



October 24, 2005

Robin Sharples
Environmental Assessment Coordinator
Forest Management Branch
Energy Mines and Resources

Re: CPAWS-Yukon comments on Environmental Assessment of Forest Development Plan for Quill Creek Bench Harvest Planning Area in the Haines Junction Area

Dear Robin,

CPAWS-Yukon appreciates the opportunity to provide comments on the above mentioned Environmental Assessment (EA) and we propose the following recommendations for sincere consideration by the Registered Authority.

Insufficient consideration has been given to wildlife when determining block layout and design. We believe that animals have an intrinsic right to persist and flourish within a landscape, as well as for the value they provide to humans. Habitat use by animals extends beyond known critical seasonal ranges. All known and predicted habitat needs should be considered in a thorough planning process. Laying out cut-blocks within known wildlife corridors, wetlands and moose habitat is unacceptable.

Furthermore, to abstain during May 1- July 31 only from logging green roundwood stems is inadequate. Migratory birds nest in a variety of trees that likely fall outside of your definition of "green roundwood." Rather than relying on operators to report nest findings during forest harvesting, you should take a proactive approach and leave an adequate amount of wildlife habitat available, as determined through integrated planning.

Recommendations:

1. In addition to removal of Operating Unit 5 from the Development Plan, eliminate all proposed cut-blocks that lie within the identified wildlife corridors (1A, 1D,

1E, 1I, 2H, 3D, 3E, 3F, 3G, 3H, 4A, 4D, 4N, 6M, 6O, 7B, 7H, 7J – block numbers base on maps in appendices). This includes removing flagging from those blocks that were laid out prior to completion of the EA.

2. Remove operating unit 1 from the FDP because “A separate Environmental Assessment will be required for OU #1.”
3. Wait until the fisheries assessment for the harvest planning area is complete before implementing development planning and block layout.
4. Ensure dispersed and aggregate retention levels meet or exceed 25% in the entire harvest plan area.
5. Allow winter logging only, in all operating units.
6. Ensure that “The future implementation of the FDP is dependent upon local demand for timber products and permit applications.” Therefore, reduce the proposed volume to less than 200,000 m³ and implement true adaptive management in order to achieve an accurate, ecologically sustainable forest industry for the south-west Yukon community.

Thank-you for this opportunity to provide input. Please feel free to contact me for further clarification.

Yours truly,

Theresa Gulliver
Forest Conservation Coordinator
CPAWS-Yukon