

Chapter or Section	Page #	Category	Comment/Description
<i>Preamble</i>			
How to Use the Plan	10	General	While one of the primary purposes of the plan is to assist with development assessment, this is not the only purpose. For example the SMAs have a goal of conservation management outside of environmental assessment and development. The plan sets goals for these areas, such as ecological integrity, that will be monitored and effected outside of EA. Suggest expanding this scope of plan usage.
<i>Section 1</i>			
Section 1	12-19	Gap	The Introduction to the Plan should note that authorities and responsibilities for land, water and resource management in the Dawson Planning region are shared between the Parties, i.e., the governments of Yukon and Tr'ondëk Hwëch'in. Joint management should be reflected in the Guiding Principles, Plan Goals, General Management Direction and Plan Recommendations (Policy and Research). A specific Goal of the Plan should be to ensure that Tr'ondëk Hwëch'in meaningfully participates in the management of public resources throughout the Dawson Planning Region, on both Crown Land and Settlement Land, in order to maintain the ecological and cultural integrity of the region.
1.1	13	Suggested Change	reverse order in last sentence "...plan designed to enable the people of the planning region to maintain a rich cultural legacy and a healthy environment, while sustaining a diverse economy."
1.1 Context	13	Addition	Add tourism into sentence 'its quality of life is attributed to opportunities and employment in mining, <TOURISM>, and other economic sectors.' Tourism is of the the biggest industries in the region and should be highlighted along side mining.
1.4.1	15	Gap	Climate change must be referenced as one of, if not the primary, PLANNING ISSUES; and not simply an issue within 'Ecological Integrity'. A theme of Climate Change, with Key Planning Issues including Impacts to Indigenous rights, Environmental effects and impacts to infrastructure, Influencing species distribution, and Complexity and adaptive management would be more appropriate. The inclusion of an appropriately amended summary of section 4.2.5 Climate Change within section 1.6.2 would provide the necessary context.
Table 1.1	15	Addition	In Table 1-1 Key Planning Issue in Dawson Region, suggest adding a reference to Energy, and in particular, renewable energy opportunities and initiatives in the Key Planning Issues.
Table 1.1	15	Addition	Add 'Traditional Economy' into the Culture and Heritage key planning issues column.
1.6.1	15	Suggested Change	Suggest using Trehude, or Continuity of Life, or Ecological Integrity within the Vision statement rather than just sustainable development
1.6.2 Guiding Principles	16	Suggested Change	Should consider incorporating the Tr'ondek Hwech'in concept of Tr'ehude (TH World View) as a guiding principle. It is not enough to incorporate TK into a Colonial planning practice such as this, must also blend elements of Trehude. Otherwise, TK is being taken out of context and forced into another world view.

1.6.2.1 Sustainable Development	16	General	Objective 11.1.1.6 states objectives of land use planning are "to ensure that social, cultural, economic and environmental policies are applied to the management, protection and use of land, water and resources in an integrated and coordinated manner so as to ensure Sustainable Development." As such, the plan must go beyond 'promoting' and ensure the principles are applied. Suggest rewording this section slightly.
1.6.2.2 Stewardship	17	Addition	Add word respectfully at end of sentence- "while allowing economic development activities to continue <respectfully>."
1.6.2	18	Suggested Change	Addressing climate change, its causes and impacts, must be specifically incorporated within the 'Draft plan concepts and principles', with recommendations and mechanisms throughout the Plan to ensure climate change considerations are acknowledged and addressed. The principle could be stated thus: Climate Change: Addressing the causes and impacts of climate change is fundamentally necessary to create an environment where people and nature thrive. This is central to the Draft Plan and essential to the continued health and well-being of the region.
1.6.2.3 Precautionary Principle	18	Suggested Change	While this may, arguably, be one aspect sometimes attributed to the PP, it is clearly NOT the definition. For example: The precautionary principle enables decision-makers to adopt precautionary measures when scientific evidence about an environmental or human health hazard is uncertain and the stakes are high. (European Parliamentary Think Tank) https://www.europarl.europa.eu/thinktank/en/document.html?reference=EPRS_IDA(2015)573876 The PP steers governance in risk management, risk governance, how science is used in policy formation; and in directing accountability for unforeseeable consequences. It does seem applicable here where wicked problems and such difficult combinations of goals are aspired to – failure seems a genuine risk. The PP will allow some restraint on the most dubious combinations of goals.
1.6.2.3 Precautionary Principle	18	General	Suggest clearly describing in this section where the plan applies the precautionary principle. It is unclear exactly how the precautionary principle is specifically applied within the plan and the various LMU's.
1.6.2.4 Adaptive Management	18	Gap	While Adaptive Management (AM) is questionably appropriate for evaluating the Regional Management Plan, what is proposed is a very truncated version of AM to "look, learn, and adjust as required". However, a full AM cycle looks more like this: Williams, B.K., Brown, E.D. Double-Loop Learning in Adaptive Management: The Need, the Challenge, and the Opportunity. Environmental Management 62, 995–1006 (2018). https://doi.org/10.1007/s00267-018-1107-5 . Even if one compressed this into Look, Learn and Adjust, the design, monitoring, need to be more formalized and scrutinized to keep from making the same mistakes twice.
1.6.2.4 Adaptive Management	18	Gap	Adaptive management principle does not mention Tr'ondëk Hwëch'in values of learning from the land, being flexible, adapting to challenges and dealing with change.
1.6.2	18	Addition	Suggest adding a new section between Stewardship and Precautionary Principle titled "Traditional (or Indigenous) Knowledge. In this section should define what this means to the plan, how the plan has incorporated TK into its decision making and into the management recommendations, and what the plans objectives and goals are for TK as a body of knowledge informing the plan and decision making in the future. TH can support the drafting of this section.

1.6.2.5 Priority Criteria for Candidate Conservation Areas	18	Gap	The conservation section is primarily about methodology (which should be moved to s. 3.2) and not principle. The discussion of conservation focuses primarily on ecological conservation and ecological connectivity and does not explain Tr'ondëk Hwëch'in's intertwined and enduring relationship with the land and cultural values, including cultural continuity and cultural landscape.
1.6.2.5	19	Gap	The language of "ecosystems services" is incongruent with a TH world view.
1.6.2.5	20	Addition	Add "fish" to harvestable resources under Heritage Resources and Sites
1.6.2.5 Heritage, Social, and Cultural	20	Suggested Change	The plan references the whereas clause from the THFA paraphrasing that the "THFA recognizes and protects a way of life which is based on an ECONOMIC and SPIRITUAL relationship between TH and the land." While this is directly from the THFA, the language could be misinterpreted outside of the framework of the THFA and the supporting chapters . Suggest explaining that the THFA recognizes and protects a way of life inseparable from the natural landscape spiritually, culturally, and economically, where economy refers to both cash and traditional economies as described in the various TH submissions.
1.6.2.5 Heritage, Social, and Cultural	20	Editing/Grammar	Remove the bold title ' Heritage Resources and Sites ' before the bullet list.
1.6.2.5 Heritage, Social, and Cultural	20	Gap	Add to list of Heritage Resources and Sites: - Sense of connection to land/sites, - Ability to move/harvest/hunt, - Science/Denezhu Knowledge, - Stewardship Responsibilities, - Heritage/Harvest Camps, - Sense of Place/Homelands
1.7 Plan Goals	21	Gap	Solely referencing "climate driven shifts in habitat" as a single Draft Ecological goal fails to impart the importance and urgency of climate change action. It must be one of the 1.7 PLAN GOALS with the objectives to reduce contributions to the causes of climate change, address climate change induced impacts, and help preserve the regions natural integrity and support First Nation rights.
1.7	21	Suggested Change	Under Draft Socio-cultural Goals, consider adding: "Ensure Development doesn't impact social life and culture". Under Draft Economic Goals, add: "Support prosperity without growth. Consider community desires before promoting development".
1.6-1.7	15-21	Suggested Change	Vision, principles, goals should each have their own section and not just part of the Introduction as they form the foundation of the plan and are the overall guiding statements for the future of the region.
Section 2			
Entire section		Gap	The section needs to explain Tr'ondëk Hwëch'in: people of this river; Dënezhu: people of this land; Tr'ëhudè: our way of life, our law. Provide a description of the region in the way Tr'ondëk Hwëch'in people see it including the intertwined and enduring relationship between Tr'ondëk Hwëch'in and the land, and how land is the foundation of Tr'ondëk Hwëch'in identity and all aspects of their well-being, and how Tr'ondëk Hwëch'in society is born out of the land – it is the place of stories, language, and teachings. Describe the landscape as Tr'ondëk Hwëch'in sees it – any distinct features or areas that are significant to Tr'ondëk Hwëch'in or that people use to navigate and understand the landscape. For example, the significance of the Yukon River.
2.1 Setting	22	Addition	There is a portion of the eastern boundary that is not Peel and is the contiguous boundary between TH and NND. Suggest adding language in this regard to include NND to the east, as they are an interested YFN in the plan.

2.2 Land Status	22	Addition	Under Land Status suggest addition: "...does consider them <as adjacent land uses> ."
2.2.3 Designated Lands	23	Suggested Change	Technically, Fortymile, Fort Cudahy, and Fort Constantine Historic Site is not designated as a territorial heritage site under the historic resources act. It is a co-managed site recognized under Schedule A of Chapter 13 of the THFA.
2.2.4 Adjacent Designated Lands	23	Gap	Suggest adding reference to adjacent regional planning areas, particularly the North Plan and the Peel Watershed Plan, immediately adjacent to the Dawson Region.
2.3 Environment	24	Addition	Include bear & sheep as examples of keystone species in the region
2.3 Environment	24	Addition	Last sentence of paragraph 4, suggest adding the Klondike as a significant tributary to the Yukon River.
2.4	25	Gap	4th para - change "For generations" to "Since time immemorial". 6th para - Jack McQuesten was greatly aided by local First Nations people and his Indigenous wife.
2.4 People and Communities	26	Suggested Change	It is important to tease out Tr'ondek Hwech'in (and adjacent FN's) unique relationship with the landscape in this section, or create a separate heading that accomplishes this to fully provide room to articulate the cultural landscape as it relates to indigenous use and value of the region. This is a critical baseline that that needs to be understood and recognized.
2.4 People and Communities	25	Addition	Emphasis needed on today's harvesting; get rid of past tense language.
2.5.1 Non-Renewable Resources	26	Editing/Grammar	Placer mining paragraph: "Dawson mining district <is> the most..."
2.5.1 Non-Renewable Resources	26	Editing/Grammar	Sentence under Hard Rock mining, 'Siver' should be silver
2.5.1 Hardrock Mining	26	General	Data is from 2019. Update claims, active projects, and region covered for Recommended Plan to 2021 #'s.
2.5.1 Placer Mining	26	General	Data is out of date. Update claims, active projects, and region covered for Recommended Plan to 2021 #'s.
2.5.2 Renewable Resources	26	General	Is there a more recent census with updated numbers? Update Recommended Plan with most recent #'s
2.5.2 Tourism	27	Gap	Yukon Tourism and TIA Yukon maintain good metrics re: visitors #s, \$ spent, and contribution to the economy. Suggest expanding the information/numbers in this section to better reflect Tourism's essential contribution to the region.
2.6	27	Gap	This section, like the others under the general heading, is short, mostly descriptive and a matter of presenting facts. Limiting the effects to temperature and precipitation, while those are vital to outcomes, diminishes the complex nature and widespread influence of our changing climate. The description should be more expansive, highlighting key issues of impacts on Indigenous rights and the need for urgent action.
2.6	27	Suggested Char	1st para -Climate change is already havign significant impact. Could strengthen this sentiment.

