

Survey ID# 722

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident

If not, where do you live?

Are you a member of a Yukon First Nation? Yes, TH Citizen

Do you work in the Dawson Region? Yes

If so, what sector do you work in? Tourism/government

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"TH Citizen"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

Land use plan a part of our self government agreement. Shares a vision - sustainable use of land, water, non renewable resources in the region. 75% of our traditional territory. Caretakers our inherent rights. Protect the land - we are the lands voice. When the land speaks she will shake, flood, and start fires. Destruction.

The things that are missing from the Draft Plan are...

The things I would change in the Draft Plan are...

STEWARDSHIP

I see myself as a steward of the land

The different ways that I take care of or connect to the land are....

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

Don't have any.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Green space for future generations.

Do you feel that most of the things that matter to you were included in the plan?

Sure.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development?

Please provide explanation

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondĖk HwĖch'in Final Agreement.

No

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

I think it should be traditional TH values that are followed.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area
I care about the entire area for many reasons and want my kids to enjoy the area and their kids.

Do you feel that the amount of human development should be limited to help maintain the things you value?

To some degree yes but housing and building for activities are needed.

WETLANDS

What do you like or dislike about this the approach to wetlands?

Nothing.

When considering development in wetlands, what impacts to your values are you most concerned about?

Fishing.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Not decided.

Please tell us why you agree or disagree

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

No all important.

Please tell us what you think about development in fens [choose one]

I do not know - do not contact me.

Please explain your answer.

How much of the regions Fens should be allowed to be developed? %

LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

Hard to read should have printed better.

The things I feel the Commission got right about the land designations are...

No opinion.

The things I would change are...

No opinion.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Unsure.

Please explain your answer (use locations where possible)

Is the SMA2 designation appropriate to protect key values? Please explain your answer

I think so.

What advice do you have for the Commission as they develop the Recommended Plan?

Think of future generations not just a few but at least 10 generations ahead.

Survey ID# 720

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident

If not, where do you live?

Are you a member of a Yukon First Nation? Yes, TH Citizen

Do you work in the Dawson Region? Yes

If so, what sector do you work in? Natural Resources

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

How would you like to be identified in this survey? (for example "Quoted from a ...")
"TH Citizen"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

The things that are missing from the Draft Plan are...

More SMA1 - No new disturbances. Far more protection than the 3.8%

The things I would change in the Draft Plan are...

STEWARDSHIP

I see myself as a steward of the land

The different ways that I take care of or connect to the land are....

Hunting, fishing, gathering berries and medicines, spiritually, emotionally, traditionally. Very strong connection has everything to do with my culture as a first nations.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

Very important this should be happening already we need more connections to the land whatever that would look like in every way.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Salmon, wetlands, caribou, moose. Other fish and wildlife means everything we depend on.

Do you feel that most of the things that matter to you were included in the plan?

More protection, more SMA.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĚK HWĚCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? Yes

Please provide explanation

More sustainability, remediation.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

How is this going to be reinforced.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Every and all land is sacred its important to not make a big imprint/footprint on the land.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

I feel all these things have a negative impact on our land, water, community, and access to hunting because we do have to go further and further into the bush to hunt and last year we didn't get a moose for the winter which we really depend on to feed us.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes less mining or more sustainable mining.

WETLANDS

What do you like or dislike about this the approach to wetlands?

Super important to protect all wetlands.

When considering development in wetlands, what impacts to your values are you most concerned about?

The land and ecosystem we are already loosing our salmon we need to preserve these areas.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Disagree

Please tell us why you agree or disagree

Why only two wetlands. Should be more wetlands protected these are important for several reasons for the ecosystem.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

All of them are 100% important were having many issues in the world like climate change, over fishing/hunting, plus many people who think like doing drilling or mining the Arctic refuge is okay when we should be working hard to protect as much of our territory because of these.

Please tell us what you think about development in fens [choose one]

No development should occur in fens anywhere in the region.

Please explain your answer.

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

Why are there so many ISA?

The things I feel the Commission got right about the land designations are...

The things I would change are...

3.8% SMA is way too low. We need more SMA in wetlands around the river/salmon and water ways/in moose habitat/in caribou range.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Yes definitely more than that.

Please explain your answer (use locations where possible)

16, 17, 23, 21, 20 need more protection and conservation.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

What advice do you have for the Commission as they develop the Recommended Plan?

More protection.

Survey ID# 719

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident

If not, where do you live?

Are you a member of a Yukon First Nation? Yes, TH Citizen

Do you work in the Dawson Region? Yes

If so, what sector do you work in? TH Government

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"TH Citizen"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

The land use categories and the descriptions provided for each category

The things that are missing from the Draft Plan are...

The things I would change in the Draft Plan are...

40% ISA 60% SMA

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

Respect for the land and its inhabitants. Respect for the vegetation on the land and in the water.
Only take what I need from the land and water.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Protection of the wetlands, protection of the inhabitants of the land, protection and limitations on hunting and fishing in the TH traditional territory.

Do you feel that most of the things that matter to you were included in the plan?

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĚK HWĚCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development?

Please provide explanation

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

Do you feel that the amount of human development should be limited to help maintain the things you value?

WETLANDS

What do you like or dislike about this the approach to wetlands?

When considering development in wetlands, what impacts to your values are you most concerned about?

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? [Agree](#)

Please tell us why you agree or disagree

[History of cultural value and valuable food resource of traditional foods. Also contains damage from mines and concentration of minerals that should be protected from further mining and damage.](#)

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?
[LMU#6 because this is where the porcupine caribou herd migrates. We should make all efforts to protect their food source.](#)

Please tell us what you think about development in fens [choose one]

[Limited development should be allowed to happen in fens.](#)

Please explain your answer.

How much of the regions Fens should be allowed to be developed? %

LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

The things I feel the Commission got right about the land designations are...

The things I would change are...

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Please explain your answer (use locations where possible)

Is the SMA2 designation appropriate to protect key values? Please explain your answer

What advice do you have for the Commission as they develop the Recommended Plan?

Survey ID# 718

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident

If not, where do you live?

Are you a member of a Yukon First Nation? Yes, TH Citizen

Do you work in the Dawson Region? yes

If so, what sector do you work in? Currently working with TH (Government)

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

How would you like to be identified in this survey? (for example "Quoted from a ...")
"TH Citizen"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

I like the want/drive for everyone to work together, the importance of sustainability. I like the understanding that we need to be thinking of the future generations, our children

The things that are missing from the Draft Plan are...

I feel like the plan could use more fully protected areas

The things I would change in the Draft Plan are...

I would like to see more SMA 1 area, currently there is only 3.8%. In SMA 2 I would not allow industrial harvesting of minerals, oil/gas, forestry. I would remove any existing claims staked in the SMA 2 and give them claim staking priority in the ISA 3 and 4 areas

STEWARDSHIP

I see myself as a steward of the land yes

The different ways that I take care of or connect to the land are....

By practicing traditional / cultural TH beliefs and activities with and on the land. By not polluting the land or destroying it. By not suing the land to make 'money'

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Not sure

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

I think the Trust sounds great, I like the idea of outing for children/youth and providing educational / research opportunities. Funds helping encourage / support industry stewardship is great because taking care of the land and the earth is most important of all. If you're going to use the land to make 'money' reclamation is important, without the earth there would be no need to make money because we wouldn't exist

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Everything, the land, water plants and animals. The earth being alive. The FN people who were here long before us. Who lived in harmony with the region, instead of using it to make money

Do you feel that most of the things that matter to you were included in the plan?

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĚCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? Not Sure

Please provide explanation

If it was up to me I wouldn't develop anymore of this land, keep it natural. There is already so much developed in this world. If you want to 'sustainably develop' the rows and rows of left over dredge tailings all around Dawson City, I'd support that rehabilitation :)

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

I think people and businesses should think about 'money' less, money disappears fast. The belief of money / currently might not be around forever. If food stopped being provided at grocery stores and restaurants then money isn't going to feed you. You can't physically eat it to survive. The land has plants, water and animals which you can survive on (trees for oxygen or shelter)

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

I feel like mining in the Indian River for example has cut off a key location first nations people used to use for hunting, trapping, and gathering plants and berries. My grandma talked about how the TH used to see that area regularly

Do you feel that the amount of human development should be limited to help maintain the things you value?

yes

Yes, human development should be limited or better yet, nonexistent. There is already so much human development on this planet, we should focus on keeping the area natural and untouched.

WETLANDS

What do you like or dislike about this the approach to wetlands?

I would love to see not development in bogs or marshes across the whole region. I strongly agree and would love to see no development in the SMA's I think some level of development in fens in ISA is Ok as long as reclamation is done

When considering development in wetlands, what impacts to your values are you most concerned about?

I'm concerned about our water for the region. If development happens in wetland it could contaminate the quality and quantity of water in the region. Also the wetlands help filter and keep the water sources clean. Water is life!

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Agree

Please tell us why you agree or disagree

I agree and feel free to highlight more wetlands for full protection :)

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

Any and all wetlands in the northern regions of the Dawson region. Protect it all

Please tell us what you think about development in fens [choose one]

No development should occur in fens anywhere in the region

Please explain your answer.

No development should occur or be aloud in fens, you said it yourself: "they are considered very hard or impossible to be replaced once disturbed" I don't think even 25% development should happen, 75% is out of the question

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

I wish the SMA 1 area was large like the SMA 2 area. I also wish the SMA 2 was fully protected like SMA 1 if SMA2 became fully protected I wouldn't feel a need for SMA 1 to be larger

The things I feel the Commission got right about the land designations are...

The things I would change are...

The regions that allow development are larger than the protected regions % I wouldn change that for prioritizing protection over all. SMA 2 is 35.5% but still allows 'careful development', it's our most northern region, I would like to see no development in SMA 2 regardless of existing staked claims, Please!! Don't develop Tombstone, it's beautiful the way it is

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Please explain your answer (use locations where possible)

Yes, please help protect our earth

Is the SMA2 designation appropriate to protect key values? Please explain your answer

yes

It's our most northern region on this map. Please keep it pure and untouched

What advice do you have for the Commission as they develop the Recommended Plan?

Think about our children and your children and their children yet to come. Let's keep this land wild, let's keep it clean and untouched. 'money' / currency may not be around forever, let's take care of the Earth and what keeps us humans alive. Please

Survey ID# 717

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region?

If not, where do you live?

Are you a member of a Yukon First Nation?

Do you work in the Dawson Region?

If so, what sector do you work in?

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

How would you like to be identified in this survey? (for example "Quoted from a ...")
"TH Elder" TH Citizen

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

Draft Plans go along with TH beliefs, laws etc. Protect the people, land water animals, ari etc. for future people Children

The things that are missing from the Draft Plan are...

Not sure

The things I would change in the Draft Plan are...

Not to familiar with the whole plan to make an educated sound decision

STEWARDSHIP

I see myself as a steward of the land Somewhat

The different ways that I take care of or connect to the land are....

Pass on knowledge on what I was taught from parents, Elders and other people about respecting the animals, land, etc.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

Elder/seniors. So many to choose from but all sounds good

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Monitor animal populations, rules and regulations put in place. Protect all land from over hunting, mining, destroying wetlands etc.

Do you feel that most of the things that matter to you were included in the plan?

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development?

Please provide explanation

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Allow animals, fish, etc to use their natural habitat that they have been using for generations. Do not destroy the lands

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

To my knowledge from what I hear is most all regions around Dawson hunting areas, it is hard to hunt for moose

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes, have more regulations on how many moose etc. to be taken out of our lands

WETLANDS

What do you like or dislike about this the approach to wetlands?

When considering development in wetlands, what impacts to your values are you most concerned about?

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands?

Please tell us why you agree or disagree

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

Please tell us what you think about development in fens [choose one]

Please explain your answer.

How much of the regions Fens should be allowed to be developed? %

LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

The things I feel the Commission got right about the land designations are...

The things I would change are...

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Please explain your answer (use locations where possible)

Is the SMA2 designation appropriate to protect key values? Please explain your answer

What advice do you have for the Commission as they develop the Recommended Plan?

additional notes on page Given so much, how high to jump, what to do and not to do. Now they want our advice. Just give give. An impact I guess. Lot picked up from mom and dad. The school couldn't break the bond. Tried to break that bond but they couldn't. Didn't know how strong people are.

Survey ID# 716

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I live in Dawson seasonally (e.g. sometimes for work)

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? Yes, seasonally

If so, what sector do you work in? exploration and mining

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Yukon Resident"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

I agree with the vision of the Commission to try to strike a balanced approach of habitat preservation and land-management while supporting continuation of existing economic and industrial activity in the region. There are many challenges associated with the DRPC's mandate, the scope and the many years of work that have culminated in the 2021 DRLU Draft Plan.

As this plan is part of fulfilment of the Â§11 (Land Use Planning) of the Umbrella Final Agreement (dated July 16, 1998), I feel grateful to be part of the discussions for planning the future and the stewardship of land management and resources of the Dawson Region in Trê™ondÃ«k HwÃ«chê™in (THFN) Traditional Territory.

The things that are missing from the Draft Plan are...

Recognizing the documents are first drafts, the intention is nonetheless to utilize these documents as the basis for refining, developing, and finalizing a more balanced and defensible Regional Land Use Plan. There are few key issues I feel weren't addressed adequately in the Draft Plan:

The methodology described in §1.6.2.5 (Priority Criteria for Candidate Conservation Areas) do not appear to always match Draft Land Management Units (LMUs) and currently proposed Land Use Designations (LUDs) consistently. Based on the methodology described in the Draft Plan, high-protection LMUs should be defined by high-density overlap of high-value features, such as habitat and heritage, and thus result in a more restrictive LUDs. High potential economic areas with lower heritage and habitat values should be classified as less restrictive LUDs.

Some high protection LMUs, such as LMU 19, partly or wholly enclose areas of high historic and current placer and hard rock mining activity. These areas have significant potential future economic value, have extensive mining claims within them and have already seen substantial disturbance. Designating these areas as high protection LMUs will result in land use conflict and the potential need for economic compensation to mineral rights holders. These areas should be recognized for the current and future economic value and placed into more appropriate LMU designations. The Draft Plan does not appear to draw from the referenced Land Use Planning Conservation Thresholds (Environmental Law Institute, 2003). Threshold values presented are very low compared to other land use plans in comparable sub-arctic, low-density populated areas and particularly relative to ecologic thresholds from scientific studies which generally indicate threshold preservation of >60% of habitat or perhaps 80% for rare species. This compares with preservation of 95%, 97.5% and 99% of habitat for the high, medium, and low development LUDs that are proposed. It is unclear in the Draft Plan if the Cumulative Disturbance Thresholds are based off Ecological derived habitat needs or are more arbitrary Management thresholds.

On October 12th 2021, the DRPC released 'Analysis of "Current" Disturbance Levels'. The outdated 2014 dataset provided was indicated to be the result of a lack of information, however figures from the document show recent satellite images mapping disturbance. If current disturbance levels are not defined, how can thresholds be proposed for each land management unit, especially if the thresholds are arbitrary management levels and not based on habitat needs or species criteria?

There is currently no implemented monitoring of disturbance or impact assessment in the Dawson Planning Region.

Lastly, it appears that there was no significant mineral industry input in the creation of the Draft Plan despite that it being the largest single economic contributor to the local economy.

The things I would change in the Draft Plan are...

- (1) Increase total area under protection with high value heritage & habitat resources and decrease designations in areas with significant pre-existing development, mining, industrial and economic activity that have lower heritage & habitat values:
 - Increase areas under SMA 1 Land Use Designation with high value heritage & habitat resources from 3.8% to 25%; and
 - Re-assign ISA designations to specific LMUs in areas with significant existing development (mining, industrial) that are outlined as having lower heritage and habitat resource values.
- (2) Simplification of the number of Land Use Designation classes to allow for clearer regulatory implementation:
 - Removal of ISA 1 Land Use Designation resulting in three (low, moderate, and high) ISA classes
 - Removal of SMA 2 Land Use Designation for clearer policies regarding high levels of protection
- (3) Assess the current levels of cumulative disturbance, implement monitoring, and utilize predictive ecosystem mapping to establish science-based ecological habitat disturbance thresholds for the regional planning area while taking into consideration current disturbance levels and future activities. This should facilitate management of monitored disturbance and encourage concurrent reclamation under the current land use permit regime.
- (4) The Mining industry generates significant economic benefits for communities that are often not well understood. Sustaining a healthy mining industry is key for the economic security of the Planning Region as the single largest non-government economic sector. It is recommended that within the current DLUP working groups that at least two (2) experienced individuals are nominated by the placer and hard rock industry to assist with the refinement of the next phase of the Plan.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

Enjoy hikes with my family in different parts of the Yukon.

Enjoy wildlife viewing.

Have participated in the community garbage cleanup in Whitehorse.

Completed trail races and outdoor triathlons in the Yukon

Fortunate to have visited and worked in many remote areas of the Yukon given my work in mineral exploration.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

The Dawson Land Stewardship Trust could promote stewardship of the land between all stakeholders in creative ways. However, it should not become another regulatory body that delays permits, licenses and activities on the land, nor should it charge costly fees that further cause financial burden to land users. Providing clear examples of how integrated Stewardship Practices could take place to support connectivity of stakeholders and land-users by providing examples for potential research opportunities to educate stakeholders with little knowledge about other value-systems and providing policies to educate and implement sub-regional plans. And most importantly, ensuring a bright future the Region and its inhabitant through the fulfilment of the Â§11 (Land Use Planning) of the Umbrella Final Agreement for Trâ€™ondâ€™k Hwâ€™châ€™in First Nation.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

â€¢ That the Regional Land Use Plan fulfils of Chapter Â§11 of the Umbrella Final Agreement in a way that honors Trâ€™ondâ€™k Hwâ€™châ€™in (THFNâ€™s) outlined heritage & habitat values. That the Land Use Planners and Commission utilize key value systems (Habitat, Heritage and Economic) to strike a balanced approach of habitat preservation and land-management while supporting continuation of existing economic and industrial activity in the region for generations to come. That the Region hosts integrated stewardship and research opportunities that bridge the gap between land users from various backgrounds to work together to create best management practises that pave the way for a bright future.

Do you feel that most of the things that matter to you were included in the plan?

The Vision and Plan Goals in the Draft Plan do work towards honouring the fulfillment of Chapter 11 in the UFA. However, at present it is unclear how the DLUPC arrived at the currently proposed land use designations and associated thresholds.

The methodology is unclear, and I believe the current plan could result in not fully meeting the mark for conservation nor preservation of a vibrant economic future. The methodology described in Â§1.6.2.5 (Priority Criteria for Candidate Conservation Areas) do not appear to consistently match Draft Land Management Units (LMUâ€™s) and

currently proposed Land Use Designations (LUDs). Based on the methodology described in the Draft Plan, high-protection LMUs should be defined by high-density overlap of high-value features, such as habitat and heritage, and thus result in a more restrictive LUDs. High potential economic areas with lower heritage and habitat values should be classified as less restrictive LUDs. It does not appear that this methodology was consistently followed throughout the draft plan.

Additionally, it is unclear how integrated stewardship practises will be facilitated to result in meaningful assessment on how the Land Use Plan is managing balancing the key values outlined. With no monitoring or adequate ongoing predictive modelling that factors in all potential factors affecting the ecosystems and economy, it is unclear if the plan will be effective.

It is important to note that despite the fact that the mineral industry is the largest non-government contributor to the region outside, there appears to have been no one in the DLUPC with significant experience in the placer and hard rock mineral industry.

If a LMU is approaching its critical cumulative disturbance threshold, it is my understanding that YESAB and YG will not approve any additional permits. How this will be addressed is not made clear and there should a defined streamlined process outlined what will occur to mitigate potential socioeconomic impacts. Will this result in triggering correspondence with land users in this LMU to begin to progressively restore historically disturbed habitats to ensure that economic activities can continue?

Does progressive reclamation get factored back into the cumulative disturbance threshold accounting? With the approach that has been taken in the study with tracking the levels of disturbance it is critical that restoration in wetland and non-wetland areas be credited back towards the disturbance accounting to ensure a long-term sustainable mineral industry. A near-net zero disturbance accounting should be the goal of the plan in economically developed areas.

It is also unclear how the various implementation bodies will work together or how their capacity will need to increase. It is very important that the current regulatory regime be utilized (e.g., mining land use permits) as they work to incentivise on-going continuous reclamation and tracking of disturbance.

Also, it is critical that while the plan is being refined and implemented the stability of the economy may continue and that the permitting process for projects in ISA LMUs for mining, forestry and agriculture be allowed to continue utilizing the existing land use permit system and that new economic investment is not frozen for the region.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĚK HWĚCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? No

Please provide explanation

Plans to maintain the economic health of the region are not discussed in detail. Management intent is unclear throughout the document and certain proposals could have far reaching negative economic impacts on the region.

Â€™s 4.1.9 and 4.3.3 on Traditional Economy recommends buffers and avoiding or reducing the level of land-use activities in areas identified as having cultural value. Map 5 (Appendix A) shows virtually the entire area as having traditional-use value. These areas need to be better defined so that it is not unclear what exact areas are being referred to and what this would mean for stakeholder-use in the entire planning area.

Sustaining a healthy mineral industry is key for the economic security of the Planning Region as its single largest economic sector. While this natural resource has been developed in the region for over a century, many placer deposits have been depleted in the heavily developed areas. While there are opportunities to reclaim and restore these historically disturbed areas, the industry will continue to move into adjacent prospective areas that share the same geologic settings. This movement into adjacent areas needs to be accommodated to allow for a healthy placer mining industry and regional economy. For instance, in LMU 12 the natural progression is to move further eastward to the Upper Indian River (LMU 19), which has same geological setting, and is demonstrating comparable economic placer values. This area is the economic future for the Klondike Goldfields and shutting it down from development would be a significant economic loss to the region.

Though the focus in LMUÂ€™s such as 12 and 19 have mostly been on placer mining, these areas are also highly prospective for future hard rock developments - as the source of the alluvial gold. Accommodation should be made for such future potential in these areas.

As discussed, a sustainable mineral resource economy is key to ensuring long-term socioeconomic health of the Planning Region. The Mining industry generates significant economic benefits for communities that are often not well understood. A substantiated figure used in the mineral industry shows that typically every dollar spent in mining generates \$5 in the local economy including indirect supporting industries & local-work force (hotels, restaurants, equipment sales and maintenance, supplies, fuel, etc.). A recent PWC report showed similar multiplier value relates to jobs supported by indirect and induced economic activity. This study of mining related jobs in British Columbia indicates that for each (1) mining related job, 4.6 indirect, or induced, jobs are created. The DLUP Resource Assessment Report does not accurately reflect economic contributions from these types of economic activity.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

Chapter 11.4.1 (Regional Land Use Planning Commissions) of THFN's UFA states: "Government and any affected Yukon First Nation may agree to establish a Regional Land Use Planning Commission to develop a regional land use plan."

I do believe that this is meeting the Objectives of the UFA. However, it is my belief that the current plan as currently proposed is not truly balanced to ensure both the conservation goals and the socioeconomic future for generations to come. Also, as this plan will set the tone for future land use planning and inspire other Yukon First Nations and Land Use Planners, this is an opportunity for showing a balanced vision for the Yukon Territory and its future.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Ultimately, I am grateful to be included in the discussion to be involved and recognize just how much work and commitment the Commission and Staff have put in and that they made themselves available to discuss and address questions across the Territory through numerous meetings and workshops.

However, it is my opinion that more time and information are required to properly assess and comment on this important Regional Planning framework as it will set the tone for future land use plans in the Territory. I hope that there is adequate time to review and address all of the responses made to the Draft Plan and that an updated draft will be released for review to allow for further refinement ensuring the final plan outlines a balanced approach that can be implemented and revised as needed.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

I sometimes see the destruction to a valley that can be caused by unprofessional placer operators. But I also see functional marshes and shallow water wetlands from professional operators that adhere to modern day best practices with regards to reclamation standards.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes

I believe that development should be limited in areas of high habitat and heritage values and sustainably managed in areas that have the ability to provide economic vitality for future generations and have lower habitat and heritage values.

It is unclear in the Draft Plan how the proposed Cumulative Disturbance Thresholds were created as there is currently no implemented monitoring and the current levels of disturbance are not fully known. Lastly, without basing the disturbance thresholds on sound science for healthy ecological habitats, it is unclear that the Plan would be effective as proposed in managing development in a way that ensures both a bright economic and ecological future.

I think that it is imperative to assess the current levels of cumulative disturbance, implement monitoring and utilize predictive ecosystem mapping with science-based ecological habitat disturbance thresholds for the regional planning area.

