

Topic	Comment
<p>General</p>	<ul style="list-style-type: none"> • ...should be a clear accounting of the cost for planning, establishing, and maintaining protected areas. • page 2 ... #6 is missing on the map • page 4 ... “wilderness areas with intact ecosystems” ... is this not understood to be part of the first goal? • Your overall plan is worthy of support. • Whose values are being protected? • There should be clearer, more implicit language about the values or value being referred to, what is valued and on what terms – clearly identifying the non-economic values, and value, so as to inspire protected areas without the baggage of economics. • I look forward to ... the upcoming implementation of protected areas. • There is no stated limit to the total area of Protected Areas. • We oppose such a wide-ranging plan that will remove large tracts of land for mineral exploration and other resource development. • We would suggest that [you] examine a multi-use approach to the wilderness lands of the Yukon that can benefit all of society. • The Strategy needs to understand mining’s “New Look” and how its economic benefits support maintenance of wilderness values for social and scientific purposes. • I strongly support the Yukon Government’s decision to initiate a protected area strategy. • I have confidence in the existing processes we have ... under the Umbrella Final Agreement, to manage our lands effectively. I see the Strategy as totally unnecessary as well as contrary to those processes. • ... your Strategy ... will instead become a legacy for the benefit of children from outside the Yukon. • ... what are you trying to protect the Yukon from? Is there an immediate or even foreseeable threat to the Yukon’s vast tracts of wilderness? • ... have you considered the costs? • The Yukon will be faced not only with the cost of implementation of this ambitious program and the ongoing cost of maintaining these protected areas, but also with the cost of compensation for tenure holders who are expropriated from

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>the new protected areas and ... of lost economic opportunity.</p> <ul style="list-style-type: none">• On the whole, [we] are very pleased with the thoroughness of the Strategy and with the presentation of issues of importance to [...] departments.• These proposals if implemented threaten our livelihood in the exploration industry and the future economic development of the Yukon. I urge you to scrap the proposed protected areas strategy in the best interests of all Yukoners.• The [...] supports the Protected Areas Program and believes that it is fundamental to responsible planning for the future of the Yukon.• Special Management Area designation through Yukon First Nation Final Agreements is an ideal way to create Protected Areas. Reluctance to agree to SMA's because of alleged "lack of public consultation/involvement in Land Claims" is a misguided smokescreen. There is broad-based public support for all of the proposed SMAs this Government is resisting in Land Claims negotiations.• [We] urge this Government to move quickly to establish a Protected Areas network in the Yukon.• The Yukon Protected Areas Strategy can not and must not be industry driven.• [We are] beginning to get the impression that Yukon is apologizing to the development sector for moving ahead in this area. This is not necessary. A vast majority of Yukoners endorse this initiative.• ... this present draft [YPAS] should strengthen its position of "respecting economic interests and the many Yukon families whose livelihoods depend upon resource industries" (p.1). In it's present form, it does not really reassure anybody concerned.• I would like to see options [of sequential mining in protected areas] explored.• How much will this [protected areas] cost? Can we afford this?• Without the background technical papers, the summary document would not be sufficient information to base comments on. It's content could be strengthened.• I wholeheartedly agree with its [Strategy] goals.• ... as a member of Yukon's mining community, I am not in agreement with any aspect of your protected areas strategy.• The removal of additional lands from those available for exploration means that there will be less money and effort spent on exploration in the future.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none">• We need jobs now, not more parks.• I ... want to see development so people can improve their lives. • If one's objective is to protect areas from abuse or over use, the last thing you want to do is designate it with some special status. • I am ... pleased to see that work is moving ahead to ensure long term protection of important areas of the Yukon. • I like and appreciate the quality of the draft, and ... I'm grateful and glad that this initiative is being taken • ... we ... request that you suspend this process in order to give us (and possibly others) time to respond to the July, 1998 draft document. • It is a good strategy however, the timing was wrong.• Government should have completed land claims negotiations with all the First Nations first, by using the Special Management Areas (SMA's) provisions of the Umbrella Final Agreement (UFA).• We believe this strategy has hindered our ability to negotiate SMA's at [...] negotiating table• The strategy does not allow for adequate First Nation government involvement in the establishment and management of protected areas in their traditional territories. • [...] supports the overall objective of establishing protected areas in the Yukon. • I strongly support the YPAS. • The [...] and the [...] join in registering their opposition to the Yukon Protected Areas Strategy.• We are of the opinion that the strategy, when implemented to its logical conclusion, would create a fatal obstacle to Yukon's prosperity.• The creation of more areas that are off limits to mineral exploration (along with their inter-connected corridors) would very much deter mining investment.• ... [we] believe that the strategy has more to do with political favoritism than with sound biological science.• ... it represents the destructive and fundamentally unfulfillable agenda of a small anti-development clique within the environmental movement.• ... the "Total Landscape Management" system would not alienate large tracts of land from development, would work within the existing regulatory regime, and would be flexible so that areas requiring environmental protection, now and in the future, receive it.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none">• We believe that a system such as Total Landscape Management could have been tailored to meet Yukon's specific needs.• The announcement by the Government of Yukon of this imprudent course of action will send a powerful and negative message to all those who may consider investing in the Yukon. • ... we are pleased with this draft document and feel it has come a long way in representing the views of Yukoners.• [...] supports the proposed use of map notation and interim protection, as well as the inclusion of non-governmental groups and the general public in decision-making processes. We are pleased that there is no limit placed on the number or size of protected areas in the Yukon, and that buffer zones and migration corridors are recognized as essential to maintaining ecological health.• The language and tone of this document is apologetic and often unsupportive of protected areas. We would like to see the government take a stronger, more active role in promoting protected areas and commitments for their establishment.• Replace statements that imply protected areas will interfere with development with positive statements that describe protected areas as a tool that works in conjunction with other management approaches to ensure the ecological health of the entire Yukon. • [...] supports the objective of establishing protected areas.• The opening statements ... would benefit further from one or two sentences that put Yukon Protected Areas into a national and global context. • I fully support the principle of the Yukon Protected Areas Strategy, and I encourage you to enact it promptly. • The document is well written, clear and concise. It also appears to have responded to public concerns raised by the advisory committee.• We are generally pleased with the strategy as drafted and believe it is time to get on with the job and get it done in a cost effective and timely manner. • We support the overall direction of the Protected Areas Strategy.• Residual language problems continue to suggest protected areas are a negative influence on the economy; the existing language skirts the intrinsic value of wilderness.• Remove language that suggests protected areas are a negative influence on the economy.• In the introduction, remove the question and answer that suggests we can't protect everything.• Add language that refers to the intrinsic value of conservation and wilderness.• Inconsistencies remain between the background technical papers and the summary document.• We suggest the summary document should more closely reflect the content of the technical papers and intent of the PAS.• ... in the Whitehorse Mining Initiative ... the industry explicitly recognized the need for representative protected areas