Section 3

Entire section		Gap	Provide a clear description of how land designation, management intent, priority objectives for the LMUs considered Tr'ondëk Hwëch'in knowledge and experience. The discussion of conservation in these sections needs to address the cultural values of Tr'ondëk Hwëch'in as the intertwined and enduring relationship with the land, where the land is both an ecological and social system, as well as having specific cultural uses, resources and sites. Concepts such as cultural landscape and cultural integrity should be added.
3.2.2 Integrated Stewardship Areas	31	General	The use of the term 'Integrated Stewardship Area.' has to actually mean something different than Integrated Management Area. Currently, it seems like it is taking advantage of a concept that Tr'ondek Hwech'in has clearly promoted in its conservation priorities and other submissions, but that it means nothing substantially different from IMA at all. To make this change, the Plan could look to different Indicators (ie. social), better monitoring and reporting, inclusion of indigenous knowledge, etc. to ensure it truly is about stewardship.
3.2.3 Cooridor Areas	31	Gap	The corridor areas and sub-regional planning areas get confusing... is corridor only for "major highways" in the region, or does the term apply to river corridors as well? Clarification is required
Table 3-1	33	Gap	Intact landscapes are cultural resources, as is wildlife.
3.3 Special Management Direction	35	Suggested Change	Add the undisturbed wetlands concept in the special management exemptions within ISAs.
3.3	35	Addition	"General management direction for the Plan is organized around a results-based management framework." This requires clarity as to what that actually means.
3.3	35		Will there be a commitment made to address how often "strategies will be adjusted in response to changing status of indicators"? Clarification is required. Review timeline should also be identified.
3.3	35	Addition	Climate change considerations must be included as a specific management direction: "Elimination or minimising of activities that contribute to the causes and adverse impacts of climate change." A definition of the 'best use of land' would be useful for clarity, and should incorporate the potential to retain the natural landscape as a natural solution to climate changes.
3.3	35	Suggested Change	To properly manage the values within SMAs they all really need to have legal designation and management planning.
3.4 General Management Direction	35	Editting/Grammar	Second sentence under General Management Direction - important correction: YESAB is not a regulator.
3.4.1 Results Based Management Framework	36	Gap	Need one more line in the table after the BMPs and measurable signals to assess if objectives are being met. If not being met, then what is the follow up action?

3.5 Cumulative Effects management	37	Gap	Potential effects of climate change must be considered as a component of cumulative impact assessments during evaluations for land-use plans. Until these changes are better understood in a cumulative context and incorporated into the Plan, it will be difficult to reliably predict the environmental, social and cultural outcomes of particular land-management designations and allowable activities. This could be achieved by: Adding climate change to the primary list of cumulative effects indicators; Incorporating and setting measurable thresholds; Considering the direct consequences that climate change may have on other indicators and activities; Addressing how allowable land-uses and activities may exacerbate the causes and impacts of climate change. These would enable specific and measurable thresholds to be developed that consider direct climate change consequences, and the degree of influence of climate change within Land Management Units.
3.5.1 CE Indicators	37	Gap	The Plan's primary Cumulative Effects Indicators are Surface Disturbance and Linear Density; chosen as they indirectly relate to a range of regional values and issues. Climate change shares these characteristics, and indeed surpasses their spheres and range of influence. Thus, climate change must be defined, incorporated and evaluated in the same manner. Equally, climate change must be a key component of the Cumulative Effects Framework; properly tracked and utilising appropriate baseline measurements. In addition to the other cumulative effects indicators identified in section 3.5.1.3, the Plan makes a recommendation that other indicators should be evaluated. These could include permafrost and wildfires and incorporate mental and physical wellness within the context of stewardship; and flooding in the assessment of water.
3.5.1 CE Indicators	37	General	The plan states that there are a number of other potential indicators that could more directly relate to values. Suggest including a Recommended Action to consider inclusion of other potential indicators upon plan review (that's adaptive management...).
3.5.1 CE Indicators	37	Gap	Impacts from "wildfire" should be included under CE indicators.
3.5.1 CE Indicators	37		Who will be given the mandate of assessing/ monitoring these indicators? If the indicators are not currently being monitored, will more money be committed or recommended to increase the research required? Clarification is required.
3.5.1.1 Surface Disturbance	38	General	Within the discussion of Surface Disturbance Measurement and Recovery, why not use all 3 metrics identified in the table? This question should be discussed at the TWG.
3.5.1.2 Linear Density	38	Gap	In the linear density discussion, suggest choosing Option 1, which limits linear features under 1.5m and determine a way to help Alces measure, either by hand drawing or finding better imagery. 1.5-3m is a big gap and will leave huge amounts of unaccounted disturbance on the landscape. If choosing option 2, would need to assume a certain percentage of unaccounted disturbance and include it in the calculation, which introduces uncertainty into the process. Discuss at the TWG.
3.5.1.2	38	Editing/Grammar	last sentence, second paragraph --> "Given the significant implications of added linear density, <using this as a limiting mechanism for thresholds> is an effective tool in cumulative measurement."
3.5.1.3 Other Indicators	39	General	The research recommendation should be to evaluate use of other potential indicators directly in the Dawson Regional Plan, not just use within other regional plans.
3.5.1.3 Indicators	39	Gap	Add noise pollution to indicators - massive impacts on wildlife stress, health, and movement patterns, as well and landscape enjoyment by those who live and visit the region.

3.5.1.3 Water	39	Gap	Water paragraph indicates "ref Cond approach" was developed in 2000's but it is unclear as to what is being used currently. Clarification is required
3.5.1.3 Water	39		How will water be used as an indicator? Defined limits or WQ parameters to be tested for should be included in this "indicators" section
3.5.1.3 Salmon	39	Suggested Change	salmon are heavily affected by factors <both inside and> outside the region
3.5.1.3 Salmon	39		As such, salmon specific indicators may not be needed at this time.... Salmon-specific indicators are needed and are a meaningful indicator for TH... This should be changed to recognize the current gap in knowledge that exists and provide recommendations to address it.
3.5.1.3 Wetlands	39	Addition	How is 40% being defined? --> 40% of an entire drainage? 40% of a single placer claim or grouping? 40% of one wetland complex? Or 40% of one wetland?
3.5.1.3 Ridge tops important for caribou migration	41	Gap	What about other caribou herds? Plenty of information exists on FMCH, Hart, Clear Creek and PCMH.... This section needs to be added to.
3.5.1.3 Ridge tops important for caribou migration	41	Gap	This speaks to critical summer migration routes, but what about summer habitat? Winter habitat?
3.5.1.3 Stewardship	39	Gap	Clear definitions of "indicators", based on current research and data collection, should inform how an indicator will be used in the assessment of CE.
3.5.2 CE Thresholds	40	Question	Why is the "disturbance within 1km of a highway"? Gravel pits and other uses that will contribute to disturbance are within a much smaller corridor
3.5.2 CE Thresholds	40	Suggested Change	Project year-end reporting needs to be committed to by all proponents such that we can get an accurate picture of disturbance on the landscape
3.5.2 CE Thresholds	40	Editing/Grammar	2nd paragraph, 2nd sentence: "Integrated stewardship Areas"
3.5.2 CE Thresholds	41	Gap	Need to identify how often the CE mapping should occur
3.5.2 CE Thresholds	41	Suggested Change	2nd paragraph.... If an indicator level in a "precautionary" or cautionary" threshold zone is reached or exceeded... Clarify that a "critical threshold" can not be exceeded.
3.5.2 CE Thresholds	41	Suggested Change	Cautionary Threshold: could include 'slowing down the pace of development'; putting a ban on new proposals for the area; increased amounts of monitoring to increase an understanding of pressures
3.5.2 CE Thresholds (policy recommendations)	41	Editing/Grammar	This work should include clarifying information requirements for project proposals to determine conformity.
3.5.3 CE Framework	42	Gap	The Plan should identify benchmarks
3.5.3 CE Framework	42	Addition	This section needs to include the monitoring of change of INDICATORS and what steps need to be followed when change is identified.
3.5.3 CE Framework	42	Gap	Identification and reporting of TRENDS needs to be included
3.5.3 CE Framework	42	Gap	Need to include WILD FIRE in the assessment of disturbance... especially in sensitive caribou habitats

3.5.3 CE Framework	43	Gap	It is hard to interpret the % wetlands figures given without knowing the total area considered; the denominator of the calculation. Additionally, distribution is important. If half the wetlands are lost on a prairie pothole landscape, there may be minimal change; if half the LMU wetlands are lost in one complex of a river valley, it could make a large difference.
<i>Section 4</i>			
4. General Management Direction	44-107	General	Throughout this chapter many of the Policy and Research Recommendations actually read like Management Recommendations, and should be included as management recommendations as they will have more strength as recommendations for implementation. Policy and research recommendations should be directed at the parties to support the management recommendations.
4. General Management Direction	44-107	Gap	Climate change must be fully considered within each of the three major themes outlined in this section, and within the Planning Strategy, management practices and recommendations.
4. General Management Direction	44-107	Gap	Stewardship as a principle applied in GMD is not well addressed. The "Recommended Management Practices" could be considered stewardship practices for land users. They are not presented this way and in many sections none are listed. The section could be used to indicate what stewardship activities land users can take on themselves and be responsible for, to promote the "shared mind-set" as presented as the stewardship principle
4.0 GMD	46	Editing/Grammar	SMD section: 2nd paragraph, 2nd sentence... "this Plan assumes that..."
4.1 Sustainable Economy	46	Addition	Sustainable Economy section --> need to add wording around "traditional economy" and wildlife provisions that sustain harvesting, trapping and arts/crafts made from these products. Traditional economy is not referenced at all within this section.
4.1 Sustainable Economy	47	Gap	Language that recognizes traditional economy needs to translate into the importance of this economic contribution to this region. Wild meat, trapping, intact landscapes all feed the wealth, health and wellness of the people. These attributes need to be considered according to Ch.11
4.1.1	47	Suggested Change	The Plan should be careful not to conflate mining history to culture in the same way culture is described to TH. These are unfair comparisons to Tr'ondek Hwech'in as their culture has lived for millenia and is not tied to economic interests or one specific industry.
4.1 Sustainable Economy	46	Suggested Change	The wording needs to shift focus from "need to balance the economic interests with other.... values" to "need to consider cultural and social values so that a balance can be found amongst ecological and economic interests". It is important to change the narrative here in order to honour the TH FA.
4.1 Sustainable Economy	46	Suggested Change	1st para, 6th line - land is currently stressed and is unable to provide "wealth and abundance" (i.e. - salmon stocks have collapsed). Currently, we need to strive for livability.
4.1.1 Mineral Exploration and Development	48	General	Policy Recommendation #2 change the word 'traditional' in reference to mining areas.
4.1.1 Mineral Exploration and Development	48	Suggested Change	Mineral exploration and mineral development does not require "all-season" roads. Suggest change to this, recognizing the seasonal nature of the mining industry.

