of current practices, including top soil and subsoil mixing, glyphosate spraying, and inadequate protection from wind.</p> <p>Have you considered changing procedures to account for our increased wind speed and longer drought periods?</p>	Thank you for the comment.

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20	2.1.2.1 Track and report the loss of productive forest landbase due to non-forestry industrial activity.	Are these reports public? How do you verify that reporting of non-forestry activity is taking place?	The land withdrawal process is very highly regulated in Alberta and all industries have to follow it. There are a number of publicly available reports on the status of the overall forested landbase, for example, those produced by ABMI. The status of this VOIT, as determined from government data sets and company tracking processes, will be reported in the Stewardship report and in FMPs
21	2.1.2.2 Identify and report on the area affected by insects, disease, wildfire and blow down	Are these reports made public or shown to the Forest Advisory Committee? How do you verify that areas are affected by blow down and not by inadequate buffering? Does reporting also include the impacts of non-forestry activity is taking place after the area is opened by logging?	The status of this VOIT, as determined from government data sets and company tracking processes, will be reported in the Stewardship report and in FMPs. The companies do not formally verify the extent of natural events.
22	2.1.3.1 Implement a noxious weed program to treat areas where noxious weeds from forestry operations are identified.	<p>Spraying glyphosate over cut blocks from airplanes provides substantial health effects to humans and the forest.</p> <p>https://usrtk.org/pesticides/glyphosate-health-concerns/</p> <p>We are aware of teams of people available to come and handpull noxious weeds. This can be more effective than 'treatment' with poisons.</p>	Thank you for the information on the available people

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23	<p>3.1.1.1 Reforest all in-block temporary roads within harvest areas and associated temporary inter-block roads that were previously forested and are not required for other access.</p>	<p>What are your methods for de-compacting the road area? What topsoil are you going to use in 'bare areas' where topsoil and subsoil have been mixed. What other methods are you going to use to overcome compaction? Decompaction methods mentioned here 'sound' good, however, the pictures we enclose show a cut block with subsoils and topsoils severely mixed, and no remedy in sight</p>	<p>A large portion of the harvested operations are conducted in the winter under frozen ground conditions which reduces compaction. To reduce impacts for unfrozen conditions, operations are curtailed during rainy and wet periods. Road reclamation procedures include ripping to decompact as well as placement of surrounding soils, materials and debris that was removed to build the road to address compaction and revegetation. To monitor the success of reforestation on roads, reforestation on in-block roads is sampled for success and growth response at the same time the surrounding cutblock is sampled. This process monitors reforestation success on cutblocks and roads and is linked to the establishment of future AAC</p>
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24	<p>3.1.1.2 Minimize the impacts of harvesting on slumping or erosion of soils.</p>	<p>This is a major problem everywhere there are clear cuts. It needs to be addressed. We are losing topsoil at an alarming rate, and the forest cannot regrow without it. The current methods for harvesting the forest are not appropriate because they continue to cause slumping, erosion, and top and subsoil mixing. Please see enclosed pictures as an example. Clay (subsoil) and rock are clearly mixed with the topsoil. Ten years ago, we addressed the SLFPAC with a request to include more selective cutting and understory protection. After 20 months of hearing from scientists on details of our presentation, the companies wrote us to say they would change nothing. The past 10 years prove that this was a mistake, and that large areas of the forest are not able to regrow as per your plans. As it is your legal obligation to regrow the forest, how do you propose to change this?</p>	<p>The companies recognise that soil erosion and slumping are detrimental and have developed operational strategies to minimize the amount of erosion or slumping in harvested areas. However, we disagree that this is a major problem in every clearcut block. The companies have not identified any significant losses of top soil following harvest operations. Erosion and slumping is managed through terrain and slumping potential considerations; prompt reforestation as well as the application of stabilization and revegetation treatments as required. These strategies are contained in best management practices and OGR's as required by the GOA.</p>
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25	<p>3.2.1.1 Plan harvesting so that changes in the amount of runoff (water running through streams and rivers) due to forest harvesting are below government thresholds.</p>	<p>Increased run off from clear cut areas has been filling up Lesser Slave Lake with silt for decades while removing topsoil from the landscape, degrading forest growth potential. Can berms around the cut help retain water on the landscape? Due to the lack of selective logging, large trees that normally would hold the water are now removed. Please practice more selective logging and understory protection.</p>	<p>The GOA developed small watersheds across the region that were used to constrain harvest levels in the regional plan. Additional constraints which further reduced harvest levels were applied to identified sensitive watersheds.</p>
26	<p>3.2.2.1 Establish no-harvest buffers around streams, rivers and lakes to protect riparian areas as identified in the Operating Ground Rules.</p>	<p>The policy has been established for a long time, however adequate buffers are often not left on the landscape. How do you verify that you are complying with riparian protection protocols?</p>	<p>Please see our response to VOIT # 9 above.</p>