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none">system as part of a balanced economic, social, and ecological vision of the future.• I urge you to move ahead with the completion of the Yukon's Protected Areas Strategy.• [Areas that are of scientific and research interest should be considered for some form of protected status].• The significant work in the Wolf Creek Basin may merit the maintenance of the long term integrity of the area.• Over the past year and a half, the YPAS has been a very rugged journey (with a few unnecessary detours) but the result is a well written, straightforward, logical process that should serve the Yukon well and will likely be valuable as a reference for other jurisdictions. Certain YTG staff should be congratulated for their perseverance and dedication to the original intent of the program.• ... we are very encouraged and supportive of the work carried out by the government in the design and development of the strategy.• There are many good points in this document that will benefit the Yukon in the years to come.• The document is poorly written and creates an impression that huge areas of the Yukon Territory could gain protected status.• The document gives not indication of what areas or size of areas are under consideration for protection – it is impossible to comment without this background.• I am writing in support of the Protected Areas Strategy and urge you to stand firm in your government's commitment to the process and to the protected areas system• In abrogating its commitments to protected areas, the mining industry has once again shown its contempt for public process, its inability to live up to commitments to protect public lands, and its simple-minded perspective that puts profits above all, including life itself.• I strong support the establishment of a protected areas system in the Yukon.• I am very pleased with the draft strategy.• I am pleased to see such a well developed and presented document.• I have ... fundamental disagreements with the draft Protected Areas Strategy.• I whole-heartedly support this most important initiative.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none">• I commend the efforts of YTG on this vital issue and urge implementation.• I firmly believe a territorial system of parks and protected areas will be of lasting benefit to all Yukoners and commend those involved in its implementation. • ... my reaction ... is of general approval, especially re the commitment to public involvement in the planning process. • I think this strategy goes a long way in setting up a process that could enable Yukoners to work together to create a viable system of protected wilderness areas that would be a model for the rest of Canada. • I ... support the Protected Areas Strategy. Development of this strategy is an essential first step in developing a comprehensive approach to land use and protection.• The Environment Act speaks of cultural, spiritual, and aesthetic as well as economic values in the first line of the preamble, and about the intrinsic value of wilderness later in the document.• Anything short of acknowledging all of these values throughout the document [Strategy] would be a retreat from existing legislation.• add: respect the intrinsic value of wilderness.• ... an evolving conservation/environmental ethic ... this needs to be added ... it is essential. • We are very strongly in support of the draft Protected Areas Strategy. • The Strategy advertises that protected areas are legacies for our grandchildren, but our experience shows that they instead become special places for the grandchildren of people that don't live here.• For example, Kluane National Park has become a place that [...] First Nation people and other area residents don't go – it now attracts 'outside' people and causes us to stay away from this area that was once [...] traditional land.• ... any protected area has the potential of becoming another place where we feel excluded.• This is why it is essential that any protected areas are the result of negotiated agreements. • ... I would like to voice my strong support for the strategy. YPAS is urgently needed.• I support the principles within YPAS and strongly urge you to move forward with the implementation process. • I ... support the general principles of the Protected Areas Strategy.• ... It is critical to make sure that we plan for the sustainable future of the Yukon.• There are many good things in the draft policy. I congratulate you on recognizing the inherent value of wild places and the wild things that live there.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none">• I support the Protected Areas Strategy and the Yukon Government's efforts to establish a network of protected areas.• ... [I] support the YPAS ... lets move on it.• This letter is in support of the Yukon Protected Area Strategy. It is time to get on with this initiative. The protected area strategy will assist the Yukon in ensuring that development remains sustainable.• It has come to my attention that the mining industry has been bombarding your offices and others with the basic message that we do not need protected areas and that the industry wishes access to the whole landscape. If it is true, it is totally irresponsible.• ... we do need a Protected Areas Strategy in the Yukon.• I wish to inform you I fully support the Yukon Protected Areas Strategy.• We have an unprecedented opportunity here and now to conserve wilderness intact.• I wish to commend the Government of Yukon for forging the Yukon Protected Areas Strategy.• I fully support the Yukon Protected Areas Strategy.• Not protecting areas will spell doom to the wilderness which remains.• The Protected Areas Strategy has strong public support from people who can look at things for the long term and not just trying to squeeze out a last quick buck.• I fully support the Protected Areas Strategy.• The [...] supports your efforts at completing such a strategy which has enjoyed broad public involvement and support.• I am very excited about the protected area strategy. It has been a long time in coming and I commend your government for developing the plan. I strongly support the principles of the PAS.• ... the strategy is a good plan and it should be adopted as soon as possible.• I encourage the Government of the Yukon to begin implementation of the Protected Areas Strategy.• I am in total support of the principals of the Protected Areas Strategy.• We urge you to move ahead with the Protected Areas Strategy process as laid out in the draft document.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • I encourage the Government of Yukon to begin implementation of the Protected Areas Strategy. I am in total support of the principals of the Protected Areas Strategy. • The draft strategy and the accompanying technical papers were considered well-organized and clearly written. • ... there is no target or limit set for the amount of space that should be set aside. Issues of over-representation in one ecoregion being reduced, or trade-offs with over-representation in one ecoregion being balanced by under-representation in an adjacent ecoregion should be addressed. • p.10-11: ... present existing protected areas in the Yukon ... needs to be integrated into the PAS.
<p><i>Our first goal: to protect representative core areas within each ecoregion.</i></p>	<ul style="list-style-type: none"> • When assessing existing protection of the 23 ecoregions, it is important to include Alaska in addition to B.C. and N.W.T. • I strongly support the notion that industrial developments will not be permitted in core protected areas. • If we are to protect representative core areas within ecoregions – we must ensure they will be sustainable far into the future. Size is important! • ... allow mineral exploration in all but the most sensitive parts of protected areas. Early stage mineral exploration, up to the stage of drilling, but excluding road access, has little more impact on the land than hunting or tourism. • I propose a keyhole approach to mine development within a protected area. The mine itself would typically have a very small footprint and access could be strictly regulated. If necessary, new land could be added to the protected area to compensate for that which is lost to the mining activity. • A rock bottom minimum of 12% of the land within each of Yukon’s 23 ecoregions should be protected. In many instances, substantially more than 12% will be required to assure the ecological integrity of the Protected Areas. In some instances, more than one Protected Area should be established within and/or overlapping individual ecoregions. • The protection afforded Protected Areas should be absolute. • Multi-use is inconsistent with Protected Areas. Mining and Oil & Gas extraction, including staking and exploration, cannot be permitted. Logging cannot be permitted. Hydro-electric development cannot be permitted. Hunting, except for aboriginal subsistence hunting, cannot be permitted. Wilderness tourism must be closely regulated to assure carrying capacities are not exceeded. • What is the basis for the need for 23 core areas with maximum level of protection? • How big will these core areas be? I suggest establishing a maximum percentage of each ecoregion to be protected.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none">• ... protecting wilderness areas with intact ecosystems ... should be a top priority.• I cannot emphasize how important it is to protect these large areas. These areas really do need to be large if they are to effectively protect the wilderness and wildlife. The strategy the way it is now will not effectively do this.• Ecosystem representation is very important, but up here in the Yukon we have a chance to do something much better and more significant by protecting vast areas of wilderness. • pg.3: With relation to tourism, our customers are often interested in observing/participating in modern mining or handmining methods. Where these activities are located in core areas prior to implementation ... will operations be permitted to continue with adherence to environmental protection? • ... there does not seem to be any documentary explanation of the 23 ecoregions.• Prior to any more effort being put into identifying areas to be protected, parks department staff must come up with explanations of and justification for the creation of 23 ecoregions. • I strongly support no industrial developments in core protected areas.• ... core areas [should] be relatively large, to give their continued ecological integrity a better chance. • We should understand that there is such as thing as intrinsic value; that wild land should be left wild for its own sake.• Are benchmarks being developed for what constitutes adequate protection for an area? I believe such objectives need to be made explicit so that the focus of an initiative won't be allowed to become diffuse and ineffective. • ... what we do not need protected in any way, shape or form are large tracts of land around Faro and current mining areas that could lead to potential mineral exploration. • ... one of the main functions of protected areas is to provide baseline data so that the ecology of unperturbed systems can be understood, and so that unperturbed systems can be used as experimental controls in studies of systems affected by human disturbance.• To have good experimental design, such studies need to have site replication (Underwood 1994), which can only be achieved if there is more than one core protected area per ecoregion.• The PAS makes only passing reference to Marine Protected Areas, and makes no reference to Marine Natural Regions.• We recommend full recognition of marine protected areas and Yukon government support for national and/or Inuvialuit efforts towards marine conservation in the Beaufort Sea. The new Yukon park Act should also contain references to marine protected areas.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • Why is mining totally excluded but only oil and gas ‘surface work’. Could I not tunnel under a protected area just like I might angle drill under one? • ... maintaining biological diversity ... should be Goal 1, with ecoregion representation and interconnectivity as tools to help achieve biodiversity protection. • One large protected area in each ecoregion is unlikely to achieve the objective of biodiversity maintenance. • These numbers (‘one large or two or more smaller’ areas) should be removed to allow flexibility in designing a system which will achieve the objective. • I support your objective to establish a core protected area in each ecoregion and to protect special natural and cultural features. • ... remove references to “one large or two smaller areas”. This ... is unnecessary and removes the flexibility that may be required in implementation. • If Goal 1 protected areas are going to be a priority ... it should be discussed in more detail in the technical papers and perhaps in the main document itself. • There is no way that we should limit ourselves to just one protected area in each region. • I am concerned that the size of protected areas will be too small to adequately protect the values that are recognized • Strict harvesting limits should be set for all, not just selected hunting activities which may threaten ecosystems. • If the First Nations are responsible for the lands in question, then they should set such quotas and administer them. • The PAS could address the use of modern versus traditional methods for harvesting in wilderness preservation areas. • p.3: The term “core protected areas” could use a clear definition. • ... the criteria for determining adequacy of representation is not included in the document. • The definition of criteria of adequacy of representation is an important element of the PAS.
<p><i>Our second goal: to protect special places.</i></p>	<ul style="list-style-type: none"> • The protection of the Carcross Desert & Dunes could be worth money to the locals and sustain the facilities. The present situation is saddening. • The goal 2 criterion protecting “large tracts of wilderness” would be redundant, as the ecoregion protection and National Parks will already have protected a multitude of large tracts.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • ... there must be serious consideration to allowing exploration within the protected areas, with guarantees to allow reasonable development when discoveries occur. • ... new mine development and ecosystem and biological conservation are not mutually exclusive. • Our wilderness should not be used as a drawing card for tourists because it is too uncontrollable and we will risk losing what we cherish here. • The process for the establishment of goal 2 needs to be elaborated on in the main document. • Goal 2 objective 5 “to protect wilderness values”: It is unclear how this would differ from goal 1. • p.4: ... includes areas of special value for outdoor recreation. Wilderness Tourism operators do not want to be blocked from using these areas. • We recommend that the PAS make specific reference to completion of a network of ecological reserves, separate from the commitments representative protected areas. • The PAS Goal 2 guidelines generally meet these needs, but there is no explicit reference to a system plan. • Is it really necessary to put ‘wilderness areas with intact ecosystems’ in here? it looks like a blank check to lock up the country. It will also cause headaches since ‘intact’ will be hard to define, doing this will be hard to justify. • p. 7: Change wording to “Buffer areas are lands associated with core protected areas. Surrounding is too limited. • The guiding principles do not link with the second goal, that of protecting special places. • Although biodiversity is mentioned and stressed as a principle, there is no mention of landforms, special features, or cultural areas.
<p><i>Conserving ecosystems on managed lands.</i></p>	<ul style="list-style-type: none"> • [Burwash Uplands/Killermun Lakes area] Where is the good management? We have to recognize the problem if we expect a solution! • ... land-use permits and regulations were not designed with a goal of maintaining ecosystems or maintaining biodiversity. While there are some regulations .. designed specifically to protect habitat of a particular species ... many species and their associated habitats “fall through the cracks” with respect to long term protection.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • If the issue of meaningful ecosystem management on lands outside of Goal 1 or Goal 2 protected areas is going to be addressed by the strategy, then the current limitations of the land-use application process must be recognized. • Unjustified and arbitrary limitations are placed on the scope and nature of the PAS, for example in pre-judging the number and scale of representative protected areas in each ecoregion. We recommend removal of repeated references to “one large or two smaller areas”. • The diagram illustrating cores, buffers and different types of protected areas should either be removed or modified. It perpetuates the “parks as islands” problem and does not reflect the goal of the PAS, which is to conserve biodiversity through applying the principles of conservation biology.
<p>Protected areas and Yukon First Nation Final Agreements.</p>	
<p>Roles and responsibilities.</p>	<ul style="list-style-type: none"> • Established municipal governments should be included in representation in the LPT. • Assessment Panel [LPT] must have a public mining consultant. • An independent mining consultant should prepare a mineral resource audit in each of the proposed target areas with the evaluation of the potential for discovery of new ore deposits in cluster/trend/district-wide categories. • Does the government have the expertise in conservation biology to carry this initiative through in a scientific and accountable manner? • The [...] would like to be part of the planning process in areas that have an impact on the Porcupine Caribou Herd. • We ask that “informal contacts with conservation and industry groups” be strengthened to a more formal level so tourism operators are not caught off-guard by new changes implemented without widespread publicity. • p.15: “Linking to other processes” ... Tourism users should be included as a stakeholder. • The [...] wishes to have a representative sit in each of the LPTs.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • Who selects or appoints the RRC representative – Government or the RRC? • There must be a role for the Wildlife Management Advisory Council (North Slope) and the Inuvialuit Game Council consistent with the Inuvialuit Final Agreement. The Inuvialuit Settlement Region should be marked on the map on p. 22. • ... participation of YFNs in a “government to government” ... it is an unclear term and should be deleted or rephrased. • ... local representatives of conservation and industry representatives ... what is local?
<p>Process: getting the job done.</p>	<ul style="list-style-type: none"> • ...who will be invited to sit on the LPTs and [what] is the process used to select these individuals. • 2-3 years seems to be a very short period of time considering consultation and the need for economic analyses.... • Sites under consideration as protected areas should be thoroughly assessed for their mineral potential. • Candidate protected areas must be subject to a thorough, field-based mineral assessment. • There is an urgency in defining where and how mining activity is going to be negatively impacted. • The investors need to know quickly – not having to wait 3, 5, or longer years while 23 areas are studied. • While [...] departments do not wish to see progress on protected areas held up by land use planning, a more satisfactory process and result will be accomplished where these processes can be integrated so as to avoid duplication. • p.15, para. 1: Proposed to add “... and roles in the planning process.” • p.17. para. 1: ... references to the mechanisms for interim protection should refer to the mechanisms for surface lands and subsurface mineral resources separately. Propose that the second sentence read, “...the Yukon Cabinet will ask the federal government to withdraw the area from surface disposition and to prohibit entry to the area for the purpose of mineral staking”. • Sidebar: Propose to rewrite the first sentence as follows: “Interim protection means withdrawing the land from new surface dispositions and prohibiting entry on land for the purpose of new mineral staking.” • p. 17. para.3: Suggest that consideration be given to including or involving the local DAP person on the local planning team to ensure DAP requirements are addressed. • p.18. para.2: “... ask the federal government to permanently withdraw the area from surface disposition and prohibit entry to the area for the purpose of mineral staking”. • It is not the [...] intent to suggest that Protected Areas planning be delayed so that it can coincide with the development of Regional Land Use Plans as they proceed in Regions across the Yukon. • The main document should include goal of avoiding high mineral potential in process, step 1 (p. 15).