I recommend the formation of an objective special technical working group who can advise on suitable disturbance thresholds to ensure the integrity of key values (ecological habitat and heritage) whilst allowing for sustainable economic development.

Additionally, the current level of high-level protection only equates to 3.8%. I believe there should be fewer land use designation classes to ease implementation and that more areas should fall under full protection where numerous key values overlap/are concentrated. Conversely, areas that are already disturbed should be able to continue economic development, with the creation of approved restoration guidelines and best management practises in wildlife key areas, to allow for responsible development (ex: LMU 19).

WETLANDS

What do you like or dislike about this the approach to wetlands?

The Plan states that effective restoration of wetlands is impossible. This contrasts with the surface disturbance recovery objectives (Â§3.5.1.1, page 38). I believe that the goal should be implementing consistent restoration practises for disturbed wetlands regardless of which LMU they are located in to ensure wetland function and habit are maintained.

The inconsistent policies regarding disturbance of wetlands and view that restoration of functional wetland habitat is effectively impossible negates the incentive for land-users to implement best possible management practices in reclamation efforts. It is imperative for maintaining function of these ecosystems that wetland restoration policy encourages incentivized restoration efforts. Disturbances in wetlands would see little industry investment if the messaging presented is discouraging towards restoration of wetland function.

There are many projects across Canada that have demonstrated that effective restoration of wetland function and habitat can be achieved. We should be striving for the same in the study region.

When considering development in wetlands, what impacts to your values are you most concerned about?

The outlined thresholds could have serious economic development consequences (particularly to placer mining which occurs in wetland areas) and the use of arbitrary thresholds introduces a high degree of uncertainty and low confidence that the results of cumulative effects on wetlands would be meaningful and result in effective management and land-use decisions.

Undisturbed wetlands with high ecological and heritage value but low economic potential should be prioritized to ensure both habitat and important hydrologic functions are maintained. Prioritized wetlands should be given an SMA 1 designation (ex: Flat Creek Watershed).

In areas with significant historic, current, and future economic activity disturbance to wetlands should be managed by installation of guidelines which outline practises to maintain wetland function. Permitting guidelines utilized in the hard-rock sector could be extended to the Placer industry to ensure a unitized approach to disturbance encouraging concurrent reclamation. This would ensure threshold levels are not reached, prevent a rush of disturbance in any given LMU, work with the current regulatory process, and is a form of integrated stewardship.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? [Disagree](#)

Please tell us why you agree or disagree

LMU 19 (Upper Indian Wetland) is comprised of approximately 10% wetlands, is an active economically developed placer area and has unknown levels of disturbance within these wetlands. The Regional Plan area also has 10% total wetlands. So, it is unclear why the Upper Indian River watershed was designated based primarily on its wetland value and currently has an SMA 2 designation. There are nearly 1,200 mining claims with 34 operators in this area and the area is fully surrounded by LMU 12 which is designated for the highest level of disturbance. This area has the same geologic setting as the lower Indian River and operators are seeing the same level of economic gold values. This area should be exchanged for the southern upper Flat Creek watershed that is similar in size, drains into the main Flat Creek watershed that has been proposed for a high level of protection and has very little to no mineral development activity (see further comments on Flat Creek below).

Similarly, the Scottie Creek wetlands (LMU 22) are centered towards the south of the currently proposed LMU. The northern portion of this LMU has seen extensive historic

and current hard rock and placer exploration (i.e., it has been disturbed). This LMU could be trimmed around these active camps and be given an SMA 1 designation in the southern section to ensure full future protection.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

The Flat Creek Wetlands LMU, is currently proposed as a relatively small LMU at 367.77 km². This wetland borders SMA 1-designated Upper Klondike LMU, has considerable coverage by the Tintina Trench Flyway and a large area of waterfowl habitat. Significant placer-mineral potential has been identified on tributaries of Flat Creek to the northwest, however, this wetland is relatively pristine and undisturbed and has very little current mineral development activity. It is proposed that the designation be increased to SMA 1 and the LMU area could be enlarged to allow a wider buffer for migratory bird habitat and wetland protection by including the upper southern watershed boundary, which is larger than LMU 19.

Please tell us what you think about development in fens [choose one]

Limited development should be allowed to happen in fens.

Please explain your answer.

Development should be allowed in fens in ISA LMU's with appropriate reclamation and restoration practices.

The Federal Policy on Wetland Conservation describes no net loss of socioeconomic or ecological wetland function and restoration of wetland function has been demonstrated globally on various projects. Therefore, it is recommended that criteria be developed for habitat and functional wetland restoration that is consistently utilized in the Planning Region to ensure the spirit of the federal policies on wetland restorations are met.

It is imperative for maintaining function of these ecosystems that wetland restoration policy encourages incentivized restoration efforts, otherwise disturbances in wetlands would see little industry investment if the messaging presented is discouraging towards restoration of wetland function.

Creation of wetland restoration policies outlining acceptable industry practises are required to provide a clear path for economic development in regions within, and proximal to wetlands (i.e., placer mining, road management). Policies concerning wetland restoration should be consistent regardless of LUD and should be standardized for consistent stewardship in the Planning Region and follow sound scientifically based criteria for the restoration of wetland function and habitat.

How much of the regions Fens should be allowed to be developed? 75%

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

There has clearly been a considerable effort put into the Land Designation System and clearly it reflects many THFN values. However, I think that the transitions from higher-protection LMU's to higher-development ones should be more gradational to avoid habitat fragmentation. Higher protection LMU's should logically cover areas with high habitat and/or high cultural values. Areas with high economic potential and lower habitat and cultural heritage values should allow for future economic development with corresponding higher disturbance thresholds, with such thresholds based on sound scientific studies for species and habitats.

The things I feel the Commission got right about the land designations are...

The vision and spirit behind the land use designations and in general the boundaries to land management units are logical. In particular, defining future planning areas for complicated land management units and corridors that cover such numerous land usages was wise to allow for timely implementation of stewardship over the region.

The things I would change are...

Reduction of Land Use Designation classes to a singular special management area (SMA 1) and three Integrated Stewardship Classes (low, medium, and high) would allow for simpler implementation, reduce the effects of habitat fragmentation, and create clearer land use designations. In addition, it may allow for a considerable increase in fully protected areas if some currently designated SMA2's become SMA1's and some large LMUs are divided to pull out areas of high overlap of key value features and given an SMA1-designation. A few SMA2's with significant economic value but lower habitat and heritage value such as LMU 19 should be designated as ISAs. LMU 23 and 24 should have a singular LUD to allow for ease of implementation and LMU boundaries should consistently utilize unmistakable features, such as a watershed boundary or a river, to ensure cross-boundary land users don't inadvertently mistake which LMU they are in.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

No

Please explain your answer (use locations where possible)

SMA2 should be eliminated as an LUD with high habitat and heritage areas moved to SMA1 for full protection and areas with lower habitat and heritage value but high economic activity moved to an ISA LUD.

LMU # 1: It is recommended that LMU#1 be divided into two smaller Land Management Units with the northern half being designated as SMA1 to protect the high overlap of key value features in a large undisturbed area. If industries do not feel they can economically explore or mine established areas, they will go to areas with lower designations that have seen little disturbance.

LMU#4 has very high ecological habitats (ex: vast Tintina Trench Flyway), a high proportion of First Nation Settlement Lands and shares a border with Tombstone Park. This is an excellent opportunity for a sizable high-preservation area (SMA1).

LMU # 11: The Flat Creek Wetlands LMU #11, is currently proposed as a relatively small LMU at 367.77 km². This wetland borders LMU #10 which is SMA1-designated, has vast Tintina Trench Flyway and waterfowl habitat. The Flat Creek wetlands are relatively pristine and undisturbed. This LMU should increase in size by including the southern boundary of the watershed and be given an SMA1 designation which would create a vast fully protected area with LMU 10.

LMU #19: Balancing conservation efforts with preserving a strong economic future could be accomplished through removing three undisturbed watershed areas within LMU 12 to allow for water quality and aquatic health monitoring at their confluences with the Yukon River and expansion of LMU 11. As stated above, the undisturbed Flat Creek Watershed could be increased in size to an area slightly larger than LMU 19 and given an SMA 1-designation for full future protection (southern Flat Creek watershed). In addition, these changes would allow for increased conservation of undisturbed wetlands whilst allowing for continued economic development within LMU 19 which has unknown levels of disturbance within wetland areas and an established strong economic future. An SMA 2 designation of LMU 19 could result in significant land use conflicts, loss of a major economic growth zone for the goldfields and thereby impact the socioeconomic conditions for future generations, the need for significant economic compensation for the 34 mineral rights holders with 1,200 claims in LMU 19, and push Industry into undeveloped LMUs with higher concentrations of key value features.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

The Plan defines Special Management Areas (SMAs) as conservation areas identified requiring high levels of conservation. However, despite all of the ecological and heritage values described, the Plan currently only fully protects 3.8% of the Planning Region. This could be an opportunity to ensure the long-term protection of high value ecological and heritage areas of the Region.

Reducing to a singular Special Management Area could result in a larger fully protected areas. The SMA 2 designation currently outlines that disturbance is to occur only in connection to existing surface and sub-surface rights; however, disturbance thresholds align with ISA I or II depending on the LMU. So, it seems more logical to simplify the Plan by removal of SMA 2. Areas with SMA 2 designations which overlap key value features

and have seen little disturbance, should be placed into SMA 1 and areas with significant defined economic potential be placed in ISA classifications. This would ensure no precedent is set by the effective removal highly prospective areas.

What advice do you have for the Commission as they develop the Recommended Plan?

I believe that more time and information are required to properly assess and comment on the Plan. A second comment period is suggested to allow adequate time for reviewing all the response submissions and a publicly released updated draft is required. As the mineral industry is a huge economic driver in the Planning Region, I recommend that within the current DLUP working groups that at least two (2) experienced individuals are nominated by the placer and hard rock industry to assist with the refinement of the next phase of the Plan.

Implementation of monitoring of disturbance (or impact assessment) in the Dawson Planning Region needs to be completed and should occur alongside predictive ecosystem modelling to evaluate the effectiveness of the management directives. This will also ensure thresholds are science-based so long as it incorporates numerous ecological parameters (including snowpack, fire activity, tourism, etc.) and doesn't exclusively single out industry. It is unknown what the drivers for potential population decline are for key wildlife species, so while completing modelling, population, and associated reproduction rate monitoring of species in undeveloped and developed areas should be evaluated to inform modelling and implementation of key directives for land users.

Implementation is key to the success of the Regional Land Use Plan. As numerous parties are responsible for implementation, roles and responsibilities must be clarified. To facilitate streamlining the process and ensure plan conformity, it is recommended the policies and special management directives align with the current regulatory regime so that continued economic development may occur in the interim.

Lastly, it is critical that while the plan is being refined and implemented that the stability of the economy may continue and that the existing permitting processes for active projects in mining, forestry and agriculture be allowed to progress in ISA designations utilizing the existing land use permit system. A freeze in the permitting process in these LMUs could unnecessarily shut down new economic investment in the region.

Survey ID# 714

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? Yes

If so, what sector do you work in? several ,including natural resources, education and the non-profit sectors.

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Dawson Resident"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

How it broadly follows the format pioneered in the N. Yukon and Peel plans.

The things that are missing from the Draft Plan are...

It fails to tie plan principles such as connectivity and caribou to action in the plan

The things I would change in the Draft Plan are...

Ensure caribou habitat and migration corridors are protected. Revise SMA 2 definitions so that these conservation areas meet the criteria of protected area.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

Advocate for the land and its inhabitants.

Take actions to avoid killing, disturbing or displacing wildlife except for food.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

Get the governance right.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Conservation of the special landscapes and wildlife

Do you feel that most of the things that matter to you were included in the plan?

Included, but not always addressed.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? No

Please provide explanation

The disturbance thresholds are too high to sustain caribou.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

I'm not a TH citizen, so I'm uncomfortable answering this question. I do think the Commission strives to do so.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Ecological, social and economic values should be considered.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

Some parts of the region have become so highly impacted that economic considerations crowd out ecological and even social values.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes

Experience shows us that unless we keep industrial development within limits, caribou disappear from the landscape.

WETLANDS

What do you like or dislike about this the approach to wetlands?

It's pretty good- the devil, as always, is in the details. It is puzzling that swamps are not addressed.

When considering development in wetlands, what impacts to your values are you most concerned about?

Ecological and social ones.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Agree

Please tell us why you agree or disagree

They are the most extensive intact wetlands with no other prospect of protection. The Indian river wetlands are under serious threat.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

All wetlands are important; even small ones that contain just a couple of ducks accumulate to a significant number.

Please tell us what you think about development in fens [choose one]

Limited development should be allowed to happen in fens.

Please explain your answer.

Ideally all organic peat based wetlands should be protected because of the impossibility of restoring them. Industrial pressures are such that this ideal is likely unrealizable. If some parts of some fens are deemed sacrifice zones, the criteria should be stringent and science based, not crafted to appease industry.

How much of the regions Fens should be allowed to be developed? 25%

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

Looks fair.

The things I feel the Commission got right about the land designations are...

Superficially consistent with previous plans.

The things I would change are...

Make ISA thresholds consistent with the N. Yukon plan.

Make some SMA 2s consistent with interim protection in the Peel. Others should be bumped up to SMA 1 status.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Yes

Please explain your answer (use locations where possible)

LMU 1, 4: Excellent sheep, caribou, moose and salmon habitat that if fully and permanently conserved can support people indefinitely. Ditto LMU 3, 7. LMU 19 because it protects some wetlands.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

I think the Commission intends to provide protection with this designation, but it fails to do so.

What advice do you have for the Commission as they develop the Recommended Plan?

Find ways to deeply engage with ordinary Yukoners, particularly Dawson region residents.

This survey is way too complicated; you are asking questions that require an in-depth answer- surveys are not the place for in-depth answers, they are best for getting an idea of attitudes and general perspectives.

Survey ID# 713

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a regular visitor to the Dawson Region

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? No

If so, what sector do you work in?

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Industry Specialist"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

It is important to try to strike a balanced approach of land management and habitat preservation while also supporting continuation of existing economic and industrial activity in the region, so I like the vision of the Commission. There are challenges associated with the DRPC's mandate, the scope, and the many years of work that have culminated in the 2021 DRLU Draft Plan.

I feel grateful to be included in discussions to plan the future and the stewardship of land management and resources of the Dawson Region in Tr'ondëk Hwëch'ine (THFN) Traditional Territory, as this plan is part of fulfilment of the s11 (Land Use Planning) of the Umbrella Final Agreement (dated July 16, 1998).

The things that are missing from the Draft Plan are...

Recognizing that the documents are first drafts, the intention is nonetheless to utilize these documents as the basis for refining, developing, and finalizing a more balanced, science-based, and defensible Regional Land Use Plan. Here are few key issues I feel weren't addressed adequately in the Draft Plan:

The methodology described in §1.6.2.5 (Priority Criteria for Candidate Conservation Areas) do not appear to always match Draft Land Management Units (LMUs) and currently proposed Land Use Designations (LUDs) consistently. Based on the methodology described in the Draft Plan, high-protection LMUs should be defined by high-density overlap of high-value features, such as habitat and heritage, and thus result in a more restrictive LUDs. High potential economic areas with lower heritage and habitat values should be classified as less restrictive LUDs.

Some high protection LMUs, such as LMU 19, partly or wholly enclose areas of high historic and current placer and hard rock mining activity. These areas have significant potential future economic value, have extensive mining claims within them and have already seen substantial disturbance. Designating these areas as high protection LMUs will result in land use conflict and the potential need for economic compensation to mineral rights holders. These areas should be recognized for the current and future economic value and placed into more appropriate LMU designations. The Draft Plan does not appear to draw from the referenced Land Use Planning Conservation Thresholds (Environmental Law Institute, 2003). Threshold values presented are very low compared to other land use plans in comparable sub-arctic, low-density populated areas and particularly relative to ecologic thresholds from scientific studies which generally indicate threshold preservation of >60% of habitat or perhaps 80% for rare species. This compares with preservation of 95%, 97.5% and 99% of habitat for the high, medium, and low development LUDs that are proposed. It is unclear in the Draft Plan if the Cumulative Disturbance Thresholds are based off Ecological derived habitat needs or are more arbitrary Management thresholds.

On October 12th 2021, the DRPC released 'Analysis of "Current" Disturbance Levels'. The outdated 2014 dataset provided was indicated to be the result of a lack of information, however figures from the document show recent satellite images mapping disturbance. If current disturbance levels are not defined, how can thresholds be proposed for each land management unit, especially if the thresholds are arbitrary management levels and not based on habitat needs or species criteria?

There is currently no implemented monitoring of disturbance or impact assessment in the Dawson Planning Region.

Lastly, it appears that there was no significant mineral industry input in the creation of the Draft Plan, despite the fact that it is the largest single economic contributor to the local economy.

The things I would change in the Draft Plan are...

- (1) Increase total area under protection with high value heritage & habitat resources and decrease designations in areas with significant pre-existing development, mining, industrial and economic activity that have lower heritage & habitat values:
 - Increase areas under SMA 1 Land Use Designation with high value heritage & habitat resources from 3.8% to approximately 25%; and
 - Re-assign ISA designations to specific LMUs in areas with significant existing development (mining, industrial) that are outlined as having lower heritage and habitat resource values.
- (2) Simplification of the number of Land Use Designation classes to allow for clearer regulatory implementation:
 - Removal of ISA 1 Land Use Designation resulting in three (low, moderate, and high) ISA classes
 - Removal of SMA 2 Land Use Designation for clearer policies regarding high levels of protection
- (3) Assess the current levels of cumulative disturbance, implement monitoring, and utilize predictive ecosystem mapping to establish science-based ecological habitat disturbance thresholds for the regional planning area while taking into consideration current disturbance levels and future activities. This should facilitate management of monitored disturbance and encourage concurrent reclamation under the current land use permit regime.
- (4) The Mining industry generates significant economic benefits for communities that are often not well understood. Sustaining a healthy mining industry is key for the economic security of the Planning Region as the single largest non-government economic sector. It is recommended that within the current DLUP working groups that at least two (2) experienced individuals are nominated by the placer and hard rock industry to assist with the refinement of the next phase of the Plan.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

Appreciate and connect with the land via hikes and walks. Be mindful of my environmental footprint and seek to minimize it in my daily life. 'Vote' with my consumer dollars by supporting locally-made products. Support green energy including the resource industries necessary for the transition to cleaner infrastructure.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

No

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

The Dawson Land Stewardship Trust could be used to promote stewardship of the land between all stakeholders in creative ways. However, it should not become another regulatory body that delays permits, licenses and activities on the land, nor should it charge costly fees that further cause financial burden to land users. Providing clear examples of how integrated Stewardship Practices could take place to support connectivity of stakeholders and land-users by providing examples for potential research opportunities to educate stakeholders with little knowledge about other value-systems and providing policies to educate and implement sub-regional plans. And most importantly, ensuring a bright future the Region and its inhabitant through the fulfilment of the Â§11 (Land Use Planning) of the Umbrella Final Agreement for Trâ€™ondâ€™k Hwâ€™châ€™in First Nation.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

â€¢ That the Regional Land Use Plan fulfils of Chapter Â§11 of the Umbrella Final Agreement in a way that honors Trâ€™ondâ€™k Hwâ€™châ€™in (THFNâ€™s) outlined heritage & habitat values. â€¢ That the Land Use Planners and Commission utilize key value systems (Habitat, Heritage and Economic) to strike a balanced approach of habitat preservation and land-management while supporting continuation of existing economic and industrial activity in the region for generations to come. â€¢ That the Region hosts integrated stewardship and research opportunities that bridge the gap between land users from various backgrounds to work together to create best management practises that pave the way for a bright future.

Do you feel that most of the things that matter to you were included in the plan?

The Vision and Plan Goals in the Draft Plan do work towards honouring the fulfillment of Chapter 11 in the UFA. However, at present it is unclear how the DLUPC arrived at the currently proposed land use designations and associated thresholds. The methodology is unclear, and I believe the current plan could result in not fully meeting the mark for conservation nor preservation of a vibrant economic future. The methodology described in Â§1.6.2.5 (Priority Criteria for Candidate Conservation Areas) do not appear to consistently match Draft Land Management Units (LMUâ€™s) and currently proposed Land Use Designations (LUDâ€™s). Based on the methodology described in the Draft Plan, high-protection LMUâ€™s should be defined by high-density

overlap of high-value features, such as habitat and heritage, and thus result in a more restrictive LUDs. High potential economic areas with lower heritage and habitat values should be classified as less restrictive LUDs. It does not appear that this methodology was consistently followed throughout the draft plan.

Additionally, it is unclear how integrated stewardship practises will be facilitated to result in meaningful assessment on how the Land Use Plan is managing balancing the key values outlined. With no monitoring or adequate ongoing predictive modelling that factors in all potential factors affecting the ecosystems and economy, it is unclear if the plan will be effective.

It is important to note that despite the fact that the mineral industry is the largest non-government contributor to the region outside, there appears to have been no one in the DLUPC with significant experience in the placer and hard rock mineral industry.

If a LMU is approaching its critical cumulative disturbance threshold, it is my understanding that YESAB and YG will not approve any additional permits. How this will be addressed is not made clear and there should a defined streamlined process outlined what will occur to mitigate potential socioeconomic impacts. Will this result in triggering correspondence with land users in this LMU to begin to progressively restore historically disturbed habitats to ensure that economic activities can continue?

Does progressive reclamation get factored back into the cumulative disturbance threshold accounting? With the approach that has been taken in the study with tracking the levels of disturbance it is critical that restoration in wetland and non-wetland areas be credited back towards the disturbance accounting to ensure a long-term sustainable mineral industry. A near-net zero disturbance accounting should be the goal of the plan in economically developed areas.

It is also unclear how the various implementation bodies will work together or how their capacity will need to increase. It is very important that the current regulatory regime be utilized (e.g., mining land use permits) as they work to incentivise on-going continuous reclamation and tracking of disturbance.

Also, it is critical that while the plan is being refined and implemented the stability of the economy may continue and that the permitting process for projects in ISA LMUs for mining, forestry and agriculture be allowed to continue utilizing the existing land use permit system and that new economic investment is not frozen for the region.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? No

Please provide explanation

Plans to maintain the economic health of the region are not discussed in detail. Management intent is unclear throughout the document and certain proposals could have far reaching negative economic impacts on the region.

THFN's 4.1.9 and 4.3.3 on Traditional Economy recommends buffers and avoiding or reducing the level of land-use activities in areas identified as having cultural value. Map 5 (Appendix A) shows virtually the entire area as having traditional-use value. These areas need to be better defined so that it is not unclear what exact areas are being referred to and what this would mean for stakeholder-use in the entire planning area.

Sustaining a healthy mineral industry is key for the economic security of the Planning Region as its single largest economic sector. While this natural resource has been developed in the region for over a century, many placer deposits have been depleted in the heavily developed areas. While there are opportunities to reclaim and restore these historically disturbed areas, the industry will continue to move into adjacent prospective areas that share the same geologic settings. This movement into adjacent areas needs to be accommodated to allow for a healthy placer mining industry and regional economy. For instance, in LMU 12 the natural progression is to move further eastward to the Upper Indian River (LMU 19), which has same geological setting, and is demonstrating comparable economic placer values. This area is the economic future for the Klondike Goldfields and shutting it down from development would be a significant economic loss to the region.

Though the focus in LMU's such as 12 and 19 have mostly been on placer mining, these areas are also highly prospective for future hard rock developments - as the source of the alluvial gold. Accommodation should be made for such future potential in these areas.

As discussed, a sustainable mineral resource economy is key to ensuring long-term socioeconomic health of the Planning Region. The Mining industry generates significant economic benefits for communities that are often not well understood. A substantiated figure used in the mineral industry shows that typically every dollar spent in mining generates \$5 in the local economy including indirect supporting industries & local-work force (hotels, restaurants, equipment sales and maintenance, supplies, fuel, etc.). A recent PWC report showed similar multiplier value relates to jobs supported by indirect and induced economic activity. This study of mining related jobs in British Columbia indicates that for each (1) mining related job, 4.6 indirect, or induced, jobs are created. The DLUP Resource Assessment Report does not accurately reflect economic contributions from these types of economic activity.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

Chapter 11.4.1 (Regional Land Use Planning Commissions) of THFN's UFA states: "Government and any affected Yukon First Nation may agree to establish a Regional Land Use Planning Commission to develop a regional land use plan."

