



## **Introduction**

I want to jump in with both feet. As most of you know, CPAWS-Yukon has published the attached map with a particular proposal for protection in the Peel. We believe it is a very good proposal, but let me say at the outset that our intention is to work with others to define just what protection in the Peel watershed should look like, both in terms of its boundaries and its management. So our intention today is to provide a basis for discussion and to explain our reasons -- we do not intend our map to be seen as a 'take it or leave it' statement by CPAWS-Yukon, but rather as a specific proposal to open dialogue and move the discussion from micro-protected areas to consideration of what a protected area should look like in terms of size and connectivity to maintain wilderness values.

And that brings me to the first of two points I want to make today -- Protected areas need to be large in order to capture the potential economic, biological, and cultural benefits. We believe that the discussion must move beyond site-specific or corridor-specific protection -- by large we mean protecting at least three or four watersheds comprising about 40% to 100% of the planning area. I will explain why we think protection on such a scale is necessary in a moment.

The second point we wish to make is that we see our Three Rivers proposal as a special core area. We understand that there are other precious and important areas within the Peel watershed. And I want to emphasize that we would like to work with others whose interests and values overlap our own to gain protection for a significant portion of the Peel Watershed. We believe that it should be possible to find common agreement between ourselves, First Nations, Wilderness Tourism outfitters, Guide Outfitters, trappers, other NGO's, and other like-minded individuals and organizations, and we are willing to modify or expand our proposal to achieve common aims.

## **How much of the area should be protected?**

Biodiversity is the source of the biological resources on which we all depend, but the global rate of biodiversity loss is now at crisis proportions. The alteration, fragmentation, or destruction of species habitat is the single largest cause of biodiversity loss globally. Climate change is predicted to compete with habitat loss as the leading cause of biodiversity loss in the next few decades. However, the Peel Watershed land use planning exercise presents the Yukon with a tremendous opportunity to avoid the creeping incrementalism that has destroyed biodiversity in so much of North America and to address issues of climate change at the same time.

The primary means of preventing biodiversity loss and minimizing the effects of climate change is through a well designed network of large protected areas where species and natural processes can remain relatively undisturbed.

The vast wilderness of the Peel watershed serves as the perfect opportunity to protect a representative array of ecosystems by maintaining viable populations of native species and the ecological processes they depend on. As a society we have not and can not accomplish this end through mitigative measures or specific management regimes, as has



been demonstrated time and again by the collapse of one ecosystem after another, and the effective disappearance of one species after another along with the biotic and cultural systems in which they were embedded – take for just one instance the dwindling numbers of southern populations of woodland caribou and the resulting consequences. One could pick from a myriad of possible examples, including the collapse of the East Coast cod fishery. In most of these examples, politics got in the way of scientific management and the result was too little, too late. We are in no better position in the Yukon to depend on mitigative measures. In fact protection of the landscape is essential to protecting both ecosystem and wilderness values. This can be assured only by the protection of complete ecosystems.

How should the landscape be viewed? Large, intact watersheds are key to defining ecological structure, function and productivity in landscapes. Most people who are concerned about the Peel watershed emphasize the primary importance of clean, pure water. Over the long term, water quality can be protected only by protecting whole watersheds. These watersheds, including not only river corridors, but also uplands, lakes, and wetland complexes are fundamental ecological units.

In addition, major undeveloped watersheds are regionally and globally significant, in part because of their rarity and in part because of the conservation opportunities they present. In the Peel we have the opportunity of protect multiple, intact watersheds which represent functional ecosystems with a high likelihood of maintaining ecological integrity over the long term.

How much of the area should be protected? We know there is a trade-off between the area of habitat protection and the likelihood of species persisting over time. Many studies demonstrate that the smaller the protected area, the more rapidly species vanish from it. Even that icon of American protection, Yellowstone Park, at nearly 12,000 square kilometers, has proven to be too small a protected area to keep top predators and their prey in balance. If we allow political rather than scientific considerations to determine what gets protected in the Peel, we will lose the full compliment of wildlife which is one of the things that makes the Peel so special.

