

Review of Recommended Peel Watershed Regional Land Use Plan

Prepared for Yukon Land Use Planning Council by
GeoPlan Consulting, February 23, 2010



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EXECUTIVE SUMMARY

The Peel Watershed Planning Commission has recommended a Plan that is very much a conservation strategy for a significant area of arctic wilderness. The Plan seeks to preserve the remote and untrammled characteristics of the region using as its primary conservation strategy limitation on development of terrestrial access in pursuit of non-renewable (subsurface) resources. For other resource users, in particular for pursuit of cultural and traditional activities of First Nations, it is a Plan about maintaining the status quo, with some enhanced opportunity for commercialization of wilderness tourism.

This latest document from the Peel Watershed Planning Commission is an improvement over the first draft, in the sense that Plan elements are no longer simply cut 'n pasted from the North Yukon Plan. As a Plan document however, many of the same flaws are still evident. The proposed land designations may have changed significantly, but conceptual foundations and implementation strategies are still weakly developed.

The process produced a wealth of information in support of the development of objectives for the Peel region. This information is not effectively used as a basis for the Plan rationale. The Plan purports to follow appropriate planning principles: Sustainable Development, Adaptive Management, and Precautionary Principle to name a few. These principles are not well applied in the Plan. Primary components of the Plan Framework are similar to the North Yukon Plan: Landscape Management Units; Land Designation System (zoning); and General Management Directions (policy recommendations). These have been unnecessarily distance from a common land use planning approach, with regard to consistency in the use of and land designation system and adaptive management approach.

The Plan foundations are not well presented; a surfeit of statements of rationale imparts unnecessary confusion. The Statement of Intent, Planning Principles and Goals are not well connected with subsequent management objectives. The differing stakeholder viewpoints are not presented objectively; the Commission considers them to be irreconcilable. These Foundations would help better organize the Plan if they were more concisely and comprehensibly stated.

The Plan recommendations would benefit from further re-factoring and alignment with regional Goals. Important elements of the fundamental principles (adaptive management, etc) have not been implemented, including measures or status of indicators that reflect ecological integrity or wilderness character.

Conditions for Plan conformity are not clearly actionable. The Commission's Reliance on Plan variance as a tool for achieving management objectives may reduce land use certainty.



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1. Introduction

1.1 Scope of Review

The Peel Watershed Planning Commission (the “Commission”) has produced a Recommended Regional Land Use Plan (the “Plan”) and has submitted it for approval to the Yukon Government and the affected Yukon First Nations of Na-cho Nyak Dun, Vuntut Gwitchin, and Tr’ondek Hwech’in (collectively, the “Parties”) as well as to Tetlit Gwich’in (not a Plan approval body).

The Plan is a significant milestone in management of land and resources in the Peel Watershed. The Plan is the culmination of over 5 years of information gathering and consensus building by the Commission. The Plan includes the Commission’s recommendations on the use of land, water and other renewable and non-renewable resources in the planning region for the well being of Yukon people. The Plan is the primary reference document for the Commission’s expression of a shared commitment to a sustainable future for the Peel Watershed.

This review is to encompass an assessment of: the clarity and flow of the Plan; the consistency of the Plan with requirements of First Nation Final Agreements (“FNFA”) and the General Terms of Reference (“GTOR”) for the Commission; terminology and concepts expressed in the Plan; and responsiveness of the Commission to previous comments made by Council on the Draft Plan.

This document is written in order to assist Council in the preparation of its own substantive comments to the Parties on land use planning policies, goals and priorities.

In the words of one stakeholder:

The critical thinker does not just think hard about these beliefs and viewpoints, but explores and evaluates their adequacy, logic, cohesion, and reasonableness. The critical thinker also asks what is the evidence, what is the source, what are the implications, are there other opinions? (CPAWS- Yukon, 2007)



1.2 About this document

The information in this document is based on: information provided to the writer by Council for the preparation of this report or posted by the Peel Watershed Planning Commission on its website (listed in Appendix “A”); documents relating to similar Yukon, B.C. or similar sustainable development planning experiences (Appendix “B”); and on the writers own knowledge and personal experience of regional planning as conducted in Yukon under Land Claim agreements, in this and previous regional land use planning efforts. This report represents the analysis and views of the author only and is not a statement of Council policy or position. Council will forward its own comments to the Parties along with this review.