I do believe that this is meeting the Objectives of the UFA. However, it is my belief that the current plan as currently proposed is not truly balanced to ensure both the conservation goals and the socioeconomic future for generations to come. Also, as this plan will set the tone for future land use planning and inspire other Yukon First Nations and Land Use Planners, this is an opportunity for showing a balanced vision for the Yukon Territory and its future.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Overall, I am grateful to be included in the discussion to be involved, and I recognize how much work and commitment the Commission and Staff have put in and that they made themselves available to discuss and address questions across the Territory through numerous meetings and workshops.

However, it is my opinion that more time and information are required to properly assess and comment on this important Regional Planning framework as it will set the tone for future land use plans in the Territory. I hope that there is adequate time to review and address all of the responses made to the Draft Plan and that an updated draft will be released for review to allow for further refinement ensuring the final plan outlines a balanced approach that can be implemented and revised as needed.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes

Yes, I believe that development should be limited in areas of high habitat and heritage values and sustainably managed in areas that have the ability to provide economic vitality for future generations and have lower habitat and heritage values.

It is unclear in the Draft Plan how the proposed Cumulative Disturbance Thresholds were created as there is currently no implemented monitoring and the current levels of disturbance are not fully known. Lastly, without basing the disturbance thresholds on sound science for healthy ecological habitats, it is unclear that the Plan would be

effective as proposed in managing development in a way that ensures both a bright economic and ecological future.

I think that it is imperative to assess the current levels of cumulative disturbance, implement monitoring and utilize predictive ecosystem mapping with science-based ecological habitat disturbance thresholds for the regional planning area.

I recommend the formation of an objective special technical working group who can advise on suitable disturbance thresholds to ensure the integrity of key values (ecological habitat and heritage) whilst allowing for sustainable economic development.

Additionally, the current level of high-level protection only equates to 3.8%. I believe there should be fewer land use designation classes to ease implementation and that more areas should fall under full protection where numerous key values overlap/are concentrated. Conversely, areas that are already disturbed should be able to continue economic development, with the creation of approved restoration guidelines and best management practises in wildlife key areas, to allow for responsible development (ex: LMU 19).

WETLANDS

What do you like or dislike about this the approach to wetlands?

The Plan states that effective restoration of wetlands is impossible. This contrasts with the surface disturbance recovery objectives (Â§3.5.1.1, page 38). I believe that the goal should be implementing consistent restoration practises for disturbed wetlands regardless of which LMU they are located in to ensure wetland function and habit are maintained.

The inconsistent policies regarding disturbance of wetlands and view that restoration of functional wetland habitat is effectively impossible negates the incentive for land-users to implement best possible management practices in reclamation efforts. It is imperative for maintaining function of these ecosystems that wetland restoration policy encourages incentivized restoration efforts. Disturbances in wetlands would see little industry investment if the messaging presented is discouraging towards restoration of wetland function.

There are many projects across Canada that have demonstrated that effective restoration of wetland function and habitat can be achieved. We should be striving for the same in the study region.

When considering development in wetlands, what impacts to your values are you most concerned about?

The outlined thresholds could have serious economic development consequences (particularly to placer mining which occurs in wetland areas) and the use of arbitrary

thresholds introduces a high degree of uncertainty and low confidence that the results of cumulative effects on wetlands would be meaningful and result in effective management and land-use decisions.

Undisturbed wetlands with high ecological and heritage value but low economic potential should be prioritized to ensure both habitat and important hydrologic functions are maintained. Prioritized wetlands should be given an SMA 1 designation (ex: Flat Creek Watershed).

In areas with significant historic, current, and future economic activity disturbance to wetlands should be managed by installation of guidelines which outline practises to maintain wetland function. Permitting guidelines utilized in the hard-rock sector could be extended to the Placer industry to ensure a unitized approach to disturbance encouraging concurrent reclamation. This would ensure threshold levels are not reached, prevent a rush of disturbance in any given LMU, work with the current regulatory process, and is a form of integrated stewardship.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? [Disagree](#)

Please tell us why you agree or disagree

LMU 19 (Upper Indian Wetland) is comprised of approximately 10% wetlands, is an active economically developed placer area and has unknown levels of disturbance within these wetlands. The Regional Plan area also has 10% total wetlands. So, it is unclear why the Upper Indian River watershed was designated based primarily on its wetland value and currently has an SMA 2 designation. There are nearly 1,200 mining claims with 34 operators in this area and the area is fully surrounded by LMU 12 which is designated for the highest level of disturbance. This area has the same geologic setting as the lower Indian River and operators are seeing the same level of economic gold values. This area should be exchanged for the southern upper Flat Creek watershed that is similar in size, drains into the main Flat Creek watershed that has been proposed for a high level of protection and has very little to no mineral development activity (see further comments on Flat Creek below).

Similarly, the Scottie Creek wetlands (LMU 22) are centered towards the south of the currently proposed LMU. The northern portion of this LMU has seen extensive historic and current hard rock and placer exploration (i.e., it has been disturbed). This LMU could be trimmed around these active camps and be given an SMA 1 designation in the southern section to ensure full future protection.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

The Flat Creek Wetlands LMU, is currently proposed as a relatively small LMU at 367.77 km². This wetland borders SMA 1-designated Upper Klondike LMU, has considerable coverage by the Tintina Trench Flyway and a large area of waterfowl habitat. Significant placer mineral potential has been identified on tributaries of Flat Creek to the northwest, however, this wetland is relatively pristine and undisturbed and has very little current mineral development activity. It is proposed that the designation be increased to SMA 1 and the LMU area could be enlarged to allow a wider buffer for migratory bird habitat and wetland protection by including the upper southern watershed boundary, which is larger than LMU 19.

Please tell us what you think about development in fens [choose one]

Limited development should be allowed to happen in fens.

Please explain your answer.

The Federal Policy on Wetland Conservation describes no net loss of socioeconomic or ecological wetland function and restoration of wetland function has been demonstrated globally on various projects. Therefore, it is recommended that criteria be developed for habitat and functional wetland restoration that is consistently utilized in the Planning Region to ensure the spirit of the federal policies on wetland restorations are met.

It is imperative for maintaining function of these ecosystems that wetland restoration policy encourages incentivized restoration efforts, otherwise disturbances in wetlands would see little industry investment if the messaging presented is discouraging towards restoration of wetland function.

Creation of wetland restoration policies outlining acceptable industry practises are required to provide a clear path for economic development in regions within, and proximal to wetlands (i.e., placer mining, road management). Policies concerning wetland restoration should be consistent regardless of LUD and should be standardized for consistent stewardship in the Planning Region and follow sound scientifically based criteria for the restoration of wetland function and habitat.

How much of the regions Fens should be allowed to be developed? 75%

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

There has clearly been a considerable effort put into the Land Designation System and clearly it reflects many THFN values. However, I think that the transitions from higher-protection LMUTMs to higher-development ones should be more gradational to avoid

habitat fragmentation. Higher protection LMU's should logically cover areas with high habitat and/or high cultural values. Areas with high economic potential and lower habitat and cultural heritage values should allow for future economic development with corresponding higher disturbance thresholds, with such thresholds based on sound scientific studies for species and habitats.

The things I feel the Commission got right about the land designations are...

I feel the vision and spirit behind the land use designations, and in general the boundaries to land management units, are logical. In particular, defining future planning areas for complicated land management units and corridors that cover such numerous land usages was wise to allow for timely implementation of stewardship over the region.

The things I would change are...

Reduction of Land Use Designation classes to a singular special management area (SMA 1) and three Integrated Stewardship Classes (low, medium, and high) would allow for simpler implementation, reduce the effects of habitat fragmentation, and create clearer land use designations. In addition, it may allow for a considerable increase in fully protected areas if some currently designated SMA's become SMA's and some large LMUs are divided to pull out areas of high overlap of key value features and given an SMA-designation. A few SMA's with significant economic value but lower habitat and heritage value such as LMU 19 should be designated as ISAs. LMU 23 and 24 should have a singular LUD to allow for ease of implementation and LMU boundaries should consistently utilize unmistakable features, such as a watershed boundary or a river, to ensure cross-boundary land users don't inadvertently mistake which LMU they are in.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

No

Please explain your answer (use locations where possible)

LMU # 1: It is recommended that LMU#1 be divided into two smaller Land Management Units with the northern half being designated as SMA1 to protect the high overlap of key value features in a large undisturbed area. If industries do not feel they can economically explore or mine established areas, they will go to areas with lower designations that have seen little disturbance.

LMU#4 has very high ecological habitats (ex: vast Tintina Trench Flyway), a high proportion of First Nation Settlement Lands and shares a border with Tombstone Park. This is an excellent opportunity for a sizable high-preservation area (SMA1).

LMU # 11: The Flat Creek Wetlands LMU #11, is currently proposed as a relatively small LMU at 367.77 km². This wetland borders LMU #10 which is SMA1-designated, has vast Tintina Trench Flyway and waterfowl habitat. The Flat Creek wetlands are relatively

pristine and undisturbed. This LMU should increase in size by including the southern boundary of the watershed and be given an SMA1 designation which would create a vast fully protected area with LMU 10.

LMU #19: Balancing conservation efforts with preserving a strong economic future could be accomplished through removing three undisturbed watershed areas within LMU 12 to allow for water quality and aquatic health monitoring at their confluences with the Yukon River and expansion of LMU 11. As stated above, the undisturbed Flat Creek Watershed could be increased in size to an area slightly larger than LMU 19 and given an SMA 1- designation for full future protection (southern Flat Creek watershed). In addition, these changes would allow for increased conservation of undisturbed wetlands whilst allowing for continued economic development within LMU 19 which has unknown levels of disturbance within wetland areas and an established strong economic future. An SMA 2 designation of LMU 19 could result in significant land use conflicts, loss of a major economic growth zone for the goldfields and thereby impact the socioeconomic conditions for future generations, and push Industry into undeveloped LMUs with high concentrations of key value features.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

The Plan defines Special Management Areas (SMAs) as conservation areas identified requiring high levels of conservation. However, despite all of the ecological and heritage values described, the Plan currently only fully protects 3.8% of the Planning Region. This could be an opportunity to ensure the long-term protection of high value ecological and heritage areas of the Region.

Reducing to a singular Special Management Area could result in a larger fully protected areas. The SMA 2 designation currently outlines that disturbance is to occur only in connection to existing surface and sub-surface rights; however, disturbance thresholds align with ISA I or II depending on the LMU. So, it seems more logical to simplify the Plan by removal of SMA 2. Areas with SMA 2 designations which overlap key value features and have seen little disturbance, should be placed into SMA 1 and areas with significant defined economic potential be placed in ISA classifications. This would ensure no precedent is set by the effective removal highly prospective areas.

What advice do you have for the Commission as they develop the Recommended Plan?

I believe that more time and information are required to properly assess and comment on the Plan. A second comment period is suggested to allow adequate time for reviewing all the response submissions and a publicly released updated draft is required. As the mineral industry is a huge economic driver in the Planning Region, I recommend that within the current DLUP working groups that at least two (2) experienced individuals are

nominated by the placer and hard rock industry to assist with the refinement of the next phase of the Plan.

Implementation of monitoring of disturbance (or impact assessment) in the Dawson Planning Region needs to be completed and should occur alongside predictive ecosystem modelling to evaluate the effectiveness of the management directives. This will also ensure thresholds are science-based so long as it incorporates numerous ecological parameters (including snowpack, fire activity, tourism, etc.) and doesn't exclusively single out industry. It is unknown what the drivers for potential population decline are for key wildlife species, so while completing modelling, population, and associated reproduction rate monitoring of species in undeveloped and developed areas should be evaluated to inform modelling and implementation of key directives for land users.

Implementation is key to the success of the Regional Land Use Plan. As numerous parties are responsible for implementation, roles and responsibilities must be clarified. To facilitate streamlining the process and ensure plan conformity, it is recommended the policies and special management directives align with the current regulatory regime so that continued economic development may occur in the interim.

Lastly, it is critical that while the plan is being refined and implemented that the stability of the economy may continue and that the existing permitting processes for active projects in mining, forestry and agriculture be allowed to progress in ISA designations utilizing the existing land use permit system. A freeze in the permitting process in these LMU's could unnecessarily shut down new economic investment in the region.

Survey ID# 712

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a regular visitor to the Dawson Region

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? No

If so, what sector do you work in?

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Ecological Expert"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

Balance between conservation and sustainable uses

Emphasis on stewardship

The things that are missing from the Draft Plan are...

Admission that ten-year duration and re-evaluation time schedule may have to slip. Track records of governments staying on this kind of schedule is spotty

The things I would change in the Draft Plan are...

SMA for Scottie Creek should be 1 and not 2; the cumulative impacts threshold should be more protective because of the high value of the wetlands and habitat connectivity in that locality. Perhaps consider a smaller SMA1 in the most important wetlands, and a SMA2 buffer closer to the headwaters where the mining is occurring.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

Study the wildlife resources and make recommendations accordingly

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

Seems like it may provide a good funding mechanism to fully implement the plan

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

wildlife and fisheries habitat connectivity, space to adapt to climate change, allow for sustainable uses and good stewardship

Do you feel that most of the things that matter to you were included in the plan?

Yes! there is a good spectrum of allowable uses, ranging from conservation areas to intensive industrial use. You propose a good balance. I generally support the SMA 1 and 2 areas in your draft (but my expertise is only on the areas that are adjacent to Alaska).

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? Yes

Please provide explanation

The plan strikes a balance between conservation, renewable resource use, and extractive non-renewable uses, where appropriate.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

not appropriate for an Alaskan to comment here

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Your approach to evaluating cumulative effects is innovative and it shows promise of success. I am hopeful you will have the funding to do this.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

Roads usually have a significant negative effect on populations of wildlife and fish that are harvested by people. These uses usually need to be regulated more strictly than in areas without road access. Agencies and developers do not have a very good track record of decommissioning and reclaiming roads once they are no longer used for their original purpose.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes

Some areas should be prioritized for conservation. Other areas should be prioritized for development of extractive resources. The in-between situations will be more difficult to manage, due to conflicting priorities and changing economics and politics.

WETLANDS

What do you like or dislike about this the approach to wetlands?

Nothing. It is a very good approach.

When considering development in wetlands, what impacts to your values are you most concerned about?

Hydrological/watershed health, effects on waterfowl and fish that are consumed by people. Loss of habitat and biodiversity for species not consumed by people.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Agree

Please tell us why you agree or disagree

Globally wetlands are becoming more rare. Scottie CK is important internationally as it feeds water into Tetlin National Wildlife Refuge in Alaska. Many people depend on the fish and waterfowl resources in this part of the upper Tanana River valley in AI

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

I am only weighing in on areas adjacent to Alaska where I have expertise.

Please tell us what you think about development in fens [choose one]

Limited development should be allowed to happen in fens.

Please explain your answer.

Very limited development allowed in fens only if there is no other alternative.

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

There is a great variety of zones ranging from strict conservation to significant development. You represented the entire spectrum, and it appears to be well balanced IMHO.

The things I feel the Commission got right about the land designations are...

They cover the whole spectrum of uses, and the choices are well justified in your rationale.

The things I would change are...

Perhaps create more SMA 1's, particularly where they could connect to conservation areas adjacent to this jurisdiction. Consider smaller SMA 1 surrounded by a buffer of SMA 2 if needed. Consider permanent removal from mineral entry in some SMA 2's, or make smaller SMA1s surrounded by a SMA2 buffer. See my next comment.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Yes

Please explain your answer (use locations where possible)

I am only familiar with areas adjacent to Alaska, so I did not weigh in except for the North, Scottie, and Matson SMAs, which I support because of their connection and impact to habitat in Alaska.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

Yes

Yes, and no. Allowing some development in an SMA 2 could be a slippery slope. Better to carve out the most important conservation areas and make them SMA1, with a buffer of SMA2 around it.

What advice do you have for the Commission as they develop the Recommended Plan?

Think carefully as to whether the 10-year review period is practical.

Survey ID# 711

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I live in Dawson seasonally (e.g. sometimes for work), Yes, I am a regular visitor to the Dawson Region

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? Yes

If so, what sector do you work in? Placer Mining

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Local business owner/operator"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

It takes into account a diverse variety of issues and concerns and tries to respond to them.

The things that are missing from the Draft Plan are...

Reclamation. If thresholds are going to be applied (and they don't have to be) reclamation must be considered.

The things I would change in the Draft Plan are...

Thresholds based on arbitrary values, seasonal closure windows in ISA areas despite a potential lack of animals, and assumptions that development is always negative.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

Spending time on the land, teaching my children about wildlife and nature on the land, following best practices on fuel storage, waste disposal, composting etc, and doing reclamation.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Not sure

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

It has to take into account additional structures being made through Successor Legislation. The concept is great but not if miners are taxed twice for the same thing.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Placer mining as a responsible part of the community

Do you feel that most of the things that matter to you were included in the plan?

They were covered although still very problematic in some places (wetlands, and LMU19 for example).

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĚK HWĚCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? Not sure

Please provide explanation

This is a bad question. The Draft Plan ATTEMPTS to achieve sustainable development, but there are some management directions that do the opposite of what they were intended. For example, the wetlands policy won't allow development even in an ISA4. Closure windows will stop business from working, even in an ISA4. Etc.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

As a non-TH citizen its not up to me to answer this, but I commend the Commission and from my perspective, I think they've done everything they can to ensure it does.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Placer mining either needs to be ok to continue under successor legislation, or not. The thresholds, the wetland rules, the closure windows: together they will make it unfeasible to operate and the industry will leave. This is a cumulative effect that is so often ignored.

Wetlands are important, but in ISA 3 and 4 areas, if water quality/quantity/flow are being met, this must be a value that is ok to change. If not, then end it all together, there isn't a way to guide this middle ground through Land Use Planning, that is the job of successor legislation (and frankly, by people with conservation goals talking to industry instead of campaigning against it).

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

Placer mining makes moose habitat, the roads people use to drive to get the moose, maintains water quality quantity and flow, creates jobs, puts SIGNIFICANT economic supports into the community, is NOT boom and bust, and is a collection of families that many live here for decades.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Not sure

This is a bad question, I think limitations are necessary, but there is only so much ground that CAN be placer mined - by cancelling the change to work there the whole industry will go. Protect other areas where there are no interest (ex LMU 1 and 4).

WETLANDS

What do you like or dislike about this the approach to wetlands?

Not much, other than I respect it was used as a starting point.

When considering development in wetlands, what impacts to your values are you most concerned about?

Placer mining sustainability, water quality, quantity and flow, and the ability to reclaim a peat wetland to a mineral one; or not?

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Disagree

Please tell us why you agree or disagree

LMU19 is actively worked, and there is a family that has been in Scottie Creek for a long time, they should not be moved out entirely, only restricted in their influence over wetlands.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

LMU1 and 4 - they are contiguous, untouched, natural, and do not sit on known mineral resources. Protect what we have that is already undisturbed, but don't limit the areas where development can occur.

Please tell us what you think about development in fens [choose one]

Development should be allowed to occur in fens (no limit).

Please explain your answer.

If an area is an ISA3 or 4, industry should be allowed to develop fens as needed to responsibly mine the resource, assuming excellent reclamation is completed. Fens are not rare, and miners don't want to disturb anything more than necessary.

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

There is a LOT of, essentially, park.

The things I feel the Commission got right about the land designations are...

They considered industry in designations.

The things I would change are...

LMU19, and management directions in others.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Yes

Please explain your answer (use locations where possible)

They limit everything.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

Unsure

Too restrictive in cases where there is known active development.

What advice do you have for the Commission as they develop the Recommended Plan?

Go High level. You cannot answer everything, but your guidelines will directly impact industry immediately (already happening) through the YESA process. If its too stringent (ex LMU19, or wetland thresholds, surface disturbance, reclamation techniques needed) no one will be able to get through the permitting process, that is already taking YEARS to go through and slowly killing industry. We NEED to be either welcome in an area or not.

Survey ID# 710

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I live in Dawson seasonally (e.g. sometimes for work)

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? Yes

If so, what sector do you work in? Mining, aviation

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Survey respondent"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

There is an actual plan

The things that are missing from the Draft Plan are...

Resource industry voice is muted in planning

The things I would change in the Draft Plan are...

Not close the percentage of land to staking

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

Don't make a mess mining operating as a responsible steward to the industry and the land.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

No

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

I see no options in the Trust that supports responsible resource extraction.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Continued access to the land for prospecting.

Do you feel that most of the things that matter to you were included in the plan?

Not at all, the resource industry's voice had little say in the plan. Example in the planning documents where mining is less than 10% of Dawson's economic base. This is patently untrue and doesn't represent the importance of resource extraction to the Dawson community.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? No

Please provide explanation

By closing over 40% of the land use planning area to staking or prospecting the future resource exploration is limited. There is no methodology in the stewardship plan to allows resource exploration.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

It would appear that resource extraction is not something that TH are interested in fostering or supporting in the land use plan.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

The Cumulative Effects Working Group had in their scoping documents specific instructions to include the resource industries in their planning. No industry input was part of the final report to YG.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

The regularity regime continues to restrict access to the land. Death by a thousand cuts has over 53% of the territory closed to prospecting. I value the free entry to the land for all and that value has been severely curtailed over the last decades.

Do you feel that the amount of human development should be limited to help maintain the things you value?

No

When there are limits to access to different classes of people dependent on intent, we as a community lose the economic and traditions associated with resource extraction.

WETLANDS

What do you like or dislike about this the approach to wetlands?

Dislike the complexity with the number and types of wetlands. How Duck Unlimited has become the de facto wetlands information provider. How wetland maps are not in the public domain. How the model utilized by DU ignores the permafrost aspects of wetlands. It has become a numbers game rather than an intent.

When considering development in wetlands, what impacts to your values are you most concerned about?

As a individual none, as a corporate entity the value of shallow water wetlands created by miners being equal to the original wetland.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Disagree

Please tell us why you agree or disagree

The change to the Scottie Creek wetlands had my Lesaux Creek project fall off the table. Investment went away.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

None

Please tell us what you think about development in fens [choose one]

Development should be allowed to occur in fens (no limit).

Please explain your answer.

The development of Fens where mining occurs is very small when measured against the total volume of Fens in the Yukon and in the Dawson region.

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

Miners might as well go home.

The things I feel the Commission got right about the land designations are...

Not a whole lot, whole regions were classified with little to no input from the resource industry.

The things I would change are...

Allow a method of exploration and claims in the closed regions that strikes a balance between stewardship and resource extraction.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

No

Please explain your answer (use locations where possible)

These are biased to stewardship with little to no voice or premise given to the resource industries.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

Operations in the Indian River Highlands will be curtailed.

What advice do you have for the Commission as they develop the Recommended Plan?

The base for much of this planning is a document the resource industry had little to no input on. This led to incorrect assumptions and a bias to towards stewardship rather than a balanced approach that accepted both resource extraction and stewardship

Survey ID# 709

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident, Yes, I am a regular visitor to the Dawson Region

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? No

If so, what sector do you work in?

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Ecological Expert"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

The boreal forest and taiga in the Dawson planning region are some of the last remaining intact forest and ecosystems in the world. Functioning as a massive carbon sink, the boreal is actively combatting climate change. These natural systems when connected and interlinked gift the human species with all that is needed to survive. That is if they remain intact. When landscapes become broken, the natural systems that sustain human life and livelihoods risk collapse. The Draft Dawson Regional Land Use Plan lays out important concepts and principles in its attempt to address competing interests across the landscape. These are: Community Stewardship; The Precautionary Principle; Adaptive Management; Landscape Connectivity; SMA I Designations; Sub-Regional Planning; and a Cumulative Effects Framework. Very important is the definition of sustainable development the Commission is working from.

The things that are missing from the Draft Plan are...

An interconnected system of strictly protected areas across the planning region's landscape.

Ecological connectivity North to South and East to West across the planning region.

More strictly protected conservation areas.

Caribou migration corridors that reflect herd ranges, sensitivities to disturbance and migration routes.

Equivalent attention to the challenges of migration routes for salmon as the plan does for caribou.

Indicators of linked social and ecological health (socio-ecological systems).

More definition about SMA IIs i.e. what is allowed where, when, by whom and how often. This is needed to create certainty for both conservation and development.

Increased clarity around the support for the co-management of LMUs with the Trêmondâk Hwâchâin.

The things I would change in the Draft Plan are...

In attempting to achieve the Plan's suite of goals, SMA IIs fall short in their contributions due to the amount of land without permanent protection (SMA Is). Key planning opportunities remain to ensure SMA Is are large and connected to other SMA Is, and SMA IIs are connected to SMA Is and other SMA IIs.

