

March 20, 2019

YESAB  
Haines Junction Designated Office  
PO Box 2126, Haines Junction, Y0B 1L0

To Whom It May Concern,

**RE: 2019-0015 Alcan Fibre Optic Project Haines Junction to Alaska Border**

**The Yukon Invasive Species Council (YISC) is concerned about the high risk of spread of invasive plants from the proposed project.**

The proposed project will disturb 325 km of ground through 1-metre deep trenching in the Alaska Highway's right-of-way from Haines Junction to the Alaskan border. Much of this highway is currently relatively free of invasive plants (see 2016 Invasive Plant Roadside Survey<sup>1</sup>). This section of highway remains one of the few in Yukon where the picturesque native flora that Yukon tourism promotes, such as fireweed and sweetvetch (*Hedysarum* species), still bloom. There are several locations where invasive species are already established along the highway and these particular species can aggressively establish on newly disturbed ground and outcompete native species. Besides decreasing native biodiversity, invasive species, such as white sweetclover and yellow lucerne which can grow over 2m tall, decrease roadside visibility, can act as wildlife attractant and affect motorist safety. They can also increase fuels along roadsides, increasing wildfire hazard. **Without strategic timing of activities and careful cleaning of equipment, this project could easily trigger the spread of invasive species along the rest of the highway.**

The 2016 Roadside Survey highlighted several locations of concern:

- 1) **White Sweetclover** (*Melilotus albus*) Alaskan border to south of Beaver Creek (Fig. 1, p. 19).
- 2) **Yellow Lucerne** (*Medicago falcata*) between Haines Junction and the old experimental farm (Fig. 8, p. 33).
- 3) **Smooth Brome** (*Bromus inermis*) south of Beaver Creek (Fig. 3, p. 23)
- 4) **Alfalfa** (*Medicago sativa*) south of Burwash (Fig. 6, p. 29).

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<sup>1</sup> Rosie, R. 2016. 2016 Invasive Plant Roadside Survey Yukon Territory. Prepared for Yukon Government Invasive Species Interdepartmental Working Group. 101 pages.

<https://www.yukoninvasives.com/index.php/en/resources/reports/32-2016-invasive-plant-roadside-survey/file>

Additional locations of concern have been identified by recent monitoring by Parks Canada. These include:

- 1) **Bird Vetch (*Vicia cracca*)** and smooth brome along Logan Street, west side in Haines Junction.
- 2) **Spotted Knapweed (*Centaurea stoebe*)** west side of Alaska Highway, south of turn to Nygren Subdivision
- 3) **White Sweetclover** west side of Alaska Highway near Sulphur Lake and near the Park's Canada visitor Centre at Thachal Dhal (Sheep Mountain). These patches are concerning as they could spread down river plains as has occurred in Alaska.

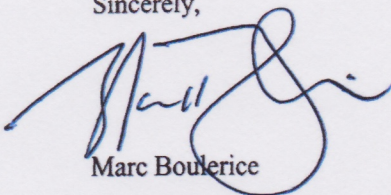
Bird vetch and spotted knapweed are of most concern because the above mentioned locations are currently the only known occurrences in southwest Yukon. Bird vetch is very aggressive and by growing like a vine can outcompete shrubs and trees in forests. They currently only occur in small patches because volunteers and Parks Canada staff have been actively pulling the plants to prevent their spread.

**The following mitigations are recommended:**

- 1) **For Logan Street work:** Time ground disturbance in April or May prior to when bird vetch sprouts. Clean equipment prior to moving away from Logan Street by visually inspecting equipment for plant material and washing soil away.
- 2) **For Haines Junction work:** Clean equipment prior to moving north of Nygren Subdivision.
- 3) **For work between White River and Beaver Creek:** Clean equipment prior to moving south of White River.
- 4) **Direction of work:** Be strategic about the direction of work over the project's life; try to end in areas with high concentrations of invasives species (such as Haines Junction) to avoid spread into uninvaded areas.
- 5) **Timing in general:** Finish all mowing and brushing by July 10 before plants go to seed.
- 6) **Prevent spread into watercourses:** Do not clean machinery near watercourses.

Thank you for taking these concerns and recommendations into consideration. We hope to see them reflected in the recommendations for mitigation of impacts associated with the proposed project.

Sincerely,



Marc Boulerice

President, Yukon Invasive Species Council.