



## YUKON LAND USE PLANNING COUNCIL

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June 17, 2009

Peel Watershed Planning Commission  
201 – 307 Jarvis Street  
Whitehorse, YT Y1A 2H3

Attention: Albert Genier, Chair

### **RE: COUNCIL'S REVIEW OF THE PWPC DRAFT LAND USE PLAN**

Dear Albert;

The Yukon Land Use Planning Council congratulates the PWPC on the production of its Draft Peel Watershed Land Use Plan. This is a significant milestone in the Commission's planning process. The Council recognizes that the document is a "draft" document and as such provides an opportunity for critical and constructive reviews. It is in this spirit that the Council provides the following comments on the draft plan.

#### Document Complexity and Flow

The plan is a large and complex document and requires considerable rendering and simplification to make it more "reader friendly" plan. The first chapter of the plan introduces too many foundational concepts that are not well linked. The plan contains the commission's: i) Statement of Intent; ii) Terms of Reference; iii) Plan Principles; and iv.) Management Goals. A reduced set of foundational statements should simply include: i) Management Principles; and ii) Plan Goals, both based upon the land claim agreements and the PWPC's Terms of Reference. From the Plan Goals, more specific Objective Statements should be built into later chapters.

There is also considerable redundancy in the information presented in Chapters 3: Plan Concepts, 4: Land Use Designation and 6. Landscape Management Units. A reduction of this duplication would help streamline the document.

#### Plan Concepts and the Land Designation System

The Council recognizes that the creation and application of the land designation system represents the Commission's attempt to balance and accommodate the many land use interests in the region. The designation system introduces a new concept to the system that was used in the North Yukon Regional Plan, this being land areas where existing subsurface rights are "grandfathered" but any additional

subsurface resource allocation is prohibited (Tier 2). The Commission needs to seek clarification from the Parties as to whether this has a legal framework to support it and if the Parties desire such a future state for the areas identified in the plan.

The Commission has recommended an elaborate set of Cumulative Effects Management Strategies. Cumulative effects management is required in regions which are envisioned to likely experience significant landscape change. Given that the plan as presented recommends little change in the region, it is reasonable to question implementing a complex cumulative effects strategy.

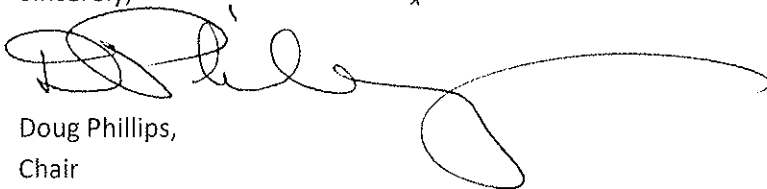
General Management Direction and Strategies and Recommendations throughout the Document

The plan contains over 300 recommendations and strategies which appear to have originated from the North Yukon Regional Land Use Plan or plans from other jurisdictions. There is a need for a rendering down of these to those that are relevant to the Peel region and that are not covered by the work of other agencies or by the implementation of the land claim agreements. The "situational awareness" that is present with the Parties (and their staff) should be utilized to identify the recommendations/strategies most appropriate to the region.

This document requires fundamental structural and conceptual changes that the Commission can begin to consider while the Parties are preparing their review. The Council recommends that the Commission begins to restructure the document by revising the Table of Contents, examining key terminology used throughout the document and reducing the redundancy between chapters. For further information regarding the points made in this letter, please contact our Director, Ron Cruikshank. Technical comments will be provided by the Council's Technical Working Group member (Jeff Hamm).

We look forward to receiving your Recommended Plan due September 30, 2009.

Sincerely,



Doug Phillips,  
Chair

Copy: PWPC Senior Liaison Committee