Greater emphasis on areas of strict no development and ecological connectivity is required.

Apply terrestrial and aquatic buffer zones against and around areas where the effects of human caused disturbances are anticipated to be high and the development is in proximity to areas of high conservation value.

The migration corridor for the Fortymile Caribou Herd needs to be larger (extended and widened). It needs to be connected to high conservation areas in all directions. Buffer zones adjacent to the corridor should be considered. Landscape connectivity that accounts for seasonal sensitivity needs to be assured.

Increase the amount of strictly protected lands (SMA Is).

Whether by ORV or other, a serious threat to the planning region's socio-ecological integrity is the proliferation of roads and trails. A significant contribution to increasing landscape connectivity and protecting ecosystems is managing the amount of linear disturbance attributable to roads and ORV use. Critical is limiting the building of any new all-season surface roads and applying necessary wildlife mitigations to any new roads.

Improve the cumulative effects framework with consideration of more no development zones, buffers, and increased landscape connectivity.

Advance the discussion about co-management of LMUs with the Trond's Hw'ch'in.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

Regular access to the outdoors to enjoy canoeing, hiking, snowshoeing, cross-country skiing and camping. I share my knowledge of backcountry travel with my family and grandchildren. I stay on designated trails, respect restrictions and look for opportunities to continue to learn about the land from others.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Not sure

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

It is a good idea that requires more discussion.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Ensuring the intactness of the boreal forest and taiga in the planning region so that the cultural integrity of the Trond's Hw'ch'in is ensured. In achieving this, all other values will be protected.

Do you feel that most of the things that matter to you were included in the plan?

Partially. The ideas are all there, most will benefit from a thorough discussion about what is "out of balance" and what "balance" really means. There is not enough strict protection for lands of conservation value. More areas need to be connected by ecological corridors.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? No

Please provide explanation

The Plan explains that it attempts to "strike a balance within the planning region between sustainable economic development and ecological conservation and socio-cultural preservation" (p. 14). The Plan assumes that economy, ecology and society are equally weighted. Two questions flow from this assumption: Firstly, what is out of balance? Secondly, should the environment, society and economy be equal in weighting?

Assuming the Plan regards economy, ecology, and society as equally weighted, scientific evidence clearly and strongly supports the conclusion that nature has been negatively affected by human-caused disturbances, putting nature out of balance with the economy and society. Consequently, in the equally weighted model, more attention is needed to bring nature into balance. Practically, this would suggest the Plan's overall zoning approach is one that attends to the necessary re-balancing through greater protection for land and water and less permissions for access and development.

The second question challenges the assumption of equal weighting. Contemporary scientific inquiry suggests that humans are part of nature. Inclusively, "the land" is what societies and economies rely on. Given the plethora of evidence, both scientific and Traditional Knowledge, that warn of the land's declining health, Commissioners may wish to examine how best to respond to these warnings. A key consideration is landing on an appropriate cumulative effects model with correctly calibrated indicators and confirming what is meant by balance.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondĖk HwĖch'in Final Agreement.

Climate change, biodiversity loss, and human caused disturbances, are making brittle the connections that keep natural systems healthy and sustain the fundamentals of life. In the north, these systems disruptions are amplified. Sustainability is no longer so much

about sustainable development. Rather, it is about sustainable biodiversity protection in a changing climate that is warming the Yukon.

The land's reduced resiliency, when put into context of the definition for sustainable development, "beneficial socio-economic change that does not undermine the ecological and social systems upon which communities and societies are dependent", found in Trond'k Hwāch'in Final Agreement, highlights the importance of the link between ecological and social systems. This human-environment connection acknowledges and reminds us that the land and the people are one and everything is connected.

The difficulty, challenge and opportunity over the life of the Plan are to mitigate global warming, slow biodiversity loss, and ensure socio-ecological connectivity. To achieve this, bold direction is required that controls and limits development and its infrastructure, in favour of conservation, protection and connectivity. One of the ways to address climate change, biodiversity loss and improve connection to nature is to protect nature. Land protected and connected, creates certainty for generations to come.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

A key principle that should be included in decision-making about the land is the principle of subsidiarity where the people most affected by the decisions being made should be involved in the decision-making. This drives the opportunity to learn together through different ways of knowing about the land. It also sets the stage for building respect, honouring the Truth and Reconciliation Commission's call for ongoing respectful relationships between Indigenous and non-Indigenous Peoples and offers opportunity toward reconciliation.

An important value is the special relationship the Trond'k Hwāch'in have with the land. While the Plan addresses this, it needs to be more prevalent throughout its writing.

The people - land connection as it relates to increased health and well-being for Indigenous and non-Indigenous Peoples is important to present more clearly.

Social science values are less detectable throughout the plan than are those associated with the natural sciences.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

Clean air, clean land, clean water, absence of garbage and litter, quiet, solitude, experiencing risk, seeing wildlife, seeing no one but those in my group, are examples of some of the values that have been affected by increasing numbers of people and development on the land.

Thresholds related to surface area and linear disturbances found in the Plan are insufficient to ensure that the evolutionary processes that have sustained the boreal forest, and species dependent on the boreal are not overwhelmed resulting in collapse. They also increase the likelihood of social values associated with wilderness experiences being negatively effected. Cultural values are also at risk due to increased fragmentation of the land.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes

If maintaining the boreal forest is key to keeping the land healthy, then significant threats to the land are, development, its fragmentation, and increased access to it by humans in numbers and ways that don't respect how much change the land can tolerate before it becomes unhealthy.

In Yukon's recent past, the Yukon was considered a frontier. It was a place of abundance: Abundance of resources, abundance of opportunity and abundance of plants and animals. Abundance as an idea functioned well in the absence of climate change and rates of biodiversity loss. Now, what is available to support nature and people in nature will not be sustainable without vigorous focus on: (1) minimizing and limiting the footprint and intensity of development to where development takes place. (2) Increasing the amount of land and water that is strictly protected and connected to other lands and waters that are strictly protected. (3) Returning and/or maintaining strong human connections to nature and natural connections within nature to secure the health of ecosystems, cultures, and social systems that support economies. Evidently, the land is no longer abundantly unbroken. Roads and other linear features associated with industrial development, tourism and outdoor recreation crisscross the landscape. Fragmentation of the landscape is not only the result of linear features greater than 1.5

metres in width. Hiking trails, cross-country ski trails, fencing and footpaths can result in changes to animal movement and serve as pathways for invasive species. The cumulative effects of all forms of linear disturbance are important to keep in mind and all forms of linear disturbance are necessary to monitor, measure, and track.

What many remember to be healthy forests from their youth has changed. Different animals are seen, forest sounds have changed, even the colours of the forest have shifted. Increasing global temperatures and more development over the last 60 years has resulted in fewer different kinds of plants and animals in the forest. What is deeply concerning is that what I remember as a healthy forest, was likely not as healthy as what my grandfather remembered. But I didn't know that. My perception of a healthy forest was already depleted. So too it may be that my children and grandchildren will experience a forest that is even more impoverished but will be "accepted" as healthy because of what is left.

A long answer to say, everything I care about in the natural world as I know it now, is at risk of being less if the trajectory of development, use and access, is not restricted. While sounding harsh to some, the idea of restrictions and concentration of uses to the smallest footprints possible, will result in more freedom to experience variety and diversity of nature by future generations.

WETLANDS

What do you like or dislike about this the approach to wetlands?

The efforts to restrict development in wetlands is important. Due to the rarity of wetlands in the region, wetlands are inherently valuable unaltered to the ecosystem. What is concerning is that access to and around wetlands can have negative effects on wetlands. There are just too many unknowns when it comes to wetlands that the risk of irreversible negative consequences is too great, particularly given climate change. It is the issue of proximity to wetlands that needs to be addressed. Buffers may prove helpful.

When considering development in wetlands, what impacts to your values are you most concerned about?

Clean water firstly but then relatedly, everything else; the entire ecosystem is changed when the wetland is developed in or nearby. As well, cultural integrity as a value must be considered which drives attention to values held by the Trê™ond'k Hw'chê™in.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Agree

Please tell us why you agree or disagree

Identified high values related to ecological and cultural integrity and their contributions to ecosystem health across the landscape.

Note that these two wetlands should be SMA Is.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

All wetlands require strict protection due to the uncertainty of negative and irreversible consequences. Some look to have additional values for consideration as a wetland of special importance.

LMU #11 (Flat Creek Wetlands). Increasing protection for LMU #11 improves ecological connectivity to LMU #10. Improved protection and connectivity for LMU #11 and because of its proximity to LMU #19 increases landscape ecological connectivity. However connectivity between LMUs #19 and LMU #11 needs to be addressed. LMU #19, #11 and #10 should all be SMA Is contributing to increasing the amount of strict landscape connectivity.

The wetlands found within LMU #21 White Tãdzan dã«k due to their contribution to maintaining an intact landscape into Alaska and few mining claims in the area.

Please tell us what you think about development in fens [choose one]

No development should occur in fens anywhere in the region.

Please explain your answer.

The application of the precautionary principle as it relates to wetlands, and specifically fens, is required. Water, and the protection of wetlands is of utmost importance because of the critical role water and wetlands play in delivering ecosystem services to human and non-human species. Understanding water quality, rates of flow and associated hydrological systems, is far from complete across the Yukon and the interactions between climate change, permafrost melt, water movement and changing water chemistry are too uncertain to risk irreversible harm. Until more is known, little should be done that could compromise the ecological integrity of fens and more broadly wetlands. It is critical to ensure hydrological connectivity and related biological integrity within wetland complexes are protected so that nutrient capture and flow remain uninterrupted or impoverished.

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

The map and description of the land designation system come across initially as useful. However, their usefulness becomes less clear once SMA IIs are reviewed in detail. The identification of the Fortymile caribou corridor reads promising but requires attention. SMA Is are well described and an important anchor concept. ISAs are also a good idea that need to be refined (vis-a-vis the cumulative effects framework). The Yukon River Corridor, the need for sub-regional planning and acknowledging transportation corridors are all good concepts. The use of the term "corridors" in so many locations may need to be addressed.

The things I feel the Commission got right about the land designations are...

SMA Is are well defined. The use of the designation of wetlands of special importance is helpful. The idea of ISAs is good (the use of the term stewardship is important). The ISA categories presented in the Plan reflect a gradient of use. This is an important concept to retain. The application of least intense land uses adjacent to areas of conservation value helps achieve landscape scale connectivity and socio-ecological resilience. They become less clear when cumulative effects thresholds, as defined in the Plan, are applied. The Fortymile Caribou Corridor is critically important as is the need for other landscape connectivity designations.

The things I would change are...

All the SMA IIs should be SMA Is. SMA Is must be large and ideally connected to other SMA Is. Therefore, to improve connectivity and socio-ecological processes across the planning region, where there is an absence of active mining claims or few claims in number, assign higher levels of protection.

The degree of permitted development within SMA IIs and ISAs will likely result in a reduction of ecosystem health and ecological integrity, particularly when considering climate change factors. Greater emphasis on areas of strict no development and ecological connectivity is required.

The migration corridor for the Fortymile Caribou Herd needs to be larger (extended and widened). Splitting the LMU into two zones in an attempt to allow development and protect migration routes creates a circumstance where the likelihood of impaired movement remains due to the proximity of human-caused disturbances to the herd. The Corridor (and the herd) need to be connected to high conservation areas in all directions.

With the above in mind, convert the Corridor to an SMA I that includes portions of White, Tãdzan dãk (LMU #21), Fortymile River Chãdãhdãk (LMU #15), Swede Creek (LMU #16) and the Northern portion of the Sixtymile Khel dãk (LMU #17). Buffer zones adjacent to the corridor should be considered. Landscape connectivity that accounts for seasonal sensitivity of the herd needs to be assured.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Yes

Please explain your answer (use locations where possible)

So much so that where SMA IIs are identified in the Plan, consider re-designating them as SMA Is. If SMA II zoning is continued, more definition about what is allowed where, when, by whom and how often, is needed to create certainty for both conservation and development.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

In attempting to achieve the Plan's suite of goals, SMA IIs fall short in their contributions due to the amount of land without permanent protection (SMA Is). It is not clear how disallowing legal designation and allowing continued development meets the intent of the zoning. The degree of permitted development within SMA IIs and ISAs will likely result in a reduction of ecosystem health and ecological integrity, particularly when considering climate change factors. Key planning opportunities remain to ensure SMA Is are large and connected to other SMA Is, and SMA IIs are connected to SMA Is and other SMA IIs. Greater emphasis on areas of strict no development and ecological connectivity is required. For example, SMU # 19 the Upper Indian River Wetlands. Here, The suite of changes necessary to achieve both protection and development goals for the LMU involve, higher order protection for cultural and conservation values; resolving its disconnection from other conservation zones; recognizing the high degree of uncertainty about how ecological factors interact with each other; and acknowledging that climate change and its effects on wetland complexes is unknown thereby creating more uncertainty.

Ideally, the LMU should be recognized as an SMA I to reflect the importance of this portion of the more extensive wetland complex of which it is a part. Resolving its isolation from other areas of conservation values, regardless of SMA designation, is through the application of ecological corridors. For example, connecting LMU #19 with LMU #11 (Flat Creek Wetlands). When connected with LMU #19 and if its zoning remains an SMA II then its cumulative effects threshold should be the lowest possible (i.e. ISA

Zone I). The recommendation in the Plan is the cumulative threshold is that of ISA II. This is inconsistent with the conservation and cultural values associated with the LMU.

An easier resolution to the challenge of connectivity is to combine LMU #19 with LMU #11 (Flat Creek Wetlands) and LMU #10 (Upper Klondike an SMA I) and organize the management direction within the larger LMU to protect the cultural and ecological resources of these high value areas.

What advice do you have for the Commission as they develop the Recommended Plan?

The draft Dawson Regional Land Use Plan admirably considers the many competing interests in the planning region and describes a possible future for the Dawson region. The Plan presents a number of critically important concepts that lay the groundwork to achieve sustainability of nature and support development.

The Plan will benefit from increasing the amount of land that is strictly protected and ensuring these areas are connected to other large protected areas through ecological corridors. This all can be achieved by re-calibrating from where “balance” is found, sharing power and decision-making with First Nations, and learning together.

Yukon’s unique governance arrangements as described in the Tr’ondëk Hwëch’in Final Agreement requires that sustainable development “does not undermine the ecological and social systems upon which communities and societies are dependent”. To honour this commitment it is absolutely essential that the Dawson Regional Land Use Plan’s first priority be conservation. This not because development isn’t important, it is because without healthy land, societies and economies will not succeed.

To improve and maintain the resilience of the land and ensure the peoples who rely on the land for their culture and livelihoods water needs protecting; large areas of land need to remain undeveloped; and across the landscape, animals need to be able to move without restrictions or barriers. Where development occurs, it needs to be as light as possible with as small a footprint as technology, design and planning can achieve.

With these imperatives in mind, there is greater likelihood that the definition of sustainable development, found in the Tr’ondëk Hwëch’in Final Agreement will be realized. Reviewing the cumulative effects framework will prove central to addressing ecological connectivity and socio-ecological systems.

The Plan's recognition of community stewardship over management as a guiding principle significantly influences the direction taken by the Plan. The Commission's thinking about how stewardship, shared by all, can be put into practice reflects needed shifts in approaching responsibility for the land. The idea of "Integrated Stewardship Areas" (ISAs) as LMU designations further demonstrates the degree to which the Commission applied the idea of community stewardship. It may be necessary to review where in the Plan the term "management" is used so that the distinction between "stewardship" and "management" is maintained.

The Plan advances the concepts of cumulative effects and adaptive management. Both contribute to ecosystem management. A great deal of what is central to the Plan relies on monitoring and tracking. The Plan is absent comment on the resources needed for monitoring and tracking. To estimate costing it will be useful for the Commission to describe monitoring programs including tracking frequency, and identify lead responsibilities (e.g. Canada, Yukon, First Nations governments, non-government organizations).

One of the most important and far reaching concepts presented in the Plan is landscape connectivity. Broken landscapes interrupt the gene flow of wild species, impede their natural movement, and stress plant communities that require regeneration that comes from connectivity. The Commission's recognition of the adjacency of existing or proposed protected areas in the Yukon and Alaska is as important for connectivity as is the Commission's efforts to ensure connectivity across the Planning Region for caribou and salmon. The identification of the Fortymile Caribou Corridor and attention to salmon and their spawning, rearing and migration routes, reflect the Commission's attention to this critical planning issue.

The Commission's support for areas of "maximum conservation" and where "no new industrial land use or surface access is allowed" (p. 30) marks an important tool to ensure the continue health of the land and protection for cultural values. SMA Is are critical to achieve the Commission's vision for the planning region.

Generally, Increasing the number of LMUs that include SMA Is, strictly protecting wetlands, and delineating ecological corridors, will strengthen the Plan.

The Commission is encouraged to examine what increased protections might be made to ensure the health of the Fortymile caribou herd. Protecting the herd is a critical goal that must be achieved.

Lastly, an important consideration for the Commission is to re-examine what balance and sustainability mean given climate change, biodiversity loss and the sacred cultural connections to the land held by the Tr'ondëk Hwëch'in. This examination may

lead to further elaborating on co-management of LMUs with the Trê™ondÃ«k
HwÃ«chê™in.

Survey ID# 706

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? Yes

If so, what sector do you work in? government

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Dawson Resident"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

All key concepts-caribou protection

-access (limited and careful new rd construction

-wetlands

-stewardships

-mineral development

The things that are missing from the Draft Plan are...

importance of preserving freshwater environments and future technology initiatives re:
freshwater recycling, refining for next generations

The things I would change in the Draft Plan are...

N/A

STEWARDSHIP

I see myself as a steward of the land Somewhat

The different ways that I take care of or connect to the land are....

-hunting, trapping, fishing,
-respect the environment
-

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust
do not know enough about trust to comment. Good initiative moving forward and will provide opportunities for locals to get involved

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

caribou/moose/fish available as a means of subsistence for licensed hunters

Do you feel that most of the things that matter to you were included in the plan?

mostly. I think YG Dawson regional bio's are doing a good job managing populations, but as with caribou it has been challenging meeting the requests of AK/YFN as a collaborative harvest strategy. In recent years we have seen small scale openings for license hunters which is a start

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĚK HWĚCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? Yes

Please provide explanation

by consulting with all involved stakeholders and making responsible decisions based on management, traditional and cultural requests into planned sustainable development

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

N/A

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

views of locals (trad/local knowledge)

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area currently works. Continue sustainable development.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes

if we do not value the land then why are we living north of 60? If I want development I would move to an urban environment. there is room for development here, but do not want to see it exceed natural resource values.

WETLANDS

What do you like or dislike about this the approach to wetlands?

Like:

No development in bogs or marshes across the whole region

No development in bogs, marshes, and fens in Special Management Areas

Consideration of some level of development in fens in Integrated Stewardship Areas

Development that occurs in wetlands in the Region should be avoided where possible and reclaimed to the highest standard reasonable after activity is complete.

When considering development in wetlands, what impacts to your values are you most concerned about?

the overall complexity and service it provides for local flora/fauna

-cannot be reclaimed.

-mine around important wetlands

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Agree

Please tell us why you agree or disagree

big and important

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

Km 0 dempster up to km 18

Please tell us what you think about development in fens [choose one]

No development should occur in fens anywhere in the region.

Please explain your answer.

Fens are peat-forming wetlands that rely on groundwater input and require thousands of years to develop and cannot easily be restored once destroyed. They can mine around them!

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

easy to read and reference

The things I feel the Commission got right about the land designations are...

N/A

The things I would change are...

N/A

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Yes

Please explain your answer (use locations where possible)

N/A

Is the SMA2 designation appropriate to protect key values? Please explain your answer

Yes

N/A

What advice do you have for the Commission as they develop the Recommended Plan?

continue to listen to people

Survey ID# 705

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? [Other...](#)

If not, where do you live?

Are you a member of a Yukon First Nation? [No](#)

Do you work in the Dawson Region?

If so, what sector do you work in?

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

[My comments can be public](#)

How would you like to be identified in this survey? (for example "Quoted from a ...")
["Industry Specialist"](#)

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

I agree with the vision of the Commission to try to strike a balanced approach of habitat preservation and land-management while supporting continuation of existing economic and industrial activity in the region. There are many challenges associated with the DRPC's mandate, the scope and the many years of work that have culminated in the 2021 DRLU Draft Plan.

As this plan is part of fulfilment of the Â§11 (Land Use Planning) of the Umbrella Final Agreement (dated July 16, 1998), I feel grateful to be part of the discussions for planning the future and the stewardship of land management and resources of the Dawson Region in Trê™ondÃ«k HwÃ«chê™in (THFN) Traditional Territory.

The things that are missing from the Draft Plan are...

Recognizing the documents are first drafts, the intention is nonetheless to utilize these documents as the basis for refining, developing, and finalizing a more balanced and defensible Regional Land Use Plan. There are few key issues I feel weren't addressed adequately in the Draft Plan:

The methodology described in §1.6.2.5 (Priority Criteria for Candidate Conservation Areas) do not appear to always match Draft Land Management Units (LMUs) and currently proposed Land Use Designations (LUDs) consistently. Based on the methodology described in the Draft Plan, high-protection LMUs should be defined by high-density overlap of high-value features, such as habitat and heritage, and thus result in a more restrictive LUDs. High potential economic areas with lower heritage and habitat values should be classified as less restrictive LUDs.

Some high protection LMUs, such as LMU 19, partly or wholly enclose areas of high historic and current placer and hard rock mining activity. These areas have significant potential future economic value, have extensive mining claims within them and have already seen substantial disturbance. Designating these areas as high protection LMUs will result in land use conflict and the potential need for economic compensation to mineral rights holders. These areas should be recognized for the current and future economic value and placed into more appropriate LMU designations. The Draft Plan does not appear to draw from the referenced Land Use Planning Conservation Thresholds (Environmental Law Institute, 2003). Threshold values presented are very low compared to other land use plans in comparable sub-arctic, low-density populated areas and particularly relative to ecologic thresholds from scientific studies which generally indicate threshold preservation of >60% of habitat or perhaps 80% for rare species. This compares with preservation of 95%, 97.5% and 99% of habitat for the high, medium, and low development LUDs that are proposed. It is unclear in the Draft Plan if the Cumulative Disturbance Thresholds are based off Ecological derived habitat needs or are more arbitrary Management thresholds.

On October 12th 2021, the DRPC released 'Analysis of "Current" Disturbance Levels'. The outdated 2014 dataset provided was indicated to be the result of a lack of information, however figures from the document show recent satellite images mapping disturbance. If current disturbance levels are not defined, how can thresholds be proposed for each land management unit, especially if the thresholds are arbitrary management levels and not based on habitat needs or species criteria?

There is currently no implemented monitoring of disturbance or impact assessment in the Dawson Planning Region.

Lastly, it appears that there was no significant mineral industry input in the creation of the Draft Plan despite that it being the largest single economic contributor to the local economy.

The things I would change in the Draft Plan are...

- (1) Increase total area under protection with high value heritage & habitat resources and decrease designations in areas with significant pre-existing development, mining, industrial and economic activity that have lower heritage & habitat values:
 - Increase areas under SMA 1 Land Use Designation with high value heritage & habitat resources from 3.8% to 25%; and
 - Re-assign ISA designations to specific LMUs in areas with significant existing development (mining, industrial) that are outlined as having lower heritage and habitat resource values.
- (2) Simplification of the number of Land Use Designation classes to allow for clearer regulatory implementation:
 - Removal of ISA 1 Land Use Designation resulting in three (low, moderate, and high) ISA classes
 - Removal of SMA 2 Land Use Designation for clearer policies regarding high levels of protection
- (3) Assess the current levels of cumulative disturbance, implement monitoring, and utilize predictive ecosystem mapping to establish science-based ecological habitat disturbance thresholds for the regional planning area while taking into consideration current disturbance levels and future activities. This should facilitate management of monitored disturbance and encourage concurrent reclamation under the current land use permit regime.
- (4) The Mining industry generates significant economic benefits for communities that are often not well understood. Sustaining a healthy mining industry is key for the economic security of the Planning Region as the single largest non-government economic sector. It is recommended that within the current DLUP working groups that at least two (2) experienced individuals are nominated by the placer and hard rock industry to assist with the refinement of the next phase of the Plan.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

Utilize best industry practice and strive towards zero net disturbance utilizing concurrent reclamation

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Not sure

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

The Dawson Land Stewardship Trust could promote stewardship of the land between all stakeholders in creative ways. However, it should not become another regulatory body that delays permits, licenses and activities on the land, nor should it charge costly fees that further cause financial burden to land users. Providing clear examples of how integrated Stewardship Practices could take place to support connectivity of stakeholders and land-users by providing examples for potential research opportunities to educate stakeholders with little knowledge about other value-systems and providing policies to educate and implement sub-regional plans. And most importantly, ensuring a bright future the Region and its inhabitant through the fulfilment of the Â§11 (Land Use Planning) of the Umbrella Final Agreement for Trâ€™ondâ€™k Hwâ€™châ€™in First Nation.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

That the Regional Land Use Plan fulfils of Chapter Â§11 of the Umbrella Final Agreement in a way that honors Trâ€™ondâ€™k Hwâ€™châ€™in (THFNâ€™s) outlined heritage & habitat values. That the Land Use Planners and Commission utilize key value systems (Habitat, Heritage and Economic) to strike a balanced approach of habitat preservation and land-management while supporting continuation of existing economic and industrial activity in the region for generations to come. That the Region hosts integrated stewardship and research opportunities that bridge the gap between land users from various backgrounds to work together to create best management practises that pave the way for a bright future.

