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# Canadian Parks and Wilderness Society- Yukon Chapter

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*Handwritten signatures and initials*

Hon. Piers McDonald, Government Leader,  
Yukon Territorial Government,  
Box 2703,  
Whitehorse, Yukon  
Y1A 2C6

AD/ABLOG # 9664

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February 16, 1998

**Re: Special Management Areas, Economic Development and the Protected Areas Strategy**

Dear Mr. McDonald,

Thankyou for the opportunity to meet with you last week to discuss various issues concerning the relationship between Special Management Areas, Economic Development and the Protected Areas Strategy. We also met with the Hon. Trevor Harding on these topics and wish to follow up our meetings with these recommendations.

We would first like to acknowledge your government's progress on a number of protected area initiatives. CPAWS and I'm sure the public in general are pleased to see the energy and leadership being devoted to the Protected Areas Strategy by Minister Eric Fairclough and his departmental staff. Secondly, we appreciate your government's proclamation of the amendments to the Wildlife Act regarding wildlife habitat protection. This important step now sets the stage for implementing management plans for Habitat Protection Areas identified through land claims agreements. We look forward to participating in the remaining required revisions to the Wildlife Act that will make it a more effective part of the Protected Areas Strategy and wildlife conservation in general.

### Protected Areas Strategy

The Protected Areas Strategy will guide the implementation of a protected areas system for many years to come. For the PAS to serve its purpose well there are a number of important issues that require careful consideration. We think the Strategy has a better chance for success if it is presented in a positive context of pride and recognition of the strong attachment Yukoners have for the land and its wild species. We are concerned that those interests who are opposed to protected areas have already begun to spread negative arguments based on fear prior to the public being given a chance to understand the many positive benefits. The public asked for change and for a sense of balance – protected areas are one step towards that balance.

- \* • We urge the government to adopt a more visible public profile in communicating the many benefits of a Protected Areas Strategy and a network of protected areas.

### **Special Management Areas**

We understand that some progress has been made on certain Special Management Area proposals and that many of these areas could, in the future, make a contribution towards the Yukon Protected Areas Strategy. We remain very concerned about continuing apparent difficulties in making progress on other remaining SMA proposals. It is clear that the lack of support for the PAS among some First Nations is directly related to the slow progress on SMAs.

Once SMAs are supported by your government for their obvious benefits to First Nations and the public interest, we expect that the PAS may be more widely viewed in a positive light by the First Nations community. As you know, virtually all new fully protected areas designated after the land claims agreements are concluded will also be SMAs, with or without the PAS.

We understand the government has not been receptive to an SMA proposal in the Coal River watershed. There are no doubt many good reasons why the Liard First Nation seeks a Special Management Area in the Coal River valley, but we draw your attention to the parallel public interest in protection. The scenic and diverse Coal River watershed is one of the last major tributaries in the Liard Basin that is not yet disturbed by industrial development on the Yukon or BC side and that does not have a road in the main valley. While all river corridors should be managed to conserve wildlife habitat, we urge you to consider the long term public interest in protecting at least one major watershed in the southeast Yukon. The region around the nationally significant Coal River Springs Ecological Reserve is a worthy SMA candidate for both cultural and natural history reasons, and the watershed as a whole is a legitimate Study Area to assess conservation options. In our view the Coal River has the least apparent conflicts between conservation and mining, oil and gas or forestry development of any of the major southeast Yukon Rivers. Furthermore, sustainable economic development in the southeast Yukon should also include retaining long term tourism opportunities in the face of cyclical resource-based industries. It is our collective obligation to ensure that unplanned industrial development does not compromise the ecological integrity and quality of life in the region.

**We urge your government to:**

- **support the Coal River watershed as an SMA and Study Area,**
- **support the remaining SMA proposals submitted by other First Nations.**

### **Economic Development**

During the past year, we have observed that some of the actions and policies of the Economic Development department appear to have been an obstacle to progress on the Protected Areas Strategy. In our view the department should be a partner in the preparation and implementation of a balanced and effective PAS. For example, it is disturbing to see Economic Development Department staff taking positions in public meetings that are contrary to progress on Protected Areas, while we understand other staff have been questioned for appearing “too green” in presenting the facts on protected areas. This apparent double standard seems contrary to government policy on protected areas and is confusing to the public. No one should need to apologize for the conservation side of the government agenda.

