

September 8, 2021 Draft

**Dawson Draft Regional Land Use Plan
Yukon Wood Products Association Comments**

The Yukon Wood Products Association (YWPA) offers our views on the Dawson Land Use Plan with an appreciation of the hard work and effort put into it by the Dawson regional planning commission. YWPA comments are offered with an interest in how the plan can be improved by providing a balanced approach to land use. The plan's greatest weakness is associated with the lack of strong support for local community based economic development in the resource sectors.

Our feedback is offered in two parts; general observations and then specific thoughts identified by page number.

General observations and suggestions:

- Conservation and protection of the region are a significant part of the overarching philosophy in the plan. There needs to be a balance between the three essential pillars of sustainable ecosystem-based management. The lack of upfront support for the business community is evident throughout the document. We notice that in chapter 5 Landscape Management Units statements of management intent commercial interests are provided as if they are an afterthought. The opening statements almost always refer to ecosystems, wildlife and/or cultural/heritage value and if mentioned at all mining and forest harvesting are mentioned in the last sentence of the paragraph.
 - YWPA would like to see the socio-economic benefits of local commercial business interests elevated to equal status with cultural and environmental values. Especially, within those LMU's that support resource sector job creation. This can be accomplished by placing our sectors interests and value in land use within the same sentence as environmental and social/cultural values. To do otherwise diminishes the importance of good jobs in the resource-based economy.
- The land use plan requires stronger linkages to preexisting plans especially the approved Forest Resource Management Plan pursuant to the Forest Resources Act and chapter 17 of Settlement Agreements. e.g., for forest operations the Forest Resource Management Plan has identified several landscape management units with timber in them. Some of them have been designated as medium importance for timber harvest planning at this time. A medium designation does not mean no operations will occur in the LMU rather the area is not needed in next 5-10 years.
 - YWPA requests that in those areas identified as allowing timber harvesting in the FRMP be clearly identified in Chapter 5 LMU's. Also, a clear and unambiguous statement be inserted in the management intent for the LMU indicating forest management and commercial harvesting is allowed.

- Mineral development may lead to a need for biomass energy harvesting in LMU's not currently designated for forest management and harvesting.
 - YWPA requests that for LMU that do not have any potential for timber harvesting at this time, but do have mine development allowed be modified to include a statement that allows the utilization of timber for biomass production in support of mining operations.
- YWPA notes that a number of subregional plans, advisory boards and committees are recommended throughout the plan
 - There may not be a need to establish all these subregional processes due to almost no immediate need due to low levels of activity;

Page Specific Issues and Concerns:

Page 18, Precautionary Principle

- When developing land use plans the precautionary principle must be used with a high degree of caution. Clarity with regard to the definition and application of this principle is a critical factor in providing certainty for resource industries. In Websters dictionary the precautionary principle is defined as “the precept that an action should not be taken if the consequences are uncertain and potentially dangerous”
- The YWPA would prefer that the underlying philosophy of the plan be focused on how to use the land within the Dawson planning region for the benefit of the community. This will require a shift in approach to assessing the acceptability of the resource sector. The question should be how can this project (wood products industry) proceed while protecting all of the other goods and services provided by the land and the forests growing on them. The precautionary principle starts from the premise that the resource sector is going to do harm so make them prove that they will not harm the land before they can proceed. This needs to change.
- The natural environment in the Dawson region is ecologically adapted to large scale disturbance and is therefore very resilient to vegetation shifts. In otherwords the ecology of the area is influenced by forest fires which replace old and mature forest with young and vigorous forests. In some landscape management unit's timber harvesting can fulfill the function of stand replacing forest fires. It is recognized however, when prescribing harvesting operations sometimes things do not turn out exactly as planned. Requiring 100% certainty would preclude any and all timber harvesting in the region.
 - YWPA recommends that the precautionary principle be dropped and a risk management approach be implemented. Risk evaluation is based upon the likelihood of an error occurring plus the consequences of the error should it occur.
 - There are well established risk assessment criteria currently in use in other jurisdictions in Canada that should be considered for use in the Dawson LUP.

Page 18 section 1.6.2.4 Adaptive management

- The Dawson Forest Resource Management Plan on page 53, has an outline of how adaptive management will be applied to the wood products industry. The LUP and FRMP documents appear to be consistent with each other.
 - YWPA recommends that a reference to the FRMP in the LUP document be made for additional clarity

Page 21 Harvesting Rights

- The wording in this section is positive and appropriate. It provides for legitimate users of the land to gain access to timber resources. Traditional, personal and commercial wood harvesting activities are provided for under this section.
 - This language should become a part of the management intent of the LMU's in chapter 5.

