



CPAWS Yukon
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November 15, 2022

To: Parks Canada and the Kluane National Park Management Board

Re: CPAWS Yukon's comments on the Draft Management Plan for the Kluane National Park and Reserve

Thank you for the opportunity to provide comments on the Draft Management Plan for Kluane National Park and Reserve. Based in Whitehorse, CPAWS Yukon advocates for the territory's most valuable and priceless resource: our lands and waters. We work with First Nations and all levels of government, local organizations, businesses and citizens to ensure the natural wealth we enjoy today is available for children tomorrow. We represent the views of many Yukoners who want the Yukon to be an example for the world of how people can live in balance with the natural resources we depend upon.

2022 is the fifty year anniversary of the creation of Kluane National Park. The establishment of the park was a troubling chapter in the Yukon's history—the park was decreed without consulting the First Nations whose territories the park comprised and for decades First Nations were barred from hunting within the park. A great deal has changed in the past half century. The park is now managed collaboratively between Parks Canada, Kluane First Nation and the Champagne and Aishihik First Nations, and the signings of Final Agreements brought the ban on hunting within the park to an end. We are pleased that the Draft Management Plan for the Kluane National Park and Reserve (KNPR) is guided by principles grounded in Southern Tutchone culture and the many important learnings from the Healing Broken Connections Project. This plan emphasizes both the ecological and cultural values that KNPR holds. CPAWS Yukon hopes that the conclusion of the KNPR Management Plan sets a strong foundation for the next fifty years.

1. CPAWS Yukon supports the Kluane First Nation and Champagne and Aishihik First Nations in pursuing land guardian and ecotourism initiatives within KNPR.

CPAWS Yukon acknowledges the colonial legacy of parks and protected areas. Far too often parks displaced Indigenous people from their territories, in pursuit of a Western concept of 'wilderness' that saw people and nature having to stand apart. This history is true of KNPR, but substantial progress has been made to ensure the management of the park is more cooperative. CPAWS Yukon is encouraged that the Draft Management Plan proposes zoning changes to allow for First Nation-run ecotourism businesses at several locations within KNPR.

CPAWS Yukon is optimistic that the future of conservation will shift to a world where Indigenous-led conservation initiatives become the prominent way that conservation happens, where Indigenous Guardians programs take off across Canada, where co-management of protected areas between First Nations and the federal or territorial governments is the norm, and where First Nations communities see strong socio-economic benefits from having protected areas on their territories. We are encouraged to see the Draft Management Plan for KNPR propose a land guardian program, as well as several First Nation-run ecotourism operations. We wish Kluane First Nation and Champagne and Aishihik First Nations success in developing ecotourism opportunities and land guardian programs within KNPR, and hope that these set an inspiring example for others to follow.

2. CPAWS Yukon supports land designations that promote stewardship of sensitive habitats.

Unlike many National Parks, Kluane is readily accessible by roads only at its very perimeter. The difficulty of access means that much of Kluane does not experience the ecological impacts that can come with heavy human visitation. That said, several points along the Alaska Highway and Haines Road offer relatively easy access, and where those overlap with sensitive areas, such as the front slopes of Thechàl Dhâl - Sheep Mountain, there is the possibility for harmful impacts.

CPAWS Yukon appreciates the Draft Management Plan's rationale for designating places such as Thechàl Dhâl as a Zone I area, though we note that the steep terrain of the mountain's front slopes, and the presence of established trails on other parts of the mountain deter most people from hiking on the front slopes. The front slopes of Thechàl Dhâl have also been the location for several nature documentaries, including for CBC's *Wild Canada*, and BBC's *The Hunt*, and closing this area off entirely could rule out future filmmaking and photography projects that showcase Kluane's wildlife. In the future, managers could consider a designation system that allows for permitted access to Zone I areas. For example, licenced hunters in the Yukon are required to take a Hunter Education and Ethics Development program. A permit program that focuses and educates permit applicants on ethical recreation in environmentally sensitive areas as a prerequisite to accessing Zone 1 areas could promote responsible hiking and wildlife photography, which could be a benefit to the rest of Kluane, and the Yukon more broadly.

3. The Draft Management Plan proposes to address emerging concerns for the KNPR's lands and wildlife.

The Draft Management Plan identifies several future management challenges, such as managing cumulative effects to grizzly bears, preventing the spread of invasive species and promoting health in the forests in KNPR while reducing wildfire risks to Yukon communities. CPAWS Yukon supports proactive efforts to address such challenges.



KNPR is mainly ice and rock, and a relatively small portion of the park is productive wildlife habitat. The region's most ecologically abundant areas fall within the narrow strip of green at the park's margin, or outside the national park altogether. For example, KNPR is six and a half times as large as the Kluane Wildlife Sanctuary, but the wildlife sanctuary contains more key habitats for animals such as moose, grizzly bears, caribou and Dall sheep. Safeguarding the wildlife and ecosystems of KNPR will require close work between the park, and the Government of Yukon and First Nation governments, who manage the lands surrounding KNPR.

Grizzly bears are one example of the management challenges presented in KNPR. The ecologically productive parts of KNPR are often too small to contain the range of wide-ranging wildlife like grizzly bears. Grizzlies often leave the park boundaries, where they encounter townsites, landfills, highways and roads, agriculture, mining, and forestry. This environment beyond the park is called a "population sink" because the mortality rate for grizzly bears is higher than population growth. In other words, the population of grizzly bears in this area would shrink without the boost provided by bears wandering out from KNPR. Safeguarding Kluane grizzly bears not only depends on actions within KNPR's boundaries (such as actions to reduce human-wildlife conflict and managing the additive impacts of anthropogenic disturbances), but will also require close coordination with managers of lands outside KNPR. Parallel initiatives could include managing the cumulative impacts of mining development within the Kluane Wildlife Sanctuary, or implementing partial closures to Congdon Creek Campground when grizzlies use the creek's delta to feed on fruiting soapberries. Successful management of grizzly bears and other ecological values within KNPR requires managers not only looking within the boundaries of the park— but working proactively with First Nations governments, RRCs, YESAB and the Government of Yukon on issues that impact the lands surrounding the park.

Thank you for the opportunity to comment on the Draft Management Plan for Kluane National Park and Reserve. CPAWS sees this plan as an example of tangible reconciliation action, and hopes that it can be an example for other parks and land management processes across the country.

Sincerely, and on behalf of the CPAWS Yukon team,

Malkolm Boothroyd
Campaigns Coordinator, CPAWS Yukon