



ENERGY MINES &  
RESOURCES, Y.T.G.

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FOREST MANAGEMENT  
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2 June 2005

Forest Management Branch  
Dept. of Energy, Mines & Resources  
Box 2703 (K918)  
Whitehorse, Yukon Y1A 2C6

Attn: Robin Sharples  
Environment Assessment Coordinator

**RE: ENVIRONMENTAL ASSESSMENT RESPONSE FOR BARNEY LAKE AND FALSE CANYON CREEK FIRES**

Yukon Forestry Association appreciates the opportunity to respond to this Environmental Assessment application and for the opportunity to voice the concerns of our members, whose lives and livelihoods are affected by the decisions made by people who will most likely never set foot in the area in question.

Since our Association was formed earlier this year, this is the first screening application we have reviewed, and we were surprised to see policy issues discussed in the application. For example, how are musings about whether salvage operations in this area should be deducted from the annual allowable cut relevant to an Environmental screening?

This application begins by stating that the area in question is 2% of the total area affected by fire. Aside from respecting archaeological concerns why not set the 2% apart for logging and allow the insects, etc. the remaining 98%.

Our members are not in favor of being forced to a fire-killed salvage area when applying for green saw logs. Policy makers do not seem to understand that sawmill operators have a customer base whose needs may not be met with a fire killed product. It's not the customers' fault, nor the operator's fault that a forest fire occurred, therefore, neither should be forced by any government agency to accept a substandard product. In fact, if green saw log applications were processed in a more timely fashion, perhaps, less forest would sustain fire damage. Some members also expressed concern with proximity to the burn area. The wood might be suitable for their purpose but to distant from their mill.



Striving to serve industry.

YFA's recommendation in this matter is to let the operator decide whether he requires green wood or salvage wood and to make sure that people are aware that salvage wood is available.

Most operators would prefer that stumpage for salvage wood remain at \$0.25 with each operator responsible for constructing his own access roads. The price incentive may attract people to salvage wood and the roads will be built where they are most useful to the people using them.

YFA finds it ridiculous that salvage loggers would have to pay reforestation fees if they harvest in this area. Who is going to pay for the reforestation in the other 98%? Will anyone bother to reforest if no one logs there? What if the whole area blows down and burns again? What would be wrong with encouraging a harvest in a salvage area?

YFA realizes that we are responding to a hypothetical situation since no one has actually been on the ground to determine if a harvest is even feasible, so it is hypothetically possible that summer logging could occur without negative impacts. If so, we would encourage this in order to maximize the recovery of wood before it degrades too much to be useful. We believe the simplest way to determine feasibility here is to let loggers look at the area and decide whether they wish to submit an application.

YFA recommends that the public be made aware that there is salvage wood available at \$0.25/m<sup>3</sup> and if applications are made, review them as quickly as possible, bearing in mind that we are only talking about salvage wood for 2% of the burn.

YFA also recommends that the reforestation levy be dropped, and would note that in the past ten years, operators have been charged a reforestation fee of \$5.00/m<sup>3</sup> but no reforestation ever occurred in many areas logged. Specifics on this issue can be obtained from YFA upon request.

YFA feels that salvage initiatives such as this could and should be dealt with at the district level. With a simple, standardized policy, local Renewable Resource Councils could have more input into decisions affecting their neighborhood.

**On behalf of the  
YUKON FORESTRY ASSOCIATION  
and its members,**



Jean-François Nantel  
President