

Mayo District Renewable Resource Council

PO Box 249 Mayo, Yukon Y0B 1M0
Tel: (867) 996-2942 Fax: (867) 996-2948
E-mail: mayorrc@northwestel.net

SEP 18 2009

FACSIMILE TRANSMITTAL SHEET

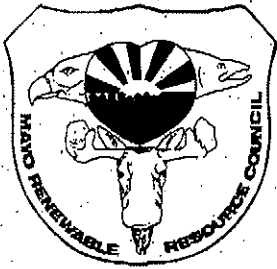
TO: Reg Whiten FROM: Barb
 COMPANY: Peel Watershed Commission DATE: July 3-09
 FAX NUMBER: 867-667-4624 PHONE NUMBER: 996-2942
 TOTAL NO. OF PAGES INCLUDING COVER: 8
 RE: Comments

- URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

NOTES/COMMENTS:

Enclosed signed copy of
 comments forwarded on June 30.
 Thank you, Reg

Barb



Mayo District Renewable Resources Council

P.O. Box 249, Mayo, Yukon Y0B 1M0
Tel : (867) 996-2942 Fax : (867) : 996-2948
E-mail : mayorrc@yknet.yk.ca

June 22, 2009

Reg Whiten, Senior Planner
Peel Watershed Planning Commission
307 Jarvis Street, Suite 201
Whitehorse, Yukon
Y1A 2H3

Dear Mr. Whiten

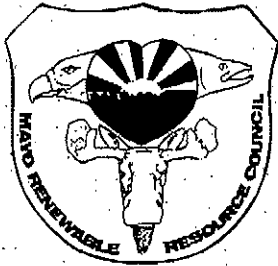
Re: Peel Watershed Land-Use Draft Plan

Mayo District Renewable Resources Council (MDRRC) has studied and reviewed the Peel Watershed Regional Land-Use Draft Plan (PWRLUP) in context with the RRC mandate presented in the Na Cho Nyak Dun Final Agreement (NNDFA). The RRC "acting in the public interest and consistent with this chapter, may make recommendations on any matter related to Conservation of Fish and Wildlife" (NNDFA 16.6.9).

MDRRC appreciates the enormous effort taken in researching and developing this document. Council trusts that the work done and data collected will be of great relevance in producing a final positive, workable document; a living document which can be reviewed, monitored and updated (UFA 11.2.1.3-5). Council also strongly encourages development of a pro-active plan which may err on the side of preservation and conservation than one which will fall to the reactive (UFA 12.1.1.1).

