

Robin Sharples
Forest Management Branch
Energy, Mines, and Resources
633-7919

Re: Anticipated Forestry Project
Harvesting of blocks C5, C9, and C12 in the Cosh Creek Operating Unit

Robin,

Thanks for the opportunity to review the project which entails forest harvesting of the previously deferred Year 1 blocks (C5, C9, and C12) in the Cosh Creek Operating Unit. As always, should you have any questions regarding our comments please contact us.

Comments:

- In Block C5, the section at the beginning of the C5-1 road is described as being a short 19m section. The road illustrated on the map appears to be closer to 50m given the provided scale. This should be made to be consistent.
- In Block C5 it is described that a 1.5m through cut of 20m length is required to cross a small esker. The physical limitations requiring this cut-through should be elaborated upon.
- The C5-2 road does not appear to have an efficient layout which would minimize the required amount of linear disturbance. The current layout entails two drainage crossings in order to access a very small area at the north end of the block segment. Access from the adjacent cutblock to the north would require only 1 crossing of the drainage. If access from the existing cutblock to the north is not possible, then this segment of timber should be considered for internal reserve considering the cost/benefit of it's harvest.
- Although non-classified drainages may not be considered streams per se, these features do feed watercourses downstream. Vegetative retention along these draws/tributaries should be designed. The THPOG requires a minimum 5m machine free zone on all ephemeral draws.
- When possible, roads should be located away from streams, off ridges, and minimize lengths and widths to meet needs.
- Maps inconsistently show planned skid trails. Skid trails should be designed with the following criteria in mind: frequency (minimize), location, proper use (ie. reducing damage to residual trees, using designated bumper trees), and stabilization methods and material (seeding, water bars, logging slash).
- Within the context of this project, there is a real need for the FMB to define "Variable Retention" in terms of ecological goals and how they are met. In certain

jurisdictions this has been used as a catch-all term to describe any variation to the classic clear cut, so some degree of clarity should be given. Block objectives such as retention percentage and type should not only be outlined but backed-up in terms of management goals for the landscape as they relate to ecological processes. The document states that rationale for this silvicultural system is provided in Section 5.2 of the Interim Wood Supply Plan for FMUs Y02, Y03, and Y09. In the context of the Act, this is a different project than the IWS, and as such every effort should be made to make this a stand-alone document. If sections from other documents are being referred to, they should be included for the benefit of the reviewers.

- There is some question as to why uniform retention is being used in blocks where the objective is even-aged management of a shade-intolerant species. It would be useful for FMB to provide some clarity as to how site objectives will be met given the silvics of the tree species being replaced on-site. The only argument in the document for dispersed retention is the results of the DTM. Ecological processes should take precedent over aesthetic values if the two are in conflict.
- The site and harvest plan states the objective: "...leave slash scattered throughout the block as widely dispersed as possible to simulate wildfire debris...". The northern boreal forest has one of the slowest decomposition rates on the continent, due in part to low temperatures and acidic (low pH) microsite conditions. Fire disturbances result in markedly different changes to the forest environment than harvesting in terms of factors that affect these conditions. The concept of uniform slash distribution throughout cutblocks should be examined with respect to the effects of this added debris on ecological processes and micro-site conditions.
- The maps that have been provided don't effectively show the applicable harvesting boundaries e.g. block C5 looks like a series of cut blocks, not like one block with various types of internal and external retention. This layout comes across as a series of several clearcuts instead of one cutblock that has adapted strategies to retain ecological values.
- The document states that FN crewmembers assisted in all operational field stages and that no observations were made with respect to cultural sites. Unless crewmembers were specifically trained to identify cultural issues this is an inadequate procedure. The department of Heritage should be contacted with respect to cultural/archaeological sites and issues.

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