Do you feel that most of the things that matter to you were included in the plan?

The Vision and Plan Goals in the Draft Plan do work towards honouring the fulfillment of Chapter 11 in the UFA. However, at present it is unclear how the DLUPC arrived at the currently proposed land use designations and associated thresholds.

The methodology is unclear, and I believe the current plan could result in not fully meeting the mark for conservation nor preservation of a vibrant economic future. The methodology described in Â§1.6.2.5 (Priority Criteria for Candidate Conservation Areas) do not appear to consistently match Draft Land Management Units (LMUâ€™s) and currently proposed Land Use Designations (LUDâ€™s). Based on the methodology described in the Draft Plan, high-protection LMUâ€™s should be defined by high-density overlap of high-value features, such as habitat and heritage, and thus result in a more

restrictive LUDs. High potential economic areas with lower heritage and habitat values should be classified as less restrictive LUDs. It does not appear that this methodology was consistently followed throughout the draft plan.

Additionally, it is unclear how integrated stewardship practises will be facilitated to result in meaningful assessment on how the Land Use Plan is managing balancing the key values outlined. With no monitoring or adequate ongoing predictive modelling that factors in all potential factors affecting the ecosystems and economy, it is unclear if the plan will be effective.

It is important to note that despite the fact that the mineral industry is the largest non-government contributor to the region outside, there appears to have been no one in the DLUPC with significant experience in the placer and hard rock mineral industry.

If a LMU is approaching its critical cumulative disturbance threshold, it is my understanding that YESAB and YG will not approve any additional permits. How this will be addressed is not made clear and there should a defined streamlined process outlined what will occur to mitigate potential socioeconomic impacts. Will this result in triggering correspondence with land users in this LMU to begin to progressively restore historically disturbed habitats to ensure that economic activities can continue?

Does progressive reclamation get factored back into the cumulative disturbance threshold accounting? With the approach that has been taken in the study with tracking the levels of disturbance it is critical that restoration in wetland and non-wetland areas be credited back towards the disturbance accounting to ensure a long-term sustainable mineral industry. A near-net zero disturbance accounting should be the goal of the plan in economically developed areas.

It is also unclear how the various implementation bodies will work together or how their capacity will need to increase. It is very important that the current regulatory regime be utilized (e.g., mining land use permits) as they work to incentivise on-going continuous reclamation and tracking of disturbance.

Also, it is critical that while the plan is being refined and implemented the stability of the economy may continue and that the permitting process for projects in ISA LMUs for mining, forestry and agriculture be allowed to continue utilizing the existing land use permit system and that new economic investment is not frozen for the region.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? Not sure
Please provide explanation

Plans to maintain the economic health of the region are not discussed in detail. Management intent is unclear throughout the document and certain proposals could have far reaching negative economic impacts on the region.

THFN's 4.1.9 and 4.3.3 on Traditional Economy recommends buffers and avoiding or reducing the level of land-use activities in areas identified as having cultural value. Map 5 (Appendix A) shows virtually the entire area as having traditional-use value. These areas need to be better defined so that it is not unclear what exact areas are being referred to and what this would mean for stakeholder-use in the entire planning area.

Sustaining a healthy mineral industry is key for the economic security of the Planning Region as its single largest economic sector. While this natural resource has been developed in the region for over a century, many placer deposits have been depleted in the heavily developed areas. While there are opportunities to reclaim and restore these historically disturbed areas, the industry will continue to move into adjacent prospective areas that share the same geologic settings. This movement into adjacent areas needs to be accommodated to allow for a healthy placer mining industry and regional economy. For instance, in LMU 12 the natural progression is to move further eastward to the Upper Indian River (LMU 19), which has same geological setting, and is demonstrating comparable economic placer values. This area is the economic future for the Klondike Goldfields and shutting it down from development would be a significant economic loss to the region.

Though the focus in LMU's such as 12 and 19 have mostly been on placer mining, these areas are also highly prospective for future hard rock developments - as the source of the alluvial gold. Accommodation should be made for such future potential in these areas.

As discussed, a sustainable mineral resource economy is key to ensuring long-term socioeconomic health of the Planning Region. The Mining industry generates significant economic benefits for communities that are often not well understood. A substantiated figure used in the mineral industry shows that typically every dollar spent in mining generates \$5 in the local economy including indirect supporting industries & local-work force (hotels, restaurants, equipment sales and maintenance, supplies, fuel, etc.). A recent PWC report showed similar multiplier value relates to jobs supported by indirect and induced economic activity. This study of mining related jobs in British Columbia indicates that for each (1) mining related job, 4.6 indirect, or induced, jobs are created. The DLUP Resource Assessment Report does not accurately reflect economic contributions from these types of economic activity.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

Chapter 11.4.1 (Regional Land Use Planning Commissions) of THFN's UFA states: "Government and any affected Yukon First Nation may agree to establish a Regional Land Use Planning Commission to develop a regional land use plan."

I do believe that this is meeting the Objectives of the UFA. However, it is my belief that the current plan as currently proposed is not truly balanced to ensure both the conservation goals and the socioeconomic future for generations to come. Also, as this plan will set the tone for future land use planning and inspire other Yukon First Nations and Land Use Planners, this is an opportunity for showing a balanced vision for the Yukon Territory and its future.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Ultimately, I am grateful to be included in the discussion to be involved and recognize just how much work and commitment the Commission and Staff have put in and that they made themselves available to discuss and address questions across the Territory through numerous meetings and workshops.

However, it is my opinion that more time and information are required to properly assess and comment on this important Regional Planning framework as it will set the tone for future land use plans in the Territory. I hope that there is adequate time to review and address all of the responses made to the Draft Plan and that an updated draft will be released for review to allow for further refinement ensuring the final plan outlines a balanced approach that can be implemented and revised as needed.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

Roads and infrastructure are important for economic prosperity, however in high-value habitat and heritage areas access should be managed to minimize impacts to wildlife or cultural resources.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Not sure

I believe that development should be limited in areas of high habitat and heritage values and sustainably managed in areas that have the ability to provide economic vitality for future generations and have lower habitat and heritage values.

It is unclear in the Draft Plan how the proposed Cumulative Disturbance Thresholds were created as there is currently no implemented monitoring and the current levels of disturbance are not fully known. Lastly, without basing the disturbance thresholds on sound science for healthy ecological habitats, it is unclear that the Plan would be effective as proposed in managing development in a way that ensures both a bright economic and ecological future.

I think that it is imperative to assess the current levels of cumulative disturbance, implement monitoring and utilize predictive ecosystem mapping with science-based ecological habitat disturbance thresholds for the regional planning area.

I recommend the formation of an objective special technical working group who can advise on suitable disturbance thresholds to ensure the integrity of key values (ecological habitat and heritage) whilst allowing for sustainable economic development.

Additionally, the current level of high-level protection only equates to 3.8%. I believe there should be fewer land use designation classes to ease implementation and that more areas should fall under full protection where numerous key values overlap/are concentrated. Conversely, areas that are already disturbed should be able to continue economic development, with the creation of approved restoration guidelines and best management practises in wildlife key areas, to allow for responsible development (ex: LMU 19).

WETLANDS

What do you like or dislike about this the approach to wetlands?

The Plan states that effective restoration of wetlands is impossible. This contrasts with the surface disturbance recovery objectives (Â§3.5.1.1, page 38). I believe that the goal should be implementing consistent restoration practises for disturbed wetlands regardless of which LMU they are located in to ensure wetland function and habit are maintained.

The inconsistent policies regarding disturbance of wetlands and view that restoration of functional wetland habitat is effectively impossible negates the incentive for land-users to implement best possible management practices in reclamation efforts. It is imperative for maintaining function of these ecosystems that wetland restoration policy encourages incentivized restoration efforts. Disturbances in wetlands would see little industry investment if the messaging presented is discouraging towards restoration of wetland function.

There are many projects across Canada that have demonstrated that effective restoration of wetland function and habitat can be achieved. We should be striving for the same in the study region.

When considering development in wetlands, what impacts to your values are you most concerned about?

The outlined thresholds could have serious economic development consequences (particularly to placer mining which occurs in wetland areas) and the use of arbitrary thresholds introduces a high degree of uncertainty and low confidence that the results of cumulative effects on wetlands would be meaningful and result in effective management and land-use decisions.

Undisturbed wetlands with high ecological and heritage value but low economic potential should be prioritized to ensure both habitat and important hydrologic functions are maintained. Prioritized wetlands should be given an SMA 1 designation (ex: Flat Creek Watershed).

In areas with significant historic, current, and future economic activity disturbance to wetlands should be managed by installation of guidelines which outline practises to maintain wetland function. Permitting guidelines utilized in the hard-rock sector could be extended to the Placer industry to ensure a unitized approach to disturbance encouraging concurrent reclamation. This would ensure threshold levels are not reached, prevent a rush of disturbance in any given LMU, work with the current regulatory process, and is a form of integrated stewardship.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? [Disagree](#)

Please tell us why you agree or disagree

LMU 19 (Upper Indian Wetland) is comprised of approximately 10% wetlands, is an active economically developed placer area and has unknown levels of disturbance within these wetlands. The Regional Plan area also has 10% total wetlands. So, it is unclear why the Upper Indian River watershed was designated based primarily on its wetland value and currently has an SMA 2 designation. There are nearly 1,200 mining claims with 34 operators in this area and the area is fully surrounded by LMU 12 which is designated for the highest level of disturbance. This area has the same geologic setting as the lower Indian River and operators are seeing the same level of economic gold values. This area should be exchanged for the southern upper Flat Creek watershed that is similar in size, drains into the main Flat Creek watershed that has been proposed for a high level of protection and has very little to no mineral development activity (see further comments on Flat Creek below).

Similarly, the Scottie Creek wetlands (LMU 22) are centered towards the south of the currently proposed LMU. The northern portion of this LMU has seen extensive historic and current hard rock and placer exploration (i.e., it has been disturbed). This LMU could be trimmed around these active camps and be given an SMA 1 designation in the southern section to ensure full future protection.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

The Flat Creek Wetlands LMU, is currently proposed as a relatively small LMU at 367.77 km². This wetland borders SMA 1-designated Upper Klondike LMU, has considerable coverage by the Tintina Trench Flyway and a large area of waterfowl habitat. Significant placer-mineral potential has been identified on tributaries of Flat Creek to the northwest, however, this wetland is relatively pristine and undisturbed and has very little current mineral development activity. It is proposed that the designation be increased to SMA 1 and the LMU area could be enlarged to allow a wider buffer for migratory bird habitat and wetland protection by including the upper southern watershed boundary, which is larger than LMU 19.

Please tell us what you think about development in fens [choose one]

Development should be allowed to occur in fens (no limit).

Please explain your answer.

Development should be allowed in fens within ISA LMU's with appropriate reclamation and restoration.

The Federal Policy on Wetland Conservation describes no net loss of socioeconomic or ecological wetland function and restoration of wetland function has been demonstrated globally on various projects. Therefore, it is recommended that criteria be developed for habitat and functional wetland restoration that is consistently utilized in the Planning Region to ensure the spirit of the federal policies on wetland restorations are met.

It is imperative for maintaining function of these ecosystems that wetland restoration policy encourages incentivized restoration efforts, otherwise disturbances in wetlands would see little industry investment if the messaging presented is discouraging towards restoration of wetland function.

Creation of wetland restoration policies outlining acceptable industry practises are required to provide a clear path for economic development in regions within, and proximal to wetlands (i.e., placer mining, road management). Policies concerning wetland restoration should be consistent regardless of LUD and should be standardized for

consistent stewardship in the Planning Region and follow sound scientifically based criteria for the restoration of wetland function and habitat.

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

There has clearly been a considerable effort put into the Land Designation System and clearly it reflects many THFN values. However, I think that the transitions from higher-protection LMU's to higher-development ones should be more gradational to avoid habitat fragmentation. Higher protection LMU's should logically cover areas with high habitat and/or high cultural values. Areas with high economic potential and lower habitat and cultural heritage values should allow for future economic development with corresponding higher disturbance thresholds, with such thresholds based on sound scientific studies for species and habitats.

The things I feel the Commission got right about the land designations are...

The vision and spirit behind the land use designations and in general the boundaries to land management units are logical. In particular, defining future planning areas for complicated land management units and corridors that cover such numerous land usages was wise to allow for timely implementation of stewardship over the region.

The things I would change are...

Reduction of Land Use Designation classes to a singular special management area (SMA 1) and three Integrated Stewardship Classes (low, medium, and high) would allow for simpler implementation, reduce the effects of habitat fragmentation, and create clearer land use designations. In addition, it may allow for a considerable increase in fully protected areas if some currently designated SMA2's become SMA1's and some large LMUs are divided to pull out areas of high overlap of key value features and given an SMA1-designation. A few SMA2's with significant economic value but lower habitat and heritage value such as LMU 19 should be designated as ISAs. LMU 23 and 24 should have a singular LUD to allow for ease of implementation and LMU boundaries should consistently utilize unmistakable features, such as a watershed boundary or a river, to ensure cross-boundary land users don't inadvertently mistake which LMU they are in.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Unsure

Please explain your answer (use locations where possible)

SMA2 should be eliminated as an LUD with high habitat and heritage areas moved to SMA1 for full protection and areas with lower habitat and heritage value but high economic activity moved to an ISA LUD.

LMU # 1: It is recommended that LMU#1 be divided into two smaller Land Management Units with the northern half being designated as SMA1 to protect the high overlap of key value features in a large undisturbed area. If industries do not feel they can economically explore or mine established areas, they will go to areas with lower designations that have seen little disturbance.

LMU#4 has very high ecological habitats (ex: vast Tintina Trench Flyway), a high proportion of First Nation Settlement Lands and shares a border with Tombstone Park. This is an excellent opportunity for a sizable high-preservation area (SMA1).

LMU # 11: The Flat Creek Wetlands LMU #11, is currently proposed as a relatively small LMU at 367.77 km². This wetland borders LMU #10 which is SMA1-designated, has vast Tintina Trench Flyway and waterfowl habitat. The Flat Creek wetlands are relatively pristine and undisturbed. This LMU should increase in size by including the southern boundary of the watershed and be given an SMA1 designation which would create a vast fully protected area with LMU 10.

LMU #19: Balancing conservation efforts with preserving a strong economic future could be accomplished through removing three undisturbed watershed areas within LMU 12 to allow for water quality and aquatic health monitoring at their confluences with the Yukon River and expansion of LMU 11. As stated above, the undisturbed Flat Creek Watershed could be increased in size to an area slightly larger than LMU 19 and given an SMA 1-designation for full future protection (southern Flat Creek watershed). In addition, these changes would allow for increased conservation of undisturbed wetlands whilst allowing for continued economic development within LMU 19 which has unknown levels of disturbance within wetland areas and an established strong economic future. An SMA 2 designation of LMU 19 could result in significant land use conflicts, loss of a major economic growth zone for the goldfields and thereby impact the socioeconomic conditions for future generations, the need for significant economic compensation for the 34 mineral rights holders with 1,200 claims in LMU 19, and push Industry into undeveloped LMUs with higher concentrations of key value features.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

The Plan defines Special Management Areas (SMAs) as conservation areas identified requiring high levels of conservation. However, despite all of the ecological and heritage values described, the Plan currently only fully protects 3.8% of the Planning Region. This

could be an opportunity to ensure the long-term protection of high value ecological and heritage areas of the Region.

Reducing to a singular Special Management Area could result in a larger fully protected areas. The SMA 2 designation currently outlines that disturbance is to occur only in connection to existing surface and sub-surface rights; however, disturbance thresholds align with ISA I or II depending on the LMU. So, it seems more logical to simplify the Plan by removal of SMA 2. Areas with SMA 2 designations which overlap key value features and have seen little disturbance, should be placed into SMA 1 and areas with significant defined economic potential be placed in ISA classifications. This would ensure no precedent is set by the effective removal highly prospective areas.

What advice do you have for the Commission as they develop the Recommended Plan?

I believe that more time and information are required to properly assess and comment on the Plan. A second comment period is suggested to allow adequate time for reviewing all the response submissions and a publicly released updated draft is required. As the mineral industry is a huge economic driver in the Planning Region, I recommend that within the current DLUP working groups that at least two (2) experienced individuals are nominated by the placer and hard rock industry to assist with the refinement of the next phase of the Plan.

Implementation of monitoring of disturbance (or impact assessment) in the Dawson Planning Region needs to be completed and should occur alongside predictive ecosystem modelling to evaluate the effectiveness of the management directives. This will also ensure thresholds are science-based so long as it incorporates numerous ecological parameters (including snowpack, fire activity, tourism, etc.) and doesn't exclusively single out industry. It is unknown what the drivers for potential population decline are for key wildlife species, so while completing modelling, population, and associated reproduction rate monitoring of species in undeveloped and developed areas should be evaluated to inform modelling and implementation of key directives for land users.

Implementation is key to the success of the Regional Land Use Plan. As numerous parties are responsible for implementation, roles and responsibilities must be clarified. To facilitate streamlining the process and ensure plan conformity, it is recommended the policies and special management directives align with the current regulatory regime so that continued economic development may occur in the interim.

Lastly, it is critical that while the plan is being refined and implemented that the stability of the economy may continue and that the existing permitting processes for active projects in mining, forestry and agriculture be allowed to progress in ISA designations utilizing the existing land use permit system. A freeze in the permitting process in these LMUs could unnecessarily shut down new economic investment in the region.

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Survey ID# 704

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? [Other...](#)

If not, where do you live?

Are you a member of a Yukon First Nation? [No](#)

Do you work in the Dawson Region?

If so, what sector do you work in?

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

[My comments can be public](#)

How would you like to be identified in this survey? (for example "Quoted from a ...")
["Yukon Resident"](#)

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

[emphasis on conservation \(albeit, I would like to see that strengthened\).](#)

The things that are missing from the Draft Plan are...

A more appropriate application of Adaptive management (AM). The current description of this approach to management is far too loosey-goosey. AM should be used where there are key issues of conservation and/or effects of resource development are not well understood, and so AM is an approach to use for explicitly designing management to TEST different hypotheses that exist for addressing testable management goals, over a specific period of time with well developed management experiments that are controlled. Depending on the outcome of the management experiment, policies and regulations would then be applied to change what is allowable, or not. This concept needs to work in conjunction with the precautionary principle, whereby if the uncertainty is too great, or the possible consequences are unacceptable, then adaptive management (or any allowance of the activity) should not be okay'd.

The things I would change in the Draft Plan are...

Stronger use of adaptive management concept. Increased protection for caribou, including NOT honouring existing mineral tenure in SMA 2 regions. Honouring existing mineral claims is problematic, if the full spectrum of development may be realized in certain areas. Thresholds should be established to limit the amount of road construction, and/or ground disturbance at any one time in most regions.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

respect all life. I think it is important to consider the often spoken of land ethic of; "Take only what you need, use all that you take", needs to be taken further. Much of what is taken from the land is NOT "needed", and we can live well by using less and living more simply. This plan can play a role in working toward this vision.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

Needs to have teeth. Needs to have industry funding through increasing resource royalty regime (way outdated!!!). Government may also increase its useable revenue by reducing industry tax breaks and incentives for exploration and mining.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Conservation. Improving First Nations land stewardship and empowerment (devolving of government powers to First Nations)

Do you feel that most of the things that matter to you were included in the plan?

Yes, in a general sense, but I do believe the plan would be improved by being far more explicit and with stronger statements about what can or cannot happen. I do think many of the management recommendations are potentially too aspirational and general and fear Government may accept the general language but not deliver on this. Territorial Government needs to be accountable to delivering on the plan. Given there is a gap in Treaty Implementation (i.e. Chapter 11 envisions the continued existence of Commissions for compliance and conformity checks, interrelationship with YESAB, per Chapter 12), I would strongly recommend that some form of independent auditing may happen. I do not think the central YLUPC is in a good and sustainable position to carry this forward.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? Not sure

Please provide explanation

The objective is to "ensure". The plan provides a good map, but there is no certainty that these objectives will be met. Strong messaging to the Parties from the commission would be very welcome. There is so much uncertainty about the potential impacts to the kind of resource development we carry out in the Yukon, we have very little in the way of good planning for addressing the future effects of climate change, and I believe we need to have far stronger commitments to the protection and management of the land for future generations. Yukon cannot act in isolation and our sustainability is largely driven by external national/ international geopolitical climate. This plan, as with all others, would do very well to emphasize the value of and planning for energy, food and water security when internal trade/ international trade fails us.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondĖk HwĖch'in Final Agreement.

I believe the plan should have much greater weight applied to it for fulfilling a vision defined by the TH Government and Community. A snapshot view of the last century certainly demonstrates just how much TH rights and interests have been violated, and

the onslaught of colonial development requires more reconciliation than can be gained from a narrow reading of the Final Agreements. A key component of the spirit and intent of the final agreements was the conditional surrender of land for the certainty of the formalization of rights, interests and objectives of the Final Land Claim Agreements and Self-Government Agreements. Much of the zoning in this plan accepts without much challenge the ongoing use of the free entry mineral staking regime and the stakeholder interest in minerals above and beyond what I imagine should be similar or greater emphasis on all areas of the TH territory to be managed and conserved by TH directing what is okay or not okay, in order to build reconnection to the land over the next several generations - and ensure objectives (of Chapter 11) such as; "to recognize and promote the cultural values of Yukon Indian People" and; "utilize the knowledge and experience of Yukon Indian People in order to achieve effective land use planning" are actually and meaningfully met. Moreover, when we speak of the Spirit and Intent of the Agreements, it should be viewed as a whole package deal, with all Objectives and the statements in the Preamble read together. With several aspects of the final agreement still a long way off from being realized, it raises my concern that TH (*and other First Nations) have not been the recipients of the bargain made. Prior to the UFA coming into effect, the concept of giving land back if the promises were not fulfilled, actually existed in drafts of the Agreement in Principle 2. Government, Boards and Councils should be encouraged to take greater action where they have mandate to do so, for achieving a better balance. The Dawson Regional Plan area is a good example of mismanagement of cumulative effects, and the YESAB regime is still not well equipped to handle recommendations since Government (and industry for their part) have yet to invest in the science and traditional knowledge for its management (i.e. a big part of sustainable development needs to look at, and manage Cumulative effects, especially the development and application of the research of cumulative effects to social and cultural values). So, in a nutshell, I do not believe the Objectives of the TH final agreement are being realized and I strongly recommend that the DRLUP make very bold and favourable recommendations that are in the interests and help promote TH's vision. As a non First Nation person living in the Yukon, I would be extremely pleased to see Yukon as a whole take greater strides toward this. Thank you for reading through my rant.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Certainly caribou should be on the list for monitoring efforts, but before elaborating on what indicators, I have 2 points. 1) many monitoring programs are insufficient to ensure we can understand what are the factors that cause the species to change/decline, and industry and consultants skirt around the issue not accepting any blame - and as such, independent expertise needs to be brought to the table; and 2) I strongly encourage the development of a parallel effort to see whether there is a different approach to resource extraction monitoring and management and not establish thresholds. The idea that it is okay to abuse the land and not worry about disrespecting wildlife and their habitats, for the purposes of an activity that may not be the best use of that resource, may be highly offensive and believed to be wrong by TH elders, community members. A question that should be asked might be; is there a way to carry out the resource activity and still be respectful of the land/animals? If no, then maybe the project should not go ahead. Is there some form of reciprocity that the resource developed can give back to enhance or help improve the condition of land as a cost of doing business?