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • 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. • Transboundary coordination should be discussed. • Incorporate a specific timeline and limit to “interim” protection so “interim” does not in effect become “permanent”. • We ask that “interim” be defined as not exceeding 3 years. • Step 4 refers to asking the federal government to remove protected land from mineral and other development. In the event the federal government says no, what avenues are available to effect protection in spite of Ottawa’s reluctance to comply with Yukoners’ wishes? • We suggest that ... if protection is not achieved within three years from the start of interim protection, the land reverts to open status. • How long will it take? This could be a good place to have a candid statement about the original initiative and its year 2000 target date and state that you are doing the best you can. Maybe by the end of the year 2000 you will be involved in [X] core protection projects with [Y] to go. • I recommend that the PAS make specific reference to completion of a network of ecological reserves, separate from the commitments representative areas. • ...under Step 6: a DAP review of the proposal ... may be a bit premature as DAP may not have anything but boundaries to review. One option might be to have DAP review the management plan described in Step 9, as opposed to reviewing the final proposal before a management plan has been completed, and before 3rd party interests have been dealt with. • ...under Step 5 it says the team will review the proposal in a public forum ... there should be an obligation to give all Yukoners an opportunity to comment. • ...under Step 8 it refers to permanently withdrawing the area from development ... as we may need some surface activities to continue as part of the management plan recommendation, both a surface and sub-surface withdrawal may not be desirable. • ...we should consider reordering the process for setting aside Goal 1 protected areas. We should look at preparing management plans first and deal with 3rd party interests, then have a Cabinet review and approve the management plan. • The last step should be the designation and the final withdrawal of the areas, according to the management plan (or at least the process should give us the flexibility to do the final approvals in this order).

Topic	Comment
<p><i>Sustaining and diversifying our economy.</i></p>	<ul style="list-style-type: none"> • p. 20. para. 3: Propose to rephrase the last sentence to reflect a balanced approach to resource assessments, ie. "... existing knowledge of ecological, mineral and other resource values." • The measures you are proposing ... pose a serious threat to viability of our company and the jobs of all of our employees. • Your proposals will cut off access to the land to those who make their living on the land. • A significant quantum of land is already removed from mineral exploration ... removing a larger quantum, blocking of access corridors and the imposition of increasingly arcane bureaucratic procedures for accessing land or commencing development projects threatens to snuff out what little development we have left. • Implement safeguards so that tourism operators are not prevented from accessing these areas and access is not cost-prohibitive. • The strategy should make allowances for new extraction technologies which will be developed in the future and may be more environmentally conscious than current methods and may also open up mineral deposits that were previously difficult to use. • ... adding to the sidebar on p. 19 ... "the value of maintaining ecosystems processes" • The [...] feels that with good solid regulations and guidelines, both the mining industry and parks can co-exist and work together. • The economics of protected areas have been shown to contribute significantly to community employment and potential for sustainable economies. In contrast to the boom and bust nature of many mining developments, the growth represented by front country and back country tourism of protected areas is steady and will be a reliable part of the Yukon's future. • My experience from the Kluane area demonstrates that protected areas are an excellent means of promoting destination travel and contribute to the well-being of communities and the environment. <p>... world prices have much more influence on the development of mines than a protected areas strategy.</p> <ul style="list-style-type: none"> • ... economic arguments against this strategy ... are short sighted, concerned with quick profits, not sustainable economies. Many studies have shown that viable, sustainable economies begin with healthy environments. • ... preserving the minimum of 12% of the land base is a small portion that insures a large investment in the future for biodiversity, and for tourism, and for our grandchildren.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • We need to have a balance between development and protecting our environment for future generations. • Protected areas are economically beneficial to our economy especially as ecotourism and tourism in general produce a lot of revenue. • Too much of the world’s wilderness has been sacrificed for short-term economic gain (gain which often does not benefit the local economy). As it stands now, the Yukon’s wilderness is one of the brightest lights on the economic horizon as it pertains to adventure tourism. • So much is already protected in the Haines Junction area that it limits economic growth in the area. • There is a need for economic diversification in the area of tourism.
<p>Managing industry uses.</p>	<ul style="list-style-type: none"> • p. 21. para. 4: Virtually all projects, not just big ones, will be reviewed by DAP. • p. 21. para. 3: Water use regulations should be referenced along with land use regulations. • Responsible mineral exploration produces ... temporary disturbance to the land, much of which is mitigated by natural processes in a surprisingly short period of time. • 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 application must be addressed. • The Draft Strategy itself is not completely clear on what the protection [from Industry] goals are and this needs to be addressed. • Yukon’s landscape has evidently endured quite well, despite 100 plus years of “unregulated” mining, farming, and logging. Concerns about these activities can now be addressed with existing legislation (and devolution). • ... the existing regulatory regime ensures responsible development throughout the entire Yukon. • ... including: Territorial Lands Act and Territorial Land Use Regulations; Yukon Waters Act and Yukon Waters Regulations; the new Mining Land Use Regulations under the Yukon Quartz Mining Act; the Yukon Placer Mining Act; the Fisheries Act and its’ Metal Mine Liquid Effluent Regulations; the Yukon Placer Authorization; the Canadian Environmental Assessment Act; the Yukon Environment Act; and many others.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • Make more explicit reference to the need for land use planning to assist with meeting buffer and wildlife corridor needs around core protected areas. • ... all of the land has to be managed to provide for the interests of it's people. • ... I was pleased to see that the current intent is to allow outfitting to continue in all of these protected areas including core regions ... • Make more explicit reference to the need for land use planning to assist with meeting buffer and wildlife corridor needs around core protected areas. • Current land use permits do not necessarily reflect the principles of ecosystem management. • Please focus your energies on improving the permitting process for mining if you are trying to appeal to the mining industry.
<p>Implementing the Strategy.</p>	<ul style="list-style-type: none"> • The length of time projected to protect new areas seems unreasonably slow ... designate well know areas more quickly. • We trust we will be kept informed as the strategy is implemented. • ... the pace of implementation is too slow. • This process needs to be more of a priority, and some definite timelines need to be stated. • There is no mention of the proposed Wolf Lake National Park. • ... the Territorial government should be giving wholehearted support to [it]. • We need to move quickly to protect entire watersheds or other complete and intact areas. • Good luck with the future of the plan and its implementation, and get on with it. • Implementation should be done more quickly than the Strategy proposes. • We need more on the ground progress. • I am disappointed that there is no explicit reference in the draft strategy to a feasibility study for a national park in the Wolf