But the bottom line is that it is the very nature of these systems that demands we think of them as a whole and at the grand scale that they exist. Amidst the variance, the science tells us that we must think big, much bigger than we have in the past and we must think of interconnected wilderness ecosystems, rather than isolated areas.

Such a holistic approach to large-scale protection also resonates with First Nations values. I believe the Commission staff have heard from First Nations governments and will be hearing more in mid-November.

Large-scale protection is also necessary for the continued success and possible expansion of existing commercial tourism, guide outfitting, trapping and increasing recreational use of the watershed, leaving room outside of protected areas for less-compatible development of non-renewable resources. Wilderness is acknowledged as one of our



most precious assets by the tourism industry, and as a priceless heritage by people who rely on the land for a way of life.

Large protected areas also offer the possibility of attracting both government and private resources to contribute to building a diversified, conservation-based segment of the economy for the region. However, the Commission's research into Conservation Economics is lacking. We are doing some of this work, but cannot carry the total burden ourselves. We would like to issue a call for further work in this important but neglected area.

In answer to the question of how much of the area should be protected, then, we argue that protection of several major tributary watersheds of the Peel at a minimum is necessary to maintain existing ecosystems, protect populations of animals and plants, provide for wilderness values, retain a basis for cultural and subsistence uses, and provide a basis for a more stable and varied economy.

Let me now say a few words as to why we do think the Three Rivers area in particular should be protected.

### **Why the Three Rivers?**

Our support for protection of the Three Rivers area, which includes the entire drainages of the Wind River, Bonnet Plume River, and Snake River, and the related part of the Peel River, corridors along other rivers, the Turner wetlands, and part of the Richardson Mountains rests on three legs:

The economic potential of the area for non-destructive activities including subsistence, tourism, and outfitting is very high. Such activities including river travel, mountain hiking, historical trails, guide-outfitting, trapping, and hunting can be structured in a way that brings economic benefit and training to local communities and First Nations.

The area is important habitat for plant and animal populations, for example, woodland and barren-ground caribou, Dall sheep, fish spawning habitat, and endemic plants and animals, all of which may come under stress from a variety of factors including climate change or industrial development.

The Three Rivers includes an overlap of the traditional land of two First Nations who are interested in its protection.

**Economic Potential for non-destructive activities.** The obvious potential of the Three Rivers area is demonstrated by the fact that the area is visited by people from all over Canada, North America, and Europe for a variety of activities ranging from guided tourism and hunting to educational and research trips by young students. This conclusion is supported by the existence of tourism businesses within the area. What is special about



the Three Rivers area? Well, quite a number of things, but among them, the fact that the area is already 'branded' as a high-value wilderness destination. As the Tourism Industry Association of the Yukon has noted, the brand is so strong that a good deal of the Yukon's image as a wilderness destination rests with the area. CPAWS has helped to identify the Three Rivers area as a special place through almost 15 years of work, including an iconic book, sponsoring river trips by First Nations people and artists, and a nation-wide traveling art exhibit and presentations expressing the unspoken values of the land.

It's physical characteristics include, of course, a tremendous elevational range from it's river valleys to it's mountain massifs, which provide both viewing and hunting opportunities, and a large enough extent to support complete populations of several species of large mammals. While inclusion of other tributaries of the Peel River, particularly the Hart River, would add to the package, nothing else stands by itself in the same way as the Three Rivers. The very remoteness of the Three Rivers country adds greatly to its value as a wilderness asset, in contrast to resource extraction for which our society would have to make a tremendous investment in infrastructure.

Importantly, the Three Rivers area adjoins the Arctic Red River drainage just across the divide in the NWT. While the Snake River has been previously proposed for protection in the Yukon, the Arctic Red drainage holds special importance for the First Nations in the NWT. The combination of a large area in the Yukon, and a major tributary of the Mackenzie River would strengthen the positive aspects of the entire area even further.

