

March 11, 2005

To: Robin Sharples  
Forest Management Branch Environmental Coordinator, YTG

From: Karen Baltgailis  
YCS Forestry Coordinator

**Re: YCS Comments on Forest Development Plan for Planning Area 2,  
Operating Unit 3, In the Haines Junction, Yukon District**

Dear Robin,

Thank you for the opportunity to review the above draft Development Plan.

It is our understanding that this Development Plan for Planning Area 2 is being produced outside of the auspices of the current Integrated Landscape Planning process in order to satisfy interim requirements for wood while the regional planning is being done. We do not have a problem with this concept of an 'interim wood supply'.

However, there are major issues to be decided in Planning Area 2; these are issues that need to be decided within the context of the Integrated Landscape Plan. The most important of these issues is access. The Resource Report and draft Development Plan for Planning Area 2 propose to leave three main access routes into the area as permanent roads to be used should there ever be a catastrophic fire approaching Haines Junction from the south. Although there is already four wheel drive access into the middle of planning area 2, access into the north and south portions would be new. Even in the middle of the planning area, upgraded logging road access would encourage more vehicular use than is currently the case. As noted by YTG Renewable Resources in their Jan. 26, 2001 comments on the draft Resource Report, permanent, new and improved access into the area will have detrimental effects on important moose areas, fisheries values, and possibly tourism.

The Champagne and Aishihik First Nation and community of Haines Junction may decide that it is worthwhile to trade off healthy moose and fish populations in the area, in return for some perceived extra level of protection from wildfires approaching from the south. However, this is an important decision that should not be made in isolation from the overall planning process, and that requires more thought and discussion.

The total volume of wood that the Resource Report proposes for harvest from Planning Area 2 (122,000 m<sup>3</sup>) is far in excess of any possible demand for wood over the next one or two years while the Integrated Landscape Plan is developed. **Therefore we strongly recommend that Development Plans for most of Planning Area 2 be deferred until they can be done as part of the regional Integrated Landscape Plan.** If there seems to be demand for more than the approximately 10,000 m<sup>3</sup> in OU 3, then perhaps one other Operating Unit could be planned outside the context of the Integrated Landscape Plan. OU 2 might make sense since it is close to the highway.

The above recommendation is consistent with local resident Dieter Gade's recommendation that the Development Plan needs to encompass all of Planning Area 2, rather than Development Plans being produced piecemeal for each of the Operating Units. Mr. Gade is correct in stating that cumulative impacts cannot be adequately assessed if each OU is planned individually. However, recognizing the need for interim wood, YCS would be comfortable with one or two Operating Units being planned in relative isolations, and outside of the Integrated Landscape Plan, so long as new road access is not required.

We have provided detailed comments on this and a number of other issues below. We assume that information about the other Operating Units besides OU 3 was provided to help reviewers to assess possible cumulative impacts from harvesting. We have provided some comments on the other OU's to help mitigate cumulative impacts, and to provide some initial input to help with the production of Development Plans for Planning Area 2, under the auspices of the Integrated Landscape Plan in the future.

Please feel free to contact me if you have any questions.

Sincerely,

Karen Baltgailis

## **Detailed Comments**

### **Clarity about which operating Units are being screened in this Environmental Assessment:**

The cover letter accompanying the draft plan states that this Environmental Assessment is of Operating Unit 3, but the document that has been sent out for review is titled "Forest Development Plan for Haines Junction Planning Area 2". There is not enough information in the document to thoroughly assess any Operating Units except OU 3.

**Recommendation:**

The final Screening Report needs to clarify on the title page that it only covers OU 3, and that other information supplied is in order to help reviewers assess cumulative impacts from OU 3 and future logging that is being considered.

In the future all draft documents that are sent out for review should be labeled “DRAFT” to prevent confusion.

