

Kluane National Park and Reserve
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March 10, 2005

Consultation Notice for Environmental Assessment of Forest Development Plan-Y06, Planning area 2, Operating Unit 3 in the Haines Junction, Yukon District

Dear Robin Sharples,

Thank-you for the opportunity to comment on the Environmental Assessment of Forest Development Plan-Y06, Planning Area 2, Operating Unit 3 in the Haines Junction, Yukon District. Parks Canada is interested in all projects adjacent to Kluane National Park.

The “Strategic Forest Management Plan” for the Champagne and Aishihik Traditional Territory was recently approved. As a result of this plan there is currently an Integrated Landscape Planning process under way for the Champagne and Aishihik Traditional Territory. Parks Canada sits on several of the working groups involved in the planning process. We look forward to the completion of the Integrated Landscape Plan, as one of the major concerns that Parks Canada has had in the past is the piece meal approach to forest development proposals and the lack of consideration of the cumulative effects of individual projects. There has been a clear need for more comprehensive and cumulative effects assessment of forest development projects than has been done to date. It is our view that large projects should not be proposed and assessed in isolation: they must be considered cumulatively, within the context of the entire ecosystem and operating landscape. The completed integrated landscape plan should help address some of these concerns.

It is our understanding that this environmental assessment is for seven blocks located in Planning Area #2, Operating Area #3, in the Haines Junction District, and no other areas in Planning Area #2, Operating Area #3. Nor is it the intention of this environmental assessment to screen either the Forest Development Plan, or Champagne & Aishihik Traditional Territory Strategic Forest Management Plan, which you refer to in your letter, dated February 2, 2005. We assume that the environmental assessment screenings, concerning those documents are separate exercises. As such, our comments will be specific to the seven blocks located in Planning Area #2, Operating Area #3, and only generally to other areas within the Planning Area #2, as they pertain to cumulative impacts. If the development plan for Area #2 operating unit #3 is taking place to satisfy interim requirements for wood supply while the integrated landscape planning process is

occurring, then we recommend that the development plan for Area #2 be limited to operating unit #3. This would allow for the rest of Planning Area #2 to be planned as part of the Integrated Landscape Plan as per the Strategic Forest Management Plan. If during the interim, additional wood is required, a second operating unit could be considered after an environmental screening occurs.

There is a significant body of evidence that cumulative effects of human activities could threaten the ecological integrity of Kluane National Park and Reserve. George Hegmann's 1995 report of Parks Canada, A Cumulative Effects Assessment of Proposed Projects in Kluane National Park, Yukon Territory concludes that: "the combined effects of all park and regional activities may result in reduced population or extirpation of some or all wildlife VECS (n.b. valued ecosystem components - grizzly bear, moose, Dall sheep, mountain goat, golden eagle) in the park in the next 20 years". The effects of timber harvest and/or salvage was not assessed in this report and our concern is that associated impacts would add to the effects Hegman identified, increasing overall cumulative impacts on the park.

Proposed cut blocks are close to Kluane National Park and many species of wildlife move across the park boundary during different times of the year. Grizzly bears in the Yukon have recently been designated as a "species of concern" by the Status of Endangered Wildlife in Canada (COSEWIC). The recently proclaimed species at Risk Act should increase the responsibility of both our departments towards grizzly bear conservation. A review of studies by Mattson et al 1996 show that grizzly bear mortality is positively correlated with road density and nearness to human facilities. In the March 2, 2005 Northern Ecosystems Initiative Integrated Cumulative Effects Thresholds workshop" held in Whitehorse there was a lot of discussion on the impacts of roads /seismic lines and industrial activity on caribou and other species of wildlife. Impacts included increased hunting, direct mortality, habitat loss, habitat avoidance and changes in predator prey interactions to name a few. The proliferation of roads and hunting in the Kluane Region could have substantial effects on some of the wildlife populations.

