

June 30<sup>th</sup>, 2009

Peel Watershed Land Use Planning Commission  
Suite 201 - 307 Jarvis St.  
Whitehorse, YK Y1A 2H3.  
Email: [PWPCPlanFeedback@planyukon.ca](mailto:PWPCPlanFeedback@planyukon.ca)

Attn: *Reg Whiten*, Senior Planner  
Peel Watershed Land Use Planning Commission

Re: **Draft Peel Watershed Regional Land Use Plan  
Yukon Conservation Society Comments**

Dear Mr. Whiten,

Thank you for this opportunity to submit comments on the draft Peel Watershed Land Use Plan. We would like to thank the Commission and staff for all the hard work that has been done to date.

The Peel watershed is unique in the Yukon and the world. In the Peel there is an opportunity to protect large, intact, thriving ecosystems – arguably no other areas that will undergo land use planning in the future will have so much essentially pristine wilderness to protect. We urge the PWPC to acknowledge this unique opportunity and recommend full protection for 50-75% of the watershed.

Please find below our response to your questionnaire, as well as detailed comments.

First, however we would like to flag an issue of paramount importance. Anyone who has only looked at the map and the Plan Highlights would get a completely false impression of what the draft plan proposes. Under Summary Statistics “resulting disposition status in draft plan” is misleading since it implies that 59% of the Peel watershed would be protected (“withdrawn”). In fact only about 11% of the watershed would be fully protected under this draft plan.

Even more disturbing, is the fact that the map and the Plan Highlights do not show that the draft plan recommends allowing winter road access for mineral exploration into all of the Peel watershed except Tier 1 protected areas. This means that winter roads would be allowed in all of the General Conservation Zone as well as all Integrated Management Zones, whereas the maps make it look like winter and all season road access would only be allowed via the three access corridors shown on the map.

Road access is the single most damaging potential impact on wilderness quality, wildlife and cultural uses. Under this draft plan winter road access would proliferate throughout the heart of the Peel watershed, destroying the vibrant and growing tourism industry and impacting sensitive wildlife habitat, just to fuel a speculative exploration industry in a region that will likely never be economically viable to mine.

YCS is absolutely opposed to winter road access for exploration in the General Conservation Zone. We provide details below.

Sincerely,



Karen Baltgailis  
YCS Executive Director

**Questionnaire Response**

	Yes, cover to cover	Only certain sections	No
<b>Have you read the Draft Plan?</b>	<b>YES</b>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Staff at the Yukon Conservation Society have read the draft plan in its entirety. Regrettably, the draft plan does not go far enough to ensure that there is enough protection and limits on development to conserve the ecosystems about which the commission has brought together an impressive amount of information.

	Yes	No
<b>Have you read the Highlights of the Draft Peel Watershed Regional Land Use Plan?</b>	<b>YES</b>	<input type="checkbox"/>

Comments: Staff at the Yukon Conservation Society have read the Highlights of the draft Peel Watershed Regional Land Use Plan. The Highlights document is misleading in that it says that 59% of the watershed is proposed to be withdrawn. In fact only approximately 11% is proposed for full protection. The General Conservation Zone would provide only partial protection (from new staking), while allowing winter road access for exploration of existing claims, and all season access if a mine is ever developed. This cannot be called protection.

The map is misleading because it does not show that winter road access for exploration would be allowed everywhere in the watershed except Tier 1 protection zones.

<b>1. How much do you agree with the following statement?</b>	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
The Plan succeeds in fulfilling its Statement of Intent (page 1-3)	<b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: The Statement of Intent says the plan will “ensure wilderness characteristics .... are maintained over time” This has not been met. The access roads to get to existing claims will destroy the wilderness character and have serious impacts on fragile species like caribou. Mines and roads are never reclaimed to the point that the original wilderness character is restored, and historically their toxic environmental legacy has been paid for by taxpayers.

<b>2. To what extent do you think the Draft Plan adequately addresses the key issues of:</b>	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
a) management of sensitive ecosystems for water, fish and wildlife	<b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) long-term maintenance of the region’s wilderness character	<b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) access to existing mineral claims for further exploration and development	<input type="checkbox"/>	<input type="checkbox"/>	<b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>
d) realizing future long-term economic potential, while ensuring full restoration of surface disturbances	<b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

The draft plan does not adequately provide for “management of sensitive ecosystems for water, fish and wildlife” as it does not adequately manage all sensitive ecosystems within the study area. For example, the lower reaches of the Peel River, the upper reaches of the Snake River, the higher altitudes of the Richardson Mountains and the portions of the Ogilvie River watershed west of the Dempster Highway.