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>Lake area.</p> <ul style="list-style-type: none"> • If in fact YTG is still supportive of a new park feasibility study in the Wolf Lake area, then I would request that this support be acknowledged in the main document, as well as in the technical appendices. • [...] views the feasibility study as a cooperative approach involving YTG, the Teslin Tlingit Council, and Parks Canada. The purpose of the feasibility study is to determine if there is support by all parties for a new national park in the Wolf Lake area. If any party determines during the study that a new national park is not desirable, or is not feasible, then [...] will not proceed. • Establish goals and commitments to adequately protect each of the Yukon's 23 ecoregions in a more efficient time frame. We suggest setting the goal of establishing 9 new area by the year 2000. • [...] fully supports amending the Yukon Parks Act to ensure legislative protection of protected areas. We must stress the importance that this work continue simultaneously with the establishment of protected areas. • ... there is no reference to educational workshops, guest lectures, or departmental support to help people understand the rudimentary details of conservation biology. • Establish objectives for public education and clarify the impact local people can have on the decision-making process. We suggest the Protected Areas Secretariat accept this responsibility. • p. 25 ... Add a bullet "The Yukon Government and federal partners will establish a Conservation Data Center to address the need to determine the status of species and ecosystems at risk." • It is unrealistic to expect to complete the protected areas process and production of management plans in one or two years. • Past experience has shown the process of selection, nomination, review and approval usually takes a minimum of 3, and more often 5 or more years to complete. • At this rate the protected areas program will take many years to complete. The issue of uncertainty during this transitional period is a concern to both conservationists and other resource users. • ... the government states it is committed to completing a wetlands protection strategy by the year 2000, setting up the secretariat, reviewing the Parks Act and completing management plans for existing Special Management Areas. We believe that unless significant additional resources are committed to the protected areas initiative, even this modest agenda will not be met. • How will the Yukon Government provide the funds to enable the RRCs to participate and play a lead role in the Local Planning Teams? • We do not see any financial commitment in the draft. Without commitments for resources, the draft may not be worth the

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>paper it is written on.</p> <ul style="list-style-type: none">• Protection of key wetlands should be well underway by March 2000 not just the strategy to do that.• Another bullet could be YTG will develop habitat protection regulations under the Wildlife Act in coordination with other management authorities (chiefly DIAND). If this is not done you will be stuck with the Parks Act as your only major tool for YPAS.• Accomplishment of the major elements of this plan will require significant support from the Yukon Government and considerable coordination with the federal and First Nation governments.• Streamlining this process and other management planning exercises related to HPAs and wetlands could be very helpful.• The wetlands initiative seems too cumbersome.• Wouldn't it be better to quickly prioritize some of these and work them up for designation and regulation by 2000?• Note that in ... traditional territories they are presently working ... on integrated wildlife plans and forest management plans which will deliver a number of HPAs. The Secretariat should be prepared to participate here when people find out that HPAs are not as simple as people thought. • I would like to see the government move more decisively in implementing the strategy, once it is complete. • The government must ensure adequate finances are available to carry out this strategy and see the resulting protected areas properly managed. • The document proposes a painfully slow implementation schedule combined with weak commitments to on-the-ground results by specified dates.• I ... urge you to assess the feasibility of a National Park at Wolf Lake as soon as the YPAS is approved. We further ask you to acknowledge the gap in the national parks system in Natural Region #7, the area within which Wolf Lake is situated.• Recognize that the Yukon Government, through its PAS, has an obligation to assess protected areas in these ecoregions and could achieve maximum benefit to Yukoners through federal financing of the project.• Increase the pace of wetlands protection. We recommend a Wetlands Protection Strategy by June, 1999, with at least 6 wetlands protected by March 1, 2000. • If this strategy has to take more than five years to be completed, then the whole thing is taking too long.• If this strategy takes 5, 10, 15 years to implement, then many of the 'special places' in the Yukon will be lost to other uses. The PAS is not to be watered down by an unreasonable time line. • ...the rate of implementation of protected areas is going to be too slow.• ... this government should live up to the promises it has made concerning a percentage of the Yukon being designated

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>into protected areas (representing the different ecoregions) by the year 2000.</p> <ul style="list-style-type: none"> • We encourage you to begin implementation as soon as possible. • We are concerned about a potentially slow rate of implementation • We are concerned about ... the negative response given to the possible National Park feasibility study in the Wolf Lake area. • Do not alter, postpone, shelve or cancel the Yukon Protected Areas Strategy. • We look forward to your government’s adoption of the Protected Areas Strategy and its timely implementation. • It is of utmost importance that your government proceed with implementing the plan. • It would be worthwhile for the PAS to indicate how this wetlands strategy will impact on the overall strategy for protected areas.
<p>Tech. Paper #1: Roles and Responsibilities for Implementation</p>	<ul style="list-style-type: none"> • ... “local” be defined to mean those residing within the region • ... Municipal Governments should have ample opportunity to participate on the LPTs. • ... schematic diagram of the entire “chain of command” would be very useful ... • ... a flow chart showing how all the components of this process fit together. • page 5 should read “maintaining ongoing, timely, contact” • Technical Research should be provided via the regional private sector whenever possible. • page 11 .. NGOs ... What funding and process guidelines are proposed to allow equal access to management of the areas? • What evaluation criteria are proposed to screen out frivolous or fraudulent proposals for intervention? • The mandated Boards and Councils exclude those which focus on the economy of the Territory. • The Local Planning Teams are heavily biased toward governments and Renewable Resource Councils. • p.3. para. 2, line 2: For greater clarity could add, “... responsible for identifying and managing the different....” • p.3. para. 3: To clarify the role of LUP Commissions in relation to Local Planning Teams could add sentence, “When land use planning Commissions are established, they may be assigned the role of the Local Planning Team by inclusion of

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>appropriate direction in their General Terms of Reference.”</p> <ul style="list-style-type: none"> • p.5. Will the Secretariat develop a terms of reference for Local Planning Teams? • p.7. para. 7: “... the majority of Yukon lands and all waters ... to include federal land and all will include federal water.” • p.8. Propose to add 3rd bullet: “Participate in YPAS discussion on selection of priority ecoregions for planning.” Federal participation is needed to coordinate planning priorities. Analysis of protected area options will have resource implications for federal departments. • p.8. para. 1: Delete reference to water use in first sentence and add “...and water use on all lands in Yukon.” • p.10. para. 3: Propose that we emphasize that the protected area strategy coordinate with the regional planning program rather than the other way around. Functionally, this may be of little consequence since coordination is a two-way street. However, it would more accurately reflect the coordinating role of the regional planning process as indicated in Section 1.1.1.1 of First Nation Final Agreements. • ... who will determine which NGO’s will be consulted? Also, as most NGO’s have very limited funding available for travel etc.? • ... the document should state that half (??) three quarters (??) of the Secretariat’s resources will focus on data/information collection, management and dissemination. • In addition to working within the Yukon Claim and with First Nation Governments and RRCs, the Strategy will be working within the Inuvialuit Final Agreement, and with the processes and Councils, Boards and Committees established ... in the Yukon under the Inuvialuit Final Agreement. • A key component to implementing the strategy will be to develop a structure/process for dealing with the tremendous amount of information that will be compiled, collected and reviewed during the implementation phase of the strategy. • This is an excellent opportunity to coordinate among the various players ... with an objective of making compatible data collection and management of biological, physical, economic and social/cultural information. • ... this ... should involve the YPAS, the Yukon Land Use Planning Council, and all Yukon Government, First Nation Governments, federal agencies and non-government organizations who will be contributing information to the process. • “Maintaining ongoing contact with First Nation governments ... to coordinate protected areas work” is one of the keys to successful implementation. • ... we feel that it is imperative that we have two people representing the [...] on the planning board and groups where they directly relate to the greater Kluane region. • A Protected Areas Secretariat within the Department of Renewable Resources makes sense, as does the provision for the involvement of Renewable Resource Councils and creation of local planning teams. • We must also recognize however, that in some cases, territorial and national interests may need to prevail in order to preserve biodiversity and meet broader environmental objectives or international commitments. The key of course is