Page 30 Special Management Area II

- As other industries develop access into this land use zone there may be opportunity for the utilization of timber resources. The high cost of road construction for small volumes of timber limits the wood products industry's ability to economically operate. New access may create an opportunity to gain better utilization of forest resources and restrictions placed on this land use designation should be kept to a minimum.
 - This particular concept is important for new mines and the need to reduce carbon foot prints. Please refer to YWPA website and the presentation made to Geoscience Forum in 2020
 - <https://www.yukonwoodproducts.org/index.php/news>

Page 33 Table 3-1 summary of land designations system for Dawson Region

- It should be noted that in many Canadian jurisdictions the starting point for thresholds applied to forest operations on a landscape unit are as follows:
 - 33% disturbance; at this level of disturbance there is little or no effect on wildlife use of the area
 - 34 to 66 % disturbance; at the low end there are noticeable affects depending upon species and in some situations, it is ok to approach the higher end of this threshold. E.g., salvage harvesting after large fires or insect infestations.
 - +67% disturbance; it is known that negative impacts are occurring and corrective action should be taken to resolve the situation.
- The maximum thresholds suggested in this plan come nowhere near the 33% disturbance level.
 - YWPA requests that an analysis be undertaken to determine if the suggested thresholds in this LUP are more restrictive than necessary. The current thresholds appear to be overly cautious and may result in curtailment or lost opportunity for developing a wood products industry that will benefit the Yukon while protecting natural habitats and the environment.

Page 35 Special Management Direction


- The third bullet refers to “best practices” this phrase is open ended and a clear definition or set of criteria should be provided. This will reduce uncertainty with regard to future activities that may or may not be impacted by the intent of this direction.
 - The forest management branch has developed a number of guide books and standard operating procedures that provide best practices to harvesting operations. These documents have application for other industries and should be referenced as a good place for all operations to start from.

Page 35 General Management Direction

- How will this directive from the plan be communicated to the Yukon Environmental Assessment Board? Will the board recognize this plan as part of the pre-consultation process for a project?
 - Land use plans are an important and significant part of the total consultation process around the development of all sectors of the economy.
 - There are three layers of planning outlined in the Forest Resources Act (FRA). This plan must be included in any evaluation of the pre-consultation processes of all sectors when submitting projects to YESAB. YESAB must ask if the project is consistent with the LUP and FRMP if so then it should assess the project as if it will proceed.
- An outline of the FRA planning hierarchy is included for the commission’s consideration.

Planning Hierarchy

Plan Level

	<ul style="list-style-type: none"> Yukon Wide policy direction 	Yukon Territory wide
	<ul style="list-style-type: none"> Forest Resources Management Plan 	Boundaries are often the First Nations Traditional Territory
	<ul style="list-style-type: none"> Timber Harvesting Plan 	Landscape unit or watershed boundary
Operational	site plan	Harvesting block

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Page 36 Results Based Management Framework

- The table uses ecological integrity as an example of how this framework can be developed and used.
 - YWPA would like to see a different example used in this table. There have been many processes during the past eighteen years since devolution that use environmental or ecological criteria as examples of how results-based principles are applied to land use. The continued emphasis on protectionism is perpetuating the perception that any activity on the land that is not oriented towards full protection is a bad thing. It is time to place more emphasis on the socio-economic benefits of supporting jobs in the resource sectors.
 - The YWPA requests that the example be changed to: 'to maintain the viability of the wood products industry'

Page 40 top of the page discussion of 'stewardship' as an indicator

- The Merriam-webster dictionary defines Stewardship as; '1.the office, duties and obligations of a steward, 2. The conducting, supervising, or managing of something, *especially*; the careful and responsible management of something entrusted to one's care e.g., stewardship of natural resources'
- Governments have various departments and professional staff that fulfill this function. The way this section is worded it seems to imply that an additional layer of oversight is

- required. With legislation such as the Forest Resources Act administrators and regulators are required to manage resources with a strong stewardship philosophy.
- This is an important obligation for anyone implementing this plan in the context of an allowed activity. However, it is complicated by the fact that the quality of stewardship is in the “eye of the beholder”. It could be likened to one’s preference for hot chili peppers on all foods, while another person may detest them.
 - YWPA suggests that stewardship would not be a good indicator and that measurable indicators be chosen that would have application to the legitimate concern for stewardship of lands and resources.

