



March 11, 2005

Robin Sharples  
Environmental Assessment Coordinator  
Forest Management Branch

**Re: CPAWS-Yukon comments to Environmental Assessment of Forest Development Plan-Y06, Planning Area 2, Operating Unit 3 in Haines Junction, Yukon**

Thank-you for the opportunity to provide comments to the above mentioned development plan. While CPAWS-Yukon is supportive of the Champagne and Aishihik Traditional Territory Strategic Forest Management Plan (CATT SFMP), we have some concerns with the proposed Forest Development Plan.

It is unclear between the cover letter and the Forest Development Plan, whether this is an Environmental Assessment (EA) for Operating Unit 3 only or for Planning Area 2 in its entirety. If it is the former, our comments below are relevant. If it is the latter, this EA is inadequate and we recommend a new EA that includes all Operating Units or written assurance that EAs for each Operating Unit will follow when the demand for timber permits becomes a reality.

From the Forest Development Plan, it appears that most of Planning Area 2 is being slated for timber harvesting either now or in the near future, prior to and apart from the completion of Integrated Landscape level Planning. To us, this amounts to an unofficial Interim Wood Supply plan for the CATT. Therefore, we recommend all future harvesting planned to occur before the Integrated Landscape Plan is completed, be called an Interim Wood Supply, complete with pre-determined parameters, before additional timber permits are issued. Pre-determined parameters should include a consensus-based decision on the most appropriate location for Interim Wood that considers sensitive sites, past harvesting locations and existing access.

The harvest scheduling and season outlined in the Forest Development Plan raises environmental and safety concerns. Without adequately detailed site information, we do not support harvesting during dry summer conditions. Additionally, the operation of machinery in forests under such conditions could increase the risk of ignition of fires. Clearing and burning all brush creates another serious fire risk. Considering that there already is a large perceived risk of catastrophic fire in the Haines Junction area, timber harvesting operations should not be allowed to increase this risk.

We recommend that timber harvesting operations occur during winter months when creeks are adequately frozen and the snowpack is sufficient to reduce the risk of human caused fire and unnecessary ground disturbance.

Connectivity is a very important component of a landscape that allows for the flow of energy, nutrients, water, organisms, and their genes at many different scales of time and space. The Forest Development Plan does not adequately address maintaining and providing connectivity, which is a necessary component of a landscape level plan. Putting an access corridor and cutblocks through and within a proposed wildlife corridor along Quill Creek would degrade the corridor and is contrary to the objective of maintaining adequate connectivity. The detrimental effects of roads on wildlife are well documented and should be considered in the design of corridors. Since the area around Quill Creek is a known wildlife corridor used by moose and bear, and likely other species, protection is necessary.

It is recommended that the establishment of a wildlife corridor along Quill Creek should include an explanation of the rationale of its location, size and shape. Similar criteria could be applied to the Integrated Landscape Plan to accommodate the continued movement of selected species through the landscape. At present, the proposed wildlife corridor is insufficient. To fulfill the function of the proposed wildlife corridor, the access road needs to be deactivated and re-vegetated, the corridor needs to be enlarged, and all cutblocks need to be a substantial distance from the corridor boundaries. If this is not possible, reference to the wildlife corridor needs to be removed from the Forest Development Plan.

In addition to meeting all of the goals and objectives of Section 5 of the CATT SFMP and determining how the indicators will actually be measured, we expect that the planning process will also include:

- adequately researching the function of wildlife corridors and determining the goal of such corridors
- identification of all areas of high conservation value within the CATT planning area and deferral of these areas from forest development
- completion of a long-term fire abatement plan that all related permits will fall under
- completion of an access management plan
- an effective adaptive management strategy that incorporates decisions made through the planning process into the Interim Wood supply

The harvest schedule in the planning area has not been defined and should be dependant on local demand for timber products. We therefore recommend that all of the cutblocks are not laid out until the Integrated Landscape Planning is complete and demand for wood has been confirmed, at which time details of the plan can be applied. As a reasonable demand for wood presents itself, permits can be made available.

CPAWS-Yukon supports a balanced approach to landscape-level planning, understanding that healthy ecosystems sustain healthy communities. A beetle-attacked forest with some dead trees is still a forest, which continues to sustain multiple values and to provide a

variety of goods and services. It is clear that the need for proper planning and responsible stewardship remains. We will continue to monitor the CATT SFMP process and endeavour to ensure that it embodies a sustainable and ecosystem-based approach that benefits all living things.

Sincerely,

Theresa Gulliver  
Forest Conservation Coordinator  
CPAWS-Yukon