

CPAWS Yukon

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To: Pickhandle Lakes Habitat Protection Area Steering Committee

Re: CPAWS Yukon Comments on the Recommended Draft Management Plan for the Pickhandle Lakes Habitat Protection Area

Dear Members of the Pickhandle Lakes Habitat Protection Area Steering Committee,

Based in Whitehorse, CPAWS Yukon advocates for the territory's most valuable and priceless resource: our abundant wilderness. We work with First Nations and all levels of government, local organizations, businesses and Yukoners to ensure the natural wealth we enjoy today is available for future generations. Thank you for the opportunity to provide comments on the draft management plan for the Pickhandle Lakes Habitat Protection Area; we wish the Steering Committee well as you finalize the management plan.

We attended the informative open house in Whitehorse on January 15th, 2024 and read through the draft plan. Our comments are organized according to the online engagement questions.

Do the recommended actions support what you think should be done for the area?

Overall, the recommended actions are comprehensive and have clearly been informed by the extensive and diverse experience of the steering committee members. Some of the recommendations would benefit from being fleshed out so that it's possible to measure and monitor if the plan is achieving intended outcomes. In general, we suggest that measurable actions are developed for each recommendation, although we recognize this may be addressed by a future implementation plan.

Our suggestions relating to specific recommendations are provided below.

Recommendation 4: Encourage the day-to-day use of Southern Tutchone, Northern Tutchone, and Upper Tanana place names.

Firstly, we appreciate the strong connection of the management plan to Kluane and White River First Nations land history, cultural practices, and language. One suggestion that we have to include a phonetic guide for pronunciation of “Chettyël Chì, Tthehtit Männ,” and other place names if possible. This would help reduce barriers to using names in a respectful way, although we recognize it can be difficult to arrive at an agreed-upon pronunciation. One option would be to include pronunciation guides or audio buttons on interpretive signage. Audio messages or downloadable audio cultural and ecological guides can be a very effective way to engage the public through an interactive approach when staff or guardians can’t be with people on the land directly.

Recommendation 9: Investigate whether historical contaminants persist in the area and their effect. If necessary, consider methods to clean-up contamination.

In the section, the pipeline right-of-way is mentioned as a vector of contamination since vegetation has been sprayed. We suggest adding another recommendation to this section to address the risk of invasive plants spreading and being introduced into the protected area via the vector of the pipeline right-of-way. It is well documented and seen across Canada that invasive species can be introduced and spread rapidly into new areas via disturbances such as right-of-ways. We suggest monitoring the right-of-way for invasive species and prioritizing treatment if necessary to prevent introduction or spread.

Recommendation 10: Manage garbage and debris in the Pickhandle Lakes HPA

This recommendation is quite broad, narrowing in on the specific issues and affected areas would help them be addressed properly. For example, overflowing bins might be best addressed by installing additional bins or having them emptied more often, while addressing illegal dumping of hazardous waste would require different resources. We suggest further clarifying achievable actions that directly address the specifics of the issue.

Recommendation 16: Review population and hunting data information for the Koidern moose management unit to determine if current hunting levels are sustainable. If hunting is determined to be unsustainable, the Parties will work together to develop management actions that reduce hunting.

We agree completely with this recommendation although it may be helpful to list the Dän Keyi Renewable Resource Council and Yukon Fish and Wildlife Management Board as implementation bodies.

Recommendation 17: Encourage collaborative monitoring of moose populations and hunting in the Koidern River Moose Management Unit and communicate results to the public.

We recommend a stronger approach than encouragement and urge a full commitment to collaborative monitoring of moose populations and hunting.

Recommendation 18: Support new or ongoing monitoring of waterfowl in the Pickhandle Lakes Habitat Protection Area.

We recognize the importance of this protected area for a wide range of waterfowl species. Given the importance of the Pickhandle Lakes for waterfowl, we feel this recommendation should be not just to support but to develop a waterfowl monitoring program. It could include measurable actions such as determining pre-existing waterfowl monitoring programs and aiming to incorporate or assemble an operational and/or Land Guardian team within a few years.

Recommendation 23: Inventory Pickhandle Lakes HPA for species of conservation concern including species listed under the Species at Risk Act.

Our input on this recommendation is to expand beyond inventory and develop a baseline monitoring program for species at risk that incorporates recovery plans where available. A baseline or state-of-the-park report at park inception provides a framework in which to compare population numbers and ecosystem attributes over time. This could also be done for water quality and quantity monitoring, invasive species, waterfowl, and other park values from the time of park establishment. Incorporating Indigenous knowledge on these key features would be an integral part of developing this monitoring program.

Are there any actions or concerns that were missed and should be brought into the management plan for the area?

Financial support to develop a Land Guardian Program:

The plan has done a commendable job of describing how Kluane First Nation and White River First Nation value and use the Pickhandle Lakes area. A tangible way the plan could support continued Indigenous presence on the land is to include a recommendation of financial support to develop a Land Guardian Program. Recognizing that Pickhandle Lakes is a small protected area, this could be a larger program spread out over multiple protected areas. We have made similar recommendations in our recent review of Asi Keyi Natural Environment Park.

This program has the potential to include many of the activities already listed in the proposed management plan such as water quality monitoring, invasive species monitoring and treatment, muskrat camps, hunting, and fishing, to name a few. There is a need for on-the-ground operational paid opportunities. Land Guardian programs across the country deserve long-term

investment and support, and opportunities could be made available to Kluane First Nation and White River First Nation. They are stewards of not just land, but of ancestral wisdom, culture, and community.

Motorized boats and seadoos:

We recognize that under the current legislation, the Yukon government does not have jurisdiction over water in a habitat protection area. We strongly suggest exploring legislative and policy solutions to managing and potentially prohibiting motorized boats or seadoo traffic in certain areas, seasons, or overall if necessary. The impacts of motorized vehicle noise to aquatic life and wildlife alike are well documented, and boat wakes can swamp nesting areas. The major pathway of introduction of invasive aquatic species is through motorized vehicles and recreation equipment. At the very least, there needs to be public education and outreach about species and actions people can undertake at key entry and exit points such as Clean, Drain, Dry: <https://canadainvasives.ca/programs/clean-drain-dry/>.

Aquatic invasive species:

Prevention of high priority aquatic invasive species such as zebra mussels, Eurasian watermilfoil, and waterweed are not included in the plan. A high priority list of invasive species for the territory in general needs to be developed so that early detection and rapid response can occur as we see the influx. Prevention is the most cost-effective stage of invasive species introduction and we strongly advise that this issue be clearly identified with corresponding actions within the management plan.

See yukon.ca/sites/yukon.ca/files/env/env-invasive-species-survey-didymo-algae-2014.pdf

Specific actions would include identifying key entry pathways into the waterbodies, such as boat launches. Detailed educational signage on responsible behaviours, such as Clean, Drain, Dry, and specific instructions is very important for those that access the protected area through these means. Also, a critical component of identifying and reporting the presence of high-priority species such as zebra mussels is providing signage and brochures that include reporting information and what to look for. All agencies associated with water use should be trained to recognize and report invasive species.

Do you have any additional feedback for the Steering Committee?

We greatly appreciated learning how the area has and continues to be used and valued by Kluane and White River First Nation, as it is the foundation for the plan to be built upon. We also recognize the depth of collaboration that has taken place to put this plan together. Thank you for the opportunity to participate.

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