Page 41 thresholds

- The discussion of thresholds for various types of disturbance can be contentious because it often difficult to pick how much of a particular landscape unit should be committed to community based economic benefits.
- In a perfect world a threshold would be established based upon sound science-based data with regard to how much is too much. Unfortunately, there is often very little information available to decision makers when faced with deciding how much is too much disturbance in a planning unit. This then leads to subjective thresholds being established based upon individual perceptions and personal values. Between individuals there will be significant variability with regard to what threshold is best.
- The plan suggests that final threshold levels will be determined by a sub-regional planning team. Sub-regional planning can be complicated and slow-moving processes. In the meantime, land users will be waiting for determinations with regard to what they can do on the land. The delays in administrative determinations with regard to timber harvesting will result in lost opportunities for socio-economic benefits through job creation and renewable energy production. Missed or delayed opportunities will have negative impacts on Yukon climate change actions and community base economic development.
- The YWPA suggests that Dawson LUP adopt thresholds currently in use from other jurisdictions that have boreal or sub-boreal forests. In BC landscape unit planning has used following guideline as a starting point when there is uncertainty regarding potential impacts: 33% disturbance is the point where negative effects of timber harvesting begins to show impacts on wildlife; 34 to 66% disturbance levels are known to affect wildlife; and, above 67% impacts are obvious and corrective action is required.
- The commission has suggested a threshold that is well below 33% disturbance as the critical threshold. Thirty three percent is a conservative threshold that allows for economic activity
 - YWPA would prefer the threshold be set at 33% or one third of the forested portion of an LMU. This would improve the economic viability of the industry on a LMU bases.
 - Currently, all harvesting in the entire Yukon amounts to 0.001% of the Yukon’s Forest annually. if one uses 15 years as the time it takes to regenerate then this

percentage increases to 0.0167% of 27,000,000 hectares of forest. Or 4,500 hectares of the total forest. The point being it is unlikely that timber harvesting will approach the safe threshold of 33% in the foreseeable future if ever in this region.

Page 44 table 3-2

- How will natural disturbance such as fire, wind and insect infestations be addressed? It is easy to declare no new disturbance, however, the boreal forest is well adapted to natural disturbance. Forest management practices can be implemented to mimic natural ecological processes through various silviculture systems. This would allow logging operations to occur on the land if conducted in a way to create habitats for species that are important culturally and economically for food and tourism.
 - It is important to note that the wood products industry in Yukon is in the energy business. Most of the commercial firewood and wood chips in Yukon are procured from forest fire and beetle killed forests. So, disturbance by logging is imbedded in the natural forest renewal processes of fire and insect infestations.
- Forest management branch has computer models that can be used to model various levels of disturbance in a landscape. Prior to establishing very conservative conservation-based thresholds the planning team should work with FMB to run scenarios that will assist the planning team determine appropriate thresholds by landscape.

Page 52 Recommended action

- The plan is calling for a subregional planning process. As one reads through the plan there are a number of calls for sub-regional plans, local advisory committees or research projects. This raises the prospect of endless rounds of negotiation and consultation on the same issues and concerns over and over.
 - This can go on for years. The Parties to this plan will at some point have to decide if there has been enough planning and research done to make informed decisions about various values and activities. Sub-regional plans will likely confirm what is already known about a particular land base, therefore, their value will be of questionable worth regarding mining, agriculture, tourism, forestry and infrastructure development being a legitimate land use.
- YWPA feels that there is already plenty of value-based information available and further planning will only result in delayed decision making. Therefore, governments should use the information coming from this plan to decide what can happen where and how it will be done.

Page 57 recommendations to the parties

- Last sentence regarding surface access; reference is made to not allowing access off the Dempster highway. However, access may be allowed through a plan amendment.
- Once this plan is approved getting an amendment to it will be very difficult for many years into the future. Any endeavor that requires access will be effectively shut down

before it can begin. This recommendation gives false hope to anyone with a legitimate reason for access. It is in effect a ‘no’ to any new access development.

- This recommendation should be modified in favour of a clear statement with risk assessment criteria that allows for access within certain preestablished parameters such as a project that is for the ‘public good’.

