

Memorandum

To: Bob Kuiper
CC: Katie Hayhurst, Jesse Duke, Grant Abbott
From: Danièle Héon
Date: 03/17/98
Re: PAS Draft-distr. March 10 1998/ Comments

This draft is significantly different from the previous one. There is an important difference in tone as well as the disturbing inclusion of several points that were not discussed or endorsed in the workshop or in the discussions of the working group. Such editorial license is not rooted in the results of consultation. I'm interested in knowing where they come from. The changes incorporated without justification in this draft cannot be supported. The points that need clarification in the previous draft still need to be clarified. I am disappointed that this draft seems to be drifting away from the initial results of discussions from the working group as well the spirit of the workshop discussions. My main objections are:

- Inclusion and EMPHASIS on completing the implementation of the PAS by the year 2000. Agreed by all (even Yuri Peepre) to be an unrealistic goal. This point, which comes up several times in the document, should be deleted. YTG's endorsement of this goal is recent, and at the time, the Yukon was divided into 8 "natural landscapes" that needed representation, not 23 ecoregions. The wording in most commitments is to make a "best attempt" to meet this goal. Statements like: "decisions...need to be made now" (p.8) are contrary to the spirit of discussions. Participants in the working group and the workshop all realized the magnitude of this project, and that careful decision-making based on sound information and public input takes time. This document should reflect that reality.

- The only commitment to realistic targets that I see spelled out here is to "not to apply a limit" on the amount of land to be protected. Realistic targets for timing for drafting and implementing the strategy need to be set, if the process is to have any credibility. There has been no agreement to a completion date of the network of protected areas.

- The redrafting of the vision statement changed it's original meaning. I protest this manipulation of a wording that came from an intense consultation effort. I agree the statement needed some work but the original intent was to acknowledge the creation of a network of PA's while respecting the need for a sustainable economy. The new

version uses the wording to state that a goal of the PAS is to contribute to a sustainable economy. This is contrary to the original intent, and, once again, is an effort by RR to promote this policy by emphasizing it's economic benefits. See next point.

Roger *
Elsie
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Wendy *
- The goal of this policy is not to promote the tourism industry. Despite numerous comments by working group members, as well as repeated comments from workshop participants, including conservation interests, industry, as well as First Nations, Renewable Resources is still using this policy to push the economic benefit side of this process. Tourism was viewed at the workshop as another form of development, alongside with the extractive sectors. There has been agreement at the workshop that increase in tourism poses strong environmental stresses that need to be carefully evaluated and controlled. Although protected areas might attract tourism dollars to the Yukon and therefore contribute to the diversification of our economy, it is not the goal of this policy to encourage an economic sector to the detriment of others. There has been no buy-in from industry to support an attrition of the land-base in order to nurture the tourism industry. The goals of this policy are ecological. Renewable Resources must incorporate that recurring comment in its policy.

- There is still no definition of criteria for protection. We must discuss and agree to the criteria that will be used to select and screen candidate sites. The public needs to know what they are endorsing, it is a question of accountability. YTG needs to provide the focus and direction to guide the planning teams. This is a very simple point and I do not understand the resistance to address it. In addition to still not having clear criteria, there is now confusion as to the main targets for the strategy: first everybody was brought on board to support ecoregion representation. That focus seems to have changed.

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Roger
- The concept of "large wilderness core areas" was introduced in this document without discussion or endorsement from the workshop. Although unclear in the document, this seems to be a new type of designation designed to protect a subjective value, and not to achieve ecoregion representation. Wilderness is a subjective term. Maximum protection and withdrawal from development should not be emplaced to protect subjective values. By addressing ecological representation, wilderness values will automatically be protected. The description of the different types of protected areas and their respective levels of designation remain unclear. As in the previous document, it seems that all protected areas will be withdrawn from development, except the occasional buffer or habitat corridor. The actual range of options for protection needs to be better articulated. If Renewable Resources still needs to achieve consensus internally or do more work on this chapter, we need to wait before releasing the Strategy. This topic has been unclear in every draft so far.

-The concept of buffers and corridors or habitat links is described in this document as specific areas with a specific set of regulations, geographically linking areas of maximum protection. When this concept was described to the working group and workshop participants, we were assured that this would not necessarily be the case. We were told that buffers and links could be established using geomorphological and

"organic" links (ex: rivers, mountain ranges), defined by wildlife migration patterns, and could be managed using existing legislation. This concept needs to be clarified and the different options spelled out in the strategy..

-Strong emphasis to the protection of cultural values. This emphasis is new. Where is our commitment to address these values as a main goal in the PAS?

-I do not see a commitment to involve public participation at the initial selection stage, as was discussed in the workshop.

-PAS should not target areas slated for development but rather where populations or sensitive environments are proven to be at risk. There has been no endorsement for any fast tracking that would sidestep the process outlined by the Strategy.

-There was agreement at the workshop to put a cap on the amount of areas under interim withdrawal, as well as a time limit. This was an important point not reflected in this document.

-There was no endorsement to "turn Yukon life, lands and waters into protected areas", no endorsement to protect entire large mammals ecosystems and full watersheds and again, no agreement to a completion date of the network of protected areas. How can such points make it in the strategy at this stage?

-There is no mention of the economic "costs" of creating protected areas.

-need to add: "review of existing regulations" between steps 3 and 4 on p.14. This point was made repeatedly at the workshop.

-It was agreed that the PAS would be a comprehensive process that would act like an umbrella process that would address all different needs for protection, not just the areas under maximum protection (contradicts p.15, 2nd par.).

I expect the next draft to be more representative of the discussions and consultation that have taken place up to date. I hope these comments can be used to reach that goal.