

May 23, 2006

Brian Johnston, Senior Planner
Peel Watershed Planning Commission
201 – 307 Jarvis Street
Whitehorse, YT Y1A 2H3

Dear Mr. Johnston:

Re: Peel Watershed Planning Commission (PWPC) Issues and Interests Report dated December 22, 2005

Thank you for the copy of the Peel Watershed Planning Commission's *Issues and Interests Report*. Congratulations to the Commission and its staff on their hard work and effort to move the planning process forward in a timely manner.

The purpose of this letter is to provide the Government of Yukon's response to your request for comments on the report and to provide our position on the primary issues the government believes the Commission should be addressing in the planning region. The comments are based on a review of the document by the Yukon Government Internal Working Group (IWG) for land use planning. More specific and technical comments by the IWG are attached.

The themes presented in the report provide a good overview of the issues and interests presented to the Commission during its first round of public consultation. Nonetheless, they are a compilation of what was said to the Commission, and we look forward to the Commission's own perspective on the critical issues to be addressed by the plan. We have four general observations on the report:

- 1) Many of the objectives and proposed actions listed in the report are very prescriptive. A non-prescriptive land use planning approach is being proposed by the North Yukon Planning Commission and is being well received throughout the Yukon government. We would suggest a similar approach for the Peel. In following a non-prescriptive planning approach we would anticipate a high level plan providing strategic direction to the parties on how to achieve the goals and objectives identified for the planning region. We would also anticipate the strategic direction to reflect the menu of resource management approaches available to the parties.

- 2) Under the goal "*recognize all economic potential of the planning region*" (page 10) the report appears to identify some activities as being "supported" by the Commission. From our perspective it is inappropriate for the Commission to single out or favour one value or economic sector over another. While we look forward to knowing the Commission's broad vision and perspective for the region and what the focus of the plan will be, we believe that the Commission should remain neutral in assessing appropriate types of natural resource-based activity. Our expectation is for a highly balanced plan that deals with the diversity of needs and issues in the region.
- 3) The report suggests conservation planning is required to address many of the issues identified under the themes of 'Fish, Wildlife & Habitat', 'Water', 'Culture & Heritage' and 'Tourism & Outfitting'. If the Commission concludes conservation planning is a priority for the planning region (notwithstanding our expectation for balance), it will be important for the Commission to work closely with the Parties to identify conservation objectives and criteria to select conservation areas within the Peel watershed. As one of the parties responsible for approving the plan we also encourage a close working relationship between the Commission and the parties to ensure a plan is developed that will enable the parties to determine the best tools for implementation.
- 4) The report contains several technical phrases that require some explanation or definition. There are also a number of "issues" raised (likely by public workshop participants) in the report that are personal views not substantiated by fact. The report should have made that distinction or identified relevant facts to support an issue. The attached comments by the IWG correct the several incorrect or misleading statements regarding Yukon government responsibilities or policies.

Regarding the overall direction of the planning process, the Government of Yukon concurs with the Peel Watershed Planning Commission that "sustainable development will be a cornerstone of the regional planning model, whereby social, cultural, economic and environmental policies will be applied to the management, protection and use of the land, water and resources in an integrated and coordinated manner" (Issues & Interest Report, page 3). In reviewing the many issues identified by the Issues and Interest Report, our collective position on the primary issues the Commission should be addressing to comply with that vision of sustainable development, are as follows:

- o Identify areas suitable for resource development as well as the required access corridors and provide management direction.
- o Identify areas that are critical habitat for fish and wildlife, have significant ecological or heritage values or require special consideration and provide management direction.

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- Provide management direction to ensure the flow and water quality of the Peel River and its tributaries are not compromised.

The Peel Watershed is currently defined by its wildness and by its significant natural resources. We believe that by focusing on the above the Commission will ensure the Peel Watershed will continue to be defined by its wild nature while allowing its natural resources to be managed in a way that will make a significant contribution to the economic well-being of the affected First Nations and the Yukon as a whole.

We hope the Commission will revisit the Issues and Interests Paper after taking all viewpoints and responses into consideration. We look forward to a summary of the Commission's response to the views you received so that we may have a clear understanding of your planning priorities as you move into the next phase of the planning process.

Sincerely,

Angus Robertson
Deputy Minister of Energy, Mines and Resources

cc: Albert Genier, Acting Chair, Peel Watershed Planning Commission

Attachment: YG IWG Review of the Issues and Interests Report: Corrections, Clarifications and Suggestions