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>balance and we feel this strategy is on the right track.</p> <ul style="list-style-type: none">• Ensure that the Local Planning Team and the Land Use Planning Commission roles and responsibilities are clearly articulated and coordinated.• ... there is still some ambiguity in the role of First Nations in the PAS process. While we concur with Yukon government leadership and political accountability, First Nations governments may also propose and negotiate protected areas as SMAs. These are not mutually exclusive responsibilities.• We recommend that non-government organizations have an opportunity to make presentations on areas of interest at the territorial and regional scale.• Public nomination of areas is an important opportunity to ensure that territorial interests are considered. • How will the Strategy address the issue of participation on a Yukon-wide basis? • These documents require re-drafting in the areas of roles and responsibilities of First Nation, Federal and Yukon Governments.• In light of the current tenure of land in the Yukon ... Federal involvement must be greater if this initiative is to succeed.• The YPAS Secretariat should consist of technical staff from all three levels of government. • It will be very difficult for Secretariat staff to co-chair LPTs.• Federal government will also be invited to cooperate with YTG in 'harmonizing' protection of HPAs. This is critical to effective functioning of territorial habitat protection regulations.• What is a 'local community'? Just say communities. • Please tell us how the fourth level of government, ie. Municipal Government, is to ensure that [...] concerns/input is received and given full consideration in the hearings. • The Secretariat should be active in promoting protected area design and establishment, not passive as described. • I would like to see the to-be-established YPAS Secretariat make all effort possible to ensure that stakeholders are aware of any developments which might affect them. • I am concerned about the cost of time and money that I will spend in preparation for, and attendance of meetings ...• I do see some benefits to this strategy and believe that things like the restrictions on vehicular access will have a positive effect on the game and the environment.• I only hope that this will be applied equally among all Yukoners and not be restricted to non-first nations people.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • I ... would like to be considered for a position on the [Tombstone] Local Planning Team. Please let me know how these appointments are made. • While local NGO representation on Local Planning Teams is best, there may be examples where NGOs delegates are invited from outside the region. • What criteria will be used to identify LPT members? Who determines membership? What recruitment methods will be used? How many members will represent each group? • Public attendance in LPT meetings is not sufficient. The public must also be able to participate constructively. • ... says First Nation governments will be invited to participate in YPAS discussions on the selection of priority ecoregions for planning. This does not appear to be consistent with Tech. Paper #3 which only mentions that an assessment will be done to determine First Nation interest in planning of ecoregions. • Are we expecting First Nations and the RRCs to have different roles in the selection of priority ecoregions? If not, the language should be consistent. • We should indicate who establishes the Terms of Reference for the Local Planning Team. I assume it is government. • ... development of any sort of land management strategy must have us [First Nations] in a partnership role. • I'm not sure that the Traditional Territories should be the planning unit for protected areas. May need to combine some areas to be more efficient. There is a need to ensure some consistency between planning teams, which might be difficult if there are 14 of them. • RRCs should participate on and co-chair the LPTs. • Municipal representatives should sit on all LPTs • LPT should be "stand alone" from the Regional Land Use Planning Commissions • RLUPCs should not take over responsibility for PAS planning process • RLUPC should be invited to have 1 rep. sit on the LPT • LPT should have Youth rep. • LPT should have elder rep. • Further clarification needs to be sought on the relationship between Land Use Planning and PAS. • The municipal government should have a seat on the LPT. It is elected and accountable to the local population and speaks up for local issues.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • The RRC is government-appointed and does not always accurately represent local views. • The UFA provides enough mechanisms for creating protected areas. YPAS is not needed. • YFNs have too much influence on how land is managed in the Yukon. • LPTs as described are too loaded with government bureaucrats. • LPTs should have local people, not federal and territorial government staff from Whitehorse telling local people what to do. • Government staff should act to provide technical support. • PAS should be planned through a Regional Land Use Plan. • YPAS needs to recognize Inuvialuit Final Agreement (IFA), associated legal requirements and management structures and Inuvialuit traditional use of the Yukon North Slope. • Tetlit Gwitch'in also need to be recognized in the YPAS. • Coordination is required with the federal government re: protection of the foreshore and the offshore. • Need to recognize unique aspect of North Slope region in the Yukon re: meeting IFA requirements.
<p>Tech. Paper #2: Types of Protected Areas and Criteria for Selection</p>	<ul style="list-style-type: none"> • ... recognized impartiality and professional practices of those evaluating the Proposed Areas will be vital factors for the acceptance of those decisions. • All information and decisions should be available to those interested. • p.3. para. 3: It may be more accurate to refer to ecoregions rather than ecosystems in the first bullet. • p.6. Naturalness: Add bullet "Existing and transboundary water use." • The designation of a Heritage River, although it invites a management plan, does not make it a protected area. • Criteria for representation should be elaborated more to reflect our local reality, as well as up to date ecological thinking. • The system as described may lead to a number of small Goal #1 areas with no coordinated biological approach to the system as a whole. • In some cases, there is a need for large areas to be protected; one such area may be the remaining portions of the winter range of the Porcupine Caribou Herd. • Define and publicize the protection criteria. • Yukoners' desire to enjoy our homeland should take precedence over protecting areas solely for use by the rich and scientific.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • The [...] would like to propose a system to protect areas for sensitive northern furbearer species. • Lynx and wolverine are recognized in Canada for conservation because of human activity. Marten, which require old growth forest as preferred habitat, will also need some protection. • ... our concept compliments the vision statement of the strategy by recognizing the importance of setting aside forested blocks of land representing habitat of these sensitive furbearer species and the implication of commercial development in the future. • The growing potential for habitat destruction through logging, road building, mining and hydro-development clearly demonstrates the need for a population and habitat management strategy • We believe that legislative protection is necessary to maintain the integrity of highly productive habitat areas and to ensure the long-term survival of these species. • The environmental values to be protected are the three species recognized for conservation and need to be reinforced in the criteria listed in Goal 2. • To prevent further encroachment in key furbearer areas, we would like to apply the concept of “Refugia” and “Reservoir Strategy” in the design and implementation of protected areas for marten and lynx populations. • The [...] wants to address the issue, in the strategy, of the proposed development of the Dawson Trail for the extension of the Trans Canada Trail. • ... we believe it would be premature for the government to support the development of the Dawson Trail without community consultation and proper resource assessment. • Trappers must continue to be allowed unrestricted freedom to trap in their concessions, unless there are very special circumstances. • Any proposal to establish “zone systems” on trapping concessions which restrict trapping activities (ie. use of snowmobiles, trail cutting, etc.) must exempt the trappers. • Clear definitions concerning what types of mining activity may be allowable in the variety of land designations beyond Core Areas (buffer zones, corridors, etc.) [are required]. • [...] appreciates the protection afforded the Fannin Sheep in an area on the outskirts of town through a no-hunting ban imposed by Renewable Resources. • We fully support the concept that there are economic benefits to protected areas, but argue against the assumption that tourism will be promoted in all protected areas. Tourism jobs may be created as a result of protected areas, but this is not a goal of the strategy. • The option must remain open to exclude tourism from specific management plans. Protected area concerns must be kept to ecological parameters.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • ... [this] paper would be improved by some clarification and consistency with respect to how and when information gaps are going to be addressed. • p. 5 ... “Some of these areas will be shaped by the need to represent large-scale ecosystems”. This is an excellent point. • p. 10 ... We recommend that Objective 4 be amended to read: “To protect areas of high value for outdoor recreation, tourism, education and research”. • A point could then be added to the criteria list: “ Areas with established programs or special opportunities for ecological research, monitoring, and education”. • Much of the Yukon must be protected in order to fulfill ecological and human demands for pristine landscapes in the future. • The PAS lacks explicit references for determining when biodiversity and wilderness values of natural regions have been adequately protected. • Develop ecological and other criteria to determine when protected area proposals meet biodiversity and wilderness conservation objectives. • p. 15: ... is the wilderness management area the reason for including this notion In view of all the other protective mechanisms and programs, this seems obsolete and confusing now. Perhaps it should be repealed? • There must be room for ‘a no mans land’ (no ‘persons’ land). For example, pick an area that includes headwaters and drainages which include important representative geography where no one will be allowed. • That means no people on foot or mechanized transport, no tourists, no researchers, no bureaucrats, no mines, movies, or even environmentalists. This could be a landmark Yukon initiative. • ... we would draw attention to the absence of any recognition for the establishment of marine conservation areas. • We would ask that marine conservation and coastal zone management planning be given full and explicit recognition in any Yukon protected areas strategy. • Using representation as a tool requires the ability to assess when ... the system is likely to protect the biodiversity of the ecoregion. Criteria are needed to assess this adequacy. • Motorized activities are not compatible with protected spaces, as all motorized activities have significant impacts on their landscapes. • The Multiple Recreation Use Zone (p. 26) is not appropriate to the PAS either. Let the downhill ski hills, the waterways for motorboats, and the ATV and snow-machines enjoy the great outdoors in their own zone, but please keep it outside of the PAS. PAS is a title that should not be used so loosely. • Wilderness Management Areas (p. 15) need stronger protection than that afforded by Cabinet.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • Surely a system can be set up where legislation would be required to remove a wilderness designation, or some other mechanism that would give wilderness areas the same level of protection as, say, national parks have. • All protected spaces in the Yukon should be respected and designated with as strong a level of protection as possible. • Models exist in ... other areas where private land owners manage their properties according to conservation management criteria. if the standards are met the lands are then incorporated into the overall total area protected for the jurisdiction. This concept may apply to First Nations, outfitters, lodge owners, farmers, and others. • Develop ecological and other criteria to determine when protected area proposals meet biodiversity and wilderness conservation objectives. • ... the demand for natural environment recreation has been rising dramatically and will increase in future. What provisions are there for the long term (500 years+) demand for protected areas? • What is meant by economic values associated with intrinsic ecological values? • Consideration could be given to protecting areas for multi-purpose economic development, and setting up objectives and criteria for these. • A requirement for mineral and energy (and forestry) resource assessment should be explicitly included in the processes for each of the four territorial types, each of the four Federal types, and the Heritage Rivers. • All of these types of protected areas will likely have a negative impact on forestry, mining, and oil-gas extraction industries, and their contribution to sustainable development. • Consideration could be given to protected areas that contain a highly protected core area and buffer zones, where limited and managed activities, not limited to recreational activities, can occur. • ... it would be worthwhile for the description of ecoregions to identify the fact that these ecoregions are part of the ecological system for Canada that was established by the Canada Committee on Land Classification. • It is not the construction of roads so much as the non-forestry or non-mining use of such roads that may threaten ecosystems. • Serious consideration could be given to regulation of road use instead of prohibiting resource extraction, and to the decommissioning of roads to prevent their improper use after completion of resource extraction. • Non-First Nation subsistence hunting is also important and should be allowed in PAS. • Outfitting can have a major impact on wildlife and should not be allowed in protected areas. • The criteria for representative areas need to be expanded upon. • This includes criteria to determine when adequate protection has been achieved to meet conservation needs and to

