

26 October 2005

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**RE: Environmental Screening of the Forest Development Plan for Quill Creek Bench**

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Thank you for forwarding the above noted Forest Development Plan for review.

We are pleased to see Forest Resources' desire to link the development plan with the current landscape level planning. The key links to the Strategic Forest Management Plan are the desire to work with the fire risk abatement working group and the integration of information from the resource assessment technical working group.

The Development Plan does contain good information on timber and some good mitigation that respect other values. However, there are a number of aspects that are unknown or unresolved. The unresolved issues are important consideration for assessing the environmental implications of forest harvesting and completing the review of this project.

Given these gaps, it is difficult to predict the likely impacts of the harvesting for the entire project. Clearing up the information gaps or laying out subsequent review processes that would occur when the new information is received would presumably move some of the project through this screening. By way of example, the Development Plan defers the EA for operating area 1 until it receives information from the Fire Risk Abatement Working Group, but it is less clear what happens to operating unit 7.

Other considerations that should be addressed include:

- 1) Access management is seen as a positive contribution to reducing the impacts on wildlife, other users such as skiers, and perhaps, wildfire risk management by limiting commercial operation to winter months. However, it is our experience that true access management and sequencing of operations does not occur in the absence of a plan that specifically addresses these issues. We encourage FMB to complete such a plan and include it in an Environmental Protection Plan for the project.
- 2) Clear direction on the Fire Risk Abatement initiative is not included, and the Forest Management Branch (FMB) does not take on the initiative to mitigate fuel or slash accumulations, slash disposal and stand conversion to species that are less flammable or intimately hazardous. Logging slash can create a more hazardous situation than presently exists and managing blocks during and after harvest to return them to a coniferous stand may conflict with abatement

requirement. The Development Plans requires objective and strategies to address these issues so that subsequent operational plans can conform. Otherwise, there is no guidance on these matters and these matters are important.

- 3) The plan identifies a potential economic expansion of the timber and wood residue industries that may reduce the number of years of wood supply. The important questions here are whether the potential timber expansion is part of this Environmental Assessment (EA) or not, and if it is not then how will it be considered if the expansion becomes a reality.
- 4) The development plan indicates that the blocks in units 1 and 7 will be finalized as needed. The Plan points out that operating unit 1 will receive an EA in the future; however, the process for unit 7 is not clear.
- 5) Under the Fisheries and Water section (2.1.4), it states that a fisheries assessment is currently underway. Although the fisheries information would seemingly be valuable information to include in an assessment, there is no information provided on what is being collected and how the information will be used. The new fisheries information would help people evaluate potential effects.
- 6) FMB encourages users of the trail systems to bring their ideas forward as part of the EA review. The issues around the trail system should be resolved in the planning process as it is difficult to deal with these people issues in an environmental assessment process, especially one that focuses on 'environmental effects'. The work needs to be completed.
- 7) The forest health section identifies a likely transmission of diseases as a negative impact but does not include mitigation measures to manage the situation. The spread of disease is important because most blocks have a significant understory that will be susceptible to the disease. Avoiding the infected areas and removing them from the blocks would be the best mitigation if FMB is not prescribing specific action. In addition, the loggers need to know what they must do to reduce the spread of the disease. Any specific practices, other than avoiding the areas, will increase costs and affect the economics of the logging program.
- 8) Some of the harvest block prescriptions are incomplete. This limits everyone's ability to predict impacts and required mitigation. The 'special concerns' section of the block information sheets provides a good example of this problem with its use of 'green hatched' and 'variable retention'. A couple of thoughts on this:
  - 1) Variable retention is not a prescription in itself unless it is defined. This is very important because variable retention can mean anything from a few trees per hectare to a few hundred trees per hectare remaining on the site. The prescription should consider dispersed retention and aggregated retention.
  - 2) Green Hatched is not a value. It is a map notation that identifies areas with values - you will need to define the values, the objectives and the strategy to maintain the values. The strategy typically information on the forest and stand structure, composition and function to come up with a harvest prescription.
  - 3) Abrupt transitions between 'valued and non-valued' areas provides little insight into the forest and stand requirements to address the specific values. A good example is 3F - the block was reconfigured by drawing a straight line so to locate the block outside of a 200 m wildlife corridor. Perhaps something other than a straight line could be used to manage a wildlife corridor.
  - 4) FMB could have helped people decide whether more or less retention would be adequate, if they would have provided an initial suggestion.

## Report Specific Issues

### Section 2.1 Landscape Issues (Page 8 of 46):

The “netting out” of the Kathleen River system by “height of land” should be more accurate with the objective of keeping forest harvesting out of sight from the Kathleen River/Crescent Lake/ Rainbow Lake chain. Even use of “height of bank” requires cutblock edge adjustment. Currently the eastern edge of stand 91, OU7 is as close as 20m from the Kathleen River watershed shoreline. The cutblock in this area should be adjusted back from the shoreline to the “height of land” as prescribed in section 2.1 or ‘height of bank’ to address “visual concerns” i.e. 2400’ contour/break of slope or possible bench line or 100m whichever is greater.

The second half of page 8 of 46 outlines a classification of areas. The link between the text’s green - economic opportunity areas and green Appendix A map areas – white spruce is unclear. Are we to assume that white spruce is the only economic opportunity? There are other “economic opportunities” besides forest harvesting that arise from the local forest. A further question arises from the map legend employed: are harvest blocks, shown in yellow automatically assumed to be part of the green coloured “economic opportunity areas” or separate and distinct entities?

#### 2.1.5 Recreation and Visual Impact (page 11 of 46)

The third paragraph references the wildlife corridor along Quill Creek which “serves as a visual buffer for recreational users of this waterway”. Quill Creek itself has a brief mid summer high water which is very limited for recreational boating. Trails in the immediate area maybe used more frequently than the waterway.

#### Operating Unit #7 (page 32 of 46)

Block 7H Special conditions refers to “a 80m riparian reserve zone and a 120m riparian management zone” requirement. Is this 80 + 120m or other? As noted above the proposed cutblock is closer to the Kathleen River shoreline than this let alone any riparian zone boundary.

We encourage FMB to continue its consultation with the Fire Abatement and Resource Assessment technical working groups and the wildlife sub-committee to assist with completion of the management strategies and ultimately the harvest prescriptions for this project. We also recommend FMB complete an access and allocation plan and the outstanding planning requirements for this project.

Yours truly,

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Environment