

December 18, 2025

Tammy Steinwand-Deschambeault, Director Department of Culture & Lands Protection Tłącho Government

Email: tammy.steinwand@tlicho.ca

Via Email tammy.steinwand@tlicho.ca

Re: Management Proposal for Reforestation on Theho Lands

Dear Ms. Steinwand-Deschambeault:

As per section 12.5.1 of the Tłįchǫ Agreement, the Wek'èezhìı Renewable Resources Board (WRRB) considers the above-mentioned proposal, submitted by the Tłįchǫ Government (TG) on October 31, 2025, a wildlife management proposal. The Board understands the goal of the management proposal is to help combat the effect of climate change related forest fire activity as well as to actively support the regeneration of habitat preferred by Tǫdzı (boreal caribou) and Ekwǫ̂ (barren-ground caribou) in the region.

Based on the WRRB's Rule for Management Proposals, the WRRB determined to undertake a Level 1 review. The joint management proposal was posted for public review to the WRRB's website from October 31, 2025 to November 17, 2025. During their recent December 2025 meeting, the Board reviewed all the information available on the record, including public comments, and approved the management proposal for June 1, 2026-March 31, 2031 as presented (Motion #1004-17-12-2025).

The WRRB provides the following recommendations related to the implementation of the program:

- 1) As a part of engagements with community elders, the existing Community Wildfire Protection Plans should be consulted for vegetation management around all Tł<sub>1</sub>ch<sub>0</sub> Communities.
- 2) While it is understood that TG plans to skip the jack pine succession phase to more quickly grow better todzı and ekwò habitat, a Thcho Board member noted that pine trees that grow quickly after a fire are good for todzı and ekwò. It will be important for the project to validate this kind of information to ensure the best success.
- 3) Consider that some high severity burn areas may require additional soil/moisture assessments to confirm species suitability.
- 4) More coniferous trees are being planted than deciduous. This seems counter to FireSmart practices mentioned in section 6 of the proposal. FireSmart practices should be at the forefront of planting around communities.
- 5) The proposed planting units around Behchoko are mostly along the roadside. Our understanding of the zone of influence for linear features would suggest this is not prime habitat for todzi or ekwò. Consider moving planting areas further from roads if safe to do so.
- 6) Recent forest fires have impacted burial sites. These sites, as well as all archeological sites, must be respected. Trees should be replanted at these sites in consultation with communities.
- 7) Timber Transport Permits are required to export seeds and cones into and out of the Northwest Territories. These will need to be secured through the Government of the Northwest Territories (GNWT), Department of Environment and Climate Change.

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- 8) Given the large area and effort required, the "snow track" surveys as proposed would likely be insufficient to gather effective information about wildlife presence and habitat use. Revisit the proposed wildlife monitoring to increase the track survey effort and use additional or alternatives methods (such as a camera trap study) to enable monitoring of wildlife year-round.
- 9) Tree planting operations are proposed for June/July in areas that burned in summer 2025 (west of James Lake, and west of Whati respectively). These are remote areas that will require helicopter access. The calving season for Todzi is between May 1 and June 30. Collared todzi have been observed to use the elevated plateau, just west of the James Lake burn perimeter, for calving. To minimize or avoid disturbance from helicopters and on-the-ground operations, the project team should contact GNWT wildlife staff prior to their June/July operations to determine if there are any collared todzi calving in, or adjacent to, areas of proposed planting operations. A reconnaissance flight to look for todzi should also be considered.
- 10) In addition to post-planting monitoring programs, the project should document pre-planting site conditions to compare against post-planting tree regeneration. These surveys should also include before and after planting monitoring surveys at "reference" sites within the burn perimeter that do not receive tree planting. Understanding where re-planting efforts were most effective will be valuable in informing future reforestation projects.
- 11) Monitoring should explicitly include drought conditions, water levels, and permafrost impacts on sapling survival.
- 12) The proposal outlines short-term monitoring of tree survival and growth; however, long-term monitoring is essential to determine whether reforestation efforts are benefiting todzı, ekwò, and other wildlife as intended. To ensure the project meets its habitat restoration goals, the project should include comprehensive wildlife monitoring framework that monitors species presence, habitat use, and movement through restored areas year-round. This approach would enable an assessment against the project's ecological objectives, as well as inform adaptive management going forward.
- 13) Desired outcome #2 on carbon sequestration is not addressed in the research or monitoring sections with regards to how this will be measured. The project should explore a way to measure how much carbon has been sequestered through this project.
- 14) WRRB staff should be provided with TG's plan for the upcoming field season each spring. A project summary should be provided to the WRRB each winter. Proposed planting units should be provided to the WRRB as soon as they are available.

The WRRB looks forward to continuing conversations with TG about reforestation activities in Wek'èezhìı. If you have any questions, please do not hesitate to contact our office.

Sincerely,

Joseph Judas Chair

Cc Stephanie Behrens, Manager, Lands Protection & Renewable Resources Culture and Lands Protection, Theho Government