Why does the Three Rivers need protection? The Three Rivers is particularly at risk. Over the last three years during the course of the work of the Planning Commission, the number of mineral claims in the area has increased from about 2000 to over 10,000. The Three Rivers area is under pressure as are few other remote places in the Yukon. Much of the exploration and claims-staking is obviously part of a strategy pursued by junior mining companies. The result is damage to wilderness values through air traffic, scaring of the land, and increasing signs of industrial activity and disturbance to wildlife which has brought little or no benefit locally. At the same time, our land and wilderness is put at risk.

Take, for instance, the threat to the Wind River Trail, so ostentatiously called a 'road' by Cash Minerals last winter when they applied for rights to upgrade the trail to haul in tons and tons of supplies for uranium exploration. Cash Minerals was granted most of what they asked for, and proudly announced so in their investors' conference call at the beginning of 2008, which until recently was available on the web. This company threatened the integrity of one of our most precious wilderness areas, and where are they now? Certainly not on the Wind River where they intended to be. They have apparently closed their Vancouver office, taken equipment out of the Wernekes, and lost their option to obtain a permit. My point is that we came very close to losing an important part of one of our most precious wilderness assets, and tourism operators did lose clients and money, because the Yukon had no process in place to properly evaluate the cumulative impacts of the company's proposal.



It would be a huge mistake to continue to rely on YESAB to protect us from these incursions because by YESAB's own position, it is unable to comment on the broader aspects of a development proposal which rightfully belong in a very strong land use plan. Thus, the only means to address these issues is through a plan which recommends protection of the land.

### **Important habitat for plant and animal populations under stress**

The Commission's Conservation Assessment report identifies large areas within the Three Rivers area that is important or critical habitat for many species. So does the CPAWS-Yukon atlas, which we produced to serve as a scientific source book for the area.

The Three Rivers can also serve to allow animals and plants to adapt to climate change. It is rare to have a large pristine area that contains such significant gradients, both North/South and Elevational. Both of these characteristics of the Three Rivers area provide some relief from the effects of climate change.

Research on these aspects of climate change has already been conducted in the Yukon, indicating that animals and plants do take advantage of these gradients. Research such as that into climate change or into equally interesting aspects of little known endemic species of fish is completely complimentary to other activities within a protected area, and can also contribute to the local economy.

### **Three Rivers includes traditional land of two First Nations**

For cultural and historical reasons, the area has been included in the traditional territory of Nacho Nyak Dun First Nation in Mayo and contains large parcels of Ft. Macpherson's Tetlit Gwitchin land known as 'primary use areas' and 'secondary use areas.' The agreements that Canada and the Yukon have signed with both First Nations indicate our mutual recognition that the Peel watershed has provided sustenance and home for these peoples over historic time and before. It continues to do so today. The respective agreements recognize a 'stewardship role' of the First Nations over the land, and their governments today take that role seriously. We believe that our values concerning the land are consistent with and supportive of a strong First Nations role in selecting and managing a large protected area.

The Three Rivers area can provide benefits to both Mayo and Ft Macpherson (as well as Whitehorse and Dawson). It is unique in this respect as Mayo is the typical take-off point for activities in the Three Rivers, and Ft. Macpherson is a common pick-up location. Different institutional and private arrangements need to be negotiated for these communities to obtain the full potential economic benefits. But given a large protected area and the kind of outside government or private monies that such an area can generate, the economic benefits are within reach, as are training opportunities, monitoring and management positions, employment on the land, and business opportunities.



**Conclusion**

As places like the Peel watershed become increasingly rare in North America and around the world, Canadians, and Yukoners in particular, believe we are responsible for safeguarding some of the most critical remaining ecosystems that support all life on earth and the people that rely upon them. We have argued that in order to protect the values that we all hold, we must establish very large protected areas, and we feel that our Three Rivers proposal is a good point to start the discussion.

The biggest challenge the Commission faces is the need to recognize that it is the biological resources and systems of the Peel that make the Peel uniquely valuable. The first task of the Commission should be defining what the core and subsidiary protected areas must be in order to protect both not only ecosystem but also wilderness values. Uses not compatible with protected areas must be carried out in some other region.