4.1.1 Mineral Exploration and Development	48	Addition	Additional objective is needed: include thresholds to development in certain areas and clear reclamation standards (expectations), along with a definition of when land can be considered "reclaimed"
4.1.1 Mineral Exploration and Development	48- Planning Strategy	Addition	Additional bullet req'd --> clarity on lands set aside for conservation to ensure cultural values are maintained by safeguarding ecological and heritage resources
4.1.1 Mineral Exploration and Development	48	Gap	There are no management practices recommended in this section. This should be strengthened, if only to just support existing best management practices. But also, ie. better reporting, etc.
4.1.1 Mineral Exploration and Development	48- Rec. Management Practices	Gap	Here is an opportunity to communicate to the mining community/ industry about their obligations of Stewardship and requirements for reclaiming all ground worked so that overall disturbance levels are controlled and efforts are made to ensure a reduction of overall landscape disturbance.
4.1.1 Mineral Exploration and Development	48- Rec. Management Practices	Gap	Another opportunity exists here by communicating the importance of the mining community working together to ensure that thresholds are kept low, reclamation requirements are completed and folks plan appropriately for what they can realistically accomplish. This language will highlight the need for the mining community to come together and work together to ensure thresholds aren't pushed and to make sure that one operator is following due diligence practices and reclaiming their ground so another miner can move into the watershed.
4.1.1 Mineral Exploration and Development	48	General	The plans supports exploration projects 'currently proceeding in the planning region.' What does this statement mean for future projects?
4.1.2 Transportation and Access	49	Addition	Add trapping and harvesting to the "economic interests of the region"
4.1.2	49	Gap	"Industrial Prosperity" needs definition.
4.1.1 Mineral Exploration and Development	49 - Policy recommendations (1)	Suggested Change	Add a sentence about the intended nature of these areas (SMA 2's)
4.1.1 Mineral Exploration and Development	49 - Policy recommendations (3)	Suggested Change	Add language about "depending on designations for LMU's"
4.1.2 Transportation and Access	49/50	Suggested Change	Add a quote that accurately reflects Ch.11 obligations, as access is known to impede many provisions of TH FA b/c of changes caused to lands and F&W from access development.
4.1.2	50	Gap	Air access and noise pollution must also be considered
4.1.2 Transportation and Access	50	Gap	Transportation is vital to our region. It is also our biggest contributor to greenhouse gas emissions. Aside from addressing the environmental and wildlife impacts of access, priority should be given to reducing emissions, minimising the need to travel, energy efficiencies and self-sufficiency – all of which have considerable economic importance. Equally, climate changes have an enormous impact on the integrity of transport corridors. While a subsequent Research Recommendation later in the Plan references permafrost – the potential economic impacts of permafrost degradation on transportation should be referenced in this section.
4.1.2 Transportation and Access	50	Addition	Winter roads --> should include the fact that winter roads typically do not require any vegetation to be removed for their construction

4.1.2 Transportation and Access	50 - Objectives	Suggested Change	Objective 2. "... or socio-cultural values, <including critical migratory corridors>".
4.1.2 Transportation and Access	51 - Key Issues	Suggested Change	The wording in this section can be elevated to recognize the high-level nature of the plan
4.1.2 Transportation and Access	51 - Recommended MP's	Addition	Refer to the various management plans in place that address, manage and mitigate for the concerns & issues mentioned above.
4.1.2 Transportation and Access	52 - recommended action	Editing/Grammar	"A sub-regional plan for the entire span (or length) of the Dempster..."
4.1.2 Transportation and Access	52 - recommended action	Suggested Change	2nd and 5th bullet contradict each other
4.1.2 Transportation and Access	52	Suggested Change	2nd bullet --> why is there only a higher conservation focus in areas adjacent to LMU's 5,7 and 10? The Dempster corridor should be secured for its own integrity, independent of adjacent land uses and land designations.
4.1.2 Transportation and Access	52	Suggested Change	2nd bullet --> of particular importance is the TH Cultural integrity Area resolution (CIA)
4.1.2 Transportation and Access	52	Suggested Change	8th bullet --> please add bridges in the examples of infrastructure requiring reclamation... could also include any work completed in riparian areas or stream crossings
4.1.2 Transportation and Access	52	Suggested Change	8th bullet --> be aware of changing terminology. Restoration vs. reclamation. Is there a defined difference in this plan?
4.1.2.1 Dempster Highway	50	Addition	Within key issues/interests there is no mention of oil and gas. If developed in the future this will increase traffic along the highway.
4.1.2.1 Dempster Highway	51	Suggested Change	Add to list of Key Issues "Alienation of TH and other Indigenous peoples from the Dempster region and Tombstone Park in particular." and "TH and Indigenous access, hunting, and cultural use"
4.1.2.1 Top of the World Highway	51	Addition	Suggest adding increased access from the TOW to other areas for industrial and commercial activities as a key issue, particularly from Placer, but also forestry.
4.1.2.1 Top of the World Highway	53 - Policy recommendation (1)	Suggested Change	"The integrity of this area must be maintained to ensure harvesting and traditional economic activities can continue. "
4.1.2.1 Klondike Highway Corridor	54	General	There is a considerable amount of placer activity within the corridor itself (ie. Clear Creek, Flat Creek, Goring, Dempster Corner.) Would suggest adding this in key planning issues.

4.1.2.1 Klondike Highway Corridor	55	General	<p>Interpretive plans are not intended for enforcement, or to deal with land use conflict. They are meant to guide the 'interpretation' of an area and facilitate recreational/tourist use, basically through signage. Most of an interpretive plan is figuring out how to tell a story about the place and where. They have very little legislative teeth and are likely not an appropriate management tool as intended in the plan. An interpretive plan could support management practices and recommendations provided by the Commission or parties, but is not the correct tool to define them.</p> <p>Suggest adding to recommended management practices and then suggest development of an interpretive plan as a tool to support these, particularly respectful recreational/tourist activities.</p>
4.1.2 Klondike Highway Corridor	54 - Planning Issues	Suggested Change	Add reference to the highway corridor being close to Klondike River and groundwater source
4.1.2 Klondike Highway Corridor	55 - policy recommendations (2)	Suggested Change	"The integrity of this area must be maintained to ensure harvesting and traditional economic activities can continue. "
4.1.2 Klondike Highway Corridor	55	Gap	This is the obvious area for expansion in the agricultural sector. Area for future ag growth needs to be identified
4.1.2.2 All-season surface access	55	Suggested Change	The Key planning issues should acknowledge this concern and also reference the subsequent increase in greenhouse gas emissions as new roads and trails are developed. Recommended Management Practices does specify that new roads and trails avoid permafrost and wetland areas "where practicable". This must be revised simply to "avoid" these areas. In addition, access use and frequency should be a consideration in approving new routes.
4.1.2.2 All-season surface access	55	Suggested Change	The terminology "all-season" is inaccurate and inconsistent with placer applications to YESAB and LUP from EMR. Need clear definitions of terms used.
4.1.2.2 All-season surface access	55	Editing/Grammar	First 2 sentences are redundant in relation to the following sentences (paragraph).
4.1.2 Transportation and Access	55	Gap	Commission's vision of what they would like to see for the future of this area needs to be better defined. Ag growth areas? Viewscape for the Valley? Mining in corridor? Future commercial areas?
4.1.2 Transportation and Access	55	Gap	What consists of "residential development"? Does this mean one house? An established subdivision? There is a housing shortage in Dawson and the Klondike Valley is the next obvious area for expansion. This should be clarified.
4.1.2 Transportation and Access	56 - Planning Issues	Gap	Fertile soils present in the Klondike Valley should be protected for future agriculture needs
4.1.2.2 All-season surface access	56	Suggested Change	".....cumulative surface linear access has resulted in increased and potentially unsustainable access for moose harvest...."
4.1.2.2 All-season surface access	57. a	Gap	WCS identifies south-facing slopes as critical refugia for endemic plant species in the future... This management direction should consider that value and identified risk.
4.1.2.2 All-season surface access	57. b	Gap	How is redundant defined? Clarification required.
4.1.2.2 Policy recommendation	57	Suggested Change	Considering that "no access off the Dempster Highway" has been included in the recommendations ... please clarify where future access can occur under a plan amendment. Alternate access from North Fork Road may be considered through a plan amendment.

4.1.2.2	58	Addition	Under Research Recommendations , stating <i>The Parties should conduct a baseline linear disturbance study with priority given to areas experiencing increased pressure from linear development...</i> it should be noted that the threshold should not be based on road density in a given area alone - more specific language should address redundancy of roads (particularly with the NAR at play) and strive to prevent loop roads that lead to increased hunting and predation
4.1.2.2 Recommended management practices	60	Suggested Change	A management practice could be added to include: If remote areas are known to have increasing access, then additional monitoring of moose, caribou, as well as linear disturbance assessments could be prioritized for monitoring. The DDRRC could be tasked with identifying "notable" high-use areas.
4.1.2.5 Water Access	61	Addition	Other Potential Key Issues: -Ferries and winter road crossing proposed by NAR - Conflicts with values associated with reasons for travel, ie. Recreational relies upon wilderness characteristics and viewscales
4.1.3 Agriculture	63	Suggested Change	How can the ag industry grow and how can we increase our food security if identified "quality growing soils" are allowed to be used for fill, mined or built on top of? Should make protection of fertile soils a priority for this area.
4.1.3 Agriculture	63	Question	How can the ag industry grow if ag area/ lands are not identified in the plan?
4.1.3 Agriculture	64	General	Policy Recommendation #3: Specify the community as Dawson City, and then be more specific of area ie. Klondike Valley? Policy Recommendation # 4: can this recommendation be strengthened to suggest a review of the regulation that allows for the subdivision of ag land?
4.1.2.5 Water Access	62 Rec management practices	Suggested Change	A fisheries assessment should be conducted on proposed fording areas to determine species presence, so that life history requirements (that vary amongst species) can be considered
4.1.2.5 Water Access	62	Suggested Change	Often, access by water is the most energy-efficient means of transport and can also help remove the impacts of climate change of overland routes. The proposed Planning Strategy recommending research into the ecological and social impacts of barging should be extended to consider all craft, develop thresholds for use if this form of access is to be promoted, and a comparison made with overland access from a climate change perspective.
4.1.2.5 Water Access	62 Research Recommendations	Suggested Change	The Stewart, Klondike and Fifteenmile Rivers need to be included under this recommendation as they are salmon bearing streams and provide for subsistence needs with freshwater fish as well (e.g. grayling and whitefish)
4.1.3 Agriculture	62	Addition	The Plan could include research into alternative farming techniques as a Key planning issue – with an Objective to “Minimise the climate change impacts of agriculture”. If the Plan is to truly support increased agriculture, it similarly needs to investigate and recommend the introduction of climate change-friendly farming methods.
4.1.3 Agriculture	62	Gap	the recognition of the Klondike Valley as containing high agricultural potential for the planning region highlights the need to safeguard this area in the interim until "future sub-regional planning" can be completed

4.1.3 Agriculture	63 Key planning issues	Suggested Change	Can an example be provided for co-existence and collaborations (e.g. mining or forestry working with farmers when clearing land to support ag endeavours when 1st use of land has been completed)
4.1.3 Agriculture	64	Addition	1st paragraph --> This could potentially be done by collaborating with foresters, as well.
4.1.4 Tourism	64	Suggested Change	The Plan could acknowledge climate change impacts as a Key planning issue, with an Objective to "Minimise the climate change impacts of tourism". The Plan can support low carbon tourism development through recommendations to: Research the measurement and disclosure of CO2 emissions in tourism; Investigate and implement emissions reductions in tourism operations; Engage the tourism sector in carbon removal.
4.1.4 Tourism	65 Key planning issues	Suggested Change	1st bullet --> should go into detail about potential implications to TH rights (working with TH TWG)
4.1.4 Tourism	65 Key planning issues	Suggested Change	2nd bullet --> should go into detail about potential implications to TH rights (working with TH TWG)
4.1.4 Tourism	65 Key planning issues	Question	5th bullet --> seems out of context for the length of this plan (and considering that every economic activity was impacted by COVID-19)
4.1.4 Tourism	66	General	Recommendation to the Parties: PR #1: Does there need to be a threshold or metric attached to this? I.e. What is a natural scenic viewscape and at what point is it adversely impacted. PR#2: For all areas, not just the Klondike Gold fields. RR #1: I.e. Trail Development
4.1.5 Outfitting	67	Addition	2nd paragraph --> could add winter and spring for wolf and bear
4.1.6.1 Dawson City Water Supply	70	Gap	There is a need for water testing that shows whether mining is contributing heavy metals to the water supply.
4.1.6.1 Dawson City Water Supply	69	General	Recommendation to the Parties: RA #1: These water sources are informal community use sites, and may not be supported as drinkable water by community services or public health. This likely won't be supported. Maybe reframe this as a recommended management practice to protect important community water sources?
4.1.6.1 Dawson City Water Supply	69	Suggested Change	To date, attempts to develop comprehensive estimates of the economic impacts of climate change in water resources sector have identified considerable economic costs associated with climate change impacts. A clearer picture of its effects in our region would be invaluable.
4.1.6.1 Dawson City Water Supply	69	Gap	2nd paragraph --> add Wolf Creek (LMU #6)
4.1.6.1 Dawson City Water Supply	69 Key planning issues	Gap	2nd bullet --> add "agriculture"

