

Mr. Bill Bowie  
Arctic Inland Forest Products  
Box 190  
Dawson City, Yukon Y0B 1G0

October 29, 2009

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FOREST MANAGEMENT  
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Mr. Lyle Dinn  
Planning Forester  
Forest Management Branch  
Energy, Mines & Resources

**Re: Proposed Forest Act Regulations, Standards and Guidelines**

Dear Mr. Dinn, *Lyle*

Regarding the Proposed Forest Act Regulations, Standards and Guidelines, We have two immediate concerns that we wish to address

Interim Allowable Cuts: These interim cuts have been established based on recent historical harvest levels. These interim harvest levels do not provide for the harvest of deciduous species nor do they recognize the immediate and future potential of the bio-fuel market. While we recognize the need for some interim level to be established, in the absence of cut levels that are based on science we do feel that the interim levels of cuts should have sufficient flexibility to allow for short term growth of the industry particularly in the bio-fuel market. There is a tendency on the part of some Yukoners to view these interim cut levels as a permanent number and there will be reluctance on the part of some interest groups to accept any increase in allowable cut in future years regardless of whether or not forest inventories prove a significant increase in cut is sustainable. It has been stated that the new legislation is intended to be an enabling act for the development of Yukon's forest industry. Setting the harvest levels too low is a disincentive to this development.

Buffer Zones: The imposition of buffer zones under the guise of protecting special values has the potential of removing substantial volumes of wood from the available harvest. In addressing this issue we need to keep sight of the fact that we are dealing with a renewable resource as are many other forest users and recognize that our impacts on the forest are neither permanent nor are they irreversible. We should be striving towards a multiple use approach in developing our forest resource and in that regard we should be avoiding as much as possible the alienation of the resource to meet the needs of individual users. Indeed in some cases it has been demonstrated that a well managed timber harvest can enhance other forest values.

Thank you for your time in addressing our concerns,  
Sincerely,

*Bill*  
Bill Bowie  
Arctic Inland Forest Products

CC: Yukon Wood Products Association

Enc: Logging Area Photos

## Logging Areas



This riparian zone was logged about 1985, on the north side of the Klondike River from Henderson's Corner. Note the regeneration on the bank. The logging access road was in the center of the photo on the right.



These areas were cleared bare to the gravel in 1976. Young spruce are now up to 15' in height in the photo on the left. Note the stumps in the photo on the right. Trees that were too small to log in 1976 are now about 20" in diameter.