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>maintain long term ecological viability and biodiversity.</p> <ul style="list-style-type: none"> • The need for Kluane Game Sanctuary should be reevaluated. With the National Park, the area may be over represented. • The KGS only shuts out the non-native hunter. • Let's balance out the areas for representation and protect those areas that need it the most. • PAS needs to clarify that certain activities will be allowed, such as tourism. • Visitor activities should not be secondary considerations for managing protected areas. • Visitor activities and access can be an important part of educating the public about the environment. <ul style="list-style-type: none"> • Current status of protection on the Yukon North Slope should be noted. • Reference should be made to the need for coastal zone management, conservation needs on the coast, and marine protection areas. • PAS should make reference to existing agreements for conservation for the IFA region. • PAS should reference work already done by some groups re: conservation initiatives in North Yukon.
<p>Tech. Paper #3: Planning and Establishing Protected Areas</p>	<ul style="list-style-type: none"> • Is it possible to initiate the DAP review to run concurrent with the remainder of the process? • ...timely and complete consultation with FNs and industry will facilitate the work. • ... interim protection should be applied judiciously ... <ul style="list-style-type: none"> • The Strategy anticipates the need to examine and mediate between competing resource values. The appointment of a regional planning Commission ... would seem to provide the greatest opportunity for success. • We would propose that the process of ecoregion priority setting include consideration of the appropriate body to carry out the public consultation aspect of the Strategy. Where regional planning Commissions are seen to be the appropriate body, the Strategy's criteria and procedural requirements could be incorporated into the Commission's General Terms of Reference. • In order to expedite the protected areas process, it could perhaps also be specified that planning Commissions may recommend areas of interest for further study prior to the completion of the entire planning process. • Cabinet approved study areas could then be referred back to Commissions for further study. • Propose that the relationship between these two processes [YPAS./YLUP} be clarified in greater detail at this point. • p.5. Step 1: Proposed to add bullet "identification of ecoregions where a regional land use planning process is being established."

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • p.5: A criteria for determining priority ecoregions should include "... ecoregions where a regional land use planning process is being established." • p.10. para. 4: Propose to add "... existing processes including land use planning will continue to be followed." • p.5: It may be clearer to the reader if the wording of the steps is the same in the Technical Report as it is in the Strategy. • We agree that Local Planning Teams are the ideal vehicles to carry out much of the work. The [...] foresees a very similar team being involved in the preparation of Regional Land Use Plans. The concern is that people in the communities will become inundated with various planning processes causing confusion and unrealistic demands on time and resources. • The [...] views the Local Planning Team as being almost one and the same for both processes. Work carried out by the Local Planning Team should be carried out once for a common goal. • The [...] supports the YPAS desire to designate the Protected Areas under existing or amended legislation. We see these areas being an integral part of the Regional Land Use Plan but not dependent on the Plan for official designation or protection. • Stakeholders will have to be invited at the table as interest holders, whether they live in the area considered or not. • There appears to be areas where there will be unnecessary overlap with other processes such as DAP; a coordinated approach may be more effective both in terms of cost and time. • During the community consultation, the local trappers would play a major role during the evaluation of initial areas of interest when dealing with furbearers. • Give individuals and interest groups the opportunity to make suggestions for candidate protected areas at the onset of the selection process ie. at the time the Secretariat is identifying areas of interest. • The Yukon Land Use Planning initiative ... should be fully integrated with the Yukon Protected Areas Strategy in order to avoid duplication of effort. The challenge will be to integrate and coordinate with other planning initiatives, and still have the YPAS goals as a priority. • p.16, Step 3: Local Planning Teams will have to communicate the "standard criteria" for identifying protected areas very clearly to local/community participants in the YPAS process. Otherwise, unrealistic expectations may be raised, or the whole process may become very arbitrary. • The link between YPAS Local Planning Teams and the Land Use Planning Commissions should be spelled out in this step. • ...[this] paper would be improved by some clarification and consistency with respect to how and when information gaps are going to be addressed. • ... need to ensure that this "process" fits with the Wetlands Strategy process.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • ... it would make sense to undertake a DAP review to make sure the specific proposal was consistent with an approved regional land use plan because of its comprehensive nature, but you would not use DAP to simply compare the merits of one resource use against another as an independent variable. • Remove onerous and unnecessary steps that will delay and obstruct the implementation process. • Using DAP and CEAA to assess the same protected area means that protected areas will be subjected to more rigorous scrutiny by an appointed body than industrial development. This would be a perversion of the intent of DAP and would be unacceptable. • Allow for greater flexibility in moving forward quickly and efficiently where communities, Renewable Resource Councils and First Nations are prepared to do so. • The draft PAS is unclear in establishing the relationship and priorities between the PAS and regional land use planning processes. • Ensure that the government and public agenda embodied in the PAS remains a government led and coordinated process that is accountable to elected politicians. We fully support the integral role of First Nations, Renewable Resources Councils, and Local Planning Teams to carry out the work required to identify and recommend protected areas. • Where Regional Land Use Planning Commissions exist, this work should be fully coordinated with the land use planning process. We recommend that, where practical, Land use Planning Commission members participate (either ex-officio or appointed) in the Local Planning Teams for protected areas. • The protected area planning process should not be held up due to lengthy regional land use planning processes. Rather, protected areas should be fed into the land use planning process as one key component. • Ensure that the PAS does not use both CEAA and DAP for assessing the same area at different stages. • ... what if there is considerable public disapproval at stage [5], how will the public's opposition be accommodated? • Those regions that are at the most risk of being disrupted should be planned before there is no representative area left. • The LPT ... we believe ... should read 'will' include local municipal government. • We would suggest that your department look at ensuring our concerns are addressed and an elected member of the Municipality is placed on the LPT to ensure that their concerns are heard and we are aware of what is happening in the region. • Secondly the [...] has a member responsible for the YPAS and needs to be kept informed of the total YPAS. • The 10-step process is too cumbersome ... There should be a parallel, alternate, or substitute process for designating protected areas where support is strong, conflict low, and research available. Build in the flexibility to allow for a quicker route.