The draft plan does not provide “long-term maintenance of the region’s wilderness character” due to the provision of access roads to serve the over 12,000 mineral claims.

The draft plan does provide “access to existing mineral claims for further exploration and development”, but this is not a good thing. It destroys the ecological integrity of the watershed and favors one form of economic activity over all others.

The draft plan does not achieve “realizing future long-term economic potential, while ensuring full restoration of surface disturbances”, because if access to mineral claims is permitted the economic potential of tourism, outfitting and traditional harvesting is sacrificed. Furthermore, it is extremely unrealistic to think that mines and roads can be reclaimed. To our knowledge no substantial all season access road has ever been reclaimed in the Yukon. Once a road is built it will be used to access other resources - there will always be a reason to keep it open. Even if there ever was an attempt to close a

road, the recovery to a natural state of soils and trees and other vegetation after being cleared for a road can take more than a hundred years.

Winter roads are also extremely difficult to reclaim. Once trees are cleared for a winter road the scar remains for decades, especially in our northern climate where tree growth is extremely slow. Parts of the Wind River Trail are still visible scars after decades of ‘recovery’. Limiting access to winter is meant to protect soils, and riparian areas where water crossing are needed. In fact however, thick snow cover is quite rare in places like along the Wind River, so soil damage and damage to permafrost is likely. Also, at least one tributary to the Wind River does not freeze in winter due to a hot spring. Winter roads are NOT consistent with maintaining the wilderness character of the Peel.

**3. Do you feel the Land-Use Planning Framework (General Management Goals, Zoning, Landscape Units, and Indicators) includes the appropriate tools to address the issues above for land-use planning in the Peel region? Why?**

Yes  No  Undecided

Yes, the land-use planning framework does include appropriate tools to address the issues. However, the tools have not been stringently applied when examining each sub-region within the Commission’s mandated area.

Also, there is little point in having water quality and water flow indicators – once water quality and flow are impacted it is too late – activities that potentially have these impacts should not be allowed. Once a mine or oil and gas activities are in place it is extremely unlikely that they would be required to make significant changes to their activities. Furthermore, in their Feb. 27, 2009 comments to the PWPC Water Resources has stated that they do not have the resources to do the kind of monitoring that would be required for these indicators, and adequate baseline data does not exist.

The Habitat Availability indicator is of limited usefulness. A single access road can have huge impacts on the viability of wildlife populations, due to hunting and fishing by humans.

**4. Overall, how much do you support these key recommendations?**

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
e) 37 % of the total region in the an Integrated Management Zone (IMZ)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) 15% of the total region in Tier I Ecosystem Protection zoning	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) 48% of the total region in Tier II Wilderness Conservation zoning	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) 59% of the total region is recommended for land withdrawal	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Measures to manage cumulative effects of multiple land use activities based upon application of appropriate land-use indicators	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Recommendations for limitations on surface access and complete reclamation of new roads.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

e) YCS has concerns about some of the specific Integrated Management Zones. These are addressed below.

f) There are not enough Tier I Ecosystem Protection Zones. 11 - 15% is not nearly enough for full protection. Conservation science shows at least 35% to 75% of a region needs to be protected to adequately protect ecosystems and wildlife. We provide details below.

g) YCS has concerns about what is allowed in the Tier II Ecosystem Protection Zones. These are addressed below.

h) YCS strongly endorse the “59% of the total region is recommended for land withdrawal”. However, the draft plan only proposes to withdraw the area from staking - the provision of access routes to grandfathered claims in these regions would negate the whole intent of the land withdrawal.

i) The “Measures to manage cumulative effects of multiple land use activities based upon application of appropriate land-use indicators” are not adequate. This is not because of a disagreement on the type of indicators (direct surface disturbance, linear density, water quality indices, water flow indices, river corridor zone crossing, habitat availability, minimum core area, minimum patch size, sensory disturbance) but rather the end result in how they were applied. In particular, in the General Conservation Zone the Commission’s application of the indicators somehow permits the possibility of mines and access routes. Shouldn’t the indicators negate these activities?

The draft plan leaves far too much up to future policies, vague references to future planning, research and best practices. It is essentially a mining and oil and gas plan, except for the proposal to withdraw part of the watershed from staking, and to protect 11% of the watershed.