A Land-Use plan for the Peel Watershed is a critical, timely undertaking and must be seen to state of completion as soon as possible. This draft is a good beginning; needing some fine tuning, some compromises, and early adoption and practice.

~~~~~



## Mayo District Renewable Resources Council

P.O. Box 249, Mayo, Yukon Y0B 1M0  
Tel : (867) 996-2942 Fax : (867) : 996-2948  
E-mail : mayorrc@yknnet.yk.ca

Page 2 - MDRRC comments to PWRLUP draft

MDRRC much appreciates that Wildlife values were foremost to the planning process Commissioner's Statement of Intent. ("The goal of the Peel Watershed Regional Land Use Plan is to ensure wilderness characteristics; wildlife and their habitats, cultural resources, and waters are maintained over time while managing resource use" 1.3 PWRLUP).

MDRRC also strongly agrees with the Plan Principles outlined in particular regarding conservation. UFA, p.1 – "The management of Fish and Wildlife populations and habitat and the regulation of users to ensure the quality, diversity and Long Term Optimum Productivity of Fish and Wildlife populations, with the primary goal of ensuring a sustainable harvest and its proper utilization"

UFA, 11.1.1.6 – "so that the Plan '...ensures that social, cultural, economic and environmental policies are applied to the management, protection and use of land, water and resources in an integrated and coordinated manner so as to ensure sustainable development'".

MDRRC strongly echoes the Sustainable Development priorities

1. Sustain ecosystem integrity
2. Sustain communities and cultures
3. Foster sustainable economic activities

Without the 1<sup>st</sup> priority firmly entrenched the others will not sustain or flourish.

MDRRC strongly supports all noted recommendations, some with suggested revision.

Data collection is a key element recommended in this draft plan; and critical to its eventual success. Research and data collection/compilation needs to be set in motion immediately.



## Mayo District Renewable Resources Council

P.O. Box 249, Mayo, Yukon Y0B 1M0  
 Tel : (867) 996-2942 Fax : (867) : 996-2948  
 E-mail : mayorrc@yknnet.yk.ca

Page 3 - MDRRC comments to PWRLUP draft

MDRRC recognizes that water is the defining element of this Land-Use area. Water is the key to life in all its forms and the conservation and preservation of the waters within this area must take precedence over all else in this plan.

Water quality and quantity is of critical concern for all ecological, social, cultural and economic conditions within this watershed (2.5.4). Every effort must be made and all measures taken within this plan to preserve its pristine nature and eliminate possible loss or contamination of any portion there in.

MDRRC strongly recommends that the "Policy Recommendation" listed 5.2.1.2 read, 'As a general guideline.....**must** be maintained below the cumulative-effects indicator levels....'.

The Research Recommendations (5.2.1.2) should read, 'To provide a benchmark for the monitoring of cumulative-effects indicator levels, **more extensive** ongoing water quality and flow .....

River Corridor Zones (RCZ) are of the utmost importance to be recognized and Council strongly recommends adoption and implementation.

RCZ protection and withdrawal of surface and subsurface tenure is critical to the hydrologic integrity of the entire system.

"Access" of any kind to these areas must be highly restricted and regulated to maintain this integrity.

The RCZ's Policy Recommendation needs to read – 'These corridors "**shall**" include the relatively flat terrain next to major rivers that lies between toes of adjacent mountains/escarpments' (3.2.1 pg 3-5).

~~~~~



Mayo District Renewable Resources Council

P.O. Box 249, Mayo, Yukon Y0B 1M0
Tel : (867) 996-2942 Fax : (867) : 996-2948
E-mail : mayorrc@yknnet.yk.ca

Page 4 - MDRRC comments to PWRLUP draft

The delineation of the Critical Landscape Zones (CLZ) are of definitive importance to the integrity of this entire watershed.

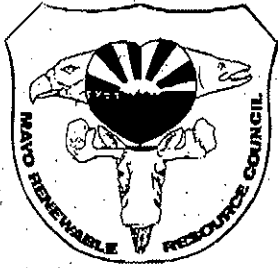
Remote Access Lakes (RAL) need higher levels of restriction and regulation invoked to maintain their value. Withdrawal of surface rights, regulated numbers of visitors, numbers of arrivals/departures, best practices regarding wildlife disturbance and strict minimum of surface use must be placed under strict monitoring.

MDRRC recommends that "**policy and regulations be developed and enacted immediately**" 'to ensure the maximum level of legal authority to protect natural resources of very high ecological and heritage/cultural value' (pg 3-5), regarding all access and use of RAL areas. Council recommends that Department of Environment develop and enact such policy directly, to coordinate with this plans future redrafting and recognition.

ALL users must be regulated and responsible for actions (eg. carry in – carry out, common campsites, containment). This carries through to activities extending into the RCZ's