4.1.6.1 Dawson City Water Supply	69 Recommended management practices	Suggested Change	a. and b. could include langaugae that refers to the riparian areas or the stream crossings
4.1.6.1 Dawson City Water Supply	70 Policy recommendations	Addition	Last policy recommendation --> add "agriculture"
4.1.6.1 Dawson City Water Supply	68	Question	How do we ensure the health of our drinking water supply without interim protection from activities that could potentially alter or pollute our water without interim protection in place until sub-regional planning is completed?
4.1.6.1 Dawson City Water Supply	69 Planning strategy	Suggested Change	A Planning Strategy should be introduced to address climate change-specific issues and impacts.
4.1.6.2 The Klondike Valley	71	Suggested Change	Top of page --> ...for recreational use and agricultural opportunities.
4.1.7 Forestry	71	Addition	Key Planning issues- forests are important habitat for furbears
4.1.7 Forestry	71 Key planning issues	Question	What about "fire breaks" to be put in around town and the oportuntiy this provides for fuelwood harvest? This would be a large swath and could provide years of harvestable timber
4.1.7 Forestry	72 Research Recommendation	Editting/Grammar	"advancing the use of biomass energy"
4.1.7 Forestry	71	Gap	Climate change impacts to regional forests are considerable. Changes to local weather and extreme weather events, likely increases in snow cover, melting permafrost, wildfires and increased potential for disease will have an adverse impact on forest viability and their subsequent ability to act as a major carbon sink. This should be acknowledged as a Key planning issue and account taken in within the section's recommendations.
4.1.7 Forestry	72	Suggested Change	The Research Recommendation to continue to explore the feasibility of advancing biomass energy should be rewritten to assess the position of biomass in the context of climate change in the region.
4.1.8 Aggregate Resources	73 Recommended planning strategies	Gap	a.ecologically important areas, such as steep embankments that provide habitat fort rheatened SAR/ COSEWIC listed avaian species such as 'Bank Swallow'
4.1.8 Aggregate Resources	72	General	Suggest changing wording in objectives from 'protect' to 'reserve'.
4.1.8 Aggregate Resources	72	General	Recommended Management Practices: a) remove the 'where possible' as it weakens the statement for future implementation
4.1.8 Aggregate Resources	72	General	Recommendation to the Parties: RA #1: need to define what 'large scale' is. This is a really subjective term that does not lend itself well to future implementation of the plan.

4.1.9 Traditional Economy	73	Suggested Change	Consider re-naming this section "Cultural or Land Based Economy", rather than "traditional" (renders it in the past).
4.1.9 Traditional Economy	73	Gap	This section seems to only directly address trapping, but should also include fishing, hunting, gathering, wildcrafting, etc.
4.1.9 Traditional Economy	73	Suggested Change	The Plan notes much of the traditional economy is based on the harvest of natural resources and contributes to cultural and social wellbeing. Potential restrictions to access to the land and its resources are a key component of climate change impacts. While the direct economic impacts of climate change on harvesting may be modest, they are sufficient to warrant climate change-induced restrictions to access to be noted as a Key planning issue and incorporated as a Research Recommendation: "The parties must support research into how climate change induced impacts affect access to traditional harvesting and natural resources and the traditional economy."
4.1.9 Traditional Economy	74	Addition	Key Planning issues -citizens and stewards have been saying for many years that it is more and more difficult to make a living from the land. This is valid information.
4.1.9 Traditional Economy	75	General	Recommended Management Practices: a) This is going to become pretty unwieldy since it can be assumed that there is traditional economy potential everywhere in the Planning Region. Suggest being more specific that this recommendation is for the environmental assessment process, for assessible activities and would be triggered at the request of either of the parties or the evaluator. This provides a threshold of activity and will make implementation easier.
4.1.9 Traditional Economy	75	General	PR #3 and RR#1 are the same. Suggest leaving it as a PR and delete the redundant RR. The challenge will be determining what these buffers are.
4.1.9 Traditional Economy	75 Policy Recommendation	Suggested Change	Potential to add another recommendation --> Support wildlife management strategies that enhance moose populations
4.1.9 Traditional Economy	75 Policy Recommendation	Addition	Research recommendation --> maintain an active tally of moose population in areas with access
4.2 Ecological Integrity and Conservation	76	Gap	The Plan acknowledges healthy air, water, vegetation and wildlife are critical to sustaining life. And the greatest threat to ecological integrity and conservation is climate change. Thus much of CLIMATE CHANGE 4.2.5 (in the expanded form suggested in this submission) could be incorporated into the introduction to this section. Equally, the Draft Ecological Goal to 'Promote awareness and support mitigation and adaptation to the effects of climate change' is not reflected in the Key planning issues or Recommendations for the majority of the section. The Planning Strategy for this section must more fully acknowledge the threat to ecological integrity that climate change carries and be definitive in its recommendations that protection of ecosystems is paramount and must take precedence over all other considerations.
4.2.1 Key Species Habitat	77 Key Planning Issues (Migratory)	Gap	1st bullet --> in years when the PCH come into the THTT, they would be "viewed" more by public to be the predominant herd and their range extends well throughout the northern 1/2 of the planning region. Please include the Porcupine caribou herd here, as this is an extremely important herd to our region

4.2.1.1 Caribou	77 Key Planning Issues (Migratory)	Gap	1st bullet on p.78 --> this is incorrect... Currently >218,000 PCH
4.2.1.1 Caribou	78 Key Planning Issues (Migratory)	Editting/Grammar	3rd bullet on p.78 --> Consistent with the precautionary principle, a high degree of caution in harvest and management strategies caution is warranted across herd ranges of migratory caribou.
4.2.1.1 Caribou	78 Key Planning Issues (Woodland)	Suggested Change	1st bullet --> The eastern extent of the region is used heavily by woodland caribou in the spring and summer year round .
4.2.1.1 Caribou	78 Objectives	Gap	3rd bullet could be added under objectives --> Disturbance and development activities should be kept to a minimum in overlapping areas with key habitats
4.2.1.1 Caribou	79 Research Recommendation	Gap	I think the PCMB maintains up-to-date information pertaining to the suitability of key habitats... this should be recognized. Potentially change language to acknowledge all of the great work and commitment that PCMB commits to the PCH.
4.2.1.1 Caribou	80 Recommended Action	Editting/Grammar	DDRRC
4.2.1.1 Caribou	79 Recommended Action	Suggested Change	The 'Fortymile Caribou Herd Harvest Management Plan' was signed off between Parties in November 2020 and provides guidance, direction and implementation strategies that have been agreed to by all management authorities. A multi-year Implementation Plan can be found in Appendix 5 of the plan. https://yukon.ca/sites/yukon.ca/files/env/env-fortymile-caribou-herd-harvest-management-plan.pdf
4.2.1.2 Moose	81	Question	Is this the most recent research available? (note ref = 2004). Other studies show differing response rates to lower thresholds and we should research most agreed to thresholds to ensure minimal behavioural response occurs so less impact to moose populations. Functional responses, seasonal variation and thresholds in behavioural responses of moose to road density Hawthorne L. Beyer, Ricardo Ung, Dennis L. Murray, Marie-Josée Fortin, First published: 08 February 2013, https://doi.org/10.1111/1365-2664.12042
4.2.1.3 Salmon	82	Suggested Change	First paragraph, last sentence: "...traditional ways knowledge to youth, to keep...."
4.2.1.3 Salmon	83	Gap	"The FHMS is implemented by the Yukon Placer Secretariat Yukon Government and Department of Fisheries and Oceans and manages". ***The information is outdated and Yukon Placer Secretariat has been replaced by CMI 'Adaptive Management Coordinator' and the info from YPS is now housed at the EMR library
4.2.1.3 Salmon	83	Addition	2nd bullet "key planning issues": ...can affect salmon habitat and are known to be an environmental stressor to juvenile salmonids .
4.2.1.3 Salmon	83	Suggested Change	add a 5th bullet --> Increased use of high-powered motor boats, jet boats and barges, along with increased horsepower driving the power boats. (If this bullet is added, then this could link to the "research recommendations" listed for salmon.
4.2.1.3 Salmon	84	Gap	Rearing habitats need to be included under the "recommended mngm't practices" section

4.2.1.3 Salmon	84	Suggested Change	a. Avoid direct Over-wintering and rearing habitats for juveniles, as well as adult salmon.
4.2.1.3 Salmon	84	Suggested Change	g. (i.e. over-wintering and rearing habitat and water withdrawals...
4.2.1.3 Salmon	84	Suggested Change	Research Recommendation SHOULD include aquatic inventories for areas that have not yet been mined AND areas that are not currently being mined
4.2.1.3 Salmon	84	Addition	Last research recommendation on this page could include " freshwater fish species " OR remove the DDRRC and YFWMB as salmon do not fall under their authority... only freshwater species
4.2.1.3 Salmon	85	Suggested Change	1st bullet --> include " or areas not currently being mined "
4.2.1.3 Salmon	85	Suggested Change	2nd bullet --> suggested use of stronger language such as "improve" (?)
4.2.1.4 Sheep	86 Objective	Gap	Recognize the importance of genetic exchange for our local sheep populations - importance of protecting genetic exchange corridors and ensuring that access and human disturbance does not become a limiting factor
4.2.1.4 Sheep	87 Objective	Gap	The strong language used in the 'objective section' for sheep will assist the implementation of protection of sheep habitat and is a good example of the direction required to fulfill the expressed intent of the Commission in regards to other key habitat areas identified. This language should be used for other values, as well.
4.2.2 Other Fish and Wildlife Habitat	88 Resident Fish Species	Gap	Issue with this number. There are not this many freshwater species occurring in the region if you are NOT counting salmon, as indicated in the description.
4.2.2 Other Fish and Wildlife Habitat	88 Recommendations to the Parties	Addition	"Parties, together with DDRRC and YFWMB should work collaboratively to define and map key aquatic habitat..."
4.2.2 Other Fish and Wildlife Habitat	88	Gap	CE assessment on water, as it relates to fish habitat and "quality, quantity and rate of flow" as per Ch.16
4.2.2 Other Fish and Wildlife Habitat	88	Gap	publicly accessible habitat inventory for freshwater species, similar to recommendation made for salmon
4.2.2 Other Fish and Wildlife Habitat	89 Key issues related to migratory birds and raptors	Addition	another key issue includes "key habitats are not well understood or mapped"
4.2.2 Other Fish and Wildlife Habitat	89 Research recommendation	Suggested Change	Add the DDRRC and Duck's Unlimited Canada
4.2.3 Water	90	General	The intro section to this section needs to be beefed up in regards to cultural importance of water. We have heard very clearly that water is the most important resource in the region. Potentially there could be a separate section on cultural importance.
4.2.3 Water	90	Gap	The plan should provide general management direction for water across the region. Protection of quality and quantity of water sources should be within the framework of this plan. These are protected under chapter 14 of the THFA

