

**Comments on the Draft Peel Watershed Land Use Plan**

Submitted to:

Peel Watershed Planning Commission

By:

DUCKS UNLIMITED CANADA

June 16, 2009

Prepared by:

Jamie Kenyon

Ducks Unlimited Canada

Whitehorse, Yukon

(867) 668-3824

[j\\_kenyon@ducks.ca](mailto:j_kenyon@ducks.ca)

Bob Hayes

Ducks Unlimited Canada

Whitehorse, Yukon

(867) 668-3824

[bob\\_hayes@ducks.ca](mailto:bob_hayes@ducks.ca)

## **Comments on the Draft Peel Watershed Land Use Plan**

Ducks Unlimited Canada (DUC) is pleased the Peel Watershed Planning Commission has released the Draft Peel Watershed Land Use Plan for public input. We would like to submit the following comments for consideration.

We congratulate the Commission for producing this draft plan, particularly given the many stakeholders with varied, and often conflicting, interests within the Peel Watershed. The “Message from the Commission” (page iii) provides a succinct overview of the challenges the Commission faced and gave useful perspective on how the plan was written. There are many positive recommendations made by this plan. From our perspective, we are pleased to see areas such as Turner Lakes, Tabor Lakes, Jackfish Creek, and the riparian areas along river corridors assigned the highest level of conservation.

Explicitly stating management of aquatic resources as a key issue and as a goal for achieving the desired state forms a strong foundation for this draft plan. Although spread out within Section 5: General Management Directions, the components of a water management plan are present. DUC believes a water management plan is critical for the Peel Watershed and successful implementation of the General Management Directions relevant to water (e.g. 5.2.1.2 Hydrological Disturbances and 5.3 Aquatic Resources) will be sufficient to maintain ecological integrity of wetland and riparian habitats. However, we feel that there is room for improvements to the current management direction. Locations of monitoring sites for water quality and quantity need to be more local to adequately monitor impacts of development. Placement of monitoring sites only along main stems of the large rivers of the region is insufficient – sites should be placed based upon sensitivity not on ease of use. One approach to measuring stream water quality and quantity is to use the reference system that has been adopted by the placer mining industry in the Yukon, taking advantage of the CABIN software. A similar system for referencing wetland condition is currently in the design phase and would provide a method for determining impacts on wetlands within the Peel Watershed. DUC would like to see a recommendation included within the land use plan that highlights the need for this or a similar monitoring program to be adopted during the implementation of this plan.

DUC agrees that the use of Land Management Units is an appropriate approach for managing land use within the Peel Watershed. Determining the level of disturbance based upon the sensitivity of the ecosystem to disturbance will allow for sustainable development that leaves ecosystem integrity intact. The range of these zones we feel is adequate with respect to wetlands.

We are pleased to see the inclusion of a recommendation highlighting the need for a wetland inventory based upon the Canadian Wetland Classification System (pages 5-15 and 5-18). Previous work by DUC producing a landcover map for a portion of the Peel Watershed provides a start for constructing a wetland inventory.

We have worked with the Commission in the past discussing the location of boundaries for Jackfish Creek and Tabor Lakes (LMU's 7b and 7c, respectively). We would like to note that these boundaries were selected as an approximation of local watersheds (with the exception of the northern boundary of Tabor Lakes). Will the boundaries be properly surveyed or use sufficient satellite or mapping data to ensure they do follow actual height of land?

The scale of the maps provided make it difficult to determine if the riparian corridors along the major rivers encompass all associated wetlands. Clarity around what the boundaries are with respect to wetlands will be beneficial.

A note about point number five on page 5-17 regarding migratory birds. All waterbirds that use the Peel Watershed, including all ducks, geese, swans, loons, grebes, gulls, terns, and shorebirds fall under jurisdiction of the Migratory Bird Act.

With respect to climate change, we acknowledge the difficulty in planning for a phenomenon that has outcomes that are unclear at this time. We agree with the precautionary principle the plan recommends regarding sensitive wetlands requiring cautious management with a high level of conservation focus. A policy recommendation that the plan proposes deals with carbon sequestration in vegetation and soils. We would like to remind the commission that peatlands (bogs and fens) are able to sequester more carbon per unit area than other habitat types and these areas may be appropriate targets for sequestration purposes.

DUC is willing to discuss any of these comments with the Commission or any other issues related to waterfowl or wetlands within the Peel Watershed at the Commission's earliest convenience.