CHAMPAGNE & AISHIHIK FIRST NATIONS HERITAGE

Response to: Environmental Assessment of Forest Development Plan for the Quill Creek Bench Harvest Planning Area

While it is apparent that considerable effort has gone into assembling the Forest Development Plan for the Quill Creek Bench area, Champagne and Aishihik First Nations (CAFN) has some concerns regarding the potential impact of this work on heritage resources.

- (1) We are doubtful that many forestry field workers, whether timber cruisers or loggers, have the skills to recognize heritage sites in the field. We are referring to page 12 of the plan, where it states that "any sites that are uncovered during road development or harvesting operations will require cessation of all operations until both the CAFN and Yukon Government Heritage are notified and site inspections performed as required." While we are pleased to know work will stop if a site is encountered, we believe proper impact assessment of the Operating Units and Access Roads is necessary, prior to development.
- (2) We therefore request that impact assessment work be completed prior to any logging or development of new access roads in those areas that are identified as being "Potential Archaeological Site Locations", [referring to the map developed by C. Thomas 2005 for the CAFN Traditional Territory] where those high potential areas overlap with targeted Operating Units and/or existing or planned access roads.
- (3) There may be heritage sites other than archaeological sites, which are the focus of Thomas' model, that are of interest or concern to CAFN, such as carved trees, brush camp sites, and traditional trails, which may be impacted by forestry work. Thus impact assessment work must include CAFN's criteria for heritage sites, which is much more than only archaeological sites.

We believe that the Quill Creek Bench Forest Development planning process provides an opportunity to address the above concerns, and to learn more about heritage site locations in the CAFN Traditional Territory, and perhaps others. This would include learning about the locations of all types of heritage sites, not just archaeological sites.

Moreover, as the Quill Creek Bench is the first of many potential areas within the Traditional Territory to be developed for forestry, it is critical that we establish the best methodology possible for this type of work, including post-development assessment, as we are still in the process of recognizing the variables that identify heritage site locations.

CAFN has undertaken some initial traditional knowledge and field investigation work in the Quill Creek Bench area and intends to follow up next summer on leads we have on site locations. This would include our own investigations of the possible heritage site locales reported in the Quill Creek Bench Forest Development Plan (p. 12). We would also advise that CAFN is in the process of developing its own traditional knowledge database. This database has the potential to considerably improve our understanding of patterning in heritage site locations beyond relying solely on registered archaeological site data (as the Thomas model does). This exhaustive project to make CAFN information more readily accessible is being developed to improve CAFN's overall land and resource management capabilities. It will provide great benefits to both the CAFN and Yukon Governments as we continue to work together in planning and assessment processes.

Thank you.

Sincerely,

Diane Strand

Heritage Resources Officer

CAFN Heritage, Lands, & Resources