4.2.3 Water	90	Gap	'Water' is referenced within sections of the Plan "that address water". There remains shortfalls however, particularly in relation to the connection between climate change and water. This must be specifically referenced in the introduction to this section and particular attention given to how climate change is altering water systems, and subsequent impacts within the region. There are recognised gaps in knowledge of the hydrological cycle within the region, especially the groundwater regime. If the Plan intends to highlight the "interconnectedness of water" greater emphasis must be given to researching baseline hydrological cycles and modelling to predict (and mitigate) alterations due climate changes. It would be worth referencing climate change within the five subsections.
4.2.3 Water	90	Suggested Change	Change the sequence list of who water sustains: plants and animals, communities and industry
4.2.3 Water	90	Gap	Water withdrawal and its thresholds/indicators need to be addressed in terms of quality, quantity and rate of flow ; this concept is important in general when gauging impacts to aquatic resources, but also in regards to TH's Final Agreement rights, specifically section 14.8.1.
4.2.3 Water	90 - 91	Gap	"water....sustains Region's plants and animals, industries, and communities" (pg.90) and "Water for community consumption has been highlighted as a main issue" (pg.91) --> These descriptions do not recognize and promote the distinct Tr'ondëk Hwëch'in cultural values of water, as a spiritual value and as essential to all aspects of well-being "water is the life force of all creation and our collective survival depends on it. Water is essential for the health of every part of the land and for every aspect of survival, and is central to our culture and traditional activities" (December 2020).
4.2.4 Wetlands	92	Suggested Change	No more than 25% of a fen should be sacrificed to development with that amount including a calculated 200 m buffer of likely-to-be-affected zone. However, it is also problematic to set a specific percentage of fens that can be sacrificed during development: relatively few existed initially, even fewer now remain; Fens are continuous in nature; Drainage results from deliberate draining, buffer effects and upslope hydrologic interruptions; Effects down the river can be cumulative; These are some of the last (and possibly marginal) places gold has been sought. Likely a product of mechanization and \$1800/oz gold prices; An abysmal record of returning them to a recognizable habitat.
4.2.4 Wetlands	92	Gap	The Plan acknowledges the urgent nature of the issues as they relate to wetlands disturbance from mining activity, but omitted the longer term impacts, expected or potential, from climate change. The list of Key issues related to wetlands must incorporate the climate change risks to these regionally scarce and valued ecosystems; and how human disturbance will exacerbate these impacts. Otherwise, the list, and the assigned Objective, are reasonable and accurately reflect the importance and value of the region's wetlands.
4.2.4 Wetlands	92	Gap	This section is one example where the associated cultural impacts are identified in Issues and addressed in Objectives (pg.93). However, the Recommendations mostly address reducing the direct impact on wetlands and do not also explicitly address the associated cultural effects. For example, what management measures could be taken to address the reduced connection to land and the sense of not upholding traditional laws, in addition to protecting wetlands?
4.2.4 Wetlands	92	Suggested Change	"...known to be the site of land-use conflict within the region due to the overlap of the potential high mineral value that exists in some areas and the ecological function being maintained by wetlands throughout valley bottoms "

4.2.4 Wetlands	92 Economy	Gap	Communities also rely on intact wetlands and riparian areas adjacent to creeks and rivers to mitigate flood risk, reduce threats to local infrastructure (including damage to roads and buildings) and to reduce the cost to fix flood-damaged infrastructure that becomes a burden to the tax payer
4.2.4 Wetlands	93	Question	What about small open-water complexes that have been created by past reclamation efforts?
4.2.4 Wetlands	93 Key issues related to wetlands	Suggested Change	2nd bullet --> Some wetland complexes in the planning region...
4.2.4 Wetlands	93	Editting/Grammar	Typo for second bulletpoint under Key issues related to wetlands *second sentence <i>The impacts of wetlands altered may result in</i> <-- should be a colon not a semi-colon.
4.2.4 Wetlands	93	Editting/Grammar	Under Key issues related to wetlands the draft speaks of the Indain River Valley being the most productive... but very important to note although Sulphur and Dominion might be the highest producing placer region, much of this area is upland and should not be confused with the wetland complex in the Indian River Valley itself <-- in other words, the wording in this statement is misleading and should be corrected.
4.2.4 Wetlands	94	Suggested Change	In December 2015, 196 governments, including Canada, agreed to a programme of climate change mitigation and adaptation under the United Nations Framework Convention on Climate Change. This calls on member states to develop Nationally Determined Contributions (NDCs) to address climate change, with nature-based solutions as a key component, including from wetlands. The agreement acknowledged the critical role wetlands play in both adaptation and mitigation; in the latter through carbon storage and sequestration, particularly in peat soils and blue carbon in coastal waters (Ramsar Convention 2015). Encouraging countries to include wetland conservation and management in NDCs is a major priority. This commitment should certainly be considered for any planning strategies for wetlands in the Plan region.
4.2.4 Wetlands	94	Suggested Change	Given the importance, rarity and role of the region’s wetlands, and as a means to stabilise the wetlands regime, the strategies for managing wetlands should be amended to read: a Avoid the loss of wetlands and wetland benefits, b Wetlands warrant the highest levels of protection, c Further research is urgently required prior to any permissions that may affect wetlands, d Researched-backed information will be used to guide decisions, and this may evolve as more information is available about Yukon’s wetlands. e Mitigation Hierarchy The Mitigation Hierarchy – a widely used concept in natural resource management, is a set of sequential steps that should be followed to minimize the loss and degradation of wetlands. 1. Avoid impacting wetlands, 2. Support practices proven to stabilise and/or enhance wetlands, 3. Reclaim previously impacted wetlands.
4.2.4 Wetlands	94 Key issues related to wetlands	Suggested Change	2nd bullet --> traditional laws pertaining to stewardship

4.2.4 Wetlands	94	Suggested Change	Referencing Mitigation Hierarchy as a problem solving/planning tool for development in wetland areas is not always the right approach - offsetting is not a viable alternative for all wetlands; reclamation implies conversion of wetlands only as peatland regeneration requires very long periods of time; lastly, TH remains concerned that the concept of <i>minimizing impacts</i> , which suggests wetland avoidance is discretionary. Some recognition of the limits to this hierarchy should be noted.
4.2.4.1	94	Suggested Change	It is important to note that while marshes and bogs store enormous amounts of carbon, fens are the means by which that carbon is absorbed and accumulated. Disturbing or removing fens eliminates that potential for carbon storage. In addition fens, if left to naturally develop, evolve into bogs and efficiently retain stored carbon. Thus these areas are as equally important as other wetland types and disturbance should really be avoided altogether
4.2.4.1	94	Suggested Change	The Policy Recommendations should apply to pre-existing permits.
4.2.4.1	94	Suggested Change	The Recommendations for the Parties, and in particular the research recommendations are welcomed and will certainly assist in facilitating urgently needed research, and in key areas too. Public awareness could be expanded to specifically include the mining industry and representative bodies. Raising awareness and highlighting the importance of wetlands may help mitigate some of the industry's objections when restrictions are introduced.
4.2.4.1	95	Question	Fen Threshold section suggests that the allowable development of fens should not be based on claimblock/permit. Please provide more clarity on the suggested alternative approach.
4.2.4 Wetlands	95 Key issues related to wetlands	Addition	3rd bullet --> "... could take hundreds of years and the extent of functionality (post-reclamation) is not well understood in the north and in permafrost environments "
4.2.4 Wetlands	95: Fen Threshold	Gap	The suggestion of approaching "thresholds" by LMU actually does the opposite of taking a holistic approach. If 100% of localized fens can be disturbed in one part of the LMU, as long as it remains less than the established threshold, then this has the potential to destroy local ecological balance and pockets of endemic species. How does this management intent protect rare plant species? How does this approach protect areas of cultural importance?
Figure 4-1	96	Gap	Figure 4-1 is a little misleading in apparent magnitude and color. Although the colored plot lines seem to portray different losses, if one considers the actual percentage change of each they are commensurate: Green line Wetlands move 1.9% points up to 7% (+ 37% change) Red line of number of placer claims move 10% points down to 15% (-40% change) Blue line area of placer claims moves down 2 percentage points to 4.5% (-44% change)
4.2.4 Wetlands	96	Suggested Change	If the LMU rationale is known to be inadequate but is chosen to provide "certainty to proponents" then one way to accommodate that inadequacy is to limit the percent developable area of fens to 25%. This, knowing the actual reach will be larger. This may require a greater degree of test drilling and prioritizing before drainage and earth moving for gold extraction take place. Maybe this is a good thing.
4.2.4 Wetlands	96 Key issues related to wetlands	Suggested Change	6th bullet --> Wetlands may is known to support rare flora and fauna... (DUC ground-truthing research)

4.2.4 Wetlands	97 Key issues related to wetlands	Gap	loss of permafrost underlying disturbed wetland areas
4.2.4 Wetlands	97 Research recommendation Buffers	Suggested Change	"Parties consider the best available data and literature on wetland buffers to determine the best-optimal solution..."
4.2.4 Wetlands	97 Research Recommendation (Wetland Inventory)	Addition	"...disturbance thresholds and should be completed using a scale that works for "on the ground" implementation of the plan. "
4.2.4 Wetlands	98 Research Recommendation (Wetland Inventory)	Addition	The DUC inventory should be recommended to be expanded upon. No need to start at square 1.
4.2.4 Wetlands	98 Key issues related to wetlands	Addition	10th bullet --> "extent and type.... not fully understood and requires further research
4.2.5 Climate Change	98	Gap	Climate change overview does not mention cultural values and the issues are narrowly interpreted as "changes to traditional land use, subsistence harvesting success, and gathering" without recognizing broader landscape level shifts, and their implications for Tr'ondëk Hwëch'in intertwined cultural values and way of life.
4.2.5 Climate Change	99 Key issues	Suggested Change	<p>Key issues related to climate change include:</p> <p>The list is relatively accurate and incorporates many of the key issues and concerns. Some additions should include:</p> <p>Indigenous rights: Climate change and its effects are directly eroding aboriginal and treaty rights, titles and interests.</p> <p>Community capacity: Existing issues relating to isolation and capacity are being exacerbated by the disproportionate impacts of a changing climate in the North. The difficulties of governing are multiplied by these new pressures.</p> <p>Permafrost: Melting permafrost 'changes' must include the destruction of habitats and potential creation of new ones.</p> <p>Instability effects many topographical features and rivers and streams too. These can block access for humans and other species.</p> <p>Flooding: We've seen first hand the potential for flooding in the Yukon this summer. While historically flood events have reduced on the Yukon River over the past decades, climate changes will lead to greater snow and ice melt, unpredictable break-ups and extreme precipitation events.</p> <p>Extreme weather: Unpredictable and severe weather events will become more common. This will equally affect communities and traditional land users. While of short duration, impacts could be long-lasting and overwhelming.</p> <p>Potential new developments: A transition to a 'green' economy and renewable energies may bring new requests for land use, additional infrastructure, access and exploration potential for minerals associated with new technologies and increased battery storage.</p>