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

It may be a taboo to say this in the Yukon, but placer mining is incredibly disturbing and an awful form of non-renewable resource extraction. The first time I flew over the Klondike gold fields I was alarmed and deeply disturbed. I have been on several claims and see the kind of activity that occurs, and there need to be major thresholds on this sort of development.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes

Placer mining is not sustainable and values a resource that has no purpose for our immediate survival. I look forward to the day that Yukon can see a sunset on this nasty and disrespectful practice.

WETLANDS

What do you like or dislike about this the approach to wetlands?

I would prefer a stronger statement based on the level of uncertainty of the science behind wetland impacts. There is enough area being exploited in the region to provide considerable wealth to this industry but the buck should stop at mining in any wetlands. We simply do not have the expertise and knowledge to protect those values and kid ourselves that we can reclaim to the highest standards (some knowledge and expertise in this area but industry would never fully pay the full cost and Yukon Government should have no business taxing Yukoners to pay for restoration out of their coffers).

When considering development in wetlands, what impacts to your values are you most concerned about?

aquatic health, fish and wildlife habitat, water quality, disrespecting water

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Agree

Please tell us why you agree or disagree

Indian River is heavily impacted and the upper IR wetlands are a portion of what should have been protected long ago. I believe there are other wetland areas in the region which should also be protected).

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

See above. Generally recommending that you don't play around with wetlands. Need to leave these sensitive sites alone and buffer accordingly.

Please tell us what you think about development in fens [choose one]

No development should occur in fens anywhere in the region.

Please explain your answer.

Peatland development should be left alone. It is pretty simple. Let's stay out of these areas. period.

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

SMA type 1 are very small. Forty Mile Caribou herd likely to change migratory pathways over time. Plan should provide greater areas to protect and enhance caribou range.

The things I feel the Commission got right about the land designations are...

Scaling is important and the categories are logical.

The things I would change are...

I'd like to see more information (maybe I missed it?) on how the mapping of culturally important areas is really integrated into the plan. Are there key recommendations and land use priorities granted above other values in the Integrated Land Use designations?

How about a new category designation that highlights a largish sized block or corridor that reflects TH land use and interests?

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Yes

Please explain your answer (use locations where possible)

Mainly intact ecosystems; need an insurance policy if we get resource management wrong and fail to protect environmental values.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

Yes

Overall if the management recommendations are maintained and effectively monitored, and development activity properly limited and enforced, this designation has a higher chance of success. Skeptical about low level mineral exploration making sense when there will be a limit to what a project could be. No point in supporting low level exploration since a large mine, access roads, camps, power infrastructure would not be consistent with those objectives. High risk if any low level project looks promising that Parties to the Plan will be pushed. May be more effective to expropriate the claims and create greater protection??

What advice do you have for the Commission as they develop the Recommended Plan?

Pay greater attention to TH and their expression of how they see this plan needs to fulfill the obligations, the rights, and interests, and overarching objectives (Spirit and Intent) of the TH FA

Survey ID# 703

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? Yes

If so, what sector do you work in? Placer Miner

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Dawson Resident"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

I like the way the commission has tried their best to break down the Dawson Region into the LMU's. LMU 23 works good for the Forty Mile Caribou Herd and also helps industry a little if done right.

The things that are missing from the Draft Plan are...

With regards to wetlands, there has to be more mapping of the wetlands to the extent of LMU 19. There is a tremendous amount of wetlands in the area around the North Ladue River. Areas in LMU 1 and 4 have a lot as well. LMU 10 and 11 are one the same but one is SMA 1 and the other is ISA 1, pretty much the same thing.

The things I would change in the Draft Plan are...

I don't agree with the statement of "No development is to be permitted in undisturbed bogs and marshes" and " No development is to be permitted in undisturbed Fens". This type of closure of area would be detrimental to the placer industry. When there is bogs, marshes and fens involved in a project, the proponent should be evaluated on a case by

case basis. The percentages that are given in the plan around how much wetlands cover I believe are not to be right. The only place to do proper wetland mapping in the regional plan has been LMU 19. The vast amount of area has only been done with satellite imagery, basically a table top exercise.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

I am a placer miner who reclaims the land to a high standard to help promote growth of wildlife. I teach my children how to hunt and live off the land. To respect what the land gives you and to give back when you can. We as a family take care of the land and try to educated others on how to preserve the landscape for all to use.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

I believe that most long time residents of the Yukon have a special connection to the land thus making us land stewards. Educating others on how to look after the land, reclaim the land in a suitable manner to promote the sustainability of water and wildlife, and the ecological values that the land holds.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

A sustainable diverse economy that continue to hold FN rich cultural back ground

Do you feel that most of the things that matter to you were included in the plan?

Yes. The issue around wetlands and how they are managed and protected has to be clearer for both industry and other land users.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? Not sure

Please provide explanation

In some areas it does but in others it doesn't. With wetland being the hot topic, I feel the plan leans too far to the environmental side. With out proper mapping and a reclamation guidelines for industry to use when wetlands are disturbed. What are the values for these wetlands and how can we work together to accomplish this goal.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

Yes I feel it has. The plan addresses Ecological Integrity, conservation and also has a plan to help with being better land stewards. The plan also addresses the cultural and heritage of the TH First Nation

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

The values that I hold deeply are the ability to go out on the land to hunt, fish gather berries and to enjoy the outdoors. But I also need a sustainable economy to be able to live here and enjoy the things mentioned above.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

I used to spent a lot of time around the Tombstone area but now I don't because of all the tourist traffic. I used to be able to hike the grizzly trail when I wanted to. Now I have to have a permit! I feel making this area a park has put a bulls eye on it and now it's gotten to the point that it cannot sustain the amount of tourist traffic.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Not sure

There has to be a balance. If you have too much conservation and not enough industry, people are not able to make a living here. What would the cumulative effects be when this happens. On the other hand if we have too much industry then the land scape is forever damaged and we loose the values of having a healthy environment to live in. Sustainable has to be good for both sides.

WETLANDS

What do you like or dislike about this the approach to wetlands?

I don't like the no development part. The data that the commission has used I believe has flaws. There hasn't been proper mapping done for wetlands in this area. Just the LMU19 has had it properly done with boots on the ground. The rest of the mapping has mostly been a table top exercise. I believe there are proper reclamation processes that can be done to restore wetlands, maybe not to what was originally there but also can enhance an area. This has been done in Alaska with regards to the placer mining industry. There may have to be a site specific analysis in areas were industry has plans for extraction. To remove all these areas from development will have a detrimental outcome for the placer industry.

When considering development in wetlands, what impacts to your values are you most concerned about?

The values that I would like to see is the area brought back to or even better than what was there. In some areas this is not achievable but can be brought back to something that may support other wildlife that has not been there before. Yes some wetlands need to be preserved but some may have to be disturbed so that our local economy sustain itself.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Disagree

Please tell us why you agree or disagree

Scottie Creek Wetlands should remain areas of Special importance. The Upper Indian River Wetlands should remain somewhat intact but the economical value of this area is too high just to ignore. Without trying some of the restorative mining practices that has been in use in Alaska here we are not giving industry a chance.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

Yes there are areas that can be of similar protection. The Ladue River Area in LMU 21 is a huge wetland complex that is virtually undisturbed and intact. Also LMU's 4 and 11 have a lot of wetland complexes in them that are pretty much designated as protected by being in a SMA II. LMU 11 is also a wetlands complex that can maybe put into the SMA II category.

Please tell us what you think about development in fens [choose one]

Development should be allowed to occur in fens (no limit).

Please explain your answer.

Development in Fens can occur if a proper reclamation plan is in place. What that plan would look like is hard to say. There may be some places where this is not achievable but there may be places where it can be done. To say they are all off limits does not support a sustainable economy. Having threshold limits does not work well with myself. Being a small placer operation the percentage that I am allowed to mine may be nothing if a large placer mining operation has already used up the percentage amount, thus putting me out of business. Is there a formula to add back to the used percentage when reclamation work is done? That way the percentage is a floating figure and allows more mining to be done.

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

Looks good, the colors could be a little brighter making each LMU more distinguishable.

The things I feel the Commission got right about the land designations are...

Having the river corridors LMU 3 Yukon River and LMU 13 Klondike River designated as a future planning area with sub regional plan is a good idea. There is a lot of different types of users in these areas and would be too much for the planning commission to take on.

The things I would change are...

I would change LMU 11 Flat Creek Wetland to maybe a protected wetland complex SMA I. It would be the same as the other side of the Klondike Hwy LMU 10.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Unsure

Please explain your answer (use locations where possible)

As stated above the only LMU that does not fit in with SMA II is #19. It has strong values for each side. Strong values for FN culture, ecological and environmental and resource based extraction. The data at the time for this LMU may not have been available to the commission around the resource extraction potential of this area. But I think strong consideration has to be given to change the designation of this LMU. We can try and use

this area as a model of how to do wetlands reclamation a bit at a time to see if this type of work can be a sustainable option.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

Unsure

They do allow for a flexible management approach but there is also a lot of restrictions for industry. The LMU's to the North 1 and 4 are rather remote and inaccessible and would like to see very little disturbance. Same with LMU 22 Scottie Creek again remote inaccessible. SMA 7 could have more potential for development but also has some very high ecological values maybe change to a ISA II. The contentious one is LMU 19, there is significant values on the cultural, ecological and environmental side but also high values for development.

What advice do you have for the Commission as they develop the Recommended Plan?

I first would like to thank the commission for presenting this plan to the community of Dawson. The DLUP team has made a tremendous effort in engaging the residents of Dawson and area. I hope the DLUP commission puts more value in what residents of Dawson have to say than other Yukoners. This plan is going to effect us the most. DLUP commission is tasks with hard decisions, but I hope we can have a sustainable diverse plan that will suit all residents of the planning region.

Survey ID# 702

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? Yes

If so, what sector do you work in? health care

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Dawson Resident"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

the broad consultation.

The things that are missing from the Draft Plan are...

that the area north of the Tintina Trench be given maximum conservation protection. In terms of the Draft Plan that would be as a Special Management Area (SMA) Level I - recommended for permanent withdrawal from any new industrial land use and surface access. It would require that a co-management plan be developed and approved by both parties: the Tr'ondek Hwech'in FN and the Yukon gov't.

The things I would change in the Draft Plan are...

see above

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

I live in the bush on titled land and we trap, hunt and fish as well as use wood for heat.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

It is a good idea. Whether or not there is actually money for this is another thing.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Balanced resource development and conservation. Proceed with plenty of discussion and adherence to the rules.

Do you feel that most of the things that matter to you were included in the plan?

Yes, except provisions for the area north of the Tintina Trench which should be given maximum conservation protection. In terms of the Draft Plan that would be as a Special Management Area (SMA) Level I - recommended for permanent withdrawal from any new industrial land use and surface access. It would require that a co-management plan be developed and approved by both parties: the TH and the Yukon gov't.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? Yes

Please provide explanation

I think that wording is fine.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

no

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

I value being able to snowmobile to town from my home in the bush. I also appreciate being able to hunt for caribou, moose, and fish for salmon (when open). I value cutting our own fire wood to heat our house.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

I don't have an issue with tourism. Building trails for skiing, biking, hiking is fine by me. Mining provides some of this access too. Keeping most of the mining to family placer mines is also agreeable to me. I am not keen on these big camps/mining operations.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes

I watch what is going on for southern caribou herds and don't want that to happen here.

WETLANDS

What do you like or dislike about this the approach to wetlands?

Yes, I agree with this.

When considering development in wetlands, what impacts to your values are you most concerned about?

These are sensitive areas for species like frogs and I think more precautions are needed.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Not decided

Please tell us why you agree or disagree

These are wetlands. I am sure there must be others.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

Not sure.

But I would like to see the tailings piles in the Klondike Valley preserved against further destruction. This is part of our history in the region. Please don't erase our history.

Please tell us what you think about development in fens [choose one]

No development should occur in fens anywhere in the region.

Please explain your answer.

Again these are sensitive environments. We need to be very careful with not disturbing species native to these areas. We are the "introduced species".

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

The map just gives colours and numbers. Where are the SMAs? What do the colours mean? This isn't very useful. You need a key to really communicate this well. I can't make any decision based on this information and the links above.

The things I feel the Commission got right about the land designations are...

Who knows. See comment above.

The things I would change are...

See comment above.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Unsure

Please explain your answer (use locations where possible)

See comment above.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

Unsure

See comment above.

What advice do you have for the Commission as they develop the Recommended Plan?

Give more information on your maps. People don't have all day to do this survey and the information needs to be easily accessed and on one page. It is hard to scroll on the map as well.

Survey ID# 700

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a regular visitor to the Dawson Region

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? No

If so, what sector do you work in?

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Other" Environmental Non-Profit Organization

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

It is very clear from the plan that the commission cares about the land - and that it has a holistic understanding of its users, including TH and non-TH Dawson area residents, industrial users, visitors, and all the wildlife with whom we share the Dawson area. It is also clear from the plan that the Commission understands the importance of the Dawson LUP Plan and the repercussions the decisions made here will have for generations.

The things that are missing from the Draft Plan are...

Many of the recommendations for protected areas are non-committal. For example, the many SMA-IIs - it is unclear what the intended fate of those areas is, in spite of the definition, and it seems to be highly variable depending on what claims already exist in the area. As such, if an area which already has several surface and sub-surface claims is designated as an SMA-II, the title may be misleading, as simply preventing further claims does not necessarily constitute as a conservation action, but the designation itself makes it seem that way. On the ground though, it seems like there may not be much difference between an ISA I or II or an SMA-II in terms of area protection, and that may not be clear to those not familiar with terminology, making the SMA-II somewhat deceiving.

The reasoning why some areas were chosen as SMAs or ISAs can also seem contradictory. E.g., for the Eagle Plains Area (Unit #2), the rationale says:

"This area has been identified as culturally important by Trê™ndã«k Hwã«chê™in, and it supports subsistence use and traditional economic activities including trapping and harvesting." AND

"[Eagle Plains is] within an identified sedimentary basin with identified potential for oil and natural gas resources. A zone 2 designation allows for Trê™ndã«k Hwã«chê™in to determine further direction for development in this area while preserving caribou habitat."

It is evidenced by the fate of the caribou in southern provinces that there is rarely win-win scenarios regarding oil and gas and caribou. The changes done unto the land by oil and gas are permanent and it seems irreconcilable to rationalize these activities after acknowledging that this is a culturally appropriate area to TH.

Similarly with the SMA-II in the LMU #3, Yukon River - the rationale only includes conservation values - so why isn't it an SMA-I?

The things I would change in the Draft Plan are...

The section on Grizzly Bears, while it appears to recognize their inherent value, does not fully acknowledge the repercussions that emerge when grizzly bear habitat or corridors are fragmented or peppered with industrial projects. While it puts bear's lives at risk, it is also dangerous for humans - whether they are recreational land users or industrial workers. Management of grizzly bear habitat is a safety issue as well as a conservation issue.

The Draft Plan mentions that there should be SMAs designated for grizzly bears, but the current YTG database does not currently have any Wildlife Key Areas for Grizzly Bears within the Dawson LUP region (at least not available online). The absence of data should not enable the absence of action - no doubt that local residents, TH or non-TH, are aware of areas with high grizzly bear activity or dens. These should be identified to some degree and added to the recommended plan to ensure that grizzly bears are given the

space they need and that industrial activity should be severely limited in grizzly "hotbeds" for everyone's safety.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

- Get out on the land as much as possible
- Speak up for wildlife and wilderness in public forums, in politics, and in research
- Speak about the land or its inhabitants to others - share my passion with others in the hopes that it gives them the same feelings
- Support organizations that promote caring for the land (Yukon Invasive Species Council, CPAWS, Y2C2)

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

I strongly support it but believe that most of the funding should come from industrial partners.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Protection of wild spaces and culturally important spaces

Do you feel that most of the things that matter to you were included in the plan?

They were included... we think they just require more discussion, which is why we look forward to seeing what other people have to say during this comment period and to reading the recommended plan.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? Not sure

Please provide explanation

As aforementioned, some of the comments which acknowledge areas that are of cultural importance to TH/VT/NND are also slotting areas for development which will permanently harm or damage cultural resources, land, water, or cohabitating species.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

We support the TH, the NND, and the VT First Nations in the formation of a Dawson LUP that supports their needs and values.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

- Level of crime and suicide in communities as indicators of ecosystem health and land relationships
- Level of professed time on the land (using surveys) from community members as indicators of ecosystem health and land relationships
- Caribou as ecosystem health indicators
- Salmon as ecosystem health indicators
- Using specialist Aquatic Invertebrates as ecosystem indicators
- Using grizzly bears prevalence/conflict level as indicators

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area
Industrial activity level in an area was historically tied to higher rates of domestic violence and community violence.

Increased industrial presence means higher risk of mismanaged attractants, which increases the risk of human-bear conflicts dramatically. Increased industrial presence also makes it more difficult to monitor whether different groups are respecting the land adequately.

New or better trails, while they are a form of fragmentation/disturbance, are also an important tool for getting people to connect to the land, which is vital for conservation and community health.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes

Natural valued components (salmon, bears, caribou, streams) are often irreconcilable with certain forms of development (e.g. placer mining vs. salmon or aquatic invertebrates). These components are valued by many, many people, and are endangered nearly everywhere else. It is risky to act as though win-win scenarios are likely or even possible in certain scenarios.

WETLANDS

What do you like or dislike about this the approach to wetlands?

We don't have highly detailed knowledge or maps about wetland occupancy and type in the area.

"No development in bogs or marshes across the whole region" and

"No development in bogs, marshes, and fens in Special Management Areas" seems like a good call.

"reclaimed to the highest standard reasonable after activity is complete" is vague. Specifically, "highest standard reasonable" is vague. Is there a reclamation plan that will help partners restore arctic/subarctic wetlands? Will the wetland be checked or monitored to see if it has been reclaimed to the highest reasonable standard? How can one measure "highest reasonable"? Reasonable is highly subjective.

When considering development in wetlands, what impacts to your values are you most concerned about?

Migratory birds, many of whose populations are in sharp decline across North America and who nest in the North.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? [Have no opinion](#)

Please tell us why you agree or disagree

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

Not qualified to answer

Please tell us what you think about development in fens [choose one]

Limited development should be allowed to happen in fens.

Please explain your answer.

Can't stop all development... but we also have to consider that the Yukon hosts a significant amount of carbon sinks, the development of which has global repercussions for the emission of greenhouse gases.

How much of the regions Fens should be allowed to be developed? 30%

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

Looks highly green! Which was good to see.

The things I feel the Commission got right about the land designations are...

They have strong intent to protect natural valued components and culturally important areas.

The things I would change are...

Many of the proposed conserved areas (SMA-IIs) are not binding - will not necessarily obtain proper protection.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Yes

Please explain your answer (use locations where possible)

The rationale for why those SMA-IIs should be protected seem right. They just won't necessarily be given adequate protection under the SMA-II designation.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

As aforementioned, the SMA-II designation seems ambiguous and seems like it would offer about as much protection as ISA-Is or ISA-IIs in many cases.

What advice do you have for the Commission as they develop the Recommended Plan?

Keep putting your heart into it. These decisions should be made with feeling. This has clearly already been the case throughout the process.

Survey ID# 699

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? Yes

If so, what sector do you work in? Mining

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Yukon Resident"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

The Draft Plan covers a lot of concerns and areas that are important to many different groups of people. The Draft Plan recognizes that it has to be improved and isn't final.

The things that are missing from the Draft Plan are...

Reclamation is missing from the Plan, as is the ability to have reclaimed mining "go back into the pot" for surface disturbance. Also, placer mining interests (as well as access to claims) in Land Management Unit 19, or LMU19 (Upper Indian River Wetlands), and LMU22 (Scottie Creek) exist for several families. The family businesses that have been in these areas for years will not be able to stay if the Plan is adopted as is.

LMU3, the Yukon River, is currently on-hold as an SMA2 waiting for "future planning". This will have significant negative effects in the interim if it cannot be considered for small-scale development of things like barge access points, especially to access the high mineral prospective areas on the west side of the River in LMUs 17 and 20, which are designated as ISA3s.

The Plan needs to be more flexible and high-level so industry is not limited by misrepresented directions in future permitting processes.

The things I would change in the Draft Plan are...

I would combine LMU19 (Upper Indian River Wetlands) into LMU12 as it is highly valued placer area that has active work. I would change the thresholds or eliminate them altogether in favour of a simpler system that relies on the fact that placer mining does not use chemicals and that legislation and policy are making reclamation practices better and better. There is little risk if placer mining is acceptable to work with good reclamation practices.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

Being a presence against poaching, raising gardens, creating wet habitats after mining.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Not sure

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

I agree that a fund promoting stewardship in the area is a good idea, however with the ongoing Placer Mining Act modernization, I caution any duplication in funds, tax systems or other revenue structures until more is known.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

That I may be allowed to live on the land and raise a family, taking from it what I need and giving back my stewardship. Responsible and sustainable placer mining.

Do you feel that most of the things that matter to you were included in the plan?

I believe there is a greater emphasis on how to mitigate mining, not on how to see it thrive responsibly. A thriving and responsible placer industry is how I see â€œsustainable developmentâ€

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĚK HWĚCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? No

Please provide explanation

This depends on what values are more important to the Commission. If development is to be sustainable, placer miners need access to areas to mine and reclaim the ground when they are done. The current Draft Plan does not make that easy for a miner, and is prohibitive of this kind of sustainable development. Placer miners need to see more support if it is determined ok to proceed.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondĕk Hwĕch'in Final Agreement.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Economy of the region is strongly tied to the placer industry

Reclamation of placer mined areas (current and historic) an important part of stewardship and sustainability

Placer mining creates unique and biodiverse habitat and does not negatively effect water quality, quantity and flow when mined responsibly. Landscape diversity, found in reclaimed areas, equals greater biodiversity.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

The moose like our mining reclamation areas as there is a lot Willow and the wolves avoid our road networks in summer. Many species of migratory shore birds call this mining created habitat home in the nesting season.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes

It depends on the area, as values change. Development should be limited in areas where no mining has or will exist, to protect that landscape as "wild". Likewise in historic and current areas that have a lot of mining, any responsible development should be able to continue, like in the gold fields and Sixtymile areas for example. Fens, in ISA areas that value mineral development, should not be protected as they are in this version of the Plan.

WETLANDS

What do you like or dislike about this the approach to wetlands?

I dislike the approach to wetlands. It values conservation over industry (when it is only in areas that placer mining occurs that this approach would be used) is too complex and is too strict to see industry succeed in the future. The current approach will seriously harm industry, and will create massive negative cumulative effects on the community as a result: businesses shut down, less workers, less infrastructure into existing businesses as people and money leave the area. This will trickle down to other sectors in other parts of the Territory. Who will the public sector staff work for if there is no private sector left? The current wetlands strategy is too hard to meet and would be challenging to enforce.

When considering development in wetlands, what impacts to your values are you most concerned about?

I think it is important to protect wetland complexes in areas where no mineral values exist, in LMUs 1 and 4 for example; but to allow for peat wetlands in LMU 12, 17 and 19 to be reclaimed to fully functioning mineral wetlands as a result of sustainable development through placer mining.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Disagree

Please tell us why you agree or disagree

No. I do not agree these large areas should be protected at this time, however specific wetland aspects of the areas, possibly. There are several families working in these areas that need the ability to keep their businesses going – they do not cover all wetlands, but the area of special importance covers all operators. I believe there are better ways to protect wetlands and ecology than putting families out of business because of a map.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

No. Miners do not look for wetlands to disturb, we look for gold resources and then explore property for viability.

Please tell us what you think about development in fens [choose one]

Limited development should be allowed to happen in fens.

Please explain your answer.

I do not agree with the Commission's current threshold information. If I had to pick of course I would ask for the high range of 75%, however I know this information has been developed from the Yukon Government's interim approach to placer mining in wetlands, and that the numbers are arbitrary and not based on science or consequence of mining. It is also not a miner's intent to disturb wetlands arbitrarily, it is only to access the gold resource which tends to be found in valley bottoms. I believe that mining should be allowed in wetlands in certain LMUs (12 for example), regulated by reclamation standards enforced by mining inspectors. The Draft Plan should be more high level and simple to read. The legislation and regulators can enforce the details.

How much of the regions Fens should be allowed to be developed? 75%

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

That the lines are too low resolution and in the wrong places. That most of the planning area is off-limits for development, including areas that have current, existing work.

The things I feel the Commission got right about the land designations are...

Designations make it easier to make areas that have high cultural interest (like LMU10) or no mineral interests (like LMU1 and 4) into protected areas.

The things I would change are...