This document does not adopt the Plan structure for its review, nor does it provide a chapter-by-chapter analysis. Instead, it describes separately the foundations for the Plan (Section 2.0 Plan Foundations) and the development of a Plan Framework and Plan Recommendations to address regional issues (Section 3.0 – Plan Content). In essence, it first evaluates the Plan as a well-formed regional land use planning document, then as a well-formed planning strategy.

Section 2.0 - Plan Foundations contains a review of the fundamental Plan elements, being the purpose, guiding principles, goals and tools that comprise the conceptual underpinning and delivery mechanism of the Plan objectives.

Section 3.0 – Plan Content contains a review of the how the Plan Foundations are focused on the values, issues and challenges identified for future of the region, as demonstrated by the Plan Framework and Plan Recommendations.

Section 4.0 – Other Observation contains marginal comments that refer to other observations made during a review of the Plan. As this is not an editorial review, this is not meant as a complete listing of structure and flow issues; most of these are now moot as the document is out for public review and comment.

2. Plan Foundations

2.1 Planning Concepts

Conceptual foundations for any Plan should demonstrate a strong sense of purpose, a clear vision, and a principled approach to decision making for the future. These foundations should give clarity to the expression of desirable outcomes for decisions that shape the future landscape, the “why” of the planning effort, as well as the “why it matters”. Clear vision and goals that define that vision in practical terms are the hallmark of effective sustainable development initiatives¹. These statements become the measures of accountability for decision makers; in pragmatic terms they turn theory into practice. They are a top-down view of the Plan; complimented by strategies for focusing these good intentions, they direct the effort toward a desired future.

It is probably the most challenging task for a layperson planning body to find appropriate language to define, describe and unify its aspirations for the future. Bringing clarity to these concepts should be a pre-requisite task for a Commission; achieving consensus on them should be one of their earliest milestones. The Plan Foundations should be an enduring contribution of the Commission to the management of land use in the region. They should not require variance, amendment or periodic review to be responsive to dynamic ecological, social and political landscape.

The distinction between concepts such as vision, purpose, principles, goals and objectives is not semantic wordplay. These concepts are distinct components of well-documented, systematic approaches to defining a framework for any planning effort.

¹ Hardi(1997), p8

The relationship between each of the fundamental components should be clear and demonstrable. A Vision statement helps provide a common understanding of purpose, the principles guide us toward that vision and the goals help us to recognize when we get there. It is absolutely necessary that each component be clearly stated in the Plan. Not only do they demonstrate clarity of purpose, they are an organizing principle for the Plan. Subsequent statements of policy, management recommendations and land use objectives should nest easily in a coherent framework.

2.1.2 Purpose and Vision

A vision statement is an expression of a desired future. It should embrace the values, and represent an ideal, but plausible future. Vision statements help the reader to ‘see themselves in the picture’. The Peel Commission’s ‘Statement of Intent’ is not clearly a vision statement, but it is the only highlighted statement in the Vision subsection (Plan S1.2). It is not a vision statement per se, but an approach to evaluating change, without providing a socio-economic outcome. It is expressed as a singular goal, but unclear as to the place of people and communities: people are to be ‘managed’ but it isn’t clear to what end (resource use ‘managed’, development pace and scale ‘managed’) or for what socio-economic benefit. The ultimate restoration of the land does not identify the penultimate benefit to our communities. There may well be benefits to these undefined “wilderness characteristics”, but it is not clear “what’s in it for us” with respect to socio-economic trade-off. The most revealing and visionary statements are contained in the Plan foreword (p iv), or restated from the draft Plan foreword (p 1-4) where, unencumbered by stiff plan rhetoric, it is observed that humans do have a place, even if it is not foreseen as a permanent one.

