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Re Environmental Assessment of Development Plan Y06, Planning Area 2

Dear Assessment Committee Members:

I will confine my comments to the most fundamental environmental flaw in this proposal; that of long term sustainability.

There were several comments regarding the draft Resource Report pointing out that proposed harvest levels exceeded the Timber Supply Analysis calculation of 1500 m³ per year. The Forestry response was that Planning Area 2 was not included in the TSA. This is true, but the question is "Why not?". The TSA excluded all areas of significant beetle attack although most of these areas have substantial volumes of live trees. We have a situation where huge volumes of green trees can be cut under the guise of salvage while our modest AAC is not touched. The live portions of beetle attacked stands should be included in our inventory in order to calculate a realistic sustainable harvest level. This will raise the AAC above the present 1500 m³ but likely nowhere near the levels suggested in this Development Plan.

The proposed harvest is primarily an economic initiative, with possible spin-off benefits of wildfire abatement (although the Ember Report gives little credence to fuel reduction so far from values at risk, i.e. Village of Haines Jct.). Therefore long term sustainability should be an essential element of harvest proposals.

It is not acceptable to pretend that trees are dead, or predict that they will soon be dead, and then harvest them indiscriminately without counting them against our AAC.

Mitigation is straightforward. In the short term limit green wood harvest to the 1500 m³ as per the existing TSA. In the longer term calculate a new AAC that reflects a true picture of the forest base with appropriate net-downs for non-timber values.

Yours truly,



Ken Anderson