**5. What other recommendations would you make to the Commission for alternative land-use zoning (please be specific on Zone type and which major or sub-unit LMU(s))?**

See below. Section 6 focuses on general comments, Section 7 on specific zoning or sub-unit comments.

**6. General Comments**

The Mandate of the PWPC, and Plan Principles and Terms of Reference

As stated on Page 1-1 and 1-4 of the draft plan, the PWPC is an arms-length commission, and an independent, public agency appointed to represent the best interests of Yukon people. It is imperative that the PWPC **NOT** make assumptions about what kind of plan the Yukon government would accept. In the letter to the editor signed by Deputy Ministers Kelvin Leary and Angus Robertson, Premier Fentie is quoted as advising Mr. Leary that “the identification of conservation areas should stem from the

land use planning process created out of the Umbrella Final Agreement and not from any one specific department.”

This means that the Commission’s direction from the Premier is to produce a plan that recommends the level of protection that the Commission feels is necessary to protect the unique ecological, cultural and tourism values of the Peel watershed – without second-guessing what the Premier or Energy Mines and Resources would like. The letter to the editor states that the Yukon government will respond to the recommended plan later in the process. *The Yukon government is not telling the Commission what kind of recommended plan to produce.*

On page 1-4 of the draft plan, the planning Commission commits to: “carefully consider all information, advice, or recommendations provided to it by any government agency, or the public ...” Although the full 22 page document with Environment’s comments on the Scenarios report may not be provided directly to the Commission by Yukon government, this document is now in the public domain. YCS is submitting this document to you as part of our submission. No matter who made the decision not to submit this document to you, it provides expert advice from departments that have been providing you with technical information during the planning process. Energy Mines and Resources’ comments on the Scenarios draw conclusions and make value judgments based on that department’s expertise. It is critical for Environment’s expert judgments to also be considered by the PWPC.

These are available on the internet (and thus in the public domain) at [http://www.yukon-news.com/news\\_docs/2009/june/19/Enviro\\_Memo.pdf](http://www.yukon-news.com/news_docs/2009/june/19/Enviro_Memo.pdf).

The Commission’s Terms of Reference commits to “recommend measures to minimize actual or potential land use conflicts throughout the planning region” and “recognize and promote the cultural values of the affected First Nations and other affected Yukon Indian people.” The draft plan does not recognize and promote the cultural values of the affected First Nations. These First Nations have clearly stated that they want full protection for the watershed – the minimal protection afforded by the draft plan does not promote their values. If roads and mining development are allowed in the heart of the watershed there will be continual conflicts as evidenced by the outcry when Cash Minerals proposed a winter road along the Wind River for mineral exploration.

#### General Conservation Zone and Ecosystem Protection Zones

Together the proposed General Conservation Zone (GCZ) and Ecosystem Protection Zones (EPZ) in the draft plan could go a long way toward providing long term protection for ecosystems, wildlife, cultural values and tourism – **if the General Conservation Zone is upgraded to Tier 1 protection. In particular, road access (both winter and all-season) must not be allowed in the currently proposed GCZ.**

Please see our comments below regarding roads.

If the GCZ is upgraded to Tier 1 protection, the GCZ in combination with the EPZ's will provide a large core area of wilderness, which is essential to the tourism industry. It will also protect important habitat for the Porcupine, Hart River, and Bonnet Plume Caribou Herds, moose, Dall's sheep, grizzly, marten, Peregrine Falcon, water birds, breeding birds, and birds of conservation concern, as well as rare and endemic plant species.

Later in this document we also recommend upgrading protection of LMU's 9a, 7a, 1a and 1b, and provide reasons for our recommendation.

#### Future Planning, Research and Best Management Practices

The Peel plan needs to be as specific as possible. It is highly unlikely that sub-regional plans will be developed in the future due to the lack of funding for planning. As Environment notes in the 22 page document that was not submitted to the PWPC, there is limited funding for research and monitoring either.

The likelihood of roads and mines being decommissioned after use is also extremely remote, judging from past history.

Statements like: "Surface disturbance should be minimized" and "potential new all season roads require careful assessment and management" provide no protection whatsoever. Only firm lines on maps and explicit statements about what activities are and are not allowed in each Landscape Management Unit are effective.

#### The Commission's Approach to Mining

The Message from the Commission (page iii – v of the draft plan) states that the PWPC used the principle of Sustainable Development to sort out its priorities. These Commission states that its priorities are: "Sustain ecosystem integrity *first*, sustain communities and cultures *next*, and foster sustainable economic activities *third*."

