

April 25, 2006

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Peel Watershed Planning Commission
201 – 307 Jarvis Street
Whitehorse, Yukon Y1A 2H3

Thank you for the opportunity to respond to the Issues and Interests Report.

We would first like to comment that we were very encouraged by the report in the way it identifies the value and importance of our industry in the planning area. It also became clear in reviewing the document that the river corridors are of great importance, not just for wilderness tourism, but also most other values identified. We would like to state however that we were disappointed that there was not more emphasis on the establishment of protected areas in the region. River "corridors" alone are not enough to satisfy the interests of wilderness tourism nor are they enough to maintain large intact tracts of land for wildlife habitat.

We would like to comment further on a few points that were raised in the document.

Conservation Areas

Although Conservation and protected areas are not itemized under a specific heading in the report we feel that we want to respond to this issue first. From a wilderness tourism perspective we are supportive of seeing large tracts of the Peel River watershed being "protected" from industrial developments by a protected area designation. To preserve the integrity of the area and to be truly sustainable the plan needs to set aside land for protection. We feel strongly that this value should be a cornerstone of the plan for the Peel area. The North Yukon Land Use Plan is a good example of incorporating National Parks, Territorial Parks and Special Management Areas into a planning area. These protected areas are critical to the sustainability of the Peel Planning Area.

Oil and gas, mineral development and resource transportation infrastructures are not compatible with protected areas. Our hope is that the long term integrity of the Peel watershed is not compromised by these land uses. If however, the commission chooses to recommend some industrial activities within the watershed, we feel that there are certain ways that impacts could be somewhat reduced. Therefore our responses to your comments on these land uses are for areas not managed by a protected area management plan, or for areas where only the river corridor itself is protected.

Oil and Gas

We suggest that seismic exploration within the riparian zone be done in the latest no-impact methods. If this work is done in the winter it should have a minimal impact on our tourism operators.

If drilling and production takes place, a considerable buffer from the river systems should be considered. With the ability for directional drilling, set-backs up to 8 km are possible. Best Practices on all Oil and Gas activities should be mandatory- not just recommended.

Mineral Exploration and Development

Your comment "avoid fragmenting and/or limiting access to areas of mineral potential" seems to be in contradiction to the notion that transportation corridors so severely fragment wilderness and wildlife habitat.

Your comment "zoning provisions should accommodate future development of the Crest iron deposit and Bonnet Plume coal deposit" is in marked contradiction to the espoused values of conservation of wildlife habitat and wilderness.

Fish, Wildlife and Habitat

As it appears, there is limited information available on fish, wildlife and their habitat. Development in the planning area should proceed cautiously until critical areas can be identified and protected. The river corridors are known habitat for wildlife and birds, especially peregrine falcons.

Water

We support the management direction which states that the integrity of the watershed should be the cornerstone of the land use plan. Industries that rely on large amounts of water should be considered as non-compatible to the goals of this land-use plan and the future of the area.

Culture and Heritage

Heritage values in the Peel have not been identified as well as they should be. There are many traditional trails, camps and sites that should be identified and protected.

There has been little work in identifying fossil sites in the region. There were also mammoth tusks found on the upper Peel River last summer, indicating the potential for new finds. Many of these sites are found along the river corridors, especially the Blackstone, Hart and upper Peel.

Protection for the site of the proposed National Historic Site Designation along the Peel Canyon should be incorporated in the plan. This area was included in the last Oil and Gas Disposition, so protection should be a priority. The canyon is not just rich in First Nation history, but also an extremely beautiful area and of value for the tourism industry.

These cultural and heritage sites should not be underestimated. The educational and research potential for the area is great. We realize that it would not be possible to identify and map all of these sites immediately. An assessment of heritage values prior to development and buffers around identified sites should be required.

Tourism and Outfitting

WTAY recognizes the potential impact on the region due to increased use. Under the Wilderness Tourism Licensing Act, all commercial operators are required to leave no trace. To date there is little impact in the planning area due to tourism, although this could change with increased visitation especially from the self-guided groups.

WTAY would support the designation of the river corridors for protection. This would allow for enforceable regulations that would apply to all users. The WTAY would be interested in participating in the development of a management plan and regulations for the river corridors.

Resource extraction or any permanent development should be restricted in the river corridors and adequate buffers need to be established.

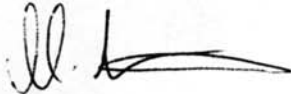
Transportation

The Peel region is one of the last roadless areas in the territory. Once roads are established into the planning region, impact from other users will occur. Minimizing the amount and type of access routes should be priority. Winter routes, using established routes and de-commissioning of roads are good management directions.

In closing we would like to once again thank you for the opportunity to participate in this planning process. The Peel Watershed is an extremely important area for our industry.

We would be happy to work with the Commission in any way possible.

Sincerely,



Per

Blaine Walden
Chair
Environment Committee