While we fully acknowledge the need for the Economic Development Department to work constructively with the mining industry, and to ensure that all resource values are considered - we also suggest it is in the public interest for the department to broaden its scope to include more emphasis on economic alternatives and community economic benefits of conservation in general. We do not believe it is appropriate for department officials to participate in the rhetoric of fear promoted by industry with respect to protected areas. In our view, the department should take a visible leadership role in more clearly articulating the economic aspects of protected areas and tourism. The department should counter the prevailing notion that protected areas will subtract from the economy and eliminate existing jobs.

**We urge your government to:**

- **carry out a comprehensive economic analysis on the long term benefits of protected areas in the Yukon, including case studies of communities such as Haines Junction that have benefited from nearby parks.**
- \* • **include protected areas as part of a strategy of economic diversification, community development and support for sustainable tourism.**
- **adopt economic evaluation techniques that include modern ecological accounting approaches in order to give a clearer picture of the long term costs and benefits associated with protection and development.**

### **Protected Areas Strategy Timelines**

The Yukon and other governments across Canada have made repeated references and political commitments to completion of the representative protected areas system by the year 2000. These commitments are well documented and have a relatively high public profile. These promises have been further reflected widely in NGO literature and performance assessments. The year 2000 is also perceived by the public as a benchmark for progress, and in fact polls show Canadians want governments to pick up the pace.

While we fully recognize that it is unrealistic to complete all aspects of the PAS by the Year 2000 we strongly urge you to retain language in the PAS that emphasizes the government will **“work towards the goal.”** Such language would still allow room for varying rates of progress in different regions and communities. To back off on the many previous commitments will be viewed by NGOs and a large portion of the public as a recipe for avoiding on-the-ground progress. The public is looking for **substantial progress** by the end of the year 2000 and this should be reflected in the PAS schedule. The NGO community will not be critical of a government that makes a **“best effort”** towards substantial progress, but doesn't quite reach the goal. On the otherhand, a significant “up front” weakening of timelines in the PAS would be a reversal of political commitments, and could undermine public confidence.

- **We urge your government to retain the goal of *working towards* completion of a representative protected areas network by the year 2000.**

### **Industrial Development in Protected Areas**

The PAS should be very clear that the protected areas with the highest level of protection will not have mining, logging, hydro-electric or other industrial development. The question of “mining in parks” has already been answered through various previous and present government commitments, policy statements and the Whitehorse Mining Initiative. The notion of “sequential uses,” that is to say, “log it first then protect it” would be unacceptable to the majority of the public and has no place in a modern PAS. Any weakening of protected areas standards would represent backsliding from broad consensus achieved during the last decade. We ask you to ensure the PAS shows clearly the continuum of protection levels that will allow flexibility outside those areas receiving the highest protection standards.

- **We urge your government to maintain a policy of no industrial development in core protected areas.**
- **We recommend a thorough overhaul of the Parks Act to ensure that industrial development is prohibited in Territorial Parks by legislation.**

### **Interim Protection**

Interim protection is a key planning component in an effective and fair PAS. In the case of candidate protected areas, it is essential to balance out the overwhelming precedence that mining laws take over alternative land uses and the public interest in general. We have the necessary tools, we are already using interim protection, the public has demonstrated strong support for it, and it is acknowledged in the Whitehorse Mining Initiative. The Tombstone example, as well as many others across the country, clearly demonstrate the very high potential for political, ecological and economic costs of a failure to employ interim protection tools.

The NGO community has already agreed to time limitations (eg. 2-3 years) and to a process that does not lead to an excessive number of interim protected areas (eg. we only have the capacity to deal with a certain number of candidate areas with interim protection at any given time). We also agree that full interim protection should be employed once an area has been elevated to “cabinet study area” status.

We recommend that the PAS allow for a two stage process that permits partial interim protection of recognized multiple candidate areas early in the evaluation process, for example with map notation. This could serve as an early “red flag” during a study process of multiple areas of interest within a single ecoregion. Once the final area(s) has been selected for detailed study, full interim protection should be employed. We recommend that the study area boundary should include the entire area being considered for protection and not just a small “core area” within the study area. The purpose of interim protection is to create a level playing field while decisions are made on what areas should be protected and what boundaries are appropriate.

- **We urge your government to support an effective and fair interim protection policy as an integral part of the Protected Areas Strategy.**

Thankyou for the opportunity to meet with you and discuss these concerns. We look forward to a positive resolution of the key challenges that the Protected Areas Strategy must address.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Juri Peepre". The signature is fluid and cursive, with a large initial "J" and "P".

Juri Peepre

CPAWS-Yukon & WWF Endangered Spaces Co-ordinator

cc. Hon. Trevor Harding, Minister of Economic Development  
Hon. Eric Fairclough, Minister of Renewable Resources  
Hon. Dave Keenan, Minister of Tourism