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> • If DAP is to be involved, perhaps it should be to facilitate and educational role. PAS provides a role model for development: if PAS is not a development, then why include it in DAP? • Ensure that the Local Planning Teams and the Land Use Planning Commission roles and responsibilities are clearly articulated and coordinated. • It is essential that non-government organizations have an opportunity to make presentations on areas of interest at the territorial and regional scale. • We are glad to hear that the science of conservation biology is used to identify representative areas for ecoregion representation. • First Nations and RRCs may not know the extent of local interest in planning. Perhaps it would be appropriate to make community announcements in order to reach interested community members who may not be known to these organizations. • Is there any funding provided for the participation of RRCs, First nations, Municipal Governments, Conservation Interests, Industry Interests, and the coordinating work of the Local Planning Team with the Regional Land Use Planning Council? • Cabinet approval could be an obstacle to the approval of a protected area requested and established by a community. What mechanism is in place to ensure cabinet approvals? What powers does cabinet have to change protected area designations established through the public process? • It is not clear in the text why it is referred to DAP. Also not clear what decision making DAP will do (accept, reject, etc.?). • ... there is some danger in relying too heavily on “local participation”. • p. 18, Step 8: seems to take for granted that all protected areas are to be permanently closed. This would eliminate the possibility of creating floating reserves, or seasonal protected areas. Since these are tools that can be effective in protecting biodiversity, the PAS might consider their possible use. • ... this paper should state explicitly that resource assessments are required for all protected areas. The impression is given in Tech. Paper 2 that only national parks require mineral and energy resource assessments. • Areas of Interest statement could also include the possibility that none of the areas of interest may be chosen if the ecoregions is determined to be adequately represented already. • Resource Assessments – (like other research done for PAS) could be subject to peer review, published and discussed during public consultation. • Timelines seem to be unrealistically short, notwithstanding consensus by industry and other stakeholders that protected areas need to be completed quickly to resolve uncertainty. • Doing a proper resource assessment typically takes 2-3 years (1st year – scoping, 2nd year – major field season, 3rd year – follow-up and write-up).

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none"> Time is required for consultation and feed-back after publication of the resource assessment.
<p>Tech. Paper #5: Socio-economic Assessments of Protected Areas</p>	<ul style="list-style-type: none"> ... socio-economic assessments should be extensive ...recognized impartiality and professional practices of those evaluating the Proposed Areas will be vital ... All information should be available to those interested. Explain the rationale behind the decisions. The assessments may be highly subjective. ... an effort to make factors and decisions understandable to FNs, industry, and the public will pay dividends. If the PAS is going to employ conservation biology to identify the size and extent of proposed areas, then mineral resource values should not enter into the evaluation. If the process is carried out with integrity ... areas with known mineral potential will be excluded from protection. This will not necessarily exclude the next major mineral discovery in the Yukon. ... no one can predict where the next major mineral discovery in the Yukon will be made and ... it could just as likely be in an area of low mineral potential, as the experts perceive it, as high. If the Yukon persists with this plan ... mining companies and their high risk exploration budgets will go elsewhere. The chances for discovery of new mines in the Yukon will drop dramatically. p.4. para. 5: last word: It may be more realistic to say minimized rather than avoided. p.8,9: The Strategy should commit to the preparation of a more detailed explanation of how this method [multiple accounts analysis] will be applied, and to a workshop to explain and discuss its application to a specific situation. The mineral resource assessment process does not work and has no credibility in the mining industry. The Regional Land use Planning Commission (where in place) must play a major role in this process [of socio-economic assessment]. The current language of the draft suggests that the mineral rights would have precedence over the value of the herd. We would ask that ecological values be placed on an equal footing with resource values. Current and continued use by commercial tourism operators should be included ... so operators will have input into how

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>future protection will affect them.</p> <ul style="list-style-type: none">• Accurate information on withdrawn lands and those where development is restricted must be compiled and made public prior to any further development of protected areas or a protected areas strategy.• ... Yukoners ... must be informed as to how much land is to be withdrawn from development and how much is available for mineral or oil and gas exploration, forestry operations, etc. • An attempt should be made to dissociate the idea of protected areas from economic advantage or disadvantage. • Another strength of the draft Yukon Protected Areas Strategy is the recognition of the economic value of intact and functioning ecosystems.• Ecosystem functions such as water filtration, flood abatement, water storage, soil production and retention, and oxygen production are now widely recognized as significant contributions to healthy, sustainable communities. • ... it does not [Strategy] consider explicitly ecological economics.• It is flawed to base economic cost-benefit analyses of protected areas on the outdated and naïve assumptions of neo-classical economics.• Even when economic analyses use mainstream criteria and do not consider ecosystem services, evidence has not always supported the presumption that protecting land from development will harm local economies.• Evidence ... suggests that economic growth is stimulated by environmental amenities.• ... case studies in southern British Columbia and Alberta in Canada, and the Greater Yellowstone Region, in the US, where environmental protection has been explicitly recognized as an economic development strategy, suggest that environmental protection and economic development are complementary goals. • It is unacceptable ... to suggest that resource values will determine the location or boundaries of protected areas.• Ecological criteria, not resource values, must be used to determine protected area boundaries. All statements that suggest overriding importance of resource values should be removed from the Strategy. • This section would be strengthened with specific reference to the economic value of maintaining ecosystems.• ... include the following points:<ul style="list-style-type: none">• National ecosystems also serve an economic function through a number of processes;• Some are obvious, such as water storage, flood abatement, and water filtration;• Others are less obvious such as soil formation, erosion control, oxygen production, and nutrient cycling;• The estimated cost of replacing these processes gives an idea of their economic value.• p. 9 ... Multiple Accounts Analysis Framework ... is a good starting point. By adding some detail under the Environmental

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>Accounts and Economic Accounts section we will have a better idea of what is being considered.</p> <ul style="list-style-type: none">• ... we find it odd that efforts to preserve our natural heritage and public resources must meet a higher standard of research and justification than other types of “land uses”.• For example, the process calls for extensive social and economic assessments with multiple accounts analysis to factor in other resource interests and non-monetary values.• We presume the government intends to create a level playing field for all types of development. Thus other resource development proposals such as mining, forestry, or agriculture will not be expected to undergo the same type of stringent review and put their development criteria on the table for evaluation.• If this is your intent, industry needs to know this up-front. If it is not and only conservation proposals are to be subjected to rigorous review, this is unfair.• ... the process outlined means completion of regional land use plans must be a priority since this is the only mechanism that allows for full integration of different resource values in a comprehensive manner. • The PAS has implicit assumptions that protected areas will not be established where other resources such as minerals are present.• Carry out resource assessments, and avoid unnecessary conflicts where possible, but avoid setting the precedent that areas with competing resource interests will be automatically avoided. • ... will there be standards for assessment dictated by your previous statements about protected areas ‘meeting SMA definitions’ etc.? • Wind power and other ‘green’ power sources should be mentioned here also. • ... there should be clearer, more implicit language about the values or value being referred to, what is valued and on what terms – clearly identifying the non-economic values, and value, so as to inspire protected areas without the baggage of economics. • Resource assessments: section is a little too simplistic. Resource assessments can help refine the areas, but it should be stated that there might be occasions where a valuable ecological resource will be in the same place as other resources. Then it will be up to the planning committee and the government to decide what takes precedence. • The overall tone of this paper is constructive.• The issue of compensation for loss of tenure and associated economic activities is not dealt with in the strategy.• p. 7: The first step, using regional scale resource assessments to help identify initial broad areas of interest is very

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>positive.</p> <ul style="list-style-type: none"> • ... selecting a study area, will, in most cases, involve field work ... on all resource issues having a possible bearing on land access. • ... it is not possible to tell whether it is necessary to do field work until the field work is done at least to some extent. • We know so little about our land (in many ways), that information gaps are almost inevitable. • p.8,9: Multiple Accounts Analysis Framework: This is an excellent approach, and can be further enhanced by building the multiple accounts into a spatial database in a GIS. • These data can then be objectively modeled in the GIS in a transparent and clearly accountable way, such that logical arguments can be experimented with, and weights of importance can be assigned in an even, consistent way to provide explainable, traceable guidance to planners. • Multiple accounts analysis is a good approach to assessments but requires more technical elaboration on how it will be applied.
<p>Tech. Paper #6: Interim Protection and Third Party Interests</p>	<ul style="list-style-type: none"> • The use of map notations is favourable ... increases the transparency of this process. • ... it is paramount that LPT's work quickly and efficiently. • Some mention should be made of the information dissemination/consultation process to FNs, industry, and the public prior to placement of Map Notations and Land Reservations ... to allow for feedback and assessment of that feedback. • The least time limit of Interim Protection should be one year, not three. • A process should provide funding and establish timelines for interventions and publication of decisions on the review. • A 5-year limit to land withdrawal seems excessive. Why not a 3-year limit? • "Third party interests will be dealt with in a fair manner". This must be clearly stated as fair market value compensation for expropriation. • What will be the procedure for determining my confiscatory compensation? • Strong interim protection is needed to prevent the nuisance staking seen in recent years around [Tombstone]. • [...] is participating in the Strategy to facilitate the process rather than to establish protected areas under it's jurisdiction. Consequently, we believe that [...] is not responsible for compensation costs which may arise in relation to the

