



July 13, 2018

To: Yukon Parks, Government of Yukon

Re: Developing a Yukon Parks Strategy

To Whom It May Concern:

The Canadian Parks and Wilderness Society (CPAWS), Yukon Chapter focuses on protecting large, connected areas of Yukon's wilderness. We work with First Nations, all levels of government, local organizations, businesses and citizens to ensure the natural wealth we enjoy today is available for our children tomorrow. We are pleased to submit recommendations to support the development of a Yukon Parks Strategy and look forward to reviewing the draft strategy. We thank you for the multiple opportunities made available to participate in this process.

Our recommendations relate to three areas of the discussion document *Shaping the Future of Yukon Territorial Parks and Campgrounds*: (1) Vision for Yukon Parks and Campgrounds, (2) Environmental Protection, and (3) Thriving Communities.

1. What principles, priorities and goals should be considered in a vision for the future of Yukon territorial parks and campgrounds?

Principles

CPAWS Yukon recognizes that parks and campgrounds fulfil multiple and sometimes competing roles including conservation, cultural preservation, recreation, and economic development and diversification. If parks are to protect our cultural and natural heritage over the long term, the most important principle for park planning and management must be to maintain (or restore) both ecological and cultural integrity. Linking and prioritizing the principles of ecological and cultural integrity recognizes that Yukon's "wild spaces" are the result of millions of years of evolving ecological processes and the enduring influence of Indigenous peoples. This is consistent with the guiding principles for the draft Dàadzàii Vàn Territorial Park management plan.

Priorities

Territorial campgrounds and parks are only some of the tools available to protect our significant wild spaces; other tools include habitat protection areas, wilderness management plans, special management areas, and, at a federal level, national parks. Indigenous Protected Areas are also emerging as a way to protect large landscapes. Uniting these different pathways to conserving

land under a territorial conservation strategy would be the most effective way to protect the full range of Yukon's natural regions. In the absence of such a strategy, however, the Yukon Park Strategy should include a framework that enables greater collaboration between Yukon Government departments, the federal government, and First Nations.

Given emerging interest in Indigenous Protected Areas across Canada, CPAWS Yukon also recommends that Yukon Parks leads an initiative, in partnership with Indigenous governments, to explore what policy and legislative changes are required to support the establishment of Indigenous Protected Areas, created and managed by Indigenous governments.

Goals

CPAWS Yukon envisions a park system that both celebrates and protects the territory's range of wild landscapes and its ecological and cultural diversity. We suggest that the best way to achieve and measure progress toward this goal is to aim to protect a significant portion of each of Yukon's 20 major ecoregions, and to consider protecting portions of Yukon's 3 smaller ecoregions. These natural regions represent the mosaic of wild spaces in the Yukon and they harbour unique wildlife habitats and patterns of biodiversity. In addition, each ecoregion has influenced and been influenced by Yukon people, both Indigenous and non-Indigenous, and these ecoregions are an integral part of Yukon's cultural mosaic.

The discussion document for the Yukon Park Strategy notes that "one of the goals of Yukon's system of parks is to protect areas within each of Yukon's 20 ecological regions." However, most protected areas in the Yukon will likely now be identified through regional planning, and not directly through a Yukon Parks process. To achieve the goal of ecological representation, the Yukon Park Strategy must therefore be strongly tied to the regional planning process. CPAWS Yukon suggests that a commitment to identify large, ecological representative protected areas should be included in the terms of reference for each forthcoming regional plan, including the Dawson Regional Plan which is currently being revived. Of course, the identification of protected areas should also be guided by Indigenous knowledge, and consider places significant for cultural and spiritual reasons, recreation, rare species and ecosystems, scenic value and so on.

2. What do you think needs to be considered to make sure Yukon's system of parks is effective at conserving the territory's ecosystems, biodiversity, and wildlife now and for the future?