The Commission's approach to mining is not consistent with the principle of sustainable development that it is supposed to be following. It appears that the Commission has decided that all existing mining claims and most known oil and gas potential must be allowed to be exploited. There is no evidence that ecosystem integrity or sustainability of cultures has been considered at all. There is no ecological or cultural justification for allowing non-renewable resource extraction everywhere that it has potential.

The 2006 Gartner Lee report and 2002 Hatch report both indicate that it is highly unlikely that any of the mineral exploration projects in the Peel will ever become operating mines. The Peel is too far away from access, power infrastructure and markets. Significant protection in the Peel watershed will not kill the mining industry in the Yukon. It would only withdraw about 8% of the Yukon's land base from mining – and this is a land base that is among the least economically viable for mining in the territory.

Access to claims, and the possibility of mines, should not guide the Land Use Plan.

### Withdrawal from Staking

The Commission is to be commended for recommending that the Yukon government withdraw the General Conservation Zone from further staking.

YCS strongly recommends that the PWPC request the Yukon government to impose a moratorium on staking throughout the mandated area until the planning process is over. YCS recognizes and applauds the commission for asking for this at the beginning of the land use planning process. It is worth noting that YCS has heard there will be ongoing staking throughout the summer of 2009 in the general conservation zone by companies interested in developing uranium projects.

In addition, YCS recommends that the PWPC ask for a moratorium on oil/gas requests for postings until the final plan is accepted. The next deadline coming up is July 15<sup>th</sup> and the entire Peel Watershed (excluding Class A First Nation settlement land) could be requested. More information on this is available at <http://www.emr.gov.yk.ca/oilandgas/rights.html>.

### Compensation for Existing Claims

More than 10,000 claims have been staked in the Peel since land use planning began. Please do not let the Yukon Government's statement that there will be no compensation for, or expropriation of claims, influence the Commission's recommended plan. It is not up to the Commission to deal with existing claims. It is the Commission's job to produce a strong plan that the Yukon public and First Nations can support.

The claims should not influence the Commissions work.

### Access Routes

The concept of providing the three recommended access routes would appear to be driven by the perceived need to eventually provide year-round land access to existing mining claims should they be developed into mines.

Apart from the conflict of having mineral access dictating land use planning (discussed further below) it is instructive to look how the North Yukon Land Use Plan approached this.

Their plan did not provide the possibility of year-round access to the Rusty Springs mining claims, located on the west side of the Fishing Branch territorial park.

The claims are still there, and as far as can be determined limited exploration is still occurring by equipment that is flown in and out.

The North Yukon Land Use Plan went ahead without having the concept of year-round land access to these claims drive the planning process.

### Suggested Outcome for Access Route Issue

One of the things that make the Peel watershed so unique for wildlife habitat, cultural uses and tourism is that there isn't road access except for the Dempster Highway. The access routes that the Commission has proposed in the draft plan seem to be based upon where the mineral claims are – they do not seem to have any basis in sustaining ecosystem integrity and cultural values. The benefit of proposing access routes is that it sends the signal that access will not be allowed everywhere. But realistically the environmental and cultural impacts of proposed access if a mine were to become viable in the Peel would require much closer analysis and negotiation between Yukon government and the affected First Nations. Putting a line on a map at this point in time is arbitrary.

The draft plan talks about roads and mines being decommissioned later on. We would challenge anyone to show one substantive all season road in the Yukon that has been effectively decommissioned. Not only is it physically difficult – the will is never there to decommission roads once they exist. Mines are rarely permanently shut down – there is always the potential for more ore to be extracted, so there is always an excuse to leave roads in place. Also, once all season access exists, spur roads would likely be developed to marginal deposits. And the meager reclamation security that mines like Minto, Carmacks Copper and Wolverine are required to provide give no assurance that future mines will be required to put down anywhere near the required money to ensure effective clean-ups and decommissioning.

Section 6 Landscape Management Units shows that the draft plan would allow winter roads everywhere in the Peel watershed except Ecosystem Protection Zones, which make up 15% of the watershed at most. Allowing a proliferation of winter roads for exploration is not consistent with the Commission's Statement of Intent. Roads, including winter roads, are not consistent with maintaining wilderness characteristics.

Winter roads can have serious impacts on viewsapes, water quality and wildlife. In areas like caribou winter habitat, winter roads can cause disturbance to wildlife at a time when animals are vulnerable. Trees and shrubs are cleared, leaving a scar that will be visible year round for decades. And snow cover in the much of the Peel is light so it's hard to get deep enough snow to protect soils, making rutting and damage to permafrost likely.