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>expropriation of third party interests. However, further discussion and analysis is needed to more fully understand the implications of the Strategy with regard to governments potential liability for compensation.</p> <ul style="list-style-type: none"> • p.3. para. 2: Proposed to add "...ensures that new surface land dispositions or subsurface mineral rights do not occur..." • p.4. para.1: Proposed to add "... notify review agencies of a conservation interest" • p.4. para. 1: "... without disturbance to the values being considered for protection." • p.4. para. 4: Change wording "... They do not prohibit entry on land for the purpose of mineral staking, however, applications for mining land use permits to perform work on quartz and placer mineral claims..." • p.6. para. 1: Change wording "The Yukon government will request interim protection for Cabinet approved study areas that are on lands under federal jurisdiction." • p.6. para. 1: Last sentence, "Interim protection will be applied in the following manner." • First bullet, "Interim protection will be ..." • p.7. para. 2: Add "... any new surface land applications..." • p.7. para. 3: Revise "... the federal Cabinet will pass, through an Order-in-Council, a Withdrawal and Prohibition Order preventing any new surface and subsurface dispositions..." • p.7. para. 4: The Withdrawal and Prohibition Orders will specify ..." <ul style="list-style-type: none"> • Map notation is entirely ineffective in providing protection. Candidate Protected Areas must be interim protected by way of subsurface withdrawal to allow for uncompromised selection and planning. The Interim protection should be timely. • Yukon should lobby the Federal Government to develop a much quicker process for interim protection. The interim protection must encompass all of the land under potential consideration. Identifying core areas only encourages speculation in the perimeter. Public announcements with respect to Government's interests or intentions in an area should not be made until interim protection is in place. [...] experience with the proposed Tombstone Park exemplifies – to our extreme frustration – what occurs when hoopla and fanfare precede interim protection. • Interests (mining claims, timber leases, etc.) that have been established in areas under consideration for protection should not dissuade Government from establishing protected areas, including SMAs, in the best possible locations and of sufficient size to adequately protect representative portions of ecoregions. • Individuals/companies/entities/opportunists who have established interests should only be compensated for costs actually incurred. They should not be compensated for purported potential values. <ul style="list-style-type: none"> • What is the compensation policy for interest holders that will be affected? • 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 use of map notations, if considered (this is unclear) should be stated clearly in the main document ... the technical document should specify the total number of areas simultaneously under interim protection, have a maximum span of 3

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>years, and not be automatically extended if no decision has been made.</p> <ul style="list-style-type: none"> • Interim Protection ... while areas are being studies is not acceptable. The industry’s experience with such orders is that they generally become permanent • There must be compensation of some kind for trappers who are restricted in their activities (ie. assignment of new trapping concession to replace an alienated one, monetary compensation, adjustment of concession boundaries, etc.). • Compensation policy for actual or de factor expropriation of mineral exploration assets within Protected Areas. • Processes for use of Resource Assessments prior to approval of protected areas. • [...] fully supports the use of map notation and interim protection of candidate protected areas. We are concerned that the predicted 3-6 months for granting interim protection will jeopardize the ecological values in the proposed study area. • Work immediately with federal officials to reduce the timeline for interim withdrawal and stress the need for a “level playing field” during the study phase. • ... the status of oil and gas should be clarified throughout the document. • Limiting the number of interim protections sounds like you would intentionally go slower with the whole process. It also sounds like a wimpy amelioration to industry. • Will the public be made aware of areas under consideration for interim protection before the interim protection is applied? [There should be guaranteed participation of municipal governments on the LPTs]. • I have a question regarding interim protection and how that would affect the right of a property owner or lessee in a potential protected area to sell or otherwise transfer title to someone else during the interim period. • I strongly believe that freedom to sell or bequest private property should not be impeded at any time before, during, or after the establishment of a protected area, and hope that this will be respected by the PAS. • If I do lose any opportunity, I want to ensure that I will be fairly compensated. • My main concern though is with Interim Protection. I find it very discouraging to see what happened in the Tombstone Park Study Area where an individual went in and staked claims along the border of the withdrawn protected area. • This ... must not be allowed to happen again in future area. • Under the interim protection measures, can a proponent renew existing surface and subsurface dispositions? If so, there

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>could be a conflict.</p> <ul style="list-style-type: none"> • What mechanisms are in place to prevent speculators from gaining land use permits and allocations which may later have to be bought back? • Change 'sale of land or leases' to 'sale or other disposition of land'. A sale or lease is not the only form of disposition. • The policy doesn't outline strict enough interim protection measures. • Step 4 might thus read: "If specific conditions justify such actin and after careful consideration of economic and social impacts, the Yukon Cabinet may ask the federal government to withdraw the area from new mineral staking and other development". • p. 17: duration and justification of interim protection is not specified. • it is good that the use of interim protection be considered only after resource assessments and much consultation have been done. • For the most part, interim protection is a needless expense because resource extraction industries tend to avoid areas being considered for protected status • p. 6: The statement "Interim protection will normally have time limits of three to five years" is inconsistent with the statement in Tech. Paper 3, p. 9: "the process for establishing areas for ecoregion representation should not take longer than two to three years from the identification of broad initial areas of interest to the completion of final management plans". • p. 7: An explicit statement that once a protected area's boundaries have been established, any land withdrawal that extends beyond these boundaries is immediately terminated to permit resumption of normal economic development activities under existing land-use regulations would be very useful. • Compensation needs to be further explored by governments. The final YPAS does not necessarily need to elaborate further on this topic.
<p>Tech. Paper #7: Work Plan</p>	<ul style="list-style-type: none"> • The schedule for protecting wetlands should be advanced. • Government should move quickly to invite the Federal government to initiate the feasibility study for Wolf Lake. • The focus of the PAS in the next two years must be to show concrete progress in identifying and protecting critical areas (e.g. SE Yukon where timber extraction is quickly narrowing choices).

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<ul style="list-style-type: none">• p.4. Section 3: Under Action Plan propose to reference establishing a Local Planning Team/or a regional planning Commission.• ... Wetlands Protection ... a strategy should be developed sooner than March 2000. By that date, it seems reasonable to hope that a strategy will be in place, and at least six wetlands protected.• A key challenge in implementing the Strategy will be to manage the tremendous amount of information required to complete assessments of candidate areas.• This Strategy may provide the basis for the Yukon government, the federal government, and First Nations to develop compatible criteria for the collection and management of biological, physical and cultural information.• [...] is particularly interested in participating in the development of an information base to track species at risk.• A data centre that documents the status of these species and their habitats would serve the Strategy objective of protecting important vegetation, fish and wildlife.• ...[this] paper would be improved by some clarification and consistency with respect to how and when information gaps are going to be addressed.• p. 3, Section 4: ... federal interests will be coordinated ... [add] Environment Canada• Other tools may be used to protect wetlands ... Replace with "Section 5 will prioritize wetland interests during the initial two-year Workplan".• The document proposed a slow implementation schedule, combined with weak commitments to on-the-ground results by specified dates.• We urge the Yukon government to live up to its promises and make explicit statements on the progress it intends to achieve by the Year 2000.• We urge you to assess the feasibility of a National Park at Wolf Lake as soon as the YPAS is approved. We further ask you to acknowledge the gap in the national parks system in Natural Region #7, the area within which Wolf Lake is situated.• If the feasibility study proposes a national park, we recommend interim protection for the area be established by September of 2000.• We recommend protecting 9 new areas by the year 2000, yet this document suggests only 2-3 may be feasible.• ... the proposed pace of designations is far too slow.• The final boundary for Tombstone Park should be established no later than March 1999, with full withdrawal of mineral rights to follow by May, 1999.• We recommend that candidate areas in the Wind, Snake, and Bonnet Plume watersheds, as well as further protection in the Keele Peak/Itsi Range and the upper Coal River watershed be advanced to full study area status by 2000.• We further recommend on-going assessment in the Beaver River watershed, Richardson Mountains/Summit Lake and

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>other sites already identified as having territorially significant conservation values.</p> <ul style="list-style-type: none"> • Increase the pace of wetlands protection. We recommend a Wetlands Protection Strategy by June, 1999, with at least 6 wetlands protected by March 1, 2000. • Are the timelines realistic? • Will the Strategy attempt to “fast-track” the establishment of Special Management Areas as outlined in the Final Agreements? • The RRCs are mandated further through Chapter’s 16 & 17 of the Final Agreements as “the primary instrument for Renewable Resource Management” and are granted status as an interested party on matters that affect the management and conservation of fish and wildlife and their habitats within their traditional territory. The role of the RRCs should be identified as mandated for the entire process. • This is a transparent and energetic action plan, but it is not always clear how the different elements are related. • ... it is not clear how the Wetlands Protection Strategy is to be integrated into the Protected Areas Strategy. • Implementation should include educational component. • Region is ready to start implementation immediately with local consultation and data collection. • What is the YPAS going to cost?
<p>Tech. Paper #8: Reviewing and Updating the Strategy</p>	<ul style="list-style-type: none"> • Quarterly and annual and five-year reports, reviews, and updates should be available to all, including the general public, within seven days of publication. • Will biological monitoring be addressed ... how will government determine if protected areas are meeting our management objectives? • A review of the workplan every 12 months is onerous due to the consultation requirements. Consideration should be given to expanding it to 18 months. <p>NATURAL RESOURCES CANADA –</p> <ul style="list-style-type: none"> • To make the review and updating of the strategy as public and transparent as possible, we suggest the use of a web-site. The quarterly, as well as annual, reports could be posted on the web-site as soon as they are reviewed and approved by

Yukon Protected Areas Strategy

Summary of Comments – Public Consultation ending September 28, 1998

Topic	Comment
	<p>the Territorial Government. This web-site could have a forum for interchange between the public and implementers of the PAS.</p> <ul style="list-style-type: none"><li data-bbox="792 329 2502 367">. Recognize the need for monitoring PAS to be able to evaluate how well the PAs are meeting conservation objectives.