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27	<p>5.1.1.1 Establish Annual Allowable Cut levels that are sustainable based on Government of Alberta rules and regulations.</p>	<p>The Government of Alberta requires that you maintain the forest for the use of your future industry and future generations. In addition, the GoA has recently proposed increasing the AAC by 20%. Can you reconcile current practices with this over arching goal? How do you account for topsoil loss, so crucial to forest regrowth when it is not being measured? Please also base your AACs on maintaining the integrity of the environment, including topsoil, wildlife, rare plant species, etc. Our children, the forest, and the future of your industry are counting on you to get this right.</p>	<p>AACs are approved by the GOA after considering a number of timber and non- timber values. Considerations are made based on a number of coarse and fine filter values such as water runoff, caribou, patch sizes, structure retention, riparian buffers, and operational planning. For random events such as wildfire, the GOA will inform the companies when unplanned disturbance thresholds have been reached and adjust AACs. Generally rare plants are best addressed at an operational cutblock level as they are scattered across the landscape and their location is usually unknown.</p>
28	<p>5.2.1.1 Reduce the risk of wildfire spreading into communities by identifying and harvesting the highly flammable timber adjacent to communities.</p>	<p>Can you also reduce the risk of wildfire by not dessicating the forest through the use of widespread aerial spraying of glyphosate pesticides? The annual practice of killing all broad leaf species through dessication (drying) provides increased fuel for forest fires.</p>	<p>This VOIT utilizes the GOA's wildfire threat potential analysis and data sets to predict changes in wildfire threat. Responding to the comment, the companies understand the resistance to herbicide use. As we noted above, the companies are investigating ways to minimize herbicides but will continue to apply herbicides in selected harvest areas to achieve government regulations.</p>

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29	5.2.1.1 Reduce the risk of wildfires across the forest by identifying and harvesting highly flammable timber types.	Can you also reduce the risk of wildfire by not dessicating the forest through the use of widespread aerial spraying of glyphosate pesticides? The annual practice of killing all broad leaf species through dessication (drying them) provides increased fuel for forest fires.	Please see our response above.
30	5.2.2.1 Discuss integration of activities with other users of the forest for mutual benefits.	How is the discussion going? Which groups have you discussed with (it wasn't our group!). Do you feel that you made any progress with other users? Is there any reporting to show the discussions you have had? From our membership eyes on the ground, things look much much worse now than 10 years ago during your last public consultation for an FMA. Here is a quote from a respected Elder who is no longer with "The forest will grow again after today's harvest practices, but it will not be the same. If these same practices are used for a second harvest, the forest will no longer regenerate."	Thank you for the comment. Through collaboration with Indigenous communities, the Companies have jointly created an additional Indigenous VOIT to be included in the FMP. The objective of the Indigenous VOIT centers around the collaboration with Indigenous communities in the decision-making process (planning, operating, monitoring) in order to promote and facilitate Indigenous participation in traditional and cultural activities.

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<p>31</p>	<p>5.2.3.1 The growth of timber on harvested and reforested areas shall be the same or more than the natural forest.</p>	<p>Here is a quote from a respected Elder who is no longer with "The forest will grow again after today's harvest practices, but it will not be the same. If these same practices are used for a second harvest, the forest will no longer regenerate." We see the regeneration of the forest to be struggling now, after the first cut. How can you justify the use of such heavy machinery providing compaction and admixing topsoil with subsoils? How do you continue to justify the 'imitation of a fire' methodology for planning a cut, when blow down over the affected areas is increasingly severe? Can you begin to see why we would call for more selective logging and understory protection ten years ago? Are you concerned that your current practices can destroy our children's livelihood and forests?</p>	<p>The companies understand the concern and are committed to maintaining the long term health of the forest so it is there for generations to come. Part of this commitment is to work with other forest users, especially indigenous communities to make sure that the forest remains health to meet everyone's needs.</p>
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32	<p>6.1.1.1 Meet the Government of Alberta's current requirements for First Nations and Métis Settlements Consultation in the FMP development.</p>	<p>Please also meet the requirements of First Nations and Metis Settlements. For example, Treaty 8 Chiefs have stated that they are against the aerial spraying of herbicide, as well as an increase in the Annual Allowable Cut. What are you doing with this 'consultation'? Are any of the suggestions or demands from First Nations and Metis Settlements being implemented?</p>	<p>There are topics where First Nations, Métis Settlements and the companies are not in alignment, and herbicide is one such topic. During Consultation, the companies have committed to working with First Nations and Métis Settlements on an ongoing basis to address site specific values. This same process is addressing other concerns such as important species and structure retention for Indigenous values.</p>
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33	<p>6.2.1.1 Meet the Government of Alberta's current requirements for Public Involvement in the FMP development.</p>	<p>We have experience expressing our concerns in a previous round of FMA planning. Our concerns were considered, as required by GoA, but they were deliberately not acted upon by forest companies, as the April 2007 letter to us from Tolko, Slave Lake Pulp, Vanderwell, and Alberta Plywood (West Fraser) documents. We are now demanding action, as the forest continues to suffer, impacts from logging increase, and forest biodiversity degenerates. What is the point of asking for public involvement if you refuse to implement any changes to procedure? How do you propose to do better this time around? We have had no correspondence from you on these critical VOIT details since 2019, just a map showing where you will cut. This process feels desparately futile, does not protect the foresst, and engenders cynicism.</p>	<p>The Companies respect all opinions and input received. The proposed regional plan contains changes from the previous plans and some of these partially addresses some of the concerns REAC identified. While these changes do not go as far as REAC requested this is as far as the companies are willing to go. Many of the mitigations are addressed at a site-specific level and require ongoing dialogue to be successful. The Companies are continuing to engage trappers, First Nations and Métis Settlements to address site-specific concerns.</p>
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