



National Outdoor Leadership School

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The Leader In Wilderness Education

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Reg Whiten P.Ag., MCIP
Peel Watershed Planning Commission
307 Jarvis Street, Suite 201
Whitehorse, Yukon Y1A 2H3

Dear Mr. Whiten:

We would like to thank the Peel Watershed Planning Commission and the planning staff for the years of time and effort that has been committed to producing the Draft Peel Watershed Land Use Plan. We also appreciate the continuing effort that the Commission and Planners are making to reach out to the public, to keep communities involved, and to maintain the website with up-to-date information so that the latest iterations of the planning process might be followed. Finally, we are grateful to have this opportunity to provide specific and targeted feedback on the draft plan in its current iteration. Future management decisions, which will have direct impacts on the National Outdoor Leadership School Society of Canada, will be based directly on guidance laid out in the plan.

With a rich outdoor education program that has been in operation on Yukon's rivers and wilderness since 1999, the National Outdoor Leadership School (NOLS) is a non-profit organization with strong ties to Peel Watershed recreation. NOLS students float the Hart and Bonnet Plume on courses lasting 27 days or more, enjoying one of the last best true wilderness experiences available on the planet. In addition to river travel, students also explore the Peel's tundra plateaus, boreal forest valleys, and remote mountain ridges. The unique combination of mountains, plateaus, and rivers, on such a vast scale, provides rare course opportunities for students and instructors alike.

NOLS courses have hiked off the Hart River Headwaters and lower down near the Peel. We anticipate running backpacking courses in the Ogilives east of the Dempster. We expect to lead hikes off the Wind River soon. Wilderness recreation in the Peel extends beyond the river corridor, but existing maps on recreational/guiding uses only address river travel. None of the mountains are marked as having hiking uses. We encourage you to consider hiking uses in the region, especially hikes adjacent to river corridors.

In its current iteration, the Draft Peel Watershed Land Use Plan (LUP) could have an inverse impact on the NOLS program, and on the established outdoor industry here. Essentially, we are concerned that this draft plan does not appropriately represent the public's desire as expressed in the last round of comments, nor does it preserve the bare

necessities of existing, sustainable economic sectors such as hunting, fishing, outfitting, guiding, wilderness recreation, outdoor education, and river running. Nor, does it adhere to the Peel Watershed Planning Commission's own guiding principles, including the Commission's Statement of Intent, the Precautionary Principle, and Sustainable Development.

The draft LUP does not "ensure wilderness characteristics, wildlife and their habitats, cultural resources, and waters are maintained over time while managing resource use." (LUP, 1-3) Scenario 2, in the previous iteration of the plan, did accomplish this. It also had the support of the majority of the public. Scenario 2 preserved the core of the Peel and its major tributaries, with sound management prescriptions for the Protected Area. A good balance was struck between sustainable and non-sustainable uses, preserving the wilderness core while leaving high-potential areas available for development. Limiting access within the protected area to winter roads preserved the rights of those with claims inside the zone, while maintaining the wilderness character. Ideally, there should be a core area where no travel is allowed at all, in the summer or winter. Setting a boundary for such a primitive area should take into consideration wildlife habitat and watershed health.

In many ways, this draft LUP does not go far enough to preserve the wild character of the Peel Watershed. The four major watersheds that are receiving the most protection, the Snake, the Bonnet Plume, the Wind, and the Hart, are still vulnerable to significant impacts in this plan. These rivers are the most crucial to backcountry recreation and outdoor education, as they remain true wild rivers. According to the draft plan, the majority of these watersheds are made up of Landscape Management Units that are to be managed as General Conservation Zones. Within GCZs all-season roadbuilding "may be permitted under certain circumstances" (LUP, 6-1). This level of protection is insufficient.

The clear, measurable circumstances that will govern road development, according to the draft plan, are linear densities of roads, and the overall surface area of impacts from development. (LUP, 3-13) For the GCZ, certain densities trigger either a cautionary level of concern, or a critical level of concern. In the case of linear densities, $.075\text{km}/\text{km}^2$ triggers a cautionary concern, and $.1\text{km}/\text{km}^2$ triggers a critical concern. Similarly, in the case of surface densities, impacts to $.075\%$ of the surface area trigger a cautionary concern, and impacts to $.1\%$ trigger a critical concern.

If the GCZs that make of the four rivers are considered as a single Landscape Management Unit, the potential for major development is striking. If LMUs 1a, 1b, 1c, 2a, 2b, 3a, 3b, and 4a are taken as a whole, they would be $37,853\text{ km}^2$ in total area. With an LMU this size, a cautionary concern would be triggered when $2,839\text{ km}$ of roads were built, or when $2,839\text{ km}^2$ were impacted by development. $2,839\text{ km}^2$ is roughly the size of Metro Vancouver, or of 386, 259 soccer fields. A critical concern would be triggered when $3,785\text{ km}$ of roads are built, or when $3,785\text{ km}^2$ of land are impacted – the equivalent of 514,966 soccer fields.

It is impossible to build 3,785 km of roads, or 515,000 soccer fields, and still maintain the integrity of the ecosystem, of wildlife habitat, and of the wilderness experience. Building thousands of miles of new roads to support energy and mineral extraction into one of the premier intact wilderness ecosystems in this hemisphere will likely drive sustainable economies based on the allure of that wilderness out of the region.

As the Planners and the Planning Commission move toward a final plan, we appeal once more for recreational uses beyond the river's edge to be considered. On NOLS courses, and on other commercial river trips, the experience doesn't end at the river corridor. Students, and clients, will take time off the river to hike deeper into wilderness areas. Broader buffers around River Corridor Zones would accommodate this use.

Bear in mind, as this plan moves toward finality, that there are certain advantages enjoyed by non-sustainable commercial interests that are not enjoyed by sustainable commercial interests. Should the government desire to eliminate existing minerals claims in a particular area, it expects to pay the claimholders for those rights. No such compensation is offered to the outdoor recreation industry when a landscape is lost. Ultimately, the sustainable economic sector has more to lose through the planning process.

The Peel Watershed is a world-class destination, and its reputation as a wild, untrammled expanse must be preserved for the long-term good of the Yukon. In hard economic times, destination vacationers will be more scrupulous in their selections. If the Peel Watershed Planning Commission would like the watershed to maintain a place among the top wilderness destinations in the world, the time to send that message is now, with a sound Land Use Plan that does what it needs to do to preserve the resource.

In life, when you undertake a major project, you spend some extra time at the beginning making sure you have the right tools for the job. If you don't have the right tools, you might make something workable, but it may have some flaws. The Peel Watershed Land Use Plan is the toolbox people will use to maintain this place. Please take the time to ensure that it is stocked with good tools.

Please do not hesitate to contact us with any questions or to discuss these matters further.

Sincerely,

Jaret Slipp
NOLS Yukon Director

Dear Mr. Whiten,

Thank you for considering the attached comments as you move toward finalizing the Peel Watershed Land Use Plan. If you have any questions or would like to discuss any matters further, please do not hesitate to contact us.

Sincerely,
Aaron Bannon

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