Page 62 Water Access

- There was a study completed a few years ago regarding the impact of large boats on the Yukon River. Was this study used as part of the information package for making recommendations with regard to boat traffic on the Yukon River.
- There has been some work done in the Muskwa-Kechika planning area with regard to jet boats on remote rivers. Some of the work could inform the Dawson planning team.

Page 71 forestry

- There is good support for the current forest-based economy and some room for expansion and diversification of the industry. This plan appears to support the development of a long-term sustainable level of harvest through an annual allowable cut determination.
 - There are specific comments provided in the section on LMU management intent provided below. It is noted that the language in the specific LMU’s is not clear with regard to supporting commercial harvesting operations

Page 75 recommendations

- There are a number of recommendations that request buffers around settlement lands be established where no development can occur. It raises the question should similar buffers be established around private property. This is a good example of a land use restriction that can have significant negative impacts on forest harvesting activities. For example, the landscape unit may allow for forest harvesting but the available land base may be constrained in such a way that the annual allowable cut is unreasonably reduced due the establishment of a protected area around private and settlement lands.
- Buffering ecologically and culturally sensitive lands is an appropriate use of buffers. E.g., salmon streams, sensitive wetlands, critical land-based habitats for flora and fauna. Expanding private land holdings would not fit into this category.

Page 76 draft ecological goals

- Second bullet uses the phrase ‘natural integrity of the planning unit’ the word integrity is potentially problematic. It is a difficult word in the context of land use to define. It is suggested that integrity be substituted by using ‘environment’. This provides a more specific statement that is less value driven.
- Another approach is to use the phrase ‘ecological function’ instead of integrity. This is suggested because ecological function is identifiable in the context of the physical elements of an ecosystem. Please see comments below specific to Page 184.

Page 81 policy & research recommendations

- There are a number of mitigation tools that can be used to protect moose populations from over harvesting as result of hunting activities. Road closures are a last resort because closures cause unnecessary economic hardship for a legitimate land user.
- Under the Forest Resources Act only authorized and permitted users can use forest resource roads which is a public use road closure but allows loggers to continue working.
- If the dates October 15 to 31 are critical for population management, then change hunting seasons in the hunting regulation to reflect this.
- It is not reasonable stop individuals who are making a living from logging or mining during these times on the chance that a moose may or may not be hunted from the road.
- This concept applies to the research recommendations as well.

Page 92 Wetlands

- Considerable effort was put into the development of a wetland policy for Yukon by the Department of Environment, First Nations and a multi-sectoral working group over the past four years. This work was inconclusive and has yet been compiled into a useable format.
- For the forest industry there are a number of legislative standards and operating procedures in place under the authority of the Forest Resources Act & regulations. These standards are clearly articulated and applied to forest harvesting operations. It may be useful for the planning commission to review these standards and apply them to wetland management activities.

Page 98 Climate Change

The discussion below is not a full examination of climate change modeling and the scenarios tested. Rather, the points made are really the starting point for a more in-depth analysis of the problem. The intent is to raise the possibility that the situation may not be as dire and some would indicate. It is a real issue that needs careful analysis, monitoring and adaptive management prescriptions to address the effects of wetter and warmer climatic conditions and its impact on the lands and forests in the region.

- In the plan it is stated that there will be an increase in annual temperature and increases in annual precipitation. There is likely to be a significant change in the forest growth and structure with climate change if it occurs during the summer as opposed to winter. A five degree increase in temperature in winter may result in a shift from -30 to -25 degrees which would have little impact on how plants and animals continue to survive and grow. However, if it all occurs in the summer a shift from a normal temperature of +25 to +30 degrees may have significant impacts on habitats and how local fauna utilize them. It is more likely that this shift will occur in a more blended fashion which may result in a lower degree of impact positive or negative on overall ecosystem productivity.
- In the same introductory paragraph, it is mentioned that precipitation is modeled to be higher. Again, the season in which the precipitation arrives will affect how the ecosystem responds. With warmer wetter conditions in the growing season, one would