4.2.5 Climate Change	100 Objectives	Suggested Change	1. Recognize that the way habitats are distributed distribution of habitats on the landscape could change...
4.2.5 Climate Change	100 Objectives	Suggested Change	The three listed objectives are very limited, and not all relate to the key issues stated earlier. The list should be altered or increased to: Recognise the opportunities to respond to climate change in ways that go beyond resilience and support a more sustainable region; Recognise the way climate change is affecting Indigenous rights and regional governance and capacity; Recommend measures to mitigate the causes of climate change, and monitor and address its impacts; Support the development of self-sufficiency initiatives, food security and truly sustainable renewable energy development.
4.2.5 Climate Change	100		The Plan could incorporate strategies to: Minimise activities that contribute to climate change; Identify and assess all impacts of climate change on the planning region; Seek and present potential solutions for effective adaptations and to improve resiliency. Could also consider adding Climate Change Recommended Management Practices can into every other facet/section of the plan, as applicable.
4.2.5 Climate Change	101 Wetlands	Addition	Could other references be provided that support the "wetland as a carbon storage" concept since this was publicly questioned (Randy Clarkson) and some of the mis-information about carbon release was shared with (and amongst) industry.
4.2.5 Climate Change	101 Policy Recommendations	Gap	Food security issues need to be prioritized and lands need to be identified as set aside or priority areas for future agricultural use and business opportunity
4.2.5 Climate Change	102 Research recommendation	Suggested Change	Change order of alternative energy sources to have solar lead the list... as we see the most amount of this investment in Dawson already, including YG, TH, municipality and personal investments.
4.2.5 Climate Change	102	Suggested Change	The position of the table of Recommendations, immediately following the section on Recommendations to the Parties, makes it look like policy, research and action are related to Wetlands only. This is easily solved through better formatting. The Recommendations themselves, while all worthwhile, are as equally limited as the Plan's approach to climate-change key issues, objectives and strategy. The list requires extensive enlargement to accommodate all aspects of climate change, or better still, for climate-change specific recommendations (policy, research and action) to be incorporated within their relevant section within the Plan.
4.3 Culture and Heritage	103	Gap	This section has generic, lumping, and equating of cultural values "unique contemporary socio-cultural setting", "maintaining and enhancing cultural and heritage values for all people", "equally important". It does not portray Tr'ondëk Hwëch'in distinct cultural values to be recognized and promoted.
4.3 Culture and Heritage	103	Gap	1st para, last sentence - maintaining cultural and heritage values is life sustaining, much more than a key part of sustainable development. Use of the term culture to mean both TH culture AND mining culture is not accurate.
4.3 Culture and Heritage	103	Addition	last sentence; first paragraph --> add language acknowledging Ch.11 objectives that speak to this/ or quote

4.3 Culture and Heritage	103	General	Suggest following edits to the second paragraph of this section: -Add a paragraph break between the second and third sentence so that the sentence starting "Preserving the important history..." is a new paragraph. - Add quote from TH Heritage Act "The land is central our identity; it is the source of life, we understand ourselves as part of the land, related to the entire natural environment and to everything in it."
4.3 Culture and Heritage	103	General	Add sentence to the end of the 3rd paragraph along the lines of: - The guiding principle of stewardship is embued in the management directions with the goal of maintaining strong cultural connections to the land.
4.3 Culture and Heritage	103	Gap	Climate change exacerbates the difficulties already faced by indigenous communities including political and economic marginalization, loss of land and resources, human rights violations, discrimination and unemployment." Thus, incorporating climate change considerations into the Plan's Draft Socio-cultural Goals is an imperative.
4.3 Culture and Heritage	103	Gap	Should add a paragraph about the Tr'ondek-Klondike World Heritage Site Nomination.
4.3.1 Heritage Resources and Sites	104	Suggested Change	Change word "rules" to 'laws.' This will capture both traditional law and things like legislation/regs
4.3 Culture and Heritage	104	Addition	add 8th bullet --> the connected landscape and unencumbered waterways, intact landscapes - these are cultural resources to TH
4.3.1 Heritage Resources and Sites	105	Suggested Change	Include the word 'cultural' in front of 'other resources' in the objective, so that it reads '...and other cultural resources'
4.3.1 Heritage Resources and Sites	105	Suggested Change	Recommended Management Practice C, add wording to read- "Avoid or minimize land use activities in significant heritage and cultural use areas durring important seson use periods.
4.3.1 Heritage Resources and Sites	105	Suggested Change	It is not appropriate for the plan to make this determination on behalf of Tr'ondek Hwech'in. It also shows a bit of misunderstanding in regards to the characterization of travel 'routes' within the traditional territory. As written, TH would not support this. I would suggest changing this to a research recommendation: <i>"The Parties should continue to support and fund research to better understand ancient trails and travel routes within in the planning region to ensure their heritage and cultural values are appropriately managed and protected, while minimizing potential land use conflicts."</i> The recommended action to jointly develop management guidelines can address potential conflict between ancestral trails (routes) and recreational use. Leave that to the parties.
4.3.1 Heritage Resources and Sites	104	Gap	Climate change impacts on heritage resources must be Key issue, and a Recommended Management Practice inserted to ensure heritage sites and resources currently or potentially impacted by climate change receive the level of care and protection required; or Research Recommendation a. could be expanded to include an assessment of climate change impacts.
4.3 Culture and Heritage	105	Gap	Heritage values rooted in the TT are existent b/c of the health and integrity of the land. The vitality of the land must persist to protect TH culture and way of life.
4.3 Culture and Heritage	105 Objective	Addition identified and preserved as well as recognizing the importance of maintaining healthy, connected landscapes.

4.3 Culture and Heritage	105	Addition	Under Research Recommendation, acknowledge that TH language workers and Han speaker(s) are already strapped and require financial support in order to provide language services such as translation. Must acknowledge the extreme pressures placed upon our remaining Han speaker and language learners, and the limited capacity they have to provide translation services.
4.3 Culture and Heritage	106 Recommended Action	Suggested Change	The Parties should explore options to augment for enhancing the sense of stewardship...
4.3 Culture and Heritage	106 Recommended Action	Suggested Change	should include Yukon Government information on areas with increased potential for archaeological and historic resources within the heritage resources section. Any large gaps could inform research recommendations.
4.3.3 Harvesting Rights and Activities	107	Suggested Change	Climate change presents a number of threats to Tr'ondëk Hwëch'in harvesting rights. Rights of access are considered in the first of the Key issues - though it may be prudent that climate change impacts and hindrances are acknowledged as a potential limiting factor. While the second Key issue does recognise climate-changed induced effects on use-areas, it doesn't properly acknowledge the full extent of impacts, nor the role climate change will play in exacerbating alterations to the environment and species distribution and behaviour. An addition to this list should recognise the possible impacts to mental and physical wellbeing if Citizen access to the land is compromised by climate changes. A Recommended Management practice should be added to ensure land use activities do not contribute to aggravating climate changes to the environment or to Citizen access.
4.3.3 Harvesting Rights and Activities	107	Addition	Add Key Issue: "First Nations opportunities to participate in resource harvesting and other economic and cultural pursuits depend on healthy fish and wildlife populations and intact landscapes "
4.3.3 Harvesting Rights and Activities	107	Addition	2nd to last sentence --> not limited to hunting, fishing, trapping and harvesting plants for medicine and foods .
4.3.3 Harvesting Rights and Activities	107	Gap	Last sentence --> The recognition and protection of this way of life is a cornerstone of the THFA and legal obligations to this effect are mandated and upheld by this Agreement . There is an opportunity to support this section (4.3.3) better with legal foundations provided under the THFA. This needs to be included as an educational piece for the general public, as well as bureaucrats and environmental assessors who will look to this plan for guidance and direction.
4.3.3 Harvesting Rights and Activities	107	Gap	3rd bullet --> ...and the Goldfields (please add as this is the most obvious LMU/ area within the region that has multi-use activities
4.3.3 Harvesting Rights and Activities	107 Objectives	Addition	add 4th bullet (?) --> Ensure land use activities do not compromise the rights guaranteed under the THFA
Section 5			
Chapter 5 Land Mangement Units	109-173	Suggested Change	Refer to LMUs as ISA, not as zone. This language is used throughout this chapter. I.e. Zone 3. Suggest just referring to it as ISA 3, etc.

Chapter 5 Land Mangement Units	109-173	Suggested Change	Stewardship should not be listed only as a “heritage, social, and cultural value”. As a DRLUP principle, stewardship applies to the entire plan and all users. As stated in the Draft DRLUP (s. 1.6.2.2) stewardship is about creating the “mindset that all land users have a duty to care for the land.” It is not only up to Tr'ondëk Hwëch'in to practice stewardship in the region, and it is not only with Tr'ondëk Hwëch'in values or practices where the stewardship principle is to be applied. Following that principle: the SMDs can be considered stewardship measures carried out by industrial land users. In addition: specific measures to support Tr'ondëk Hwëch'in stewardship practices should be added as SMDs; under the list of heritage, social and cultural values, the Tr'ondëk Hwëch'in value would be cultural continuity and cultural landscape rather than stewardship.
Vegetation and Unique Features	109-173	Addition	Within Section 5. Land Management Units add additional value of Trehude under Heritage, Social, and Cultural Value. It is important to articulate the cultural significance outside of the 'heritage resources section' It is also important to recognize traditional land use outside of traditional economy and heritage resources. There will be some redundancy, but this section can focus more on Settlement Lands, traditional pursuits, and cultural use areas, and describe and better integrate TH relationship with the land. This could be the intention of the 'Stewardship' value. Suggest retitling if this is the case. If not, suggest adding a separate Tr'ëhudè section in each LMU as the first row in the list under Heritage, Social, and Cultural Value.
Traditional Economy	109-173	Gap	Where do Licenced Harvest and community gathering activities (berries, non-timber forest products like mushrooms and plants), that are not necessarily tied to Tr'ondek Hwech'in, fit? Is this under Traditional Economy? Within the plan TE is focused on indigenous use , so this kind of gets lost as a community resource. Its not really recreation because people depend on these resources as contributing to their annual food source. Suggest considering how to characterize this community value within chapter 5.
Values	109-173	General	Suggest reviewing the language within the tables so that it is consistent across LMUs. There is considerable variability throughout in how the values are being articulated.
Heritage Resources	109-173	Addition	Throughout the region there is variable 'potential' for archeological and historic resources, with areas of increased potential for likelihood where resources may be found. Should get this information from YG to include in the heritage resources section. I think this is as important as exisiting resources as we know there are thousands of sites out there that just are not yet identified, but need to be considered. If there are large gaps or unknowns, this could be included as a research recommendation.
Heritage Resources	109-173	Suggested Change	Retitle Heritage Resources to Heritage and Cultural Resources through the section.
LMU 1: North	110	Addition	Special Management Directions should include limitations on air traffic (timing and frequency) to reduce impacts to key wildlife values (sheep, caribou, peregrine falcon), not air access landing only as per SMD #7.
LMU 1: North	111	Suggested Change	SMD 5: Other existing land use rights (trapping, outfitting, traditional economic activities, subsistence harvest rights) recognized
LMU 1: North	111	Question	SMD 6: Clarify the wording. Is it a timing window where no activities allowed during a specific time, or just no activities in lambing and late winter habitat?
LMU 1: North	111	Suggested Change	SMD 7: need stronger language then 'may'. Suggest rewording this to make it stronger.