Even in winter, river crossings can damage riparian areas. Along the Wind River the proposed winter road would cross more than 100 streams – at least one doesn't freeze due to a hot spring. And once a winter road is built the likelihood of this 'existing access' becoming all season is much greater.

River crossing are another huge impact on wilderness character.

Furthermore, the Commission's Terms of Reference state that the Commission's job is to "recommend measures to minimize actual or potential land-use conflicts throughout the planning region." The extreme controversy generated when Cash Minerals proposed a winter road and air strip along the Wind River last year shows what will continue to happen if winter roads for exploration are allowed. Mineral exploration has been

occurring in the Peel for almost 50 years. Almost all of this exploration has been by air. If existing claims are grandfathered they should continue to be explored by air.

## **7. Specific Concerns**

### **Sheep Habitat**

YCS is concerned about the lack of protection of Dall's sheep habitat along the Richardson Mountains – particularly in Zone 9a (proposed to be an IMZ Level II). Given the possibility of an access route immediately adjacent (in LMU 12a) and the existing access along the Dempster Highway (in the North Yukon Land Use Plan – their LMU 10a) the impact from human disturbance could be very severe. YCS recommends that this become a IMZ Level I or Critical Landscape Zone. There seems to be little mineral or oil and gas potential in this LMU.

The sheep lambing areas along the lower Snake River also need to be protected by zoning it a critical Landscape Zone.

### **Caribou**

#### **Bonnet Plume Caribou Herd**

YCS is concerned about the lack of protection for the Bonnet Plume Caribou Herd – particularly in zone 1b.

Zone 1b has been heavily staked by Chevron Corporation in what is known as the Crest iron ore deposit. It is also important Bonnet Plume Caribou herd winter and fall range.

While the Crest iron ore deposit might well be one of the largest iron ore deposits in the world, it is also quite possibly one of the least economically viable deposits in the world. The lack of enough year round water to feed the needs of a mine, the lack of transportation and energy infrastructure, and the low grade of the ore all make it extremely unlikely that an economically viable mine could ever be developed.

The Bonnet Plume Caribou herd range needs similar protection to that afforded the Hart River Caribou herd (a portion of whose range – LMU 4b – is zoned as Critical Landscape Zone (CLZ).

YCS recommends that that LMU 1b change from IMZ IV to IMZ1, and LMU 1a be zoned Critical Landscape Zone (CLZ). There is little mineral potential in LMU 1a and none of the wells drilled in the Peel Plateau and Plain basin have resulted in a significant discovery.

LMU 1a is also one of the richest areas in the Peel watershed for breeding birds, with 31-50 species. This is another reason to zone LMU 1a as Critical Landscape Zone.

Furthermore, 1d, which has been zoned Critical Landscape Zone is too small to function ecologically – it needs the support of a surrounding protected landscape.

The Bonnet Plume Caribou Herd also uses the Wind River area in winter, which is another reason why a winter road along the Wind River is not acceptable. As stated on Page 35 of the Conservation Priorities Assessment report, “human activity and noise along such linear corridors force caribou to use more energy to avoid the disturbance, by foraging more often in poorer quality habitats, and by having to avoid use of some high quality security habitats.”

### **Porcupine Caribou Herd**

The Porcupine Caribou herd range also does not receive adequate protection in the draft plan. The Winter Concentrated Use area north of Tombstone Park should be a critical Landscape Zone, and the winter Moderate Use area in LMU 6a and LMU 5a should be IMZ1.

### **Boreal Caribou Herd**

The Boreal Caribou Herd winter range in LMU 7a should be zoned Critical Landscape Zone. It appears that the main reason that LMU 7a has been zoned IMZ1 instead of Critical landscape Zone is that the Commission is recommending road access to the Crest deposit through this area. We recommend that road access be properly examined if the Crest deposit is ever economically viable, rather than downgrading a zone that is so important to the Boreal Caribou Herd because of the remote possibility that a road through this zone may someday be considered appropriate.

### Moose

The draft plan does not directly address protecting important moose habitat.

The Conservation assessment Report shows that Tr’ondeck Hwech’in local knowledge identifies the Blackstone River and the lowland area east of it as important moose habitat. This means that it is essential to protect a wide river corridor on the Blackstone and to avoid road access into the area. Because this area is so close to the Dempster Highway it is even more important to avoid road access into LMU 5a, since over-hunting could easily occur if there is access into LMU 5a off the Dempster.

