

**Comments on Draft One (“working group draft”):**

- The **types of areas** that will be designated need to be defined along with along activities and restrictions. These included core area designations, buffers and corridors.
- **Criteria** for designating protected areas of all types need to put forward for public discussion.
- **Priorities** for establishing protected needs to laid out: what values/attributes are being protected? Recreation vs. ecological values, aesthetics, viewsapes, habitat etc.
- **Legal instruments** for enacting protected areas measures need to be defined, gaps in existing legislation need to be spelled out.
- Protecting “**wilderness**” is problematic as an objective, scientifically-based definition of wilderness does not exist.
- **Recreation** and tourism activities do not need to be “protected”. They are an outcome of a network of PA’s and will need to be carefully managed.
- Emphasis should lie in **values and objectives** rather than in protecting specific areas. The key is how these areas contribute to the attainment of a set of well-defined goals.
- The contribution of PA’s to this set of goals should be **reviewed periodically** to ensure that they are meeting objectives. PA’s should be deleted and/or realigned if they are not. YCEE should be tasked with an independent review, to make sure government is accountable.
- The concept of “**ecosystem fragmentation**” needs to be defined.
- **Timing of resource valuations** and economic values needs to addressed. Require consideration consistently throughout the process.
- Needs some discussion of how the **resource and economic assessment information** will be used in the process.

**Section 2**

- Representativeness (Goal #1). Need to **define** the process and avoid prescribing how it is achieved. Objectives-based criteria required.
- Special Natural and Cultural Features.
  - Are **secondary** to goal of representiveness.
  - Need to be more **specific** in describing these features.

## Economic Development

- Drop protection of **wilderness** as a natural or cultural feature. Too vague, we need to be more specific on *what* we protecting.
- **Recreation** as a natural or cultural feature that requires protection is a bit of a stretch. We should be protecting natural features that will be then be used for recreation. Recreation, as a value that requires protection, is not a reason on its own.
- The section needs to **avoid prescriptions** but instead should provide concepts and descriptions of what we protecting.

### Section 3

- Consistency of process: **Guidelines** should appear in the Strategy, cannot be deferred until after the Strategy is complete.
- Need to **define Ecological Integrity**.
- State the **principles**, avoid the prescriptives.
- The Strategy should not suggest that **entire ecosystems** will be subject to protection. This flows to the concept of representativeness where protection adequate to represent an ecosystem will be enacted.

### Section 4

- The Strategy should assess what level of **up-front technical information** is required to undertake technical assessments. Resource information will be available at a territory-wide level for minerals, forestry, oil and gas and energy potential. Assessments of the state of data for ecological and social values will need to be undertaken as well.
- Section 4.0 should reflect some **discussion of options** other than establishment of core areas. This includes provisions under the Wildlife Act to protect species and populations of wildlife or other options that would not necessarily include establishment of a core area.
- Need to clarify the **roles of the TPAT and the LPAT**. Basically, the LPAT is an advisory body while the TPAT is a steering body. Suggest that LPAT's are chaired by a YG PAS-team member to ensure that government's objectives are balanced against those of the community.
- The YG needs to provide clear **terms-of-reference** to the process that are adopted by the LPAT's. There is a need for some level of control over the process.

### Section 5

- The **criteria** for application of interim protection measures should be clearly spelled out in the Strategy. Interim protection should be defined clearly as a "measure of last resort".

## Economic Development

- Suggest adding a **limit, or cap, on the number of hectares** that are interim protected at any one time. This would prevent an over-application of interim protection, a large concern of industry in the Yukon.
- A **time limit** should also be set for interim protection of any given area and defined in the Strategy. This principle was widely accepted at the February workshop.
- The Strategy should spell out how the rights of **existing permit-holders** will be affected. Interim protection restricts the issuance of new permits. Mineral staking is one activity that may be allowed to continue under interim protection as mining Legislation allows no restrictions. Some clarity is required in this section on these topics.
- The issue of **compensation** for expropriated rights needs to be addressed.

### Section 5 (b)

- There was workshop commitment to **review existing Legislation**.
- Guiding principles call for **periodic reviews of Management Plans**. A suggestion would be to have this review undertaken by the Yukon Council on the Economy and Environment, an independent body from government. These reviews should include a determination of whether protected areas are achieving the goals and objectives of the Strategy and whether adjustments to the management plan and/or land quantum are required.