



The Society of High Prairie

Regional Environmental Action Committee (REAC)

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To Whom it May Concern,

RE: Slave Lake Forest Public Advisory Committee consultations have not been sufficient to address our concerns or promote sustainable forestry practices

In 2004, after expressing our concerns to the Alberta government, REAC was directed to the Slave Lake Forest Public Advisory Committee (SLFPAC). We still have concerns on the impact that unsustainable practices used in the forest industry were, and continue to be, having on Alberta's boreal forests. Starting in 2006, our concerns were addressed for over a year by scientists brought in by the SLFPAC. These scientists often supported REAC's concerns, yet forest companies declined to make any action towards resolution (see enclosed letter: Selective Harvest Response_20071). Since that time, little progress has been made in utilizing more sustainable practices within forestry industries. We can't support Alberta's proposed new Forest Act because of this.

In 2019 at the request of ForCorps, a third party consultant now working on behalf of forest companies around the Lesser Slave Lake, REAC once again presented our concerns about the unsustainable practices that are occurring. We submitted a VOIT document (values, objectives, indicators, and targets) as requested, and the response from ForCorps is insufficient, made no reference to changing any methods in harvesting, and in many places, point us back to the Government of Alberta.

We also gave blood analysis work to ForCorps on behalf of a local citizen, which proves the dangers of their practices. This individual has very high blood pressure, and glyphosates¹, the active chemical in aerial spraying by forest companies, were found in their blood in large quantities. We never heard back from ForCorps on this. Forest companies need to know that their public engagement contractor has failed, as they haven't responded to this major concern.

REAC was blessed with a prophecy from Alfonse Cardinal (Indigenous Elder), who warned us that the current industry's practices will have irreversible effects on the forests' ability to replenish itself. He stated that, after the second harvest, if the techniques used are the same as today, the forest will no longer regenerate. This advice from the First Nation Elders is a gift,

¹ <https://usrtk.org/pesticides/glyphosate-health-concerns/>

exemplified by recent efforts in western science that are beginning to catch up to and understand this Indigenous knowledge[i]. It is astounding to us that our current provincial government is ready to increase the allowable cut by 20 percent, with present forest management practices. This is a step in the wrong direction.

If changes are not made to current logging industry practices, our forests and the life within them could perish and the now abundant supply of lumber could be lost. The great news is that through selective cutting and the elimination of herbicides, forest companies could be capable of harvesting trees in a sustainable and profitable manner for the foreseeable future[ii].

We feel it is our duty to take up Elder Alfonse's prophecy, and display the scientific evidence that supports his claims[iii]. Elders who have far greater experience with this land have warned us that if we continue to practice forest management utilizing the current harvest methods, the forest will not be able to regenerate itself to its full capacity.

REAC has challenged the forest industry to do better using their process for the past twenty years; our cries have been heard but not acted on. We have conducted countless hours of research and advocacy to push for more sustainable practices in the forest industry. Our concerns have been extensively expressed and studied and now time for change is running out. Even when industry officials have indicated on their plans that they will implement some forms of sustainability, contractors in the field continue to ignore these new strategies and go about their business as usual. The forests will not be able to survive a second clear cut as performed today. It is our duty as Albertans to preserve our beautiful environment by continuing to innovate, diversify, and improve our industrial practices.

Requests:

The effects that current forest management practices are having on the environment, biodiversity, and sustainability are extensive, negative, and robust. We have attached our filled VOITs document, as developed by ForCorps, to highlight specific concerns.

The Elimination of Herbicide Use: Herbicides with the active ingredient glyphosate, are the most immediate danger to the forest and the community surrounding these spray sites[iv]. Glyphosate has been linked to several human health issues, and its continued use is a growing concern, not only for the health of the forest, but for the health of the residents nearby. There is evidence that individuals in Alberta are starting to find glyphosate in their blood. Tests of a local citizen's blood have been shared with ForCorps, in matter which we received no response[v]. This evidence clearly shows that the use of herbicides is a public health concern! 90% of rural Albertans are reliant on groundwater, and with growing evidence that herbicides have been infesting this ground water supply; it is a necessity to eliminate our use of carcinogenic pesticides like glyphosate[vi].