LMU 1: North	112	Suggested Change	Heritage & Cultural Resources: Traditional trails and travel routes between cultural areas (identified routes along Tatonduk River, Eagle Creek, Mount Klotz, and Yukon River), Several Tr'ondek Hwech'in Settlement Land Parcels chosen for their traditional and cultural significants. Historic Trapping Cabin on sitdown creek. Documented archeological site on coal creek, with high liklihood of undocumented archeological sites throughout the LMU.
LMU 1: North	112	Addition	Suggest adding Research Recommendation specific to LMU 1 for increased documentation of archaeological and cultural sites. Rationale being that the area has been identified as culturally significant, but site indentification and documentation for the area is limited to date.
LMU 2: Eagle Plains	114	Addition	Special Management Directions should include linkages between future Dempster Corridor planning and this LMU to ensure connectivity, particularly since this area/SL is disconnected from other Land Management Units.
LMU 2: Eagle Plains - Traditional Economy	115	Suggested Change	Reword Traditional Economy: "Presence of First Nation land use along Oglivlie River, the Dempster Hwy , and within LMU
LMU 2: Eagle Plains - Heritage Resources	115	Suggested Change	The way the Heritage Resources area is worded misrepresents the area. Reword: "Heritage & Cultural Resources: Important Caribou harvesting area. Potential for undiscovered archaeological sites and infrastructure related to historic harvest activities. "
LMU 3: Yukon River	116	Addition	Re: the interim withdrawal of lands from staking, more clarity is needed around linking the intended holistic vision for the river with the consideration of differences in North and South of Dawson activity levels (i.e., Special Management Directions #4 and 6). For example, how will allowable development proximity of adjacent LMUs be buffered?
LMU 3: Yukon River	117	Addition	Consider adding another priority objective: " <i>To preserve the wilderness characteristic of the Yukon River Cooridor.</i> " This is extremely important to support and preserve so many of the values (economic, recreation, First Nation identity and use) of the area.
LMU 3: Yukon River - Economic Value	118	Addition	Economic Value: What about commercial fishery in economic value? There is also nothing about timber harvest.
LMU 3: Yukon River	118	Gap	The Yukon River Cooridor is overlapped by outfitting concessions on the north side between Dawson and the Alaska Boarder.
LMU 3: Yukon River - Tourism	118	Addition	Also include winter opportunities such as dogsledding, snowmobile tours, as well as emerging indigenous tourism opportunities.
LMU 3: Yukon River - Heritage, Social, and Cultural Value	118	Suggested Change	Change wording- Heritage & Cultural Resources : Location of many important traditional routes , historic sites, TH land use sites, heritage reserves, historic resources, and archeological sites.
LMU 3: Yukon River - Recreation	118	Addition	List some recreational activities to ensure they are reflected during implementation- hiking, boating, canoeing, camping, snowmobiling, fishing etc.
LMU 3: Yukon River - Stewardship	118	Addition	Add to stewardship section: The Yukon River is critical to Tr'ondek Hwech'in way of life and connection to the landscape, and is central to the Tr'ondek Hwech'in cultural landscape. "
LMU 4: Fifteen/Chandindu	119	Addition	Special Management Directions #6 --> more on the consideration/implementation (the what/where/and hows) of establishing an Indigenous Protected and Conserved Area (IPCA) would be appreciated, as it is not mentioned any further in the document.

LMU 4: Fifteen/Chandindu	119	General	The management statement describes this area as relatively inaccessible. This may be true for the most northerly extent, but the areas adjacent to the Yukon River Corridor, particularly the area between Dawson, Yukon River, Chandindu and Tombstone Park are quite assessible and contain a number of existing overland access routes.
LMU 4: Fifteen/Chandindu - Priority Objectives	120	General	The priority objective about heritage (bullet #2) needs to be broadened to include TH perspectives. Include additional wording around culturally important areas and traditional land use areas.
LMU 4: Fifteen/Chandindu - Tourism/Recreation	121	General	Current tourism and recreation and future opportunities of this LMU are misrepresented . There is actually considerable use of this area for hiking, snowmobiling, and emerging packrafting opportunities, among others. This is close to town and adjacent to Tombstone and actually probably has one of the highest recreation and future tourism potentials in the region for wilderness tourism. There is also the Yukon Ditch that runs through this area which Tr'ondek Hwech'in has completed a feasibility study for opening this trail as a recreational hiking trail.
LMU 4: Fifteen/Chandindu - Heritage Resources	121	Suggested Change	Suggest using the terminology 'Traditional routes' instead of trails. It better characterizes the holistic concept of travel and the fact that these 'routes' are not necessarily trodden trails on the landscape. Consider this throughout the plan.
LMU 4: Fifteen/Chandindu - Heritage Resources	121	Suggested Change	There are actually a considerable # of archeological sites identified in this LMU. The Yukon Ditch also transects this LMU and there are a number of historic sites associated with the Yukon ditch system.
LMU 5: Tombstone	122	Question	Formatting-wise, having the Land Status box containing TH SL parcels under the Tombstone LMU makes it seem like these parcels are within the park when they are not. Given these parcels are not part of the park but are within this LMU, how does the plan proposed to manage these parcels or give them a designation?
LMU 6: Klondike	123	Suggested Change	Special Management Directions #2 should read " <i>Development in this area should ensure impacts to lynx are minimized or avoided.</i> "; #4 should read " <i>Development in this area should take care in not impact this important water source</i> "; additionally, protection of wetlands should be added to the list Special Management Directions.
LMU 6: Klondike	123	Suggested Change	The plan states McQuesten Highlands ecoregion is not represented in Yukon's protected areas. Does this ecoregion receive protection in another LMU/elsewhere in the plan? This section should clarify this.
LMU 6 Klondike-Trondek - Tourism	125	Addition	Potential for Indigenous tourism and interpretation along the Dempster Highway, at places like Wolf Creek (ie. Jackie Olson)
LMU 6 Klondike-Trondek - Heritage Resources	125	Addition	The area includes a portion of the Yukon Ditch and yukon ditch sites
LMU 6 Klondike-Trondek - Recreation	125	General	Suggest removing the word 'some' from the sentence . There are several hiking opportunities along the Yukon Ditch, and within tombstone mountains south of Tombstone Park. There is also snowmobiling along existing access within the LMU.
LMU 7: Upper Brewery/Hamilton	126	Addition	The North Klondike River and its tributaries are not mentioned as an ecological value . This misses out on the headwaters of this important salmon-spawning river.

LMU 7: Upper Brewery/Hamilton - Special Management Direction	127	General	5. What is it about the viewscape to be maintained? Need to define. Is it the aethentic and natural character? Wilderness character?
LMU 7: Upper Brewery/Hamilton- Rationale for Designation	128	General	What makes the mineral disposition 'important'? Suggest removing the word from the sentence. This is value laden.
LMU 7: Upper Brewery/Hamilton - Economic Value	128	Addition	Add Traditional Economy: the area is an important harvest area of high cultural value.
LMU 7: Upper Brewery/Hamilton - Heritage, Social, and Cultural Value	128	Addition	Add Heritage and Cultural Resources: Includes a number of archeological sites, and Settlement Lands of cultural significance.
LMU 7: Upper Brewery/Hamilton - Recreation	128	Addition	Also canoeing North Klondike.
LMU 7: Upper Brewery/Hamilton - Trehude	128	Addition	Add Tr'ëhudè: Important area for connecting to the land through the practive of land use/and traditional economic activities, including trapping, gathering, and harvesting.
LMU 8: Lower Brewery/ Hamilton	129	Addition	Special Management Directions #3 should state that future/placer development shall not interfere with the noted water baseline data collection and monitoring deemed necessary for quartz mining practices (i.e., Laura Creek).
LMU 8: Lower Brewery/ Hamilton	129	Addition	Special Management Directions should include a statement such as "This Designation shall not limit TH's ability to access the land for traditional land use activities."
LMU 8: Lower Brewery/ Hamilton	129	Addition	Ecological Values - Caribou should include the Hart River Herd - listed as species of Special Concern under SARA.
LMU 8: Lower Brewery/ Hamilton	129	Suggested Change	This is a large LMU, which lumps in the relatively undeveloped western portion with the Brewery hard rock site. Consider redrawing western boundary. This is important because as placer activity in the Clear Creek area to the south pushes the Clear Ck caribou herd northwards, they will need habitat refugia.
LMU 8: Lower Brewery/Hamilton - Tradional Economy	130	Addition	Also small game, birds, and berries. Wood cutting and other traditional pursuits.
LMU 8: Lower Brewery/Hamilton - Heritage Resources	131	Suggested Change	Several archeological resources documented in this LMU.
LMU 8: Lower Brewery/Hamilton - Recreation	131	General	There are 2 rows for recreation. Merge the 2.

LMU 8: Lower Brewery/Hamilton - Recreation	131	Addition	Also canoeing/packrafting the North-Klondike.
LMU 9: Clear Creek	132	Suggested Change	The entirety of TH SL R-79B (and R-2A) parcel should enjoy the conservation/staking withdrawal protection provided under adjacent LMU10; in other words, the parcel should not be included in this designation at all. Having this parcel split undermines the value of the entire parcel and jeopardizes what is better protected. This change would also better facilitate the Management Intent of adjacent LMU 11: ISA I.
LMU 9: Clear Creek	132	Suggested Change	Ecological Values - Wetlands - wetlands do not only appear near the Klondike Hwy, they appear well > 2km from it.
LMU 9: Clear Creek	132	Suggested Change	Management Intent should explicitly recognize important habitat requirements for the FMCH as well as the Clear Creek Herd (CCCH); Overall, don't feel that an ISA 4 is providing any protection for the CCCH or the Clear Ck wetlands.
LMU 9: Clear Creek - Traditional Economy	133	Suggested Change	Portions of this area are absolutely utilized for harvest activities, particularly those areas transected by the Klondike Highway and Clear Creek road. This should be reworded. R-7B and R-2A which this LMU overlays was selected partially as a hunting, trapping, and recreation area. There are a number of expressions of interests on these parcels by TH citizens.
LMU 9: Clear Creek - Heritage Resources	132	Suggested Change	This section is inaccurate. There are several identified archeological sites in this LMU (~15). Clustered on the ridge above McQuesten, and along the Klondike Hwy on the NE side of the LMU.
LMU 10: Upper Klondike	135	Suggested Change	The portions carved out of parcels R-79B and R-2A should <i>not</i> be carved out for this Management Intent Statement to make sense (i.e., " <i>to preserve the deep cultural connection to the land and active use of the area by TH citizens.</i> "). Expanding this LMU eastwards to include a portion of 8 and 9 would address concerns about allowing development in CCCH habitat (see above)
LMU 10: Upper Klondike	135	Suggested Change	Priority Objectives: Replace "Minimize" with "Avoid disturbance to key salmon habitats for various life cycle stages."
LMU 10: Upper Klondike - Management Intent Statement	135	General	Use Han name for Land of Plenty: Nānkāk Ch'ēholay
LMU 10: Upper Klondike - Transportation and Access	135	General	The North Fork access road is a HPW maintained road up to the Brewery Creek Mine entrance. It has its own surveyed ROW. If the mine is developed there will be increased access through this SMA to support the mine. Not sure if this is congruent with the value and objectives of the LMU or not. There have been discussions/feasibility re: a transmission line transecting this area to provide power to the mine site.
LMU 10: Upper Klondike - Economic Value	135	General	As per the THFA Government has a right to construct the North Fork Hydro Project centered to the greatest extent possible on the Ditch and shall have right of access for this. There is a flooding right for the purposes of the project. Not too sure how this is accommodated with the SMA 1.
LMU 10: Upper Klondike - Traditional Economy	137	General	Area is highly used for harvest activities and hunting.

