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24 April 1997

MEMORANDUM

To: Scott Milton (F-1)

From: David Downing (F-4)

Subject: Proposed Approach, Yukon Protected Areas Strategy

The *Yukon Protected Areas Strategy* document incorporates several fundamental policy changes with significant resource management and economic implications, generates a lack of trust in the architects through an extremely biased analysis, fails to realistically present a process that includes appropriate stakeholders consultation and, includes major cost and time requirements from this department in the current fiscal year. I thus concur with your statement that “the products and timelines of the strategy require close scrutiny.”

Policy Changes

The Protected Areas Strategy as proposed includes several fundamental policy changes which have significant implications on natural resource and land management and on resource economics.

- First Nation selections used to facilitate a protected areas strategy.
While there can be cases where this policy could facilitate settlement of a specific issue, in general it circumvents public and stakeholder participation.
- The use of withdrawal orders to protect candidate areas while the government ponders.
If ever there was an approach that will send a negative investment message to the natural resource industries this is it.
- Provide full park protection to a wider range of protected areas.
Full park status is the most limiting of possible protection choices. It removes the land from general use and reserves it for only a narrow segment of the economy and in practice for only a narrow segment of the population.
- Protection is to be provided for all ecoregions in Yukon.
Protection of ecoregions stems from an international agreement. Consideration to where these ecoregions are adequately protected or partially protected in other jurisdictions should be included in the Protected Areas Strategy.

Lack Of Trust

In the drafting of government policy I would expect to find a best effort toward consideration of the overall public interest. This document presents such a biased analysis that it undermines the trust relationship between departments that should exist for a productive business environment.

- The mandates quoted as justification for the strategy when read do not come close to supporting the actions supported.
- There are seven major benefits stated versus two minor costs. Is this a balanced analysis?
- The “Opportunity Costs” section blatantly and irresponsibly understates the opportunities lost. There is no mention of lost royalties, lost taxes, lost energy self sufficiency, lost diesel fuel import substitution, lost infrastructure development, lost hydro and coal development or the access barriers created to resource development and infrastructure development.
- “The cumulative impacts of development have already seriously affected wilderness in the Yukon.” Is there documentation of this? Is this statement a government position?
- The energy and mining sectors of the Yukon economy dwarf all others. There is mention of only one local mining industry group in the consultation list. There is no mention of any national mining groups, energy industry groups or oil and gas industry groups
- The time-frames in this document indicate that this strategy is already moving ahead. There is not enough time allowed for consultation with major mining, energy, oil and gas or pipeline industry groups. Is it a done deal?

Costs And Process

The last circulated draft of the Yukon Parks Selection Process focused on the use of Multiple Accounts methodology to facilitate planning decisions. This Protected Areas Strategy document does not mention the proposed planning methodology.

The current year includes establishment of protected areas in the Bonnet Plume, Eagle Plains, Peel Basin and SE Yukon. These areas include significant oil and gas and other energy resource, such as coal and hydro, potential. What is our time-frame for undertaking the resource assessments required for these areas and what resources in terms of dollars and personnel are available to the department to undertake these assessments?

In summary I would like to ensure that this document is consistent with and reflective of Yukon Government policy; that the strategy incorporates a balanced approach that will fall within a framework of sustainable development; the strategy includes realistic time frames for consultation with a comprehensive set of stakeholders; the strategy includes a workable methodology for planning decisions and; the strategy timelines and deliverables be achievable with respect to department and government budgets.

(signed by)

David Downing
Oil & Gas Analyst
Energy Resources Branch
Mines & Resource Development Division