LMUs 9, 19, 17, 20, 21,22,and 23 have known placer interest and should have placer mining as a value to preserve, rather than seeing it as a negative impact. If we are not protected or at least encouraged through the Draft Plan, there will be no development to sustain.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Unsure

Please explain your answer (use locations where possible)

The Commission has done a good job making only the most important areas SMA1 areas and I support them in not protecting areas for money but for the values. I understand the funding that is available to the Environmental NGOs makes it attractive to push for everything to be an SMA1, but making decisions on funding opportunities over, say moose values, is not something I can support. Instead, I think SMA2 areas should be integrated into the ISA framework, and allow for more diversity in guidelines on how the land should be managed in those areas.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

I understand the words "special management area" have been borrowed from the Peel Plan, which is problematic to start with. It might be better to rename SMA2s as a Conservation Value Area instead. This should allow the Commission to protect certain values in certain areas, like moose, or development, as well as wetlands or caribou

(depending on the area). Ultimately, I would like to see SMA2 areas either designated as an SMA1 "park", or morphed into an ISA, allowing for future development.

What advice do you have for the Commission as they develop the Recommended Plan?

Allow the voice of those miners who have been raised on the land you seek to protect shed light on sustainable and even environmentally beneficial future for industry and ecology.

Survey ID# 698

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident

If not, where do you live?

Are you a member of a Yukon First Nation? Yes, Other YFN

Do you work in the Dawson Region? Yes

If so, what sector do you work in? Placer Mining

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Local business owner/operator"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

The draft plan is a living document and is the commissions best attempt at meeting a reasonable consensus that will try and meet many parties interests. The draft plan is not the recommended plan, so we still have time to respond and have our voices heard. The draft plan has taken a much more balanced approach to land planning then the previous land plans; North Yukon, and The Peel.

The things that are missing from the Draft Plan are...

The draft plan is missing reclamation, and is unclear on how reclaimed land will be put back into the threshold model. Good reclamation should be encouraged and operators who do good reclamation should be able to continue to sustainably mine for many years to come. Reclamation should be considered complete once the operator has met what they have stated they will do in their license.

Reclaimed wetlands have also not been included or acknowledged by the commission. Placer mining creates biodiversity which is great for a lot of species, and helps sustain higher levels of harvesting in animals like moose.

Overall placer interests have been missed in some areas. By designating areas with existing placer claims on it as SMA2, you have essentially shut these operators down because the majority of their placer potential is in wetlands. They will unfortunately be left behind by the plan.

The plan needs to focus on higher level ideas and in areas where placer mining is deemed to be an acceptable use of the land it then needs to decide on what values are wanted for post placer mined areas, that way the operators, KPMA, YG, TH and other organizations can hopefully begin to work on reclamation practices that meet the values expected.

The things I would change in the Draft Plan are...

I would combine the LMU23 all into one designation being ISA2. Or move the low lying areas on the south side of the highway into LMU17, and combine the low lying area on the north side of the highway with LMU15. As the low lying area in LMU23 represents some of the more historic placer mined areas on Bedrock Creek in upper sixty mile valley and on Moose Creek in the 40mile drainage. These areas also represent some of the areas where the industry could continue to grow.

I like the creativity of the commission, but am concerned it may be difficult to enforce. I personally have placer ground that lands in both the high and low sections and I am struggling to figure out how that would work. I also watched Andrew Carnes presentation and I understand that it would be difficult for the quartz industry as well.

I realize that the forty mile caribou is of concern but there has been little acknowledgement that the herd has rebounded from only a few thousand to 70-80,000 all while mining and other industrial activities have been occurring unrestrained. As well as Alaska has recently proposed culling the herd. Why would we restrict areas that have potential for industry when there does not appear to be an issue, and if there is an issue, our neighbor's believe the herd is to large.

I would also combine LMU19 with LMU12 as it is an area with placer potential, and the gold is only where we find it, there are massive areas of the planning region being protected from future disturbance, we should not be restricting the few areas that has access and potential and instead acknowledging that the placer industry needs areas to continue to be sustainable.

I would change the thresholds or eliminate them altogether in favour of a simpler system that relies on the fact that placer mining does not use chemicals and that legislation and policy are making reclamation practices better and better. There is little risk if placer mining is acceptable to work with good reclamation practices.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

I am a fourth generation placer miner and have grown up in the area placer mining my whole life and currently live in Dawson City. I have learned to care for the land from my parents and grandparents before me. I am a steward of the land by doing good reclamation far exceeding what is expected of me, I am constantly trying to improve on my reclamation habits. We do not use chemicals while mining and clean up all of our old sites and leave it in the past shape possible. Our mine is always reclaiming older previously mined areas that are near our current mining sites, by building ponds and covering dredge tailings, white channel tailings fans and old stripping piles with mud.

I connect to the land by taking my family and children out onto the land to hunt and berry pick. I often show my family the reclamation that my parents and grandparents did, as well as we go to see other areas that other miners have reclaimed. I enjoy going out onto the land in nonmined areas as well, and we go for hikes up the Dempster and go boating on many of the local rivers. I enjoy seeing all types of landscapes both untouched wilderness and post-mining landscapes.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

Great idea, it would be great to be able to have a stewardship fund that allows more people to get out onto the land. As well as it would be great to clean up some of the legacy sites with this fund, that being said I believe that if the placer miners are given

time to continue mining more and more of these sites will be cleaned up by them, even if we were not the ones to create them.

Only one caveat, we need to be sure that a land stewardship trust doesn't overlap with new legislation. It would be concerning to have overlap on a fund like this.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Responsible and Sustainable placer mining

Do you feel that most of the things that matter to you were included in the plan?

I feel that mining was looked at as a negative and there was an overall approach to slow it down or stop it all together. I would like to see a sustainable approach to mining, meaning there is room for the industry to responsibly continue on into the future, if we restrict and close off to much area, especially areas with known placer gold reserves we will eventually see the end of the industry and not because it had run its course but because it was forced out by over regulation.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? Not sure

Please provide explanation

Placer mining should be a key contributor to Sustainable development in the future, but as the plan is currently laid out, the industry will begin to enter the end of its cycle, as potential new areas are being removed both from LMU designations and their threshold's as well as wetland preservation.

Sustainable development to me means, mining should be allowed to continue to occur in areas with high probability for placer gold such as (LMU's 9,12,15,16,17,19,23). If mining occurs the operators should be encouraged to do better reclamation and need to be told what values are being asked for in a post placer mined area.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondĖk HwĖch'in Final Agreement.

I believe the planning process is meeting the objectives as it will ensure that large parts of the land is protected and other parts will be usable for generations to come.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Economic, reclamation, hunting, harvesting values.

Placer mining is a key value to the local area as it is one of the longest standing industries in the area, and we have seen its resilience. During Covid it supported the local economy and during low gold prices large quartz operations left and placer miners continued because our businesses rely on us being here ever year, we are small privately owned businesses that can not go through the boom or bust cycles.

Reclamation needs to be continued to be encouraged, good reclamation can often lead to a biodiverse landscape that will sustain more hunting and harvesting then the native areas. Hunting and harvesting is important to me in order to feed my family, and I do most of my harvesting and hunting on mining roads as it allows good access into some of the richest moose hunting areas, being the reclaimed placer mining areas.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area
Post mined landscapes provide some of the best hunting. Some of these areas are being overhunted as large numbers of people from Whitehorse come up and hunt the goldfields. Yet even with overhunting the populations seem to continually hold up. More mining roads allow access to new areas, reducing some of the pressures on areas that were being overhunted previously.

Do you feel that the amount of human development should be limited to help maintain the things you value?

No

I do not believe things should be limited if that area is deemed to allow that activity to occur. In areas where mining and economic activity is deemed acceptable there should not be many limitations on total area covered, and should not have restrictions on wetlands. The Yukon is a very large area and there is lots of space that will be designated as protected space, I don't think the small areas (in all of Yukon context) deemed for mining should also be heavily restricted. New legislation and wetlands policy will guide how much should occur and what will be acceptable in those areas.

If an area is decided that it should be protected and left undisturbed then human activity should be limited.

WETLANDS

What do you like or dislike about this the approach to wetlands?

I do not like the approach as it is highly restrictive to industry and does not acknowledge the broader context of wetlands, as there are massive portions of the Yukon that will remain untouched. Endless bogs, fens and marshes will be protected just by virtue of our vast landscape. We do not need to further restrict in areas where there is economic value. We need to encourage better reclamation practices and miners need to be told what type of mineral wetland (swamp, marsh or shallow open water) is preferred in these areas, as these types of wetlands are achievable to recreate. Using this approach on wetlands will greatly reduce the placer mining industry in the near future.

If industry was entirely left to its own devices, there would still be miner impact to wetlands in the Yukon as the gold is only where we find it. We are not going to mine in areas where the resource is not economical to mine and that is 99% of the Yukon.

When considering development in wetlands, what impacts to your values are you most concerned about?

I believe it is important to protect large wetland complexes and mother nature has already decided on those areas. Areas such as LMU 1 and 4 are good examples of massive wetland complexes with little resource value under the wetlands that are designated to be protected and have connectivity to other areas that are protected.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Disagree

Please tell us why you agree or disagree

Both areas have current operating placer mines in them, and LMU19 has good access and great potential for future placer mining. Parts of these areas could be protected but areas being protected should not directly put people out of business, current claims and mining interests need to be protected.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

I do not see any areas in particular, as mining can only occur in a limited number of areas and the rest will be protected simply by not having resource potential.

Please tell us what you think about development in fens [choose one]

Development should be allowed to occur in fens (no limit).

Please explain your answer.

I believe if an LMU is designated to have development then fens should be allowed to have development without restriction as they are one of the most plentiful types of wetland in the Yukon and Canada. A very small percentage of fen and other wetlands have potential reserves under them. Just by the nature of the gold reserve, most of the fens in an area will be protected.

Good wetland reclamation needs to be encouraged and miners need to be told what type of wetland is preferred in a post mining landscape.

The wetland policy will also guide what should occur in different types of wetlands.

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

Conservation is clearly the main objective as once you combine the entire regions percentages using the threshold's around 98% of the area is protected. Very little opportunity for sustainable placer mining going forward.

The things I feel the Commission got right about the land designations are...

The way the commission has divvied up the LMU's seem to match the values represented on the ground. Areas that are mostly untouched like LMU1 for an example will be left that way.

The things I would change are...

I would like areas with placer mining occurring in them to include placer mining as a value in order to acknowledge the benefit brought to the community from these activities.

I hope to see LMU19 included in LMU12 and have the mineral potential acknowledged.

LMU23 is a difficult one personally as I have placer claims in both lower and upper designations and I will find it difficult to figure out how that works. As well as I believe it is an area with high mineral potential and it is being vastly restricted. I think it should either be all ISA2 or should get divided up a little bit different.

One easy adjustment that could be made would be to move Bedrock Creek on the upper Sixty mile river into LMU17. This would help as it is a previously mined creek and has two active licenses on it currently, it would get added to the pot for LMU17 which would give those operators more flexibility, but it would also allow for a small amount more activity for those still left in LMU23.

As an operator who has ground on bedrock creek and poker creek, this small change would help us both ways.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

No

Please explain your answer (use locations where possible)

In some cases these areas have high value such as LMU 1,4 and 7. In other cases LMUs 19 and 22 these designations are being used to stop industry in some of the few places that have mineral potential. In these two LMU's the mineral potential is unknown but the operators there are finding good values on the claims they currently have and in both cases they intend to continue mining for many years to come.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

SMA 2 is giving a false hope that development can occur, when in a placer context it will essentially shut the operator down. Not allowing mining in bogs, fens or marshes will entirely kill a mining plan and in turn the operator and families working in that area. There should only be areas that are deemed for protection or areas that are deemed to allow varying levels of development.

The current setup allows interest groups to say that only 3.8% of the area is protected when really almost 50% is fully protected when including SMA2s. And over 95% of the area will ultimately be protected.

What advice do you have for the Commission as they develop the Recommended Plan?

Find ways to encourage Responsible and Sustainable placer mining, find ways to encourage other sectors such as agriculture and timber harvesting to be sustainable, we all want the community to have a healthy economy and a healthy land going forward.

Encourage multi-use on the land, the placer miners are out there mining and most of them want to do the right thing and are very approachable with new ideas. They also

have equipment which could be used to leave the landscape in a variety of ways that could benefit the land. A great example is Marty and Marian Knutson.

I believe the land is no where near being over developed or over used but the industry is very close to being over regulated and will soon die from a thousand cuts.

The commission has acknowledged this so far, but could go further in acknowledging that this area is the most mineral rich and is the economic heart beat for the Yukon and has a lot of potential for future industry. It does not need to and should not look anything close to the North Yukon or Peel.

Survey ID# 697

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? Yes

If so, what sector do you work in? placer mining

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Dawson Resident"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

Not much, but it covers some concerns of some people.

The things that are missing from the Draft Plan are...

Placer mining interests and access to claims are not clear.

Access to mineral deposits off the Yukon River have to be addressed.

The plan needs to be more flexible.

The things I would change in the Draft Plan are...

I would allow the Upper Indian River placer mining to continue as they do not use chemicals and reclamation practices are good so there is little risk of harm to the environment.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

I hunt and I fish and I placer mine and I actually live out on the land.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

It sounds good but where will the revenue come from and will the funds be used practically?

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Responsible and sustainable placer mining

Do you feel that most of the things that matter to you were included in the plan?

No. There is too much emphasis on mitigating mining and not enough on how to make it thrive.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĚK HWĚCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? No

Please provide explanation

Placer mining is part of the community and placer miners need to see more support.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

No

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Placer mining is an economic necessity and with reclamation practices it creates better habitat for wildlife and does not affect water quality.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

My experience is that placer mining enhances wildlife habitat (mice, owls, moose, birds, ducks, geese, beavers) which i value and especially moose which i hunt to feed my family.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Not sure

Because every situation is different.

WETLANDS

What do you like or dislike about this the approach to wetlands?

I dislike this approach because it will seriously harm the placer mining industry as it targets the areas where placer mining occurs.

This approach will have a huge negative effect on the community as so many local businesses are woven into the placer mining industry.

This approach sounds like a death knell for placer mining.

When considering development in wetlands, what impacts to your values are you most concerned about?

There are lots of wetlands out there that will never be mined because there is no mineral value so the ones that have mineral value should be allowed to be mined as with reclamation they will return to wetlands afterwards.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Disagree

Please tell us why you agree or disagree

Because this is an active placer mining area it will put people out of business.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

No

Please tell us what you think about development in fens [choose one]

Development should be allowed to occur in fens (no limit).

Please explain your answer.

Because mineral deposits determine what gets disturbed and that is a natural limiting factor.

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

That it makes most development off limits.

The things I feel the Commission got right about the land designations are...

Designations make it easier to make areas that have high cultural interests like LMU 10 or no mineral areas like LMU 1 & 4 into protected areas.

The things I would change are...

LMUs 9, 19, 17, 20 and 23 have known placer interests and should have placer mining as a value to preserve rather than being seen as a negative. If we are not protected thru the Draft Plan there will be no development to sustain.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Unsure

Please explain your answer (use locations where possible)

Unsure

Is the SMA2 designation appropriate to protect key values? Please explain your answer

Unsure

It could work but i do not understand enough about it.

What advice do you have for the Commission as they develop the Recommended Plan?

Consider the interests of the placer miners.

Survey ID# 696

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a regular visitor to the Dawson Region

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? Yes, seasonally

If so, what sector do you work in? mining exploration

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Industry Specialist"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

I agree with the apparent effort to strike a balanced approach of habitat preservation and land-management with support for continuation of the important existing economic and industrial activity that provides jobs and revenue for the region.

Being that this plan is part of fulfilment of the Umbrella Final Agreement, it is important to invite the various interested parties/stakeholders to be part of the discussions for planning the optimum future balancing the stewardship of land management and resources of the Dawson Region in Trê™ond'k Hwê™chê™in (THFN) Traditional Territory.

The things that are missing from the Draft Plan are...

Recognizing the documents are first drafts, the intention is clearly to have them as the basis for developing and finalizing a more balanced and defensible Regional Land Use Plan. There are few key issues that could be more adequately addressed:

The methodologies described in §1.6.2.5 (Priority Criteria for Candidate Conservation Areas) do not appear to consistently match Draft Land Management Units (LMUs) and currently proposed Land Use Designations (LUDs). To provide appropriate designations, high-protection LMUs should be defined by high-density overlap of high-value features, such as habitat and heritage, and thus result in a more restrictive LUDs. High potential economic areas with lower heritage and habitat values should be classified as less restrictive LUDs.

Some high protection LMUs, such as LMU 19, partly or wholly enclose areas of high historic and current placer and hard rock mining activity. These areas have significant potential future economic value, have extensive mining claims within them and have already seen substantial disturbance. Designating these areas as high protection LMUs will result in land use conflict and the potential need for economic compensation to mineral rights holders. These areas should be recognized for the current and future economic value and placed into more appropriate LMU designations. The Draft Plan also does not appear to draw from the referenced Land Use Planning Conservation Thresholds (Environmental Law Institute, 2003). Threshold values presented are very low compared to other land use plans in comparable sub-arctic, low-density populated areas and particularly relative to ecologic thresholds from scientific studies which generally indicate threshold preservation of >60% of habitat or perhaps 80% for rare species. This compares with preservation of 95%, 97.5% and 99% of habitat for the high, medium, and low development LUDs that are proposed. It is unclear in the Draft Plan if the Cumulative Disturbance Thresholds are based off Ecological derived habitat needs or are more arbitrary Management thresholds.

On October 12th 2021, the DRPC released 'Analysis of "Current" Disturbance Levels'. The outdated 2014 dataset provided was indicated to be the result of a lack of information, however, figures from the document show recent satellite images mapping disturbance. If current disturbance levels are not defined, thresholds cannot be adequately nor accurately proposed for each land management unit, especially if the thresholds are arbitrary management levels and not based on habitat needs or species criteria. Additionally, there does not currently appear to be any implemented monitoring of disturbance or impact assessment in the Dawson Planning Region.

Lastly and importantly, it appears that there was no significant mineral industry input in the creation of the Draft Plan despite that it being the largest single economic contributor to the local economy and a well-recognized historic cultural aspect, as well.

The things I would change in the Draft Plan are...

- (1) Increase total area under protection with high value heritage & habitat resources and decrease designations in areas with significant pre-existing development, mining, industrial and economic activity that have lower heritage & habitat values:
 - Increase areas under SMA 1 Land Use Designation with high value heritage & habitat resources from 3.8% to 25%; and
 - Re-assign ISA designations to specific LMUs in areas with significant existing development (mining, industrial) that are outlined as having lower heritage and habitat resource values.
- (2) Simplification of the number of Land Use Designation classes to allow for clearer regulatory implementation:
 - Removal of ISA 1 Land Use Designation resulting in three (low, moderate, and high) ISA classes
 - Removal of SMA 2 Land Use Designation for clearer policies regarding high levels of protection
- (3) Assess the current levels of cumulative disturbance, implement monitoring, and utilize predictive ecosystem mapping to establish science-based ecological habitat disturbance thresholds for the regional planning area while taking into consideration current disturbance levels and future activities. This should facilitate management of monitored disturbance and encourage concurrent reclamation under the current land use permit regime.
- (4) The Mining industry generates significant economic benefits for communities that are often not well understood. Sustaining a healthy mining industry is key for the economic security of the Planning Region as the single largest non-government economic sector. It is recommended that within the current DLUP working groups that at least two (2) experienced individuals are nominated by the placer and hard rock industry to assist with the refinement of the next phase of the Plan.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

We have a deep connection to the land for its beauty and biodiversity and spend countless hours exploring these incredible places. We are strong advocates for sustainable development and operate within the strong regulatory regime currently in place within both the placer and hard rock mining sectors in Yukon. Minimal disturbance, monitoring of wildlife, reclamation among others.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

No

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

The Dawson Land Stewardship Trust could promote stewardship of the land between all stakeholders in creative ways. However, it should not become another regulatory body that delays permits, licenses and activities on the land, nor should it charge costly fees that further cause financial burden to land users. The risk is adding another layer of bureaucracy with potential to become mired in systemic delays, versus a clear mandate, transparent documentation and predictable outcomes. Providing clear examples of how integrated Stewardship Practices could take place to support connectivity of stakeholders and land-users by providing examples for potential research opportunities to educate stakeholders with little knowledge about other value-systems and providing policies to educate and implement sub-regional plans. And most importantly, ensuring a bright future the Region and its inhabitant through the fulfilment of the Â§11 (Land Use Planning) of the Umbrella Final Agreement for Trâ€™ondÃ«k HwÃ«châ€™in First Nation.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

â€¢ That the Regional Land Use Plan fulfils of Chapter Â§11 of the Umbrella Final Agreement in a way that honors Trâ€™ondÃ«k HwÃ«châ€™in (THFNâ€™s) outlined heritage & habitat values. â€¢ That the Land Use Planners and Commission utilize key value systems (Habitat, Heritage and Economic) to strike a balanced approach of habitat preservation and land-management while supporting continuation of existing economic and industrial activity in the region for generations to come. â€¢ That the Region hosts integrated stewardship and research opportunities that bridge the gap between land users from various backgrounds to work together to create best management practises that pave the way for a bright future, including other areas within Yukon which this may be a template for.

Do you feel that most of the things that matter to you were included in the plan?

It is a difficult answer, given there appears to be a lack of clarity/certainty with respect to several key aspect. It is important to note that despite the fact that the mineral industry is the largest non-government contributor to the region, there appears to have been no one in the DLUPC with significant experience in the placer and hard rock mineral industry.

The Vision and Plan Goals in the Draft Plan do work towards honouring the fulfillment of Chapter 11 in the UFA. However, at present it is unclear how the DLUPC arrived at the currently proposed land use designations and associated thresholds.

The methodology is unclear, and I believe the current plan could result in not fully meeting the mark for conservation nor preservation of a vibrant economic future. The methodology described in §1.6.2.5 (Priority Criteria for Candidate Conservation Areas) do not appear to consistently match Draft Land Management Units (LMU™s) and currently proposed Land Use Designations (LUD™s). Based on the methodology described in the Draft Plan, high-protection LMU™s should be defined by high-density overlap of high-value features, such as habitat and heritage, and thus result in a more restrictive LUD™s. High potential economic areas with lower heritage and habitat values should be classified as less restrictive LUD™s. It does not appear that this methodology was consistently followed throughout the draft plan.

Additionally, it is unclear how integrated stewardship practises will be facilitated to result in meaningful assessment on how the Land Use Plan is managing balancing the key values outlined. With no monitoring or adequate ongoing predictive modelling that factors in all potential factors affecting the ecosystems and economy, it is unclear if the plan will be effective.

If a LMU is approaching its critical cumulative disturbance threshold, it is my understanding that YESAB and YG will not approve any additional permits. How this will be addressed is not made clear and there should a defined streamlined process outlined what will occur to mitigate potential socioeconomic impacts. Will this result in triggering correspondence with land users in this LMU to begin to progressively restore historically disturbed habitats to ensure that economic activities can continue?

Does progressive reclamation get factored back into the cumulative disturbance threshold accounting? With the approach that has been taken in the study with tracking the levels of disturbance it is critical that restoration in wetland and non-wetland areas be credited back towards the disturbance accounting to ensure a long-term sustainable mineral industry. A near-net zero disturbance accounting should be the goal of the plan in economically developed areas.

It is also unclear how the various implementation bodies will work together or how their capacity will need to increase. It is very important that the current regulatory regime be utilized (e.g., mining land use permits) as they work to incentivise on-going continuous reclamation and tracking of disturbance.

Also, it is critical that while the plan is being refined and implemented the stability of the economy may continue and that the permitting process for projects in ISA LMU™s for mining, forestry and agriculture be allowed to continue utilizing the existing land use permit system and that new economic investment is not frozen for the region.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? No

Please provide explanation

Plans to maintain the economic health of the region are not discussed in detail. Management intent is unclear throughout the document and certain proposals could have far reaching negative economic impacts on the region.

Âsâ€™s 4.1.9 and 4.3.3 on Traditional Economy recommends buffers and avoiding or reducing the level of land-use activities in areas identified as having cultural value. Map 5 (Appendix A) shows virtually the entire area as having traditional-use value. These areas need to be better defined so that it is not unclear what exact areas are being referred to and what this would mean for stakeholder-use in the entire planning area.

