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October 21, 2005

Consultation Notice For Environmental Assessment of Forest Development Plan for the Quill Creek Bench HPA in the Haines Junction Area.

Dear Robin Sharples,

Thank-you for the opportunity to comment on the Environmental Assessment of the Forest Development Plan for the Quill Creek Bench HPA in the Haines Junction Area. Parks Canada is interested in all projects adjacent to Kluane National Park and Reserve.

The new Quill Creek Bench Timber Harvesting Plan addresses some of the concerns expressed by Parks Canada and others during the initial review of the Resource Report for Planning Area 2. Access continues to be one of our major concerns. Of all disturbance corridors created by humans, roads probably have the greatest impact on wildlife populations. The most important effects are direct and indirect mortality and loss of habitat effectiveness as a result of habitat avoidance in the vicinity of disturbance corridors. Other concerns related to access include: increased hunting and changes in predator prey interactions. The most powerful tool available to reduce the effects of disturbance corridors on wildlife is access management. We are pleased to note that the need for 3 permanent access roads for fire fighting was re-evaluated and considered to be unsuitable and that all new development will require de-activation. However we are concerned with the wording used in section 2.1.9 on pages 8 & 9 which states: "The maintenance of access routes into the HPA for use in fire fighting is not **currently** considered a suitable objective, so all new development **currently** requires de-activation". This leads one to assume that this decision is the "flavour of the day" and is likely to change. We would like to see the word "currently" removed from the sentence. There is mention of upgrading the road through the wetland between OU 3 and OU4. It would be preferable to evaluate alternate routes so that the road through the wetland could be avoided.

The report allows for the potential of summer harvesting. We recommend that harvesting be restricted to the winter months. There is a multitude of literature (a lot of which has been brought forward during the original consultation for the resource report ) that conflicts with statements in this harvesting plan regarding aspen suckering. Early and late summer logging do not promote good aspen suckering. The plan states that greenwood harvesting will not occur between May 1 and July 31, which would then leave early and late summer for "summer harvesting". Harvesting in winter when the trees are dormant results in a greatest amount of suckers as well as faster growing suckers. We would like to see all greenwood harvesting restricted to winter. Soil disturbance from logging will not necessarily promote soil mixing and better seed bed conditions for white spruce as stated in the report. The literature shows that summer logging can result in soil

compaction which can inhibit white spruce regeneration and be detrimental to spruce seedling establishment.

The Forest Development Plan for the Quill Creek Bench is a plan that has been developed to meet industry's need for an interim wood supply while the integrated landscape plan (ILP) for the CATT area is being developed. During the September public consultations the public was informed that the ILP was nearing completion. A possible date for completion of a draft document was given as Dec. 2005. If this is the case, then the Forest Development Plan for the Quill Creek Bench should be reduced in size and volume to operating units #2, #3 and #4 (the northern portion) of the development area. This would provide an interim wood supply and the rest of the area could be developed under the auspices of the completed ILP. In addition, this would allow for adaptive management. DIAND, the community of Haines Junction, industry and others would be able to experience first hand, the impacts of logging in the area (environmental, socio-economic, positive and negative) and modify operating requirements for future development plans if and as required. If the area for the development plan is reduced, then future Development Plans for OU #6, #7 and #1 would be assessed under YESSA when the time arises. If it is not reduced then there will still be requirements for OU #1 to go through an environmental screening.

The development plan includes some cut blocks in areas that are located within green cross hatched areas. The "special values" in the cross-hatched zones are not constant as they vary across operating units. The plan does not address what the specific values are in the cross-hatched areas in which logging is proposed and what type off management will be used to protect these areas. Variable retention is a very broad term and the amount retained can range from just a few trees to 80+%. Increased levels of detail should be provided.

We would suggest that cut block 4N be removed from the plan as it is situated entirely within a wildlife corridor. This would allow better access to the little lake/pond and several options for an uninterrupted path from the Haines Highway through to the Kathleen River mid-way between Quill Creek and the north end of the Quill Creek Planning Area.

In section 2.1.5 of the report, there is mention of "an old ski trail". This trail which is called "the Moose Meadows Ski Trail" is still being used by local skiers. Volunteers pack and track set the trail every winter. Use of this trail may not be obvious as it is often windblown and thus looks like no one has been using it. Perhaps a meeting with the local ski club could take place to discuss the future of the trails in the area.

If the Development plan is not reduced in size then we would like to see all of the proposed cut blocks in OUs #3, #4 and #2 utilized before OU #6 and #7 are opened up. This would reduce the development of additional access roads until absolutely required.

Wildlife would then be able to travel through OU #3,#4 and #2 once the harvesting has been completed without being disturbed.

Monitoring and surveillance of the harvest operations is very important as this area will be viewed by local residents and the general public as an indication of what forest harvest in the rest of CATT will look like. It also provides an opportunity for long term monitoring and determining what actually works in our area. Information learned from here will be very applicable to a good portion of CATT.

Rhonda Markel

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Kluane National Park and Reserve.