In the North Yukon Plan, the Vision is “the continuation of Vuntut Gwitchin culture and traditional economy, a healthy environment, and people’s connection with the land”. It is readily evident what’s important, and to whom. The principles and goals can then do all the heavy lifting.

2.1.3 Principles

Principles, particularly ones drawn from other sources, should not be stated, and then redefined. This creates confusion as to the distinction between principle and practice.

Sustainable development is a well-defined principle:

“Beneficial socio-economic change that does not undermine the ecological and social systems upon which communities and societies are dependent.” (UFA, p7).

Ecological integrity *is not* about harmony with people, but sustainable development *is*. Sustainable development has been re-cast as sustainable *ecosystem* (my emphasis), where the basic subject of the sustainability principle (beneficial socio-economic change) becomes an object, and an object (ecosystem integrity) becomes the subject (p 1-6). Sustainable development, as defined in the UFA, is a state of change, not an endpoint. It is an approach to decision-making across *multiple* dimensions, not just one. It is not something we achieve; it is a means oriented principle. The Plan misstates ‘achieving’ sustainable development as its primary purpose (p 1-2). This is not an appropriate endpoint for a land use plan: it implies an end to the process of change. Change is inevitable.

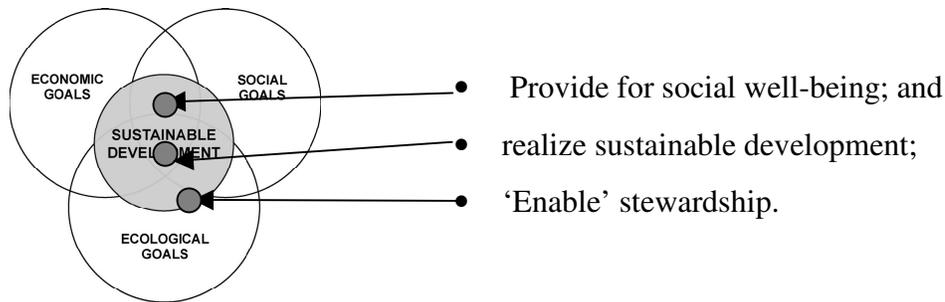
The presentation of Plan Principles, Goals and Issues is disjointed, confusing and unfocused:

- Integrated management has been (wrongly) included as a sustainable development principle. Sustainable development is a *change process* that defines the parameters of acceptable change; integrated management is a *process for coordinating* independent actors.
- Adaptive management has been (wrongly) defined as a document that can be amended as required to reflect current realities. Adaptive management is a *decision process*, not a document management strategy.
- The precautionary principle has been (wrongly) stated as a First Nation cultural objective. It is about “*do no harm*” decisions, not a decision deferral process. It is a conscientious effort to anticipate negative outcomes, and avoid them even if it isn’t certain they will occur. It is about inclusive decision-making, and accountability. It should not be confused with a ‘cautious, conservative’ plan, which emphasizes minimal change.

2.1.4 Goals

A demonstration of the relationship between goals and sustainable development principles would help focus the goals. A useful and well-used Venn diagram helps emphasize the three principle thrusts of sustainable development, being the social, ecological and economic dimensions, thus “centering” the Plan goals.

Three ‘major’ Plan goals are stated (p 1-7), which might be illustrated as follows:



Stewardship is a goal of shared responsibility for the integrated management of natural resources. Who should these stewards be? What does the plan do to ‘enable’ personal/institutional responsibility? Is this goal to address issues of partnership? capacity? awareness? ethics? Is it possible to tie stewardship more directly to the restoration of a ‘natural state’? Should the Plan establish objectives for environmental education? What baseline data should be used? What targets are established? Does the stated Plan principle of conservation, which only suggests regulation of users, support this goal? There are no stated principles that support community engagement. Stewardship initiatives require organizational commitment and resources. Institutional experience in Yukon suggests there are impediments to establishing stewardship initiatives.