Of all disturbance corridors created by humans, roads probably have the greatest impact on wildlife populations. The most important effects are direct and indirect mortality and the loss of habitat effectiveness as a result of habitat avoidance in the vicinity of disturbance corridors. The most powerful tool available to reduce the effects of disturbance corridors on wildlife is access management (the control of human use on the corridor). We would suggest that the need for 3 permanent roads be re-evaluated by the teams working on the Integrated Landscape Plan. Access management could include the creation of low-quality access where applicable, to discourage other human use. Where possible, road width should be minimized and curvilinearity increased while still ensuring safety for vehicle operators. Lower road standards should be considered as they deter use, and promote lower vehicle speeds thus reducing the likelihood of collisions.

Although the report (page 3), states that there will be no harvesting within the areas identified as sensitive moose habitat, the proposed plan shows cut blocks located in, or adjacent to some of the sensitive habitats. We recommend the removal of all harvest blocks that are situated completely within sensitive moose habitat, and that extra care be taken in areas adjacent to sensitive moose habitat. We also recommend that blocks that encroach upon sensitive wildlife habitat and corridors be amended. As this report does not specifically describe season or method of harvest, it is difficult to elaborate on specific concerns for wildlife. The report/assessment states that “ proposed shelter-wood harvesting in conjunction with existing anthropogenic disturbance in this area will not detrimentally impact wildlife movement”. This does not consider the cumulative effect of existing human disturbances combined with cut-blocks. This could compromise the effectiveness of the wildlife corridors.

The report discusses buffers for riparian habitats in Operating Unit #3. We would recommend that the final development plan include adequate buffers for all water bodies and watercourses in Planning Area #2. We recommend ongoing monitoring of the harvest operations so that if infractions occur they can be corrected as soon as possible.

We recommend that harvesting only occur during the winter months. This would help reduce impacts such as soil compaction, which can inhibit white spruce regeneration and be detrimental to spruce seedling establishment. According to the report all logging slash is to be piled and burned upon completion of harvest activities. Last summer the Yukon experienced an extreme fire season with long periods of high wildfire risk. Predictions for future fire seasons are also grim, which lead us to believe that it would be prudent to burn slash during winter months.

Kluane National Park and Reserve is an internationally recognized World Heritage Site, a destination for over 30,000 people per year and one of the flagships for the Yukon’s tourism industry. The report provides measures to reduce negative recreational and visual impacts. We recommend that the harvest operations are monitored with respect to visual impacts, and that mitigating measures are modified as required. Buffers must be located along all water travel corridors (i.e. the Kathleen River for canoeists and kayakers and along what is locally known as the “moose meadows” ski trail).

With regard to references that this plan is intended to reduce risk of wildfire threat to Haines Junction, Parks Canada believes that current cut block design, and harvest methodology will do little to reduce the overall threat of wildfire to Haines Junction, and we suggest that this reference be deleted. Location of the proposed harvest operating units will do little to reduce head-fire intensities generated from a wind driven wildfire heading towards Haines Junction. Fire History to date in the area, suggests that by far the most common ignition source of wildfires, are human caused ignitions. By increasing access into the proposed harvest areas, there will be an increased risk of human caused ignitions and wildfire threat, not a reduction. Reclamation of harvest block access corridors should minimize, but not totally reduce this risk. We can accept this plan as a salvage-harvest plan, promoting regional economic development, but do not consider it as a viable wildfire risk mitigation strategy for the Village of Haines Junction.

We recommend that all fuel abatement strategies, including access for future wildfire suppression activities, and specifically the creation of several east-west oriented corridors as referred to on page 10, not be referenced, nor completed as a component of this plan. This plan contains no specific locations, layout methodology, nor maintenance strategies identified for these corridors, and very little discussion of any wildfire risk and hazard threat abatement. Parks Canada believes that these strategies are important enough on their own merit to be fully assessed and integrated with current regional analysis and planning being conducted by the Champagne & Aishihik Traditional Territory Fire Risk Abatement technical working group (FRATWG). Our recommendation is that this plan and associated environmental assessment should deal only with the salvage harvest of the seven blocks under consideration, and not wildfire risk and hazard threat abatement.

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