The presence of moose late winter key areas along the lower Wind and upper Bonnet Plume and Snake Rivers is another reason not to allow winter roads to explore mining claims.

### Highway Corridors – LMU 5 and 6A

Protect views along the Dempster Highway. While the Dempster Highway was originally constructed as a road to resources (resources in the traditional sense of metal ores and fossil fuels) it has become a tourist road. To this end, the viewscape of the highway corridor is now important to tourists who will remain within the road corridor

for their entire trip through the Peel Watershed yet wish to view unspoiled vistas. To this end, development in and around the Dempster highway corridor should emphasize that it must be out-of-sight of the actual highway.

This concept is similar to what has occurred in the Alaskan panhandle regarding the interaction between the cruise ship industry and logging operations. In order to maintain the façade that Alaska is an unspoiled wilderness logging activities are not carried out along the mountain slopes that are visible from the cruise ships. They are done out of sight.

### River Corridors

Rivers are the arteries of the landscape for both wildlife and tourism.

We support the PWPC's recommendation that there be no grandfathering of subsurface claims in six of the major tributaries. Clearly the entire Peel main stem needs the same protection – it is very odd that the Peel main stem was not included.

However, while the draft plan says that river corridors will be protected, the wording is so weak that the actual result will not be protection of river corridors. On page 4-8 of the draft plan, it says that road development for all-season access is “strongly discouraged.” This kind of weak wording will not protect river corridors as an exception can always be claimed. The draft plan is unclear about whether road access will be allowed along parts of the 6 major tributaries. It clearly allows access along the Wind River. It is impossible to limit impacts to tourism, wildlife, and traditional activities from roads near rivers. Sound carries great distances and linear corridors are avoided by wildlife like caribou. The plan needs to clearly state that roads and river crossings will not be allowed in RCZ's.

The draft plan does not indicate the width of the river corridors. It is unclear what is being preserved, be it riparian habitat, animal corridors, or viewsapes. The first two could be accommodated if the third issue, viewsapes, was the deciding factor in determining the width of river corridors.

The entire glacial valley, up to the toe of the mountains on each side of all rivers needs to be protected for wildlife. To protect viewsapes the slopes of the mountains visible from rivers also need to be protected. It is not appropriate to “consider future expansion” of rivers corridors because this is very unlikely to occur. The PWPC needs to make clear, strong recommendation if river corridors are to be protected.

### Percentages of Protection

Fully protect at least 50 – 75% of the Peel from industrial development, including the Hart, Wind, Snake and Bonnet Plume River watersheds, and important cultural areas along the northern Peel main stem.

All important First Nations cultural areas need full protection, including the Tr'ondek Hwech'in cultural area north of Tombstone Park.

### Peel River Watershed and Climate Change

Strong protection of the Peel River Watershed will help Yukon Government meet its goals set in the Climate Change Action Plan: to enhance our knowledge and understanding of climate change, improve our ability to adapt, reduce greenhouse gas emissions and lead Yukon action in response to climate change.

The boreal forest and wetlands in the Peel River Watershed are critical to the Yukon and the world as carbon sinks, where CO<sub>2</sub> is captured and stored and oxygen is produced. Retaining the watershed's ability to provide natural carbon sequestration will become even more important to the Yukon when greenhouse gases and ecosystem services are accounted for economically, which appears increasingly likely.

Carbon intensive industrial development is causing climate change, which affects the land and will continue to do so at an exponential rate.

Caribou herds are threatened throughout Canada and in the Yukon due to industrial development, roads and residential development. Disruptions to caribou habitat are expected to increase as climate change continues to alter the landscape. The Peel River Watershed contains critical habitat for the Porcupine, Bonnet Plume, Boreal and Hart River Caribou herds. These herds are vital to the food security and cultural survival of a number of aboriginal peoples in the Yukon and NWT. Caribou, and all other species of wildlife, will need large areas and intact ecosystems in which to adapt to the changes facing their habitat from climate change.

Yukon Government says it wants Yukon “to become a region able to minimize the negative impacts of climate change, committed to mitigation and willing to recognize and act on new opportunities presented by climate change.” Protecting the majority of the Peel River Watershed from industrial developments like mineral, oil and gas exploration and extraction, road development and logging, will be an excellent step toward achieving this. To help Yukon Government in its commitment to mitigation, the Peel Planning Commission should not allow carbon intensive industrial activities to occur in this globally significant region.