“The biggest challenges in implementing an environmental stewardship program in the Yukon education system are the gaps in specific policies and detailed building information, and the lack of a process for effectively integrating resource use data into the decision-making process.”²

The Plan should provide more specific outcomes for stewardship. For example:

“The Calgary Board of Education is guided by its ecological footprint indicators in efforts to advance environmental leadership.”³

² Black, 2009. p. 7

³ op cit. p 16

‘Consideration of heritage, culture, employment and quality of life objectives’ is not a goal in itself; it is more a statement of principle. A quantitative assessment of socio-economic indicators is acknowledged to be difficult, with limited availability of data for all land use activities and highly seasonal operations. This is typical of land use planning exercises that seek to quantify the relative benefit of tourism vs. extractive industry scenarios.⁴ That said, a choice was clearly made between alternative land use scenarios on the basis of some trade-off of economic opportunity vs. ecological integrity, and this should be expressed more clearly in this goal. The proposed Plan exposes communities to a higher level of economic risk, as opportunities for wage-based opportunities will be more limited in wilderness tourism than for a primary resource industry. The net economic value of wilderness tourism can be shown to be relatively small in relation to resource extraction. Wilderness tourism generates little economic flow; it pays nothing for the use of natural resources and employs few people. It is itself a high risk venture, as demonstrated by the reported decline in wilderness tourism in Kluane National Park.⁵ It is the negative external costs (for resource extraction) that are not well accounted for, but which could be minimized by the application of land use management objectives for higher standards of community consultation and environmental protection. The loss of wage opportunities may have other quality of life impacts, as the option to participate in a traditional livelihood is a personal choice, not a community one.

‘Realize sustainable development’ is a mundane goal: it has already been stated as a purpose, as a principle and as an approach. The second part of this final goal is “maintain traditional First Nation livelihoods” (which should be stated as “maintain the traditional livelihoods of Yukon Indian People”). This is a goal unto itself, but would be stronger if it stated ‘promote’ or ‘enhance’ or similar words that imply some beneficial change of state. Ostensibly, it is no different than the previous goal, as the definition of ‘sustainable development’ includes objectives for socio-economic

⁴ B.C. Ministry of Agriculture and Lands, March 2006

⁵ Yukon News, Feb 3, 2010. p5

performance, encompassing heritage, culture and employment. Fundamentally, sustainable development suggests that people should have a choice of economic pursuit so long as that choice does not undermine another person's choice, or the environment.

Over 90 statements of 'desired future state', representing about 70 distinct goals, supplement the three 'major' goals. These 'major' goals do not appear to guide the development of these subsequent goal statements. They are also of limited relevance in the context of the 'vision', which is one of un-compromised ecological integrity, with limited consideration of socio-economic outcomes.

The relationships between Plan directions and Plan Goals are neither obvious, nor complete. This is especially true of terms relating to the issues of "wilderness character" or "global significance" which are never defined in terms of their constituent elements. Information on these concepts was prepared on behalf of the Commission and should be reflected in its enumeration of these terms.⁶

Comparative examples of plan principles and goals may be drawn from the North Yukon Regional Land Use Plan and the Tombstone Park Management Plan. In the North Yukon Plan, the expression of Plan Principles and Goals is accomplished in two pages, including a diagram that demonstrates the inter-relationship of goals and principles. Principles and purposes for Plan are well organized. It was understandably the result of iterative re-factoring; it is recollected by the writer that editing of the North Yukon's early drafts to achieve this language took considerable time and a collaborative effort with YLUPC. Similar expressions of conceptual foundations may be found for the Tombstone Plan, which contains an explicit "vision statement" as well as 15 single sentence statements of principle.

⁶ Green, M.J.B., et. al., 2008.