Sustaining a healthy mineral industry is key for the economic security of the Planning Region as its single largest economic sector. While this natural resource has been developed in the region for over a century, many placer deposits have been depleted in the heavily developed areas. While there are opportunities to reclaim and restore these historically disturbed areas, the industry will continue to move into adjacent prospective areas that share the same geologic settings. This movement into adjacent areas needs to be accommodated to allow for a healthy placer mining industry and regional economy. For instance, in LMU 12 the natural progression is to move further eastward to the Upper Indian River (LMU 19), which has same geological setting, and is demonstrating comparable economic placer values. This area is the economic future for the Klondike Goldfields and shutting it down from development would be a significant economic loss to the region.

Though the focus in LMUâ€™s such as 12 and 19 have mostly been on placer mining, these areas are also highly prospective for future hard rock developments - as the source of the alluvial gold. Accommodation should be made for such future potential in these areas.

As discussed, a sustainable mineral resource economy is key to ensuring long-term socioeconomic health of the Planning Region. The Mining industry generates significant economic benefits for communities that are often not well understood. A substantiated figure used in the mineral industry shows that typically every dollar spent in mining generates \$5 in the local economy including indirect supporting industries & local-work force (hotels, restaurants, equipment sales and maintenance, supplies, fuel, etc.). A recent PWC report showed similar multiplier value relates to jobs supported by indirect and induced economic activity. This study of mining related jobs in British Columbia indicates that for each (1) mining related job, 4.6 indirect, or induced, jobs are created.

The DLUP Resource Assessment Report does not accurately reflect economic contributions from these types of economic activity.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

It is invaluable to have dialogue among the groups impacted in order to come to a strong, balanced and functional strategy.

Chapter 11.4.1 (Regional Land Use Planning Commissions) of THFN's UFA states: "Government and any affected Yukon First Nation may agree to establish a Regional Land Use Planning Commission to develop a regional land use plan."

I do believe that this is a solid starting point for meeting the Objectives, however, it is my belief that the current plan as currently proposed is not truly balanced to ensure both the conservation goals and the socioeconomic future for generations to come. Also, as this plan will set the tone for future land use planning and inspire other Yukon First Nations and Land Use Planners, this is an opportunity for showing a balanced vision for the Yukon Territory and its future.

I am grateful to have the opportunity to be included in the discussion and recognize just how much work and commitment the Commission and Staff have put in and that they made themselves available to discuss and address questions across the Territory through numerous meetings and workshops.

However, it is my opinion that more time and information are required to properly assess and comment on this important Regional Planning framework as it will set the tone for future land use plans in the Territory. I hope that there is adequate time to review and address all of the responses made to the Draft Plan and that an updated draft will be released for review to allow for further refinement ensuring the final plan outlines a balanced approach that can be implemented and revised as needed.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Respect for the land and the residents, respect for the First Nations, independence, Sustainability, providing ongoing opportunities for a strong future

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

Through work on area projects, we have been able to provide new employment and training opportunities through mineral exploration, forged strong relationships both of which benefit communities.

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes

There should of course be limits and those should be a thoroughly considered sustainable development ideal. I believe that development should be limited in areas of high habitat and heritage values and sustainably managed in areas that have the ability to provide economic vitality for future generations and have lower habitat and heritage values yet are also subject to respect and proper environmental stewardship.

It is unclear in the Draft Plan how the proposed Cumulative Disturbance Thresholds were created as there is currently no implemented monitoring and the current levels of disturbance are not fully known. Lastly, without basing the disturbance thresholds on sound science for healthy ecological habitats, it is unclear that the Plan would be effective as proposed in managing development in a way that ensures both a bright economic and ecological future.

I think that it is imperative to assess the current levels of cumulative disturbance, implement monitoring and utilize predictive ecosystem mapping with science-based ecological habitat disturbance thresholds for the regional planning area.

I recommend the formation of an objective special technical working group who can advise on suitable disturbance thresholds to ensure the integrity of key values (ecological habitat and heritage) whilst allowing for sustainable economic development.

Additionally, the current level of high-level protection only equates to 3.8%. I believe there should be fewer land use designation classes to ease implementation and that more areas should fall under full protection where numerous key values overlap/are concentrated. Conversely, areas that are already disturbed should be able to continue economic development, with the creation of approved restoration guidelines and best management practises in wildlife key areas, to allow for responsible development (ex: LMU 19).

WETLANDS

What do you like or dislike about this the approach to wetlands?

The Plan states that effective restoration of wetlands is impossible. This contrasts with the surface disturbance recovery objectives (Â§3.5.1.1, page 38). I believe that the goal should be implementing consistent restoration practises for disturbed wetlands regardless of which LMU they are located in to ensure wetland function and habit are maintained.

The inconsistent policies regarding disturbance of wetlands and view that restoration of functional wetland habitat is effectively impossible negates the incentive for land-users to implement best possible management practices in reclamation efforts. It is imperative for maintaining function of these ecosystems that wetland restoration policy encourages incentivized restoration efforts. Disturbances in wetlands would see little industry investment if the messaging presented is discouraging towards restoration of wetland function.

There are many projects across Canada that have demonstrated that effective restoration of wetland function and habitat can be achieved. We should be striving for the same in the study region.

When considering development in wetlands, what impacts to your values are you most concerned about?

The outlined thresholds could have serious economic development consequences (particularly to placer mining which occurs in wetland areas) and the use of arbitrary thresholds introduces a high degree of uncertainty and low confidence that the results of cumulative effects on wetlands would be meaningful and result in effective management and land-use decisions.

Undisturbed wetlands with high ecological and heritage value but low economic potential should be prioritized to ensure both habitat and important hydrologic functions are maintained. Prioritized wetlands should be given an SMA 1 designation (ex: Flat Creek Watershed).

In areas with significant historic, current, and future economic activity disturbance to wetlands should be managed by installation of guidelines which outline practises to maintain wetland function. Permitting guidelines utilized in the hard-rock sector could be extended to the Placer industry to ensure a unitized approach to disturbance encouraging concurrent reclamation. This would ensure threshold levels are not reached, prevent a rush of disturbance in any given LMU, work with the current regulatory process, and is a form of integrated stewardship.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? [Disagree](#)

Please tell us why you agree or disagree

LMU 19 (Upper Indian Wetland) is comprised of approximately 10% wetlands, is an active economically developed placer area and has unknown levels of disturbance within these wetlands. The Regional Plan area also has 10% total wetlands. So, it is unclear why the Upper Indian River watershed was designated based primarily on its wetland value and currently has an SMA 2 designation. There are nearly 1,200 mining claims with 34 operators in this area and the area is fully surrounded by LMU 12 which is designated for the highest level of disturbance. This area has the same geologic setting as the lower Indian River and operators are seeing the same level of economic gold values. This area should be exchanged for the southern upper Flat Creek watershed that is similar in size, drains into the main Flat Creek watershed that has been proposed for a high level of protection and has very little to no mineral development activity (see further comments on Flat Creek below).

Similarly, the Scottie Creek wetlands (LMU 22) are centered towards the south of the currently proposed LMU. The northern portion of this LMU has seen extensive historic and current hard rock and placer exploration (i.e., it has been disturbed). This LMU could be trimmed around these active camps and be given an SMA 1 designation in the southern section to ensure full future protection.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

The Flat Creek Wetlands LMU, is currently proposed as a relatively small LMU at 367.77 km². This wetland borders SMA 1-designated Upper Klondike LMU, has considerable coverage by the Tintina Trench Flyway and a large area of waterfowl habitat. Significant placer-mineral potential has been identified on tributaries of Flat Creek to the northwest, however, this wetland is relatively pristine and undisturbed and has very little current mineral development activity. It is proposed that the designation be increased to SMA 1 and the LMU area could be enlarged to allow a wider buffer for migratory bird habitat and wetland protection by including the upper southern watershed boundary, which is larger than LMU 19.

Please tell us what you think about development in fens [choose one]

Limited development should be allowed to happen in fens.

Please explain your answer.

The Federal Policy on Wetland Conservation describes no net loss of socioeconomic or ecological wetland function and restoration of wetland function has been demonstrated globally on various projects. Therefore, it is recommended that criteria be developed for

habitat and functional wetland restoration that is consistently utilized in the Planning Region to ensure the spirit of the federal policies on wetland restorations are met.

It is imperative for maintaining function of these ecosystems that wetland restoration policy encourages incentivized restoration efforts, otherwise disturbances in wetlands would see little industry investment if the messaging presented is discouraging towards restoration of wetland function.

Creation of wetland restoration policies outlining acceptable industry practises are required to provide a clear path for economic development in regions within, and proximal to wetlands (i.e., placer mining, road management). Policies concerning wetland restoration should be consistent regardless of LUD and should be standardized for consistent stewardship in the Planning Region and follow sound scientifically based criteria for the restoration of wetland function and habitat.

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

There has clearly been a considerable effort put into the Land Designation System and clearly it reflects many THFN values. However, I think that the transitions from higher-protection LMUâ€™s to higher-development ones should be more gradational to avoid habitat fragmentation. Higher protection LMUâ€™s should logically cover areas with high habitat and/or high cultural values. Areas with high economic potential and lower habitat and cultural heritage values should allow for future economic development with corresponding higher disturbance thresholds, with such thresholds based on sound scientific studies for species and habitats.

The things I feel the Commission got right about the land designations are...

The vision and spirit behind the land use designations and in general the boundaries to land management units are logical. In particular, defining future planning areas for complicated land management units and corridors that cover such numerous land usages was wise to allow for timely implementation of stewardship over the region.

The things I would change are...

Reduction of Land Use Designation classes to a singular special management area (SMA 1) and three Integrated Stewardship Classes (low, medium, and high) would allow for simpler implementation, reduce the effects of habitat fragmentation, and create clearer land use designations. In addition, it may allow for a considerable increase in fully protected areas if some currently designated SMA2â€™s become SMA1â€™s and some large LMUs are divided to pull out areas of high overlap of key value features and given

an SMA1-designation. A few SMA2's with significant economic value but lower habitat and heritage value such as LMU 19 should be designated as ISAs. LMU 23 and 24 should have a singular LUD to allow for ease of implementation and LMU boundaries should consistently utilize unmistakable features, such as a watershed boundary or a river, to ensure cross-boundary land users don't inadvertently mistake which LMU they are in.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Please explain your answer (use locations where possible)

LMU # 1: It is recommended that LMU#1 be divided into two smaller Land Management Units with the northern half being designated as SMA1 to protect the high overlap of key value features in a large undisturbed area. If industries do not feel they can economically explore or mine established areas, they will go to areas with lower designations that have seen little disturbance.

LMU#4 has very high ecological habitats (ex: vast Tintina Trench Flyway), a high proportion of First Nation Settlement Lands and shares a border with Tombstone Park. This is an excellent opportunity for a sizable high-preservation area (SMA1).

LMU # 11: The Flat Creek Wetlands LMU #11, is currently proposed as a relatively small LMU at 367.77 km². This wetland borders LMU #10 which is SMA1-designated, has vast Tintina Trench Flyway and waterfowl habitat. The Flat Creek wetlands are relatively pristine and undisturbed. This LMU should increase in size by including the southern boundary of the watershed and be given an SMA1 designation which would create a vast fully protected area with LMU 10.

LMU #19: Balancing conservation efforts with preserving a strong economic future could be accomplished through removing three undisturbed watershed areas within LMU 12 to allow for water quality and aquatic health monitoring at their confluences with the Yukon River and expansion of LMU 11. As stated above, the undisturbed Flat Creek Watershed could be increased in size to an area slightly larger than LMU 19 and given an SMA 1-designation for full future protection (southern Flat Creek watershed). In addition, these changes would allow for increased conservation of undisturbed wetlands whilst allowing for continued economic development within LMU 19 which has unknown levels of disturbance within wetland areas and an established strong economic future. An SMA 2 designation of LMU 19 could result in significant land use conflicts, loss of a major economic growth zone for the goldfields and thereby impact the socioeconomic conditions for future generations, and push Industry into undeveloped LMUs with high concentrations of key value features.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

The Plan defines Special Management Areas (SMAs) as conservation areas identified requiring high levels of conservation. However, despite all of the ecological and heritage values described, the Plan currently only fully protects 3.8% of the Planning Region. This could be an opportunity to ensure the long-term protection of high value ecological and heritage areas of the Region.

Reducing to a singular Special Management Area could result in a larger fully protected areas. The SMA 2 designation currently outlines that disturbance is to occur only in connection to existing surface and sub-surface rights; however, disturbance thresholds align with ISA I or II depending on the LMU. So, it seems more logical to simplify the Plan by removal of SMA 2. Areas with SMA 2 designations which overlap key value features and have seen little disturbance, should be placed into SMA 1 and areas with significant defined economic potential be placed in ISA classifications. This would ensure no precedent is set by the effective removal highly prospective areas.

What advice do you have for the Commission as they develop the Recommended Plan?

I believe that more time and information are required to properly assess and comment on the Plan. A second comment period is suggested to allow adequate time for reviewing all the response submissions and a publicly released updated draft is required. As the mineral industry is a huge economic driver in the Planning Region, I recommend that within the current DLUP working groups that at least two (2) experienced individuals are nominated by the placer and hard rock industry to assist with the refinement of the next phase of the Plan.

Implementation of monitoring of disturbance (or impact assessment) in the Dawson Planning Region needs to be completed and should occur alongside predictive ecosystem modelling to evaluate the effectiveness of the management directives. This will also ensure thresholds are science-based so long as it incorporates numerous ecological parameters (including snowpack, fire activity, tourism, etc.) and doesn't exclusively single out industry. It is unknown what the drivers for potential population decline are for key wildlife species, so while completing modelling, population, and associated reproduction rate monitoring of species in undeveloped and developed areas should be evaluated to inform modelling and implementation of key directives for land users.

Implementation is key to the success of the Regional Land Use Plan. As numerous parties are responsible for implementation, roles and responsibilities must be clarified. To facilitate streamlining the process and ensure plan conformity, it is recommended the policies and special management directives align with the current regulatory regime so that continued economic development may occur in the interim.

Lastly, it is critical that while the plan is being refined and implemented that the stability of the economy may continue and that the existing permitting processes for active projects in mining, forestry and agriculture be allowed to progress in ISA designations utilizing the existing land use permit system. A freeze in the permitting process in these LMUâ€™s could unnecessarily shut down new economic investment in the region.

Survey ID# 695

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident, Yes, I live in Dawson seasonally (e.g. sometimes for work)

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? Yes

If so, what sector do you work in? mining

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Yukon Resident"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

Unsure there is a positive aspect to this planning

The things that are missing from the Draft Plan are...

The input from industry appears to be lacking eg: "Mining provides less than 10% of the economic activity for Dawson City." I feel the data sets used to determine the planning process is skewed towards conservation.

The things I would change in the Draft Plan are...

Start over again with stronger input from the non stewardship members of the region.

STEWARDSHIP

I see myself as a steward of the land **Yes**

The different ways that I take care of or connect to the land are....

Mining

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

No

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

The language of the trust itself removes resource extraction as part of that stewardship

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Not closing over 60% of the land to prospecting

Do you feel that most of the things that matter to you were included in the plan?

Not at all - the plan appears very biased towards stewardship and leaves no room for development voices at the table.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? **No**

Please provide explanation

Closing over 60% of the planning area to staking removes the prospector voice from the table.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

All values. Resource voices should have similar representation at the table that stewardship has.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

Mining roads tend to be used by local FN for hunting yet developing these roads has become a huge burden in the regulatory regime. Beaver Creek land planning process is a excellent example where land use planning removed the average Yukoner's ability to access that region.

Do you feel that the amount of human development should be limited to help maintain the things you value?

No

YG & Federal studies propose a 35% point where cumulative effects start to harm the land. Yet this land use planning is proposing a 5% at the maximum for effects. Why is the 5% proposed as the maximum rather than the 35% number?

We see studies on the North Slope of Alaska where development has not hindered Caribou rather in some areas assisted in protecting the species.

WETLANDS

What do you like or dislike about this the approach to wetlands?

Less that 1% of total wetlands have been harmed in the Yukon yet the planning process will remove over 40% of wetlands from any development.

When considering development in wetlands, what impacts to your values are you most concerned about?

Most concerned with the regulatory regime impacts by the wetland regulations.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Disagree

Please tell us why you agree or disagree

I abandoned three years of work in the Moosehorne region where I hold a Class 4 water license. The removal of wetlands removed all ability to utilize the infrastructure developed in the region to explore other creeks and areas.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?
One wetland is the same as another.

Please tell us what you think about development in fens [choose one]

Development should be allowed to occur in fens (no limit).

Please explain your answer.

It becomes a numbers game. If a company wants to mine a Fen rich area. Increase the claims that have Fens to reduce the numerical requirements. Sadly this has quickly become the go to method.

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

Far to much land closed to prospecting

The things I feel the Commission got right about the land designations are...

Not very much - maybe leaving the Hunker loop alone.

The things I would change are...

Open up all land to prospecting with a regulatory regime in place that provides land protections.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

No

Please explain your answer (use locations where possible)

Vast tracts of the Yukon have the same values, what makes these specific areas so special. Australia Creek is the same as the Chandeau or Rock Creek or the list goes on. The difference is Australia Creek holds mineral values while Rock Creek appears not to have values.

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

Choosing what can appear as random undeveloped areas appears to create a poorly managed plan. There are areas like the Indian River highlands that don't mineral values and could be protected.

What advice do you have for the Commission as they develop the Recommended Plan?

Start over since the information base used for this land planning did not include all voices and contains biased information allowing the policy of conservation stewardship as the major aspect of the land planning. What is wrong with developmental stewardship?

Survey ID# 694

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a regular visitor to the Dawson Region

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? No

If so, what sector do you work in?

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Yukon Resident"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I like about the Draft Plan are...

At last planning is being done in this region

The things that are missing from the Draft Plan are...

Not enough fully protected areas.

The things I would change in the Draft Plan are...

A mechanism to get rid of some of the placer/quartz claims that are in important ecological areas (wetlands and caribou habitat for example)

STEWARDSHIP

I see myself as a steward of the land Somewhat

The different ways that I take care of or connect to the land are....

Hiking and skiing and trying to reduce my ecological footprint

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

Yes

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

Good idea. It might take some tweaking to get it to work but once it does it could be a model for other, future land use plans in the Yukon

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Conservation

Do you feel that most of the things that matter to you were included in the plan?

Not really. I would have liked to see more conservation areas

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĚK HWĚCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? Not sure

Please provide explanation

The First Nation was pushing for 60% protection, yet this plan only provides about 3%.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Look after indicator species (such as caribou, and their habitat) and the rest should be easy

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

The number of mining roads and trails in the area (both north and south fo the Yukon River) is causing habitat fragmentation. At this rate the Dawson region is going to end up like northern Alberta

Do you feel that the amount of human development should be limited to help maintain the things you value?

Yes

Yes, let's limit how much staking and mining (be it exploration or actual mining) can happen

WETLANDS

What do you like or dislike about this the approach to wetlands?

There should be no development development in fens in the Integrated Stewardship Areas. Development that occurs in wetlands in the Region MUST be avoided.

When considering development in wetlands, what impacts to your values are you most concerned about?

Wetlands are complex ecosystems supporting a wide variety of life (both fauna and flora). Leave all of it alone.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Agree

Please tell us why you agree or disagree

Agree, but all wetlands are important.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?
Most rivers and streams have small wetlands along them. These should be mapped and protected.

Please tell us what you think about development in fens [choose one]

No development should occur in fens anywhere in the region.

Please explain your answer.

In this era of climate change and humans trying to limit what we emit as far as Greenhouse Gases go, let's not develop any fens

How much of the regions Fens should be allowed to be developed? %

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

Not enough SMAs1

The things I feel the Commission got right about the land designations are...

At least they put in some SMAs, but not enough 1's, too much 2's

The things I would change are...

Change the SMAs2 to 1s, especially the one's north of the Yukon River (SMAs2 numbered 1 and 2)

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

Yes

Please explain your answer (use locations where possible)

They (the ones north of the Yukon River) are comparatively untouched, and they provide a good connectivey between Tombstone and the US border

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

Protect them fully. Otherwise the miners will keep doing their thing and it will be death by a thousand cuts

What advice do you have for the Commission as they develop the Recommended Plan?

Be bold. Protect more. Our descendents will thank you

Survey ID# 693

Section 1: Survey Introduction

GETTING TO KNOW YOU

Are you familiar with the Dawson Region? Yes, I am a full time resident

If not, where do you live?

Are you a member of a Yukon First Nation? No

Do you work in the Dawson Region? Yes

If so, what sector do you work in? Mining and Tourism

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

My comments can be public

How would you like to be identified in this survey? (for example "Quoted from a ...")
"Local business owner/operator"

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

The things I <u>like</u> about the Draft Plan are...
The things that are <u>missing</u> from the Draft Plan are... There is not adequate consideration of the economy and jobs as being important to social welfare of a community. This includes the importance of continuation of the ability for small operators to be able to continue contributing to Yukon's economy. In addition adequate consideration is not given to reclamation as an important factor for regulators/decision makers to consider when deciding that a project may proceed.
The things I would <u>change</u> in the Draft Plan are... Enhance recognition of economics and the contribution jobs in general and small operators in particular to the economy and welfare of communities. Incorporate reclamation more fully as a positive decision element in projects.

STEWARDSHIP

I see myself as a steward of the land Yes

The different ways that I take care of or connect to the land are....

I live and work on the land for at least six months each year. I see how the land repairs itself after disruption and do my best to help it along.

DAWSON LAND STEWARDSHIP TRUST

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan?

No

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

I believe that these things should happen but I do not believe that they should be managed by a trust.

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

Please tell us briefly what matters to you most in the Region?

Economic and environmental welfare of the region.

Do you feel that most of the things that matter to you were included in the plan?

I believe that it is very heavily weighed in favour of the environment without consideration of the effectiveness of reclamation.

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĖK HWĖCH'IN FINAL AGREEMENT (THFA)

In your opinion, does the Draft Plan achieve the objective of Sustainable Development? No

Please provide explanation

I don't believe that it is understood how devastating this draft plan as proposed will be to the economy of the region.

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

No. I think it is mostly looking at environmental concerns without consideration of positive effects of reclamation and does not consider adequately the potential economic and social impacts of what it is proposing.

Section 3 Key Issues

CUMULATIVE EFFECTS

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Your example doesn't seem to reflect evidence of things like the forty mile caribou herd utilizing areas of past and present mining. It seems to assume that if there is any human activity caribou are harmed.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

Things in your example are happening but I don't believe it is because of access roads or trails. I believe that it is happening because of increasing population in the territory and world. It appears that certain sectors are pointed at without sufficient evidence that they are the cause of problems which creates the risk that reducing or harming these sectors won't solve the bigger problems.

Do you feel that the amount of human development should be limited to help maintain the things you value?

No

I believe that there are tools already in place to manage the extents of human development other than bringing in more rules and processes. The tools are already in place in existing acts and regulations. One small example of a tool to manage extents of human development is progressive reclamation in resource development sectors.

WETLANDS

What do you like or dislike about this the approach to wetlands?

I think that blanket rules for each type of wetland and each area is not the way to go. Regulatory bodies need to have the ability to make decisions on a case by case basis.

When considering development in wetlands, what impacts to your values are you most concerned about?

Social and economic factors as well as remediation need to be given more consideration.

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? Disagree

Please tell us why you agree or disagree

I do not believe that they were chosen for scientific or ecological reasons. I believe that they were chosen for political reasons.

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

No, because I believe that decision authorities need to be able to look at each project on a case by case basis and decide accordingly.

Please tell us what you think about development in fens [choose one]

Limited development should be allowed to happen in fens.

Please explain your answer.

Mineral and other resources are unlikely to be found in all areas where there are fens. The presence or absence of economic resources should be one of the factors used in considering whether a specific fen area can be disturbed.

How much of the regions Fens should be allowed to be developed? 25%

: LAND DESIGNATION SYSTEM

What are your first impressions of this map and the land designation system?

I don't believe that this is a system that should be used.

The things I feel the Commission got right about the land designations are...

The things I would change are...

We are one territory and one small population. We are becoming far too complicated and with far too big a public sector at multiple levels to be sustainable with our small population. We are being strangled by ineffective, bureaucratic red tape. I would look for ways to simplify and streamline the system to enable effective decision making on a case by case basis.

Special Management Area 2 (SMA 2):

As you review the areas we have designated as SMA 2, do you agree that these are areas of high conservation value?

No

Please explain your answer (use locations where possible)

See above

Is the SMA2 designation appropriate to protect key values? Please explain your answer

No

only allowing for development of existing mineral claims does not consider new discoveries.

What advice do you have for the Commission as they develop the Recommended Plan?

Make it easier for decision authorities to make decisions rather than tying their hands.