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Re: A Draft Protected Areas Strategy for the Yukon, July 1988

I understand that this public draft of the Protected Areas Strategy is this government's attempt to meet its commitments towards the implementation of a network of protected areas while reassuring resource industries of every scale that their interests will be considered in the process. I think the Strategy falls short of this goal and the main reason is that it is based on certain rigid assumptions. It assumes that development interests are incompatible with maintaining ecosystem integrity. It assumes that tourism and hunting activities are of low environmental impact.

Polarised opinions on this topic are due I think to differing worldviews. Protectionists look at a planet in crisis and see an opportunity to protect large tracts of wild lands while they are still viable candidates for protection. Developers look at the Yukon as a land which is capable of sustaining a local economy and which is under no immediate threat of over-development.

I assume it is the role of this Strategy to balance both worldviews, to ensure that global environmental, as well as local community concerns are being met. I think that this present draft should strengthen its position of "respecting economic interests and the many Yukon families whose livelihoods depend upon resource industries" (p.1). In its present form, it does not really reassure anybody concerned.

We have the opportunity to learn from the experiences of other jurisdiction throughout the world. Obviously, more homework is needed. In Chile, intense eco-tourism in a well-advertised park poses serious environmental stresses, while lesser known areas of lesser level of protection, but still under special management, retain their ecological integrity. In the Arctic, wildlife viewing activities, first thought to be an example of a "sustainable economy", had to be curtailed due to wildlife disturbance. In Africa, the north-American model of "parks" was locally found to be incompatible with local community structures and relationships with the wildlife and the land that sustains it.

On the other hand, superb examples exist of mining in sensitive areas. The Alaskan Green's Creek, Valdez creek and Usabelli mines offer models of flexibility and benefit to the community. During the last workshop, the Yukon Chamber of Mines proposed a model of sequential mining; somebody else asked if logging would be allowed if a forest fire were to consume timber within a protected area. I do not recall any opposition to

those ideas yet, at no point in the further discussion has the government considered the viability of such options.

I would like to see these options explored. Repeated statement that development will not be permitted in core areas lock us into an inflexible position that we, as a society, may want to change further down the road. I would like to see an honest attempt at asking the difficult questions, at least considering other options.

Some questions have been asked since the beginning of consultation and are still awaiting an answer.

- How much will this cost? Can we afford this?
- What is the compensation policy for interest holders that will be affected? Lessons can be learned from other jurisdictions.
- What is the basis for the need for 23 core areas with maximum level of protection? The commitments agreed to in the Whitehorse Mining initiative were set when the Yukon was divided in eight "landscapes". In light of this new target of 23 large core areas, maybe these commitments could also be revised.
- How big will these core areas be? The government refuses to put a cap on the areas potentially covered by protected areas. I suggest establishing a maximum percentage of each ecoregion to be protected.
- Does the government have the expertise in conservation biology to carry this initiative through in a scientific and accountable manner?
- Where is the provision for the evaluation of the impact of proposed protection and allowed activities (such as tourism) on ecosystems? This item is still being avoided despite having been brought up by many different interest groups during previous consultation. It should be stated in the main document that options such as quotas of visitors are being considered.

Some assumptions require rectification.

- Development does not occur in a legislative vacuum. The document gives the impression that without protected areas, the integrity of the land-base would be at risk. In fact, in today's regulatory landscape, no new project can go ahead without the scrutiny and general approval of the community through the different permitting processes. The legislative review required by the participants of the last workshop would have helped clarify this issue.
- Contrary to what is stated, interim protection does "change land uses that are already in place" (p. 17, sidebar). Although mineral claims remain valid, activities requiring permitting can be and have been prohibited, due to the protected status of the land.
- The designation of a Heritage River, although it invites a management plan, does not make it a protected area.

Some concepts require clarification

- The concept of buffers and corridors needs elaboration. The industry needs certainty regarding the land uses outside these areas. The impact of protected areas on land managed through the laws of general applications must be addressed.
- The process for the establishment of goal 2 needs to be elaborated in the main document.
- Goal 2 objective 5 "to protect wilderness values". It is unclear on how this would differ from goal 1. This actually leads to quite a bit of confusion and mistrust. If these

areas do not fit into goal 1 and are proposed in addition to the core areas, they shouldn't have the maximum level of protection as proposed for the candidates for goal 1. Most of the Yukon would qualify as wilderness. This should not be reason enough to impose maximum level of protection if these large areas do not satisfy the criteria for ecoregion representation.

- In the main document, one study area is proposed, while the technical paper no3, p.6, states that more than one study area can be established. This is an important difference and should be stated in the main document. It also states on page 7 that a study area is an area that is being formally proposed for protection. This implies that the whole area is proposed for protection. I do not believe that this reflects the spirit of what was said in consultation. A study area, in fact, is an area larger than what may be finally proposed. This, if stated clearly, will help minimize conflict in the final stages of boundary selection.
- Map notation vs interim protection. The use of map notations, if considered (this is unclear) should be stated clearly in the main document. In addition, to reflect consultation, the technical document should specify the total number areas simultaneously under interim protection, have a maximum span of 3 years, and not be automatically extended if no decision has been made.

If the goal to reassure industry and its investors is to be met,

- The questions raised earlier in this letter will have to be answered.
- Stakeholders will have to be invited at the table as interest holders, whether they live in the area considered or not.
- The main document should include goal of avoiding high mineral potential areas in Process, step 1 (p.15).
- The commitment to collect more data if necessary should be made.
- The outline of management plans should be elaborated earlier in order to help with the decision-making process.
- Criteria for representation should be elaborated more to reflect our local reality, as well as up to date ecological thinking
- Trans boundary coordination should be discussed.

The implementation of the PAS will have a very strong impact on the many facets of the Yukon landscape. I hope that these suggestions will be considered.

Thank you for giving me the opportunity to express my personal views on this very important topic.

Danièle Héon

released by re-analyze

520 ops
78 collecter

1738

BCFG

B how many samples

CE half
FSE
GS half

HS 4.50
BI 3.00

7.50

900,000
\$10,000