MDRRC recommends that this regulatory development be done whether or not this draft or portions thereof become approved and set in practice.

~~~~~



## Mayo District Renewable Resources Council

P.O. Box 249, Mayo, Yukon Y0B 1M0  
Tel : (867) 996-2942 Fax : (867) : 996-2948  
E-mail : mayorrc@yknet.yk.ca

Page 5 - MDRRC comments to PWRLUP draft

Tier II - General Conservation Zones (GCZ) 'or parts there in' should eventually be reclassified to Tier I Ecosystem protection following withdrawal and discontinuance of tenure. Anticipating that reclassification, recognition of sensitive areas within these zones with higher wildlife value through Habitat Protection Area status now will better ensure that future possibility.

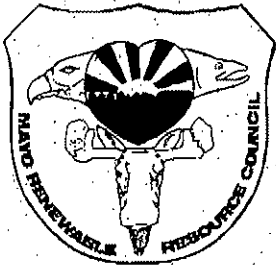
There has been some critical habitat left completely or partially exposed to disturbance; without any kind of protection noted.

There is a lack of protection recognized throughout the alpine and sub-alpine reaches for important sheep, caribou, and grizzly habitats. These documented areas should be recognized as a Habitat Protection Areas (HPAs). With the higher emphasis on wildlife values HPAs would offer, this designation would better ensure the ability to establish Tier I CLZs in the General conservation Zone. This would also provide added insurance of sustainability.

Some specific areas of concern are caribou wintering and rutting grounds as indicated in the Conservation Assessment (CA) report:

Porcupine caribou habitats in the South Richardson Mountains and areas north of Tombstone Park regions (CA map 8); Hart River caribou herd fall habitats south of the Tier 1 CLZ (4b) in the Ogilvie range (CA map 12); and the Bonnet Plume caribou herd grounds across the Bonnet Plume and Wind River areas (CA map 14).

Documented Sheep mapping indicates heavy range usage areas as outside any protection zoning. The upper and central reaches of the Snake, Wind and Bonnet Plume plus the western South Richardson slope habitat are not covered (CA map 18).



## Mayo District Renewable Resources Council

P.O. Box 249, Mayo, Yukon Y0B 1M0  
Tel.: (867) 996-2942 Fax : (867) : 996-2948  
E-mail : mayorrc@yknet.yk.ca

### Page 6 - MDRRC comments to PWRLUP draft

Grizzlies are known occupants throughout the Peel Watershed. Little survey and documentation has been done to date. However given known species habits and territories further protection through HPA status throughout the RCZ's would be optimum. This again reiterates the need for the RCZ's to extend from water, into the toes of the adjacent mountains.

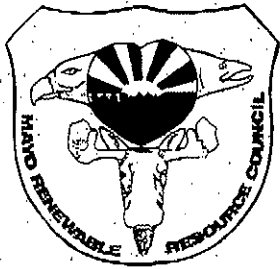
The South Richardson Mountain range is documented habitat for rare bird and plant species and is under no protection status what so ever. The area north of the Ogilvie Mountains also highly documented with rare species. Neither of these areas has been covered with any protection elements indicated particularly in the Richardson's. (CA maps 26.27)

The Watershed, the plan, to say nothing of the populations, could greatly benefit with these high usage areas being further protected through HPA (designated/recommended) status. The additional protection offered would further enhance the true possibility of future reclassification to Tier I Conservation Zones.

~~~~~

Any sub-regional and management plans/drafts for populations and land-use now in draft or operation throughout this watershed must be expressed in this plan now or the document will be incomplete and ineffectual. When or if they are adopted or revised, the PWRLUP will be prepared and adaptable. If they are not indicated initially, completion, adoption and incorporation later will become much more complex.

~~~~~



# Mayo District Renewable Resources Council

P.O. Box 249, Mayo, Yukon Y0B 1M0  
Tel : (867) 996-2942 Fax : (867) : 996-2948  
E-mail : mayorrc@yknet.yk.ca

Page 7- MDRRC comments to PWRLUP

There are a large number of references to management and monitoring in this draft. What body/s will be responsible for this and who will they be accountable to; i.e. "Who would the RRC's or anyone go to for information, data or file concerns?".

As this plan would largely affect First Nations traditional and cultural territories, principally the Na Cho Nyak Dun First Nation, and the Tetlit Gwich'in, Vuntut Gwitchin and Trondek Hwech'in, a localized office to handle data storage, activity registration, permitting, monitoring, and assessing information, would be an asset to the management of the plan.

~~~~~

Any further development of this plan requires determined complete stakeholder involvement. Proponents must provide timely notice of information sessions, with significant prior availability of discussion documentation.

~~~~~

This draft is a highly technical, complex document which is not user friendly. Documentation needs to be presented in layman's language to be understandable and workable to all users.

~~~~~

MDRRC would like to thank the Commission for its appreciation of these comments and concerns.

Sincerely

Frank Patterson, Chair
Mayo District Renewable Resource Council