

October 21, 2005

Dieter Gade  
P.O. Box 5488, Haines Junction, YT, Y0B 1L0

Robin Sharples  
Environmental Assessment Coordinator, FMP  
Yukon Energy, Mines and Resources  
Box 2703, Whitehorse, YT, Y1A 2C6

**Re: Comments on Draft Forest Development Plan (FDP) for the Quill Creek Bench Harvest Planning Area in the Haines Junction Area, September 21, 2005.**

Dear Robin,

Thank you very much for providing the opportunity to comment on the proposed FDP for the Quill Creek Bench area. I am happy to see that this revised plan incorporates many of the comments provided by stakeholders for the initial FDP for the Haines Junction Planning Area 2, January 21, 2005.

However, I still have a number of strong concerns about the new draft FDP and would like to offer the following suggestions:

**1. Limit scope of the FDP to interim wood supply.**

The scope of the new draft FDP has significantly changed from the initial FDP of Jan. 21, 2005. The initial FDP proposed a timber volume of 11,270 m<sup>3</sup> from Operating Unit # 3 to be utilized as interim wood supply while the regional forest planning process in the CATT is ongoing. The new FDP increases the proposed timber volume to almost 200,000 m<sup>3</sup> to be cut in Operating Units #1 to # 7. The planning document states that the proposed timber volume should meet current industry demand in the Haines Junction Area for a period in excess of 5 years.

Clearly, this FDP reaches far beyond the scope of providing an interim wood supply for the local industry (to my knowledge, over the period of the last 2 winters, the main local timber operator harvested less than 10,000 m<sup>3</sup> of timber in Planning Area # 1, O.U. #2).

The ongoing forest planning process for the CATT estimates that the total volume of timber available for the entire planning region is approximately 750,000 m<sup>3</sup>. I believe it is inappropriate to "by-pass" the ongoing planning process by allocating more than 25% of the total timber at this time before the regional forest planning process is completed.

***Recommendation:***

The scope of the FDP should be restricted to provide an interim local wood supply until the ongoing regional planning process is implemented. A timber volume of around 20,000 m<sup>3</sup> should be adequate to cover the local interim wood supply needs. Perhaps Operating Unit # 2 with a total volume of 26,900 m<sup>3</sup> could be utilized as interim wood supply.

The Environmental Assessment for an interim wood supply FDP (O.U. # 2) must include all known future developments in that area (e.g. O.U. # 1, 2 to 7) in order to properly evaluate possible cumulative impacts of proposed present and future developments. Maps provided in the FDP should include 1:5,000 scale maps (1:5,000 scale maps were provided in the initial FDP but not in the current development plan.).

I strongly suggest that the remaining O.U.s of Planning Area # 2 be dealt with in the ongoing forest planning process for the CATT and not be included in this FDP.

**2. Winter operation only**

As stated in my previous comments for the initial FDP for Planning Area 2, harvest should be limited to winter season only. Cutting in the summer is not only detrimental to forest re-generation, cutting of timber in dry summer conditions also poses a significant fire risk. The risk of human-caused wild fires is accelerated by the extreme volatile fuel conditions of the targeted dry timber stands.

***Recommendation:***

All timber operations should be restricted to winter season.

**3. Reduce air pollution caused by wood smoke**

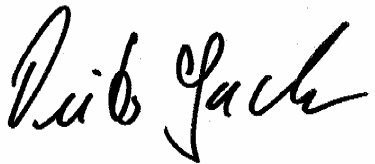
I am concerned that the air quality will suffer from smoke from burning wood piles at the harvest site. Also, due to the low quality of the local dead timber, a high percentage of unusable wood will need to be burned at the site(s) of local sawmill(s). Wood smoke not only negatively affects the public's health (we are already exposed to smoke from wild fires in the summer), but extensive smoke from burning wood waste may also negatively affect winter tourism.

***Recommendation:***

- a. The issue of air pollution from wood smoke related to timber operations should be included in the Environmental Assessment for the interim wood supply FDP.
- b. Wood waste management should be included as part of the ongoing forest planning process for the CATT.

I appreciate your consideration of my comments. Please contact me if you require any additional information or detailed references.

Best regards,

A handwritten signature in black ink, appearing to read "Dieter Gade". The signature is written in a cursive, flowing style.

Dieter Gade