As mentioned above, CPAWS Yukon believes that the first priority of park planning and management must be to maintain both ecological and cultural integrity. This could be achieved in a number of ways. In particular, we recommend:

- a) Developing a framework to coordinate landscape-level conservation planning in the territory. In the absence of a territorial conservation strategy, Yukon Parks should coordinate with the federal government, other territorial government departments, and First Nation governments and communities.
- b) Aligning and tying the Yukon Parks Strategy to the regional planning process. As mentioned above, the terms of reference for regional planning should include a commitment to identifying ecologically representative protected areas, of sizes large

enough to preserve ecological integrity. Given the pressures on Yukon's wild spaces and the value in conserving them, Regional Planning Commissions should not develop regional planning scenarios that do not include protected areas. Scenarios that lack protected areas do not meet the goal of regional planning as identified in the Umbrella Final Agreement, which is to ensure sustainable development, meaning "beneficial socio-economic change that does not undermine the ecological and social systems upon which communities and societies are dependent." Given that conservation science consistently points to protection of 25% to 75% percent of the landbase to ensure the persistence of species and ecosystems, regional planning scenarios that do not include protected areas do not meet the definition of sustainable development under the Umbrella Final Agreement. These types of scenarios are also inconsistent with the goal of the Yukon park system to protect areas within each of Yukon's 20 ecological regions.

- c) Exploring pathways to create territorial parks outside of the regional planning process. Given that regional planning across the entire territory will take time, and that not all First Nations have final agreements which are required to enable regional planning, the territorial government should lead an initiative, working with First Nation governments, to explore protected area creation outside of the regional planning process. Large scale resource extraction, often at the scale of entire land management units, currently proceeds through YESAB in the absence of a regional plan and the creation of protected areas should be similarly enabled.
- d) Developing management plans to protect the ecological integrity of areas surrounding all campgrounds. Newly created campgrounds will attract people and increase pressures placed on the surrounding ecosystem. These pressures may include:
 - Increased use of trails, both on foot and by off road vehicles (ORVs)
 - Informal trail creation, both footpaths and ORV trails
 - Additional hunting and fishing pressure
 - Off-leash dogs harassing wildlife
 - Spread of invasive species
 - Increased presence of bear and other animal attractants
 - Cutting and collection of firewood

These pressures should be anticipated, monitored and managed.

- e) Robust monitoring of territorial parks, using both western science and Indigenous knowledge. Monitoring should include ecological, cultural, economic and social impacts, and be used to adaptively protect the integrity of territorial parks and as a yardstick to ensure the sustainable management of land outside the protected areas system.
- f) Ensuring funding is available for monitoring, enforcement and maintenance of a growing park system. Yukon Government should explore additional funding sources, including industry funding. For instance, one of the most recent protected areas in Alberta, Birch River, was largely funded by a large oil company in exchange for conservation offset credits.

- g) Supporting community development of Indigenous Guardians programs, where Indigenous citizens monitor ecological health, maintain cultural sites and protect sensitive areas and species.

3. What economic opportunities do you want to see explored and/or supported in Yukon parks and campgrounds?

Many of Yukon's current and future protected areas are or will be located in remote areas, far from roads or communities. CPAWS Yukon recommends that Yukon Government support placing visitor centres in communities that act as a "gateway" to these parks. These visitor centres would welcome and orient visitors, provide ecological and cultural interpretation, and provide communities with a sustainable economic opportunity. In particular, we recommend that Yukon Parks explore how to support a visitor centre in Mayo, one of the major gateways to the future protected areas within the Peel Watershed.

Within the park system, CPAWS Yukon would like to see Yukon Parks continue to focus on nature-based and cultural visitor experiences. We recommend that Yukon Parks continue to work with Indigenous peoples and communities on opportunities for interpretive and storytelling programs rooted in traditional activities and traditional knowledge.

As mentioned in the previous section, CPAWS Yukon also recommends the Yukon Government supports the creation, expansion and sustainable operation of Indigenous Guardians programs and initiatives in Yukon parks.

Thank you for the opportunity to provide recommendations. CPAWS Yukon looks forward to reviewing the draft Yukon Parks Strategy.

Sincerely,

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