2.2 Planning Issues

The Plan Introduction contains a subsection on ‘Key land use management issues’, a complete section is devoted to “Regional Description” and a description of issues and affected resource values is presented together in the Plan’s Appendix “E”. There are many other issues peppered thru-out the Plan, also identified as “key”. Many are not issues at all, but are potential “risks” that have not been realized within the region (e.g. jet boat use, mineral development, conflict between traditional use and caribou conservation) or are better described as constraints (e.g. slow tree growth, lack of a visual landscape inventory). The ‘Regional Description’ is divorced from the issues expressed in Sec 1.3. Additional issues are identified within LMU prescriptions. The issues should be described in relation to the underlying values.

The characterization of planning issues should help the reader understand the context in which the Commission has developed its strategies. It is not the place to demonstrate a response, but rather an opportunity for an objective overview of the complex and wicked problems faced in the region. Stakeholders represent two divergent viewpoints; these are not competing goals, but rather conflicting perspectives. The Commission is not faced with a choice between them; their principle of impartiality should aid them in defining strategies that will minimize land-use conflicts that result from the contemporaneous pursuit of both of them. In characterizing them as irreconcilable, they have aligned themselves with only one.

The knowledge gap is overstated in characterizing the issues. There is adequate information available to help define strategic level land use strategies that can protect and enhance the values. The Commission spent considerable time gathering information, conducting assessments, and evaluating alternatives. These were to be gap-filling tasks, and yet it appears that the results are unusable. The Peel International Significance Report suggests that information is “sufficiently well developed to inform planning and management processes.”⁷

⁷ Green, 2008. p.7

The Commission suggests their response is a *precautionary approach*; they invoke a well-defined precautionary principle and then apply their own interpretation of it. The precautionary principle is one of decision-making, not decision avoidance.

Upon completion of Section 3, it is not clear what objective measures are proposed to ensure that the Plans goals are met:

- wilderness is defined as a natural area, but the wilderness characteristics that are to be maintained are not identified, the value of that wilderness character to other land uses is not demonstrated (this intrinsic value is to be accepted);
- ecological integrity is not quantified with land use metrics, so it is difficult to identify acceptable change land use objectives (unless they're zero);
- social well-being is an area with very little in the way of documented performance measurements (i.e. 'happiness index'), and states a traditional lifestyle as the only desirable outcome of realizing development potential;
- trade-offs between economic development and ecological are not identified

2.3 Summary of Findings: Plan Foundations

- vision, principles and goals are poorly presented
- review of planning issues is incomplete and subjective
- plan terminology is inconsistent with common usage
- stated goals have no clear land use objectives
- plan foundations inadequate to support substantive recommendations
- information and knowledge from the process is not effectively used to develop the Plan

3. Plan Content

These should be elements common to all Yukon plans: spatial units with similar ecological properties and management prescriptions (LMU); land use designations that reflect broad management intent or intensity (LDS); and strategies and recommendations of general application (GMD). There is adequate flexibility within this framework to allow its use in different regional contexts. A cumulative effects framework has utility in monitoring the ecological integrity of protected areas, though the measures do need to be refined for the potential conflicts that may occur. There are Open Standards⁸ for an Adaptive Management Framework, with monitoring as a widely accepted strategy for conservation. Common standards and measures of performance that could recognize the values expressed in each landscape unit, or priority values at regional scale might warrant a fourth leg, but these are not well enough established; no landscape metrics such as linear feature density or surface disturbance indicators are proposed for the IMA units. Any area where human activity is permitted, including wilderness tourism, will have limits on capacity to accommodate it. It may require measurement in different terms, but they should still apply throughout a region.

The Plan Framework is described having four parts, with LMU –Specific conditions” used as a prop to facilitate an analogy to a planning table, which seems an unnecessary device. This suggested deviation from the concepts as already expressed in the North Yukon Plan detracts from the goal of a common land use planning process.

It is oft suggested that processes for Plan variance and amendment are appropriate tools for consideration of development applications, however the exercise of discretion by the Commission in granting these is not at all clear, especially in view of the poor presentation of Plan foundations. It is not results-based or adaptive; it is prescriptive, allowing or prohibiting specific uses.