- anticipate an increase in productivity which should result in greater species richness within landscape units which would indicate higher levels of biodiversity. If precipitation increases in winter the impact will be greatest with regard to when and how melt water peak flows occur. This could have implications for infrastructure such as roads and communities. There will likely be little influence on forest productivity and forest habitat should remain relatively similar to current conditions.
- With regard to increased fire starts, size and intensity of fires in the planning area due to climate change the shift may or may not be as significant as the current modeling projects. Especially under a higher moisture regime in a summer. This is because more summer precipitation will mitigate drought conditions and raise relative humidity's. Increased forest productivity may result in species shifts towards diecious forest on some areas. If the increased precipitation occurs in winter soils will be recharged with moisture resulting in higher moisture content in forest vegetation which would mitigate fire weather build up indexes. Which would in theory lower the intensity of fire when it does occur.
 - With increased atmospheric temperature and increased precipitation, one could anticipate a shift from Spruce Willow Birch Biogeoclimatic Zone towards Boreal White and Black Spruce biogeoclimatic zone (special report 6, Ecosystems of British Columbia, 1991). This will result in greater productivity of the overall forest ecosystem. As mentioned above the it is quite possible that biodiversity and species richness could be increasing in the area.
 - The most significant change for the wood products industry will likely be a shift in when fall freeze up and spring break up will occur. The result could be a shortened winter operating season. This may be mitigated by warmer temperatures in January which would mean less cold weather shut downs.
 - The forest management branch has a relatively new vegetation inventory on forested landscapes in the Dawson Region. This inventory is supported by permanent sample plots which are valuable tools already in place that could be used to monitor vegetation shifts temporally and spatially. Therefore, for monitoring purposes it would be useful to use the year that the vegetation inventory was completed as baseline for future monitoring programs.

Page 106 Stewardship

- The Forest Resources Act has a strong stewardship orientation built into it and the forest industry supports this important principle. Our mission statement speaks to the importance of community, environment and stewardship.
- The Stewardship Trust is an interesting idea and is worthy of further analysis. There is a Forest Sector Trust Fund (FSTF) with several million dollars available that is in the process of being established. The wording and focus in the FSTF is on forest management the words may be slightly different than would be found in a stewardship trust however, the concepts and principles are compatible. The Dawson planning team

should look into the compatibility of the forest trust in relation to stewardship. Perhaps the trust already exists with slight modification.

Page 109 Landscape Management Units

The FRMP has identified a number of LMU's where commercial and personal timber harvesting may occur. The language in the LMU's doesn't appear to align with the FRMP. As mentioned on page one of this submission, the language in this section needs to be balanced in a way that clearly states that resource sectors are allowed to utilize the resources present within the LMU. Legitimate land use such as wood products and mining must be placed on equal footing with other resource values on the land. Otherwise, the plan will not lead to sustainable economies, societies or environments.

YWPA comments are focused on LMU's that have timber harvesting potential identified in the FRMP.

Page 119 LMU 4; Fifteen/Chandindu – Tsey Dek/Tthen-Dek

- Forest management and timber harvesting are recognized as having economic value. However, the recommended management direction eliminates the possibility of community based economic activity by not allowing new road infrastructure in winter or summer. While the Forest Resource Management Plan acknowledges this area has merchantable timber it also classifies planning as medium priority. Because of this it appears that the planning commission has concluded there is no need to provide for forest harvesting in the unit. This is clearly not the intent of the FRMP, rather it is an indication that in the near term there is enough timber in adjacent LMUs to support the current industry. This unit will likely be required for timber harvesting as some point in the future.
 - YWPA requests that the commission reconsider the elimination of new temporary winter roads and allow for winter road access to timber resources at a future date. Forest management branch has recently completed a timber supply analysis which would assist the commission understand how long-term sustainable harvest levels are linked to the land base. A medium priority does not mean that the LMU is not part of the long-term timber supply it means that this area is not currently required to support the wood products industry.
 - Please add a sentence into the management intent that clearly allows timber harvesting as a legitimate use of the land in this LMU

Page 123 LMU 6; Klondike-Trondek

- This LMU has recognized forest operations are allowed.
 - YWPA requests that the wording in the Management Intent box be modified to reflect that timber harvesting is an acceptable use of this land management unit. Meaningful, work in good jobs is an important element of a healthy sustainable community, economy and environment

Page 126 LMU 7; Upper Brewery/Hamilton

- The south Klondike portion of the LMU is important to the wood products industry. The designation of the areas is special management II which appears to allow for some commercial harvesting.
 - YWPA requests that language be inserted into the management intent that would support limited timber harvesting in the southern portion of the LMU where traditional harvesting has occurred and on areas that are less sensitive disturbance.
 - YWPA is concerned about the need for a variance to the plan for access infrastructure. The uncertainty associated with this type of direction will preclude any attempt to capture the economic potential. In other words a ‘maybe’ is the worst possible direction in a land use plan.