Preservation of Old Growth Forest: For many species, old growth forests serve as important food supplies during the long and harsh Alberta winters[vii]. Without old growth forests going through their natural decomposition, the food supply for some species is decimated (e.g. birds, caribou)[viii]. Old growth forests contribute to the necessary diversification of the environment, and their natural decomposition helps the forest recuperate [ix]. The forest industry has fragmented and removed intact old-growth forests and peat wetlands in Alberta caribou

ranges[x]. Provincial biologists have recognized the need to protect caribou since the 1940s, and little has been done to adequately protect caribou habitat[xi]. Based on data pertaining to fifteen caribou populations in Alberta, four are stable, eleven are declining (between one and three herds are nearing extirpation)[xii]. The main factor that presents an imminent threat to the recovery of the caribou populations are the pervasive industrial activity of clear-cutting and oil/gas developments[xiii]. It has been shown that southern mountain caribou are stopping their seasonal migrations due to forestry cut blocks that have eliminated a portion of their habitat[xiv]. The reduction or elimination of clear cutting could create sustainability in the caribou populations, as their habitat would then be preserved.

The Benefits of Selective Cutting:

Selective cutting eliminates the need for herbicides and prevents soil compaction, as it maintains the forest's ecosystem, and it is less intrusive on the ecosystem's natural processes[xv]. Clear cut forests destroy soil compaction due to heavy equipment compacting and mixing topsoil and subsoil[xvi]. This practice leads to more flooding and a greater risk of fires. Selective cutting maintains the integrity of soil composition and allows the ecosystem to preserve itself[xvii]. Through selective cutting, the forest industry would be able to harvest trees at a reduced cost. This is partly due to the lack of need to replant and spray chemicals, as the forest will naturally grow if a portion of trees is left untouched. Selective cut and understory protection could eliminate many costs of the industry (e.g. replanting, herbicide spraying) while providing them a more sustainable business model. Clear cutting (or fire imitation) practices eliminate vast ranges of habitat for the species present in these areas[xviii]. It takes much longer for a clear-cut forest to recuperate and has devastating effects on ecosystems[xix]. Replanting is not a viable solution to replenish the ecosystem. Many companies only replant the trees they wish to harvest in the future, and do not replenish the other diverse flora destroyed in their harvesting. This eliminates essential diversity in the ecosystem, which prevents fauna from reclaiming habitat in the replanted areas[xx].

Conclusion:

In 2006, REAC requested that the SLFPAC set aside a substantial area for selective logging and understory protection 'pilot' projects for each company. We are still adamant that if companies adopt these practices, they will see for themselves the benefits selective cuts can have for their businesses including sustainability and longevity. Selective logging and understory protection can eliminate costs in many ways (e.g. herbicide use, replanting costs). If the forestry industry does not heed our warnings, our ecosystems and their future forest industry could be lost. This will only have detrimental effects on the environment and the ability for the lumber industry to continue to harvest trees successfully in the future.

REAC entirely supports the Treaty 8 Chiefs in calling the provincial government to stop any new Forestry Act that permits even greater allowable cuts.

Sincerely,



Allan Atkinson, Director

[i] Imai, N., Samejima, H., Langner, A., Ong, R., Kita, S., Titin, J., . . . Kitayama, K. (2009, December 11). Co-benefits of sustainable forest management in biodiversity conservation and carbon sequestration. Retrieved April 05, 2021, from <https://journals.plos.org/plosone/article?id=10.1371%2Fjournal.pone.0008267>

[ii] Endnote i.

[iii] Endnote i.

[iv] Bruggen, A., He, M., Shin, K., Mai, V., Jeong, K., Finckh, M., & Morris, J. (2017, November 05). Environmental and health effects of the herbicide glyphosate. Retrieved April 02, 2021, from <https://www.sciencedirect.com/science/article/abs/pii/S0048969717330279>

[v] Dr. Elyse Caron-Beaudoin (Link Zip File)

[vi] Hill, B., Miller, J., Chang, C., & Rodvang, S. (2008, November 21). Seasonal variation in Herbicide levels detected in shallow ALBERTA GROUNDWATER. Retrieved April 02, 2021, from <https://www.tandfonline.com/doi/pdf/10.1080/03601239609373043?needAccess=true>

[vii] Alberta Wilderness Association. (2021, February 08). Retrieved April 02, 2021, from <https://albertawilderness.ca/issues/wildlife/caribou/#parentHorizontalTab5>

[viii] Endnote vii.

[ix] Endnote vii.

[x] Endnote vii.

[xi] Endnote vii.

[xii] Endnote vii.

[xiii] Endnote vii.

[xiv] Williams et al.

[xv] Endnote i.

[xvi] Endnote i.

[xvii] Endnote i.

[xviii] Endnote i.

[xix] Endnote i.

[xx] Endnote i.