⁸ The Conservation Measures Partnership, Version 2.0, October 2007

3.1 Land Designation System

The Land Designation System (LDS) proposed in the Plan is distinctly different from the LDS in the North Yukon Plan, where the concept is clear, and encompasses the notion of sensitivity of the landscape to disturbance as well as representation of ecological and cultural values. In the NYRLUP, zones are defined as ‘protected’ or ‘managed’, with management conditions proportional to risk of unacceptable change. In this Plan, ‘protected’ zones are instead defined as special management areas (SMA). SMA are a specific term used in Final Agreements, and are developed in consultation with UFA Boards and Government. The use of this terminology here is confusing, as these areas acquire no legal status by virtue of adoption of the Plan. The SMA s described in the Plan are further differentiated by ‘management emphasis’, expressed in terms of heritage; fish and wildlife; watershed management; and environmental protection (‘wilderness’), and a shopping list of park designations. It is certainly appropriate for the Plan to identify areas where ‘protection’ should be the management emphasis. Determination of status as Special Management Areas, or park designations under the Parks and Land Certainty Act are subject to other decision processes.

The Integrated Management Areas are intended to provide a ‘working landscape’ for resource exploration and development, however access is to be determined on a discretionary basis by the Commission. This should not be a decision made by the Commission, however standards of performance would be beneficial, particularly for the restoration requirements envisioned by the Plan. The suspension of all access privileges is contrary to legal rights of mineral claim holders.

3.2 Landscape Management Units

The Plan defines a logical basis for 21 landscape management units, which are described in Section 4.2 of the Plan. 3 types of land-uses are described (p 4-2-1), and a concise checkbox format provided to indicate acceptable land use activities for each unit. Three types of Plan recommendations are indicated (p 3-15) relating to conformity requirements (Class A & B, Supplementary). Primary implementation tools are identified, for example establishment of habitat protection area.

The description of each LMU is concise and well laid out. A rationale is provided for each designation, a desired future state expressed, management objectives are expressed and management conditions prescribed. UFA linkages are shown to demonstrate integrated management, although it is unclear how regional goals are achieved through management at the LMU level.

Goals expressed earlier in the Plan are not well used to frame the subsequent management strategies. The management objectives described for each LMU are not stated in measurable terms. For example “minimize impact of land use activities on wildlife movements and habitats” is an objective in LMU 5. This is not a measurable objective in the way a limit to surface disturbance or linear feature density would be. “No effect on caribou movement” may also not be a measurable management objective without time scale. “No new infrastructure within 250m of raptors nest sites” is a measurable objective.

The Class A Management conditions are a mandatory requirement for Plan conformity. These are for the most part actionable statements of management focus that should be applied by decision makers, although without a measurable indicator. For example, a mandatory requirement to “manage levels and types of uses in advance of significant declines in touristic values” has no measurable indicator for the value. Enhanced consultation requirements are reinforced here, as appropriate for application of the Precautionary Principle.

3.3 General Management Directions

General management directions are grouped by land use sector as well as by resource issue, as well as supplementary recommendations in Appendix B. This results in more page flipping required than should be necessary to identify applicable recommendations for any given land use activity.

Management goals are given for each land use sector, issues are re-presented, and recommendations are described. The re-characterization of issues and responses is unnecessary here, and belongs in an earlier section of the Plan with the substantive discussion of issues. As a result, the presentation of Recommendations becomes choppy.

General Management Directions are broad in scope. Some are non-land use related, such as that for First Nation harvest reporting (p 4-1-6), or prevention of hunting along access routes (p 4-1-15). Others suggest revision to the First Nation Final Agreements, such as the de-designation of the Wind River Trail as a right of way (p 4-1-13). None are framed in terms of the Plan Goals.

3.4 Participation in Decision Making

Requirements for ‘enhanced consultation’ are a confusing mix of participatory and consensus decision making provision of the First Nation Final Agreements, legal dispute resolution mechanics (large ‘C’ Consultation) and components of the precautionary principle (‘engagement of affected Parties in decision making’). If the precautionary principle was properly defined, this could be more effectively integrated with monitoring of outcomes and accountability. Instead, it is described only in terms of First Nation interests, not those of all affected land users.