**The draft plan states that layout and planning for the remaining Operating Units will continue in 2005 (p. 3):**

It is not clear whether the draft Development Plan is proposing to do layout and planning for future Operating Units at the same time. Clearly, layout of the remaining OU’s must not be done until after they have undergone Environmental Assessment, as the proposed layouts may need to change due to concerns raised in the EA.

It is our understanding that Planning Area 2 is being seen as an ‘interim wood supply area’ which could be harvested while the long term forest management planning is done. There is little demand for wood at the moment. Therefore, it does not make sense to ‘plan’ 122,000 m<sup>3</sup> (all of the proposed volume for Planning Area 2, identified in the Final Resource Report) outside of the context of the overall Integrated Landscape Plan for the traditional territory. Difficult decisions will have to be made about Planning Area 2. For example, is it worthwhile to trade off impacts from increased moose hunting and fishing due to permanent new access, in return for roads that might be useful in the event of a forest fire? This kind of important decision should be made in the context of the overarching plan, and the information contributed by the various Technical Working Groups.

**Recommendations:**

Do not lay out the remaining OU’s until after they have undergone Environmental Assessment.

Defer producing a Development Plan for the rest of Planning Area 2 until this can be done as part of the regional Integrated Landscape Plan. If there seems to be demand for more than the approximately 10,000 m<sup>3</sup> in OU 3, then perhaps one other OU could be planned outside the context of the regional plan. OU 2 might make sense since it is close to the highway.

**References to “reducing fire risk” in the draft plan:**

The final Resource Report did not address a major concern that was raised during its EA process. Specifically, the Alsek RRC, CATT Forest Management Planning Team, YTG Renewable Resources and YCS all objected to the Resource Report’s claim that the proposed logging is for fire hazard reduction purposes. The Resource Report used the Haines Junction Fire Risk Assessment Report (Ember, 2000) to justify fuel abatement in Planning Area 2. However, the Fire Risk Assessment Report for Kluane National Park

and Reserve/Community of Haines Junction (Ember and AEM 2002) states (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."

Forest Management Branch staff in an email to Dieter Gade (Jan. 7, 2005) also said that fuel abatement is not the purpose of the proposed logging. The area is too far from town, and only treats patches of a total 10,000 ha area that is mostly old, beetle affected spruce. Fuel abatement effectiveness would therefore be minimal. Furthermore, the logging prescriptions would have to specifically address fuel abatement, which they do not. In addition, new and/or improved road access into the area increases the likelihood of human-caused fires in the area.

**Recommendation:**

Delete references to fire hazard reduction from the final Development Plan.

**Effect of logging on beetle spread:**

The Resource Report states that salvage logging will limit local expansions of the infestation. Logging pockets of the beetle affected trees will not act in any way to limit the spread of the beetles. The whole area is affected by beetles, so logging pockets of the affected trees will not limit the spread of the beetles. In fact logging has been shown to spread beetles by providing host logs if logs aren't removed quickly, and by transporting infested logs to mills in other locations.

**Recommendation:**

The final Development Plan needs to explicitly state that the proposed logging will not inhibit the spread of the beetles, and needs to include measures to ensure that the logging doesn't actually contribute to spreading the infestation.

**The draft plan states that CAFN "may" do local First Nation consultation:**

Consultation with the affected trappers and other local First Nation people who use the area is a vital part of the EA process. These are some of the people who know the area the best, and who are most directly affected by developments.

**Recommendation:**

We would very much hope that CAFN is involving the affected trappers and citizens who use and know the area in the review of the draft plan.

**Sensitive moose habitat areas:**

The draft plan states that there will be no harvesting in the two areas identified as important moose habitat. This is a good start. However, the map shows cutblocks in OU 4

and OU 1 that are inside one of the moose habitat areas. Also, a number of cutblocks are directly adjacent to the moose areas in OU 3, 2, and 4. Moose areas should be buffered from logging to protect moose from line of sight, and access.

