

Dieter Gade

Comments on draft Forest Development Plan (FDP) for Haines Junction, Planning Area 2

Item	Page/ Section	FDP Statement	My Comments	My Recommendation
1	1/1.0	<p>“The Plan meets the parameters ... and strategic directions provided for in the Strategic Forest Management Plan (SFMP)...”</p>	<p>The statement that the FDP meets the parameters of the SFMP is incorrect.</p> <p>This paragraph suggests that the FDP is in compliance with the criteria of the SFMP. Although the proposed FDP addresses some parameters set out in the SFMP, the scope of this development is far too small to conclude that it conforms with the SFMP. Parameters in the SFMP are intended for landscape level planning. The FDP of course misses the whole stage of Integrated Landscape Planning. The purpose of the FDP is to plan and provide an interim wood supply for the CATT until the SFMP is implemented. My concern here is that the statement that this development plan complies with the SFMP encourages additional piecemeal development in this region.</p>	<p>Remove statement that the FDP meets the parameters provided for in the SFMP.</p>
2	2/21	<p>“Key issues identified in the Resource Report were:</p> <ul style="list-style-type: none"> • Beetle killed and decadent spruce has created an increased risk for a major fire event in the Haines Junction area. • Economic recovery of beetle killed timber in high-risk fire areas.” 	<p>The Final Resource Report for Planning Area #2 is outdated in respect to the fire risk assessment of Haines Junction and the effectiveness of fuel abatement.</p> <p>The referenced Resource Report dated July 2001 is in part based on the findings of the Haines Junction Fire Risk Assessment Report (Ember, 2000). A complementary Fire Risk Assessment Report for Kluane National Park and Reserve/Community of Haines Junction was published in May 2002 (Ember, AEM 2002). The 2002 report states: (Page 12, section 5.2.1) “ When all factors are considered, the community of Haines Junction has a relatively lower fire risk than many other Yukon communities. Much of this lowered risk is due to the existing matrix of deciduous forest around the townsite, and is a major contributing factor to the overall “Moderate” fire risk ranking”</p> <p>(Page 15, section 5.2.4) “...Upon examination of the forest harvest plan (Final Resource Report) and considering the fuel types and expected fire behaviour that would be expected along the spruce beetle affected forests of the Haines Road, fuel modification (i.e. harvesting) in the proposed location would present minimal fire risk reduction benefits to the community of Haines Junction.”</p>	<p>Remove all references to the Resource Report’s statements concerning increased fire risk for Haines Junction due to beetle-killed trees.</p> <p>Remove all statements that the proposed harvest is done under the auspice of fuel abatement (hazard reduction).</p> <p>The Forest Management Branch already advised (email of Jan. 7, 2005) that: “...the development plan for Planning Area 2 will not prescribe timber permits under the auspices of "fuel abatement", but rather, for timber salvage.”</p> <p>Future references to fire risk levels and fuel abatements should be pending on the findings and recommendations of the technical working group.</p>

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3	3/3	“New developments will be sequenced as directed in the Resource Report...”	Including only O.U. # 3 out of seven proposed O.U.s constitutes piecemeal development.	All seven proposed O. U.s should be included in the FDP and be reviewed as a whole in the Environmental Screening Report.
4	9/4	“It is possible to harvest during dry summer conditions”	<p>All activities should be restricted to winter. Operations in the summer should be avoided for the following reasons:</p> <ul style="list-style-type: none"> • Increased risk of human caused fire during harvest operation. • Negative impacts on forest floor • Detrimental to forest regeneration 	Remove all references to possible harvest activities during the summer. State that the operation is limited to the winter season only.
5	9/4	“The harvesting system proposed within the harvest area, is mimicking this natural disturbance process. (SFMP Strategic Direction)”	<p>The proposed harvest method of clear cutting is not a substitute for the complex naturally occurring forest disturbances and renewal process.</p> <p>A natural forest disturbance such as fire creates a complex structural diversity that cannot be mimicked by clear cutting. Trunks and other coarse debris, for example, which are important to maintain a high level of biodiversity, largely remain after a natural disturbance. Natural disturbances do not create and leave roads.</p>	Remove statement that the proposed harvest method mimics the natural disturbance process.