LMU 10: Upper Klondike - Heritage Resources	137	General	Also historic sites related to the Yukon Ditch.
LMU 11: Flat Creek Wetlands	138	Addition	Since the Management Intent Statement highlights " <i>important wetland habitat that is integral to the ecological and socio-cultural value</i> " of this region, the Special Management Directions should include wetland protection as a second point (would be more appropriate than under the current Priority Objectives).
LMU 11: Flat Creek Wetlands	139	Addition	Should emphasize the harvest use in this area. It is mostly adjacent to the hwy, but there is considerable harvest activity along this area.
LMU 12: East	141	Suggested Change	Also, sharp-tailed grouse habitat are " <i>an immediate management concern,</i> " Special Management Direction #2 should read <i>their key habitat should be minimized avoided</i> .
LMU 12: East	141	Suggested Change	Concern with size of LMU and threshold, which could allow for high future levels of development in the southeastern portion of the LMU that is currently relatively undeveloped. Suggest reducing size of LMU and leaving the area north of the Stewart out of this ISA4.
LMU 12: East - National Historic Sites	143	Suggested Change	It is strange that this is teased out of the heritage resources section. It could just be included within the Heritage and Cultural Resources row.
LMU 13: Klondike Valley - Heritage Resources	145	Gap	Flooding represents one of the greatest natural disturbances in the region. In addition, permafrost degradation, and in particular the risks from slumping and unstable ground, and the potential for landslides particularly in the north end of the community are potentially enormous risks to be considered. These must be addressed through Special Management Directions for LMU 13.
LMU 13: Klondike Valley - Tr'èhudè	147	Addition	Add Trehude row, first row in Heritage, Social and Cultural Value, which reads: "Important areas for connecting to the land through the practice of land use activities. This area is important for maintaining Tr'ondek Hwech'in way of life and connections to the land."
LMU 15: Fortymile River	149	Addition	In order to preserve the cultural significance this area holds to TH Citizens, proximity to the Forty Mile camp/ Heritage Site needs to be further protected by buffers (such buffers should not distinguish between high level and low level activities as it is non-sensical to permit exploration closer to important heritage and multi-use areas if those areas are off limits for higher impact activities anyway) (precedent: 2020-0142 Decision Document supporting YESAB 56.1.c)
LMU 15: Fortymile River	149	Addition	Ecological Value: The 40mile river is valuable habitat for chum and other fish species. This is not mentioned, only Chinook. NOTE: future reclamation and closure planning for the Clinton Creek site is underway, this comment on p.151 could include more detail. Talk to TH TWG.
LMU 15: Fortymile River - Heritage Resources	151	Addition	There are also documented precontact archeological sites in this LMU. The area was part of the 2014 Archeological Potential model, which would have mapped high potential polygons for this area. Language around this potential mapping could be included.
LMU 15: Fortymile River - Traditional Economy	151	Addition	Harvest of Non-timber forest products(ie. berries) by the community is important in this LMU.
LMU 15: Fortymile River - Tourism	151	Addition	Also tourism along the TOW. The area also includes the Clinton Creek access road, which provides access to the Fortymile, Forty Cudahy, Fort Constantine Heritage site, and portential component within the Tr'ondek-Klondike World Heritage Site.
LMU 15: Fortymile River - Tourism	151	General	TOW is a major tourist artery. Wilderness characteristic of the TOW is an important component of this. The natural characteristic of areas of the LMU visible from the TOW should be preserved.

LMU 15: Fortymile River - Stewardship	151	Addition	Add: "Important area for connecting to the land through the practice of traditional land use activities. This area is important for maintaining Tr'ondek Hwech'in way of life and connections to the land."
LMU: Fortymile River-Trehude			Important to include a Trehude section for this LMU.
LMU 16: Swede Creek - Transportation and Access	153	Addition	The LMU is bound by the TOW highway, and is accessible by this and secondary roads and trails off the hwy.
LMU 16: Swede Creek - Tourism	153	General	TOW is a major tourist artery. Wilderness characteristic of the TOW is an important component of this. The natural characteristic of areas of the LMU visible from the TOW should be preserved.
LMU 16: Swede Creek - Trapping	153	Addition	The community trapline may also be part of this LMU and provides learning experiences for amateur trappers.
LMU 16: Swede Creek - Traditional Economy	153	Addition	Add Traditional Economy: the area is an important harvest area for Moose, grouse, berries ect.
LMU 16: Swede Creek - Heritage Resources	153	Addition	Documented pre-contact archeological sites in the LMU
LMU 16: Swede Creek - Recreation	154	Addition	Adjacency of the LMU and TOW make it very appealing for recreational pursuits of all kinds. Also consider winter activities including dog mushing, and snowmobiling.
LMU 17: Sixtymile	155	Gap	Management Intent for this area states " <i>...to adequately protect caribou habitat and to ensure sustainable development</i> " and that " <i>Interest in the area is growing, which includes increased opportunities into previously remote areas</i> ". However, interest in the area should not justify more access. The LMU designation is in contradiction with Special Management Direction #2 statement. Suggest re-designating to at least ISA 2. Precisely because it's remoteness, this landscape should be better protected; access management considerations should include flight traffic (timing and frequency) to better protect sensitive wildlife and TH Land Use rights, focus on linear redundancy above and beyond linear density alone and have additional protection for important cultural sites like TH S-14B.
LMU 17: Sixtymile	155	Suggested Change	Priority Objective 2 states that "New access infrastructure is planned for & managed..." What about reclaimed or decommissioned? It is understood that the plan can't necessarily do this and the correct tool is the Resource Road Regs, but the plan could emphasize limits on roads and importance of removing roads from landscape before new ones are allowed.
LMU 17: Sixtymile - Priority Objectives	156	Suggested Change	The caribou priority should be made the first priority in the list.
LMU 17: Sixtymile - Tourism	157	General	TOW is a major tourist artery. Wilderness characteristic of the TOW is an important component of this. The natural characteristic of areas of the LMU visible from the TOW should be preserved.
LMU 17: Sixtymile - Traditional Economy	157	Suggested Change	Change language to 'The area is important for subsistence harvesting and traditional economic activities. There are a number of settlement lands parcels identified as important harvesting and gathering sites'
LMU 17: Sixtymile - Traditional Economy	157	General	Harvest of non-timber forest products is important for the community, especially along the TOW, but also down the 60mile road and other access off the TOW.

LMU 18: Matson Uplands - Management Intent Statement	158	General	From a caribou perspective this LMU isn't enough. It is delineated and dictated by the mineral claims around it, not for what is best for the caribou. The priority here needs to be the caribou, and we need to consider what they need first before all else.
LMU 18: Matson Uplands	158	Addition	No issue with designation. Area is too small though. Comment/question: what forms the boundaries? I.e. why is one a straight line? Is this the edge of a claim block? Does not seem like a natural feature.
LMU 18: Matson Uplands - Stewardship	159	Suggested Change	This area is important for maintaining Tr'ondek Hwech'in way of life and connections to the land.
LMU 19: Upper Indian River Wetlands	160	Addition	The area carved out for "wetland protection" excludes part of the main stem of the Indian River... there are examples of LMUs where a collage of various conservation priorities can 'coexist' - this needs to be applied to the Indian River (as well as other wetland sensitive areas). Special Mgmt Direction 3.c) should specify that the robust reclamation practices are for non-peatlands; clarify where exactly these practices are coming from (i.e. which guidance document or wetland policy?)
5.19: Upper Indian River Wetlands.	160	General	By the numbers there are 587 claims and 11 placer leases within the LMU. By area this is 65.2km ² , or 13% of the region. Within this LMU Ducks Unlimited has mapped 35.26km ² of wetlands. Of that wetlands 22.16km ² , or around 63% is covered by active claims or leases. This designation does not effectively 'protect' the wetlands in this area.
5.19: Upper Indian River Wetlands - Stewardship	162	Suggested Change	Add language: "...and is important for maintaining Tr'ondek Hwech'in way of life and connections to the land."
LMU 20: Coffee	163	Addition	Special Management Directions #4 should state that future/placer development shall not interfere with the noted water baseline data collection and monitoring deemed necessary for quartz mining practices.
LMU 20: Coffee - Tr'ëhudè	165	Addition	Add Trehude row, first row in Heritage, Social and Cultural Value, which reads: "Important areas for connecting to the land through the practice of land use activities. This area is important for maintaining Tr'ondek Hwech'in way of life and connections to the land."
LMU 21: White - Stewardship	168	Suggested Change	Add language: This area is important for maintaining Tr'ondek Hwech'in way of life and connections to the land.
LMU 22: Scottie Creek - Stewardship	171	Suggested Change	Add language: This area is important for maintaining Tr'ondek Hwech'in way of life and connections to the land.
LMU 23: Fortymile Caribou Corridor	170-73	General	The physical operation/implementatation of this will be near impossible. Elevation is a pretty clear indicator so should be pretty easy to delineate on the landscape.
LMU 23: Fortymile Caribou Corridor - Traditional Economy	174	Suggested Change	S-14 is not in this LMU. As noted for other LMU, it is not appropriate to highlight 1 SL parcel within the entire plan as important. Would suggest just broadening this language to say that the areas is important for hunting and harvest activities.
LMU 23: Fortymile Caribou Corridor - Recreation	174	General	This is the type of language that should be included for any LMU adjacent the TOR. Also need to consider winter recreation.
LMU 23: Fortymile Caribou Corridor - Stewardship	174	Suggested Change	Add language: This area is important for maintaining Tr'ondek Hwech'in way of life and connections to the land.

Section 6			
6 Plan Implementation and Revision	175-183		The Commission should consider recommending for an RRC like structure to be setup with a post plan 'commission' as a recommendation body and an administrative staff to ensure successful implementation of the plan.
6.1	175	Suggested Change	The authorities and responsibilities for implementing the Plan are shared between the governments of Tr'ondëk Hwëch'in and Yukon, and that all aspects of Plan implementation should be jointly managed. This could be reflected by adding references to joint implementation throughout this section. This could also be achieved through an omnibus statement about joint decision making at the beginning of section 6.
6.1	175	Suggested Change	Section 6 of the Draft Plan – Plan Implementation and Review – states that “The implementation of a land use plan is an important part of the planning process”. In our view that is an understatement. We would like to see that strengthened to say that the implementation of a land use plan is a “critical” part of the planning process. Implementation is when the guiding principles, goals and recommendations are turned into actions. Without effective implementation, the whole land use planning process may be for nought.
6.3.1.2	176	Suggested Change	It is obvious that the decision to not provide any strong or legal protection for SMA2s wasn't considering the impact that this lack of true protection could have on the Tr'ondëk Hwëch'in people. The Tr'ondëk Hwëch'in have been on this land for millennia, and they intend to be here for another thousand years. 3.8% protection will not sustain them into the future. Increasing the protection for SMA2s at least gives them a fighting chance. Therefore, it is recommended that the DRLUP draft be updated to increase the longer-term certainty of protection for SMA2s. Increased protection for SMA2s means increased protection for the Tr'ondëk Hwëch'in people and culture.
6.3.3 Subregional Plans	176	General	Include timeline
6.4 Plan Conformity	177	General	The recommendation should be for the parties to commit to capacity and resources to ensure plan conformity can be conducted effectively and ensure successful implementation of the plan.
6.6.2 Plan Review	179	General	Would like to see a process put in place for successfully considering adaptive management and for measuring plan success. Really, the implementation committee should be compiling annual reports for review which includes feedback from the parties, Yesab, Ylupc ect. This is the best way to ensure there is a process to evaluate the plan. I think the recommended action could be worded slightly stronger to look at a process of annual evaluation of the plan.
6.6.2 Plan Review	182	Addition	A detailed evaluation of Scope creep; bureaucratic slippage; Agency capture; compliance; and enforceability should be undertaken.