The draft Development Plan also shows the logging road continuing through sensitive moose habitat to access OU 4. It appears that the four wheel drive trail does this already, however a logging road would provide much easier access, which should be avoided to prevent impacts from increased hunting of moose in the area. We realize that the current screening does not include OU's 1, 2 and 4. However, since these OU's are included as background to OU 3, the final Development Plan for OU 3 should address these concerns.

**Recommendations:**

For all OU's, not just OU 3:

- Delete all cutblocks inside moose areas.
- Plan a buffer between moose areas and cutblocks.
- Do not plan any logging roads through moose areas.

**Wildlife corridor:**

Planning for a wildlife corridor along Quill Creek is a good start. However, as the draft plan notes, there are cutblocks in OU 3 that overlap the corridor. There is also a block in OU 6 that is almost completely inside the corridor. The draft plan justifies this by stating that, because there is existing anthropogenic development, negative impacts on wildlife would not result. On the contrary, cutblocks combined with other human disturbances create cumulative impacts. Furthermore, in consideration of the people who are using or living in the area, there should be a buffer between cutblocks and selection blocks or private property.

**Recommendations:**

For all OU's, not just UO 3, remove all cutblocks or parts of cutblocks from within the wildlife corridor.

Buffer selection lands and private property unless the people in question request localized fuel abatement around them.

**Riparian buffers:**

The map shows OU 7 having cutblocks in the riparian buffer on the Kathleen River. Renewable Resources' Jan. 26, 2001 comments recommend a 400 meter buffer along water bodies and watercourses in OU's 6 and 7 to protect fisheries values and visual integrity for tourism.

**Recommendation:**

The final Development Plan for OU 3 should show 400 m. riparian buffers on water bodies and rivers in OU's 6 and 7.

**Recreation trails;**

The Resource Report refers to a network of recreation trails in the planning area (Section 5.6), but does not show them on maps or identify where they are. Neither the Resource Report nor the draft Development Plan provides any information about how the esthetics and safety of recreational trails will be maintained during and after logging.

**Recommendation:**

The final Development Plan needs to clearly identify recreational trail areas, and buffer them. In order to adequately mitigate concerns of recreational trail users, the Ski Club and local skiers and hikers need to be consulted before the final Development Plan is produced.

**Access:**

The only way that logging in Planning Area 2 could possibly help protect Haines Junction from a fire coming from the south, might be roads to provide access for fire fighting. However, permanent road access would have negative impacts on the local moose population, and could lead to over fishing. The Department of Renewable Resources' Jan. 26, 2001 comments on the draft Resource Report call for access closure after logging for these reasons. The decision whether or not to create permanent road access should be made in the context of the regional Integrated Landscape Plan, which would have to weigh some possible usefulness to fire fighting against long term impacts to wildlife. In particular, new access into the northern and southern portions of Planning Area 2 should be carefully evaluated, since there isn't even four wheel drive access currently. The fire fighting usefulness of a road in the southern-most portion of the Planning Area is especially doubtful.

**Recommendation:**

Defer the decision as to whether the upgraded road to access OU 3 should be permanent to the Integrated Landscape Planning process. Do not build new roads in the northern and southern parts of the Planning Area before the Integrated Landscape Plan is done.

**Silviculture system:**

In general the proposed prescription seems appropriate, particularly the preservation of the established understory. Since most of the blocks are small, line of sight should not be a major issue. Block B, however is 27.5 ha. The Timber Harvest Planning and Operating Guidebook (THOPG) recommends 10% internal retention in blocks bigger than 10 ha. Since the understory is being protected and the overstory is dead or dying, the important ecological component that the logging will remove is mostly snags and coarse woody material. Research indicates that a minimum of 20 metric tons per ha of coarse woody material should be left in clearcuts in the boreal forest (Silviculture's Role in Maintaining the Boreal Forest, R.T. Graham and T.B. Jain, 1998). Coarse woody material is important for small mammal habitat, regulating soil moisture, shelter for white spruce seedlings, and long term nutrients. Snags are crucial for bird and mammal habitat, food and shelter.