These goals are not introduced as components of earlier goals, but are further qualified by goals within SMA designations in Section 4, where there are still no measurable objectives stated.

3.5 Plan Variance and Amendment

There is a preponderance of discussion of processes for granting of variance or amendment of the Plan, including categories of the Plan that might be subjected to one, or both of these processes. These unnecessarily complicate the application of sound land use planning principles to land and resource management decisions. The Plan should strive to be applicable for the longest term possible. Well established Goals and Principles should not be trivially amended, nor should the Plan Framework require re-configuration if properly conceived. Clearly, decisions that would undermine the management intent, should require Plan amendment, however this process should not be used as a preferred method of land use decision-making. It is cumbersome, expensive, and subject to indeterminate decision principles. It is not clear whether the Commission grants variances (as suggested in Plan Highlights, p. 3-11,) or the YESAA Designated Office (as per Plan Sec.3.4.1).

If Plan variances are indeed to be ‘avoided’ (p 3-16), the intent and objectives of the Plan should be crystal clear, and achievable. The Commission obviously wants a seat at the decision table; while desirable, it has been made clear that it is currently out-of-scope for the Commission. Contemplating appropriate Goals and Objectives, rather than insisting on a perfunctory role in land use decision-making, would better serve the Commission and the region.

The requirement of a Plan amendment should the Primary Regulatory Tool not be desirable or possible may be difficult to support. Certainly, any significant change of management emphasis should trigger Plan amendment, but processes for establishing Parks are decisions subject to other legal tests that might out rank the Plan.

3.6 Summary of Findings: Plan Content

- Unnecessary distortion of the land use plan framework (LMU,LDS,GMD)
- No established indicators of acceptable change at regional or landscape scale
- Not clearly tied to regional goals
- Recommendations are more well developed than draft Plan
- Not as flexible as it purports to be, a lot of requirements for Plan amendment or variance to allow adaptive management



4. General Observations

- It is not the purpose of this review to provide a complete enumeration of grammatical or structural defects in the Plan. The document is clearly in need of a comprehensive editorial review, preferably by someone with a background in the subject matter.
- The structure of the document doesn't follow the Table of Contents, and the Table of Contents doesn't follow the Plan structure. This makes navigation of the Plan more difficult than necessary.
- The Plan format provides little room for statements of rationale. These tend to become choppy challenge/response segments that lose a sense of connectedness. This is most noticeable in the Introduction, where statements of approach and conclusion may be found in single statements. The statement of Plan Foundations should be much more concise.
- Diagrammatic aids would help illustrate some of the fundamental concepts of sustainable development or adaptive management as land use management tools. These tools are widely documented, but not well referenced here.
- There are numerous self-referencing citations, but few references for the “research has shown” statements, or other generalizations. Research undertaken in support of these statements should be clearly evident, and well documented.
- Use of first person “we” is inappropriate for a policy document.
- Inconsistent section references (e.g. no Section 3.5 as indicated on 3-11).
- Page numbers in the Table of Contents for the LMU sections would be helpful.

APPENDIX

A List of Reference Documents

- i. Final Recommended Peel Watershed Regional Land Use Plan
- ii. Umbrella Final Agreement
- iii. General Terms of Reference – Peel Watershed Planning Commission
- iv. Peel Watershed First Nations Meeting (Minutes of Aug 25, 2006)
- v. PWPC Final Issues Report
- vi. Draft Plan Review Comments – YLUPC

B Supplementary References

B.C. Ministry of Agriculture and Lands, March 2006. *Socio-Economic Assessment of Haida Gwaii/Queen Charlotte Islands Land Use Viewpoints*. Commissioned by the Integrated Land Management Bureau, Coast Region, Ministry of Agriculture and Lands

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http://conservationmeasures.org/CMP/Site_Docs/CMP_Open_Standards_Version_2.0.pdf

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