

YUKON FISH AND WILDLIFE
MANAGEMENT BOARD



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June 26, 2009

Albert Genier, Chair
Peel Planning Commission
307 Jarvis Street
Whitehorse, YT Y1A 2H3

Dear Mr. Genier:

Re: The Peel River Land Use Plan

Thank you for the opportunity to comment on the Draft Peel Watershed Land Use Plan. As you know, the Yukon Fish & Wildlife Management Board (YFWMB) is the “primary instrument of Fish and Wildlife in the Yukon” (16.7.1), and we have deliberated the contents of the briefing note provided to us by your commission head planner, and our Executive Director has reviewed the plan in its entirety.

The Board respects the mandate of Renewable Resource Councils that have jurisdiction in the region that encompasses the Peel Watershed. The Board does not wish to dilute any influences they may have with respect to the recommendations or comments they put forth in this regard, however, we recognize that this plan has Yukon wide implications.

The Peel River Watershed is notoriously sensitive, and given the widely accepted view that northern ecosystems such as that of the Peel are slow to rebound from disturbance, the implications of the plan must be weighed carefully based on its long-standing influence. In addition, although the Board does not oppose economic growth, we realize that at times the cost of development can override the benefits to the economy if the development occurs in sensitive habitat, or if this development occurs as a result of poor planning. In addition, the Peel River Drainage has a high value in its natural state, and this is widely recognized.

In addition, the Board has worked on the issue of access management for many years and it is clear that in general, access is the most significant factor when problems arise with respect to habitat, or fish and wildlife management. Our mandate outlines a need to speak for Yukon fish & wildlife, and given the results of this planning process will weigh heavily on all land use decisions that influence this sensitive region, we must be mindful of the area’s significance both culturally and environmentally.

Furthermore, the Commission must consider the results from public consultations that have already taken place, both through the Peel Commission's own work, and through consultation completed through other agencies. The YFWMB undertook an exercise called "Yukon Fish & Wildlife – A 20:20 Vision, and members of the Peel Commission were in attendance during our Whitehorse meeting. Within this exercise, we commissioned a Yukon wide statistically valid and representative survey through Datapath Systems asking Yukoners many questions about Yukon fish and wildlife and the environment. One of the questions that we asked was "how important each of the following four areas were when making decisions on land use:

- Environment
- Scientific Data
- Social/Cultural/Lifestyles/First Nations
- Economic/Dollar value

Yukoners responded with 86% of their support for the environment, 80% for scientific data, 60% for the social aspects of decision making and economics was supported at 32%. This data has been published and this survey is attached to this letter for your review and consideration.

The Board was also made aware that in your public consultation the Peel Commission received overwhelming support for the scenario that provided a large amount of potential protection for the Peel River Watershed. This result may not be relevant to the plan being presented, but speaks to Yukoners values specific to this particular region, and the plan presented provides dedicated protection to only 11% of the land base of the Peel and access to all existing mining claims other than those that exist in the main river corridors. As a result, the plan awards surficial access to most existing claims, which seems to be a contradiction of the consultation that you undertook, and the reported positions supporting protection forwarded by all First Nation Chiefs that govern the areas of the Peel and the Council for Yukon First Nations.

Board staff found the Peel River Land Use Plan extremely difficult to read and navigate which raises some serious concerns about its usability. If this is a public document, with landscape designs that have policies attached to them that will directly influence land use, any lack of clarity in the interpretation of the contents of this plan will likely result in some serious stumbling blocks for future users and potentially legal action as a result. It is clear that there can be no room for debate once the plan is accepted on what its contents reflect. Therefore, some editing must be incorporated in order to provide a clear, and decisive land use plan that is user friendly.

Finally, the Board has a concern with the divisive debate that has arisen as a result of the drafting and consultation of the Draft Peel Watershed Land Use Plan. The Board has a mandate to comment on matters that affect Yukon's fish and wildlife and habitat, but our objectives also outline a key mandate to support renewable resource economies. The issue of mining, versus no mining – access, versus no access, or whether wilderness tourism operators are the perfect environmental stewards or just a part of the problem is not the crux of the issue. Yukoners need to focus on what will work for everyone in this plan, so that people from all walks can enjoy the Peel in a manner that does not

negatively affect its fish and wildlife, or the relatively pristine habitat of this highly sensitive area. The goal must be to create a plan that will ensure that socially and environmentally acceptable activities can occur in this region, with the aid of the most recent technology so that it remains as natural as possible for generations to come.

In summation, the core issues in this plan are land protection and surficial access, and acceptable development. This is not clearly defined in the plan, and in the Board's view – based on your published consultation results and the reported positions of First Nation Chiefs and the Council for Yukon First Nations; that plan does not address these issues adequately. Within the YFWMB's mandate, it is apparent that our role is to provide for protection of habitat for our children, and our children's children.

Sincerely,



Georgina Sydney
Chair, YFWMB

Cc. Chief Ed Taylor, Tr'ondek Hwech'in First Nation
Chief Simon Mervyn, Na-Cho Nyak Dun First Nation
Chief Joe Linklater, Vuntut Gwitchin First Nation
Dan Reynolds and Will Fellers - Dawson District Renewable Resource Council
Frank Patterson, Chair - Mayo District Renewable Resource Council
Robert Bruce, Chair - North Yukon Renewable Resource Council