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Mr. Nathen Richea
Acting ADM, Environment and Natural Resources
Government of the NWT
Yellowknife NT X1A 2L9
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Conveyed Electronically

Dear Mr. Richea:

RE: Forest Management and Protection Act

This letter contains Alternatives North's questions and comments on the proposed *Forest Management and Protection Act*. This is in conjunction with our letter of June 15 (attached), which contained comments regarding the five pieces of legislation.

We appreciate the ecosystem approach taken in the proposals, and the requirements being made to increase public involvement. Certainly the emphasis on non-timber values is very important and welcome.

Our main comments concern the new forestry fund. We agree with the concept that GNWT is proposing, i.e., revolving forestry fund, with the GNWT taking on all responsibility for reforestation. The reasoning on this seems sound, such as promotion of natural revegetation. Given this is quite a new approach, we believe this needs to be very carefully monitored so that the fund does cover liabilities. We recommend requiring annual reporting to the public, covering items such as:

- forest ecosystem objectives (long term)
- annual forest reforestation objectives
- state of forest ecosystem monitoring
- state of the health of the forest ecosystem, including predictions in changes to forests due to climate change
- state of understanding of natural forest regeneration
- number of permits and licences given, with details on annual reforestation requirements and responsive action achieved

- accounting of Forestry Fund (e.g., capital; investments; expenditures; proposed expenditures)

We do understand that reforestation efforts may be 'grouped', so that work is cost-effective. However, the work undertaken and planned still needs to be shown annually, so the public has an understanding of what liabilities the GNWT is incurring, and how it plans to discharge those liabilities.

A public assessment of how the forestry fund system is working should be required in 5-10 years.

We would also like clarification if the forestry fund might be used for areas impacted by wildfires.

Two other legislative comments:

- 1) Permitting for incidental use should include considerations for hydrology and sensitive areas.
- 2) We recommend a statement in the preamble stating that forests have more than monetary value.

We would also like to stress a point made in our overall letter of June 15th: that soil is not abiotic. Healthy soil should be teeming with fungi, bacteria, nematodes, arthropods, and protozoa. This is likely only a legislative issue with respect to the definition proposed for ecological integrity. However, it does bring forward questions on what research ENR Forestry is doing on soil health (along with research on regeneration). For example, is there ongoing research on how forest fire retardants impact our northern forest soils; and how retardants influence natural regeneration?

We look forward to continued engagement on this and the other Acts.

Alternatives North



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cc. Christine_glowach@gov.nt.ca
Cory Vanthuyne, Chair, Standing Committee on Economic Development and Environment