Page 129 LMU 8; Lower Brewery/Hamilton

- The FRMP has stated that this area has high timber values but is a medium for timber harvest planning in the near term. It is important to note that the near term could mean next 10-20 years.
 - YWPA requests that the management intent includes the statement that forest harvesting potential is high and harvesting activities are a legitimate use of the land.

Page 132 LMU 9; Clear Creek

- YWPA requests that the management intent includes a statement that timber harvesting is allowed in this unit.

Page 135 LMU 10; Upper Klondike

- YWPA requests that the management intent includes a statement that timber harvesting is allowed in this unit.

Page 141 LMU 12; East-Nacho-Dek

- YWPA requests that the management intent includes a statement that timber harvesting is allowed in this unit.

Page 144 LMU 13; Klondike Valley

- YWPA requests that the management intent includes a statement that timber harvesting is allowed in this unit.
- For the wood products industry a sub-regional plan already exists in the form of the FRMP. This should be recognized in the management directions specific to the recommended sub-regional planning process.

Page 163 LMU 20; Coffee-Tthatryan

- There may be an opportunity for the wood products industry associated with the production of biomass to support the mining industries energy needs. This is a future opportunity that may present itself in landscape units where current conditions do not

lend themselves to investment in the wood industry. However, should a mine require heat for buildings or processing ore the timber surrounding the mine may become a valuable source of renewable carbon-neutral energy.

- YWPA requests that future opportunities in LMU where mining is recognized as an important land use that timber harvesting be allowed in association with mining. This would be in support of the mining operation and its need for low emission, renewable carbon neutral energy production.

Page 176 Integrated Stewardship Areas

- use of some phrases are difficult to interpret and apply; e.g., stewardship should be conducted in a ‘respectful way’. The difficulty lies in the eye of the beholder; respectful and ethical practice to one person may look disrespectful to another.
- The principle of ethically applied stewardship is a key principle incorporated into the Forest Resources Act which governs forest industry activities on the land. Please refer to the preamble of that act. similar language could be incorporated into this plan.

Page 184 Table 6 Regional Indicators

- Ecological section; UBC forest ecology professor J.P. Kimmins in his text book Forest Ecology (1987) points out that the physical environment includes the following:
 - Solar Radiation
 - Temperature: an ecological factor
 - Wind: effect of atmospheric movement
 - Soil: the least renewable component
 - Water: makes life possible
 - Fire: pervasive and powerful
- Each of these physical elements plays a significant role in the development of the forest communities that interact with them. The indicators chosen should be chosen for their ability to track positive and negative trends. This is especially important for monitoring physical changes and their influence on flora and fauna.
- Most of the indicators chosen for monitoring in the Ecological category may have influences beyond the physical elements in the environment. Especially, when looking at wildlife population variation over time. For ungulate populations recruitment rates may be a more significant factor in population survival than habitat shifts. E.g., low recruitment may be caused by predation by natural predators and human over hunting.
- There is reference to habitat integrity in the various boxes. The use of the value laden word ‘integrity’ is problematic. It would be beneficial to refer to habitat function as a measurable outcome rather than integrity which implies personal ethics.

Conclusion

The wood products industry in Yukon is small and community based. In the context of land use planning the plan should be focused on how the wood products industry can contribute to the wellbeing and sustainability of the planning region. Locally based commercial wood products

businesses can and do result in sustainable communities and environments. The YWPA membership recognized several years ago that large commodity based lumber production is not possible in most of the Yukon. This is the reason our focus is on the production of biomass energy with some residual lumber production. In this context community based economic development in wood products is our focus. Therefore, the Dawson Land Use Plan needs to state clearly that timber harvesting is an important and legitimate land use in the planning region. That can be used to mitigate global climate change impacts.

Please, accept the comments offered in this document in the spirit that they are offered. That is to offer our issues and concerns in a way that they can be incorporated into the plan. With the objective of improving the plan for the sum of the goods and services that the land can offer the citizens of the region.

Please do not hesitate to contact the Yukon Wood Products Association executive director Myles Thorp at mhthorp@klondiker.com or phone 867-335-1914 if you have any questions.

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