10% retention of beetle affected trees in Block B would help to provide these important snags and large woody material.

**Recommendation:**

Maintain 10% of the overstory scattered throughout block B, and any future blocks larger than 10 ha. These can be trees that are large but not economically desirable (e.g. trees that are twisted, forked, have rot, etc.)

**“Mimicking” natural disturbances:**

It does not make sense to talk about logging mimicking natural disturbances. Logging in no way mimics either fire or beetle kill, since logging removes the trunks/coarse woody material while fire and beetles leave it.

**Recommendation:**

Remove references to “mimicking” natural disturbances from the final Development Plan.

**Harvesting Season:**

The draft Development Plan suggests that harvesting can occur in summer, suggesting that soil disturbance from logging will promote soil mixing and better seed bed conditions for white spruce. Research shows that high density white spruce seeding after a disturbance is dependent on a mast year cone crop during the first two years after the disturbance. (‘Mast years’ are periodic years of high cone crops. In Alberta these occur approximately once every two to six years.) Even after fire white spruce seeding is not good unless the mast year cone crop happens within two years at most after the disturbance. If there is not mast year cone crop, the disturbed area instead converts from mineral soil to a less receptive humus layer, or in-fills with other plants that inhibit spruce seeding. (Natural Regeneration of White Spruce Following Natural Disturbance in the Boreal Forest, 2001-13 Final Project Report Sustainable Forest Management Network, S.E. Macdonald et al.) This is likely what happened in the areas referred to on p. 6 of the draft Development Plan, where there are “patches of grass on disturbed areas”. Grass is both competition for spruce seedlings, and a potential ground fire hazard.

The conclusion to be drawn from the above is that disturbing the duff layer and exposing mineral soil will not necessarily promote seedling establishment except if there are productive seed trees nearby, and a mast year. There is also considerable literature about the inhibiting effect of soil compaction, which can be caused by summer logging, on white spruce regeneration. For example, a Feb. 2000 BC Forest Service Research Note states that over four years of study height and diameter increments of white spruce seedlings decreased as the percentage of compaction increased. The report also notes that the most vigorous white spruce regeneration was on the last disturbed sites. (Fourth Year Responses of Aspen and White Spruce; the BWBS Long-Term Soil Productivity Study, R. Kabzems, BC Forest Service, Prince George, Prince Rupert and Caribou Forest Regions, Note #LTSPS-02, Feb. 2000.)

In view of the detrimental effects of soil compaction and soil disturbance on White Spruce regeneration, and since there is an established spruce understory, the main regeneration goal should be protecting the understory and advanced growth. This is better done in winter.

Summer harvesting is also justified in the draft plan by saying that “Summer harvesting will promote aspen suckering.” On the contrary, the literature shows that soil disturbance is detrimental to aspen suckering. Trials show that spring/summer harvest of aspen produces the least suckering, and winter harvesting produces the most, and fastest growing suckers. Summer harvesting can produce compaction, decreasing soil porosity, and can damage the shallow root system that produces suckers. Displacement of surface litter to expose mineral soil has also been found to be detrimental to aspen suckering. (University of Minnesota Extension Service: Regenerating Quaking Aspen: Management Recommendations, P.C. Bates et al, 2002)

In any case, it is questionable whether harvesting the mature spruce will lead to aspen suckering. Even if there are aspen nearby to produce suckers, research shows that auxin – the substance that stimulates suckering, is produced when mature aspen are cut or burned. Logging the spruce in a mixed wood forest may not promote conversion to aspen.

The YTG Renewable Resources Department, in their Jan. 26, 2001 comments on the draft Resource Report recommended early winter harvesting only to avoid disturbance to moose.

**Recommendation:**

There should be winter harvesting only.