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7 February 2022



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Dear DLUP Planning Commission, TLC Committee, Staff Members

**RE: Balanced Options for Effective Stewardship & A Bright Socio-Economic Future - Draft Dawson Regional Land Use Plan**

Please accept this letter and appended presentation as a distilled summary of our previously submitted comments that have been endorsed as a mineral industry-wide commentary on the Dawson Regional Planning Commissions (DRPC) Draft Land Use Plan (June 2021).

We appreciate the challenges associated with DRPC's mandate, the scope, and difficulty of the task that has been delegated to them. We recognize the many years of work that have resulted in the 2021 Draft Plan. There are numerous aspects of the current draft that we believe provide a solid foundation for a plan that can aid in responsible sustainable development for the years to come.

As this plan is part of fulfilment of the §11 (Land Use Planning) of the Umbrella Final Agreement (dated July 16, 1998) we are grateful to be part of the discussions for planning the future and the stewardship of land management and resources of the Dawson Region in Tr'ondëk Hwëch'in (THFN) Traditional Territory. We are also grateful to the commitment and efforts of the Commission and Staff who have made themselves available to discuss and address questions from the mineral industry.

Recognizing that the documents are first drafts, our intention was to provide a summary of key industry perspectives distilled from submitted comments to help the DLUPC refine and finalize a balanced and implementable Regional Land Use Plan. It is our belief that a final plan that effectively balances environmental stewardship with socio-economic growth will set a positive tone for future land use planning and inspire other Yukon First Nations and Land Use Planners to see this as an opportunity for the Yukon Territory and its future. The recommendations and proposed changes to LMUs and LUDs outlined in this document have been endorsed by all of the mineral industry participants listed the appended presentation.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Johnson".

Greg Johnson  
Chairman  
Metallic Group of Companies  
Suite 904 - 409 Granville Street  
Vancouver, BC V6C 1T2

A handwritten signature in brown ink, appearing to read "Lauren Blackburn".

Lauren R. Blackburn  
Lands, Regulatory & Community Relations Manager  
TruePoint Exploration

Balanced Options for Effective  
Stewardship & A Bright  
Socio-Economic Future -  
Draft Dawson Regional  
Land Use Plan



YUKON-WIDE MINERAL INDUSTRY SUBMISSION

JANUARY 2022

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HARD-ROCK INDUSTRY SUPPORTERS



PLACER INDUSTRY SUPPORTERS\*

FELLMHAWK PLACERS

FAVRON ENTERPRISES

NORTHERN ENVY PLACERS

MOONLIGHT MINING

AJAX MINING

NORTHERN SONIC DRILLING

SCHMIDT MINING CORP

SLATE RIVER MINING

K1 MINING

MOOSEHORN EXPLORATION

NEW ERA ENGINEERING

DAVAL MINING

GOLDBOTTOM MINE TOURS

FINE GOLD RESOURCES

STORM STRUCTURES

HAWKER MINES

2074098 ALBERTA LTD

NORTHERN EXPOSURES

ACE PLACER MINES

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\*THE ABOVE REPRESENTS ~150 LOCAL PLACER MINERS

## Complexities of the Plan

We appreciate the challenges associated with DRPC's mandate, the scope, and difficulty of the task that has been delegated to them.

We recognize the many years of work that have resulted in the 2021 Draft Plan. There are numerous aspects of the current draft that we believe provide a solid foundation for a plan that can aid in responsible sustainable development for the years to come.

We are grateful to the commitment and efforts of the Commission and Staff who have made themselves available to discuss and address questions from the mineral industry.

Recognizing that the documents are first drafts, our intention was to iterate on these documents to help the DRPC refine and finalize a more balanced and implementable Regional Land Use Plan.

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# A Balanced, Sustainable Approach

It is critical that the final plan:

- Fulfill Chapter §11 (“Land Use Planning”) of the Umbrella Final Agreement and honour Tr’ondëk Hwëch’in (THFN’s) outlined heritage & habitat values.
- Utilize provided heritage & habitat (ecological) layers to strike a balanced approach of habitat preservation and land-management while supporting the continuation of future and existing economic and industrial activity in the region to honour the regions mineral potential.
- Look to increase protection of high-value heritage & habitat areas and develop a manageable regulatory framework for stewardship of areas that have lower heritage & habitat values with significant pre-existing or potential economic and industrial value.

This proposal iterates on the draft plan to **improve clarity, reduce conflicts and economic takings, increase protection and enable balanced economic development.**

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# Key Points & Considerations

## 1. Methodology and Land Classifications

The methodology described in §1.6.2.5 (Priority Criteria for Candidate Conservation Areas) does not appear to always correspond to Draft Land Management Units (LMUs) and currently proposed Land Use Designations (LUDs).

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 LUDs. High potential economic areas with lower heritage and habitat values should be classified as less restrictive LUDs (See Appendix: Summary of Ecological, Heritage and Economic Values with LMU Recommendations).

→ *Recommendations:*

1A

*Align LUDs with the scope outlined in the Plan to match the stated methodology.*

✓ Reduce Conflicts

✓ Increase Protection

✓ Balanced Economic Development

1B

*Revise cumulative effects thresholds for ISAs to protect the integrity of key ecological and heritage values while allowing for sustainable economic development*

✓ Reduce Conflicts

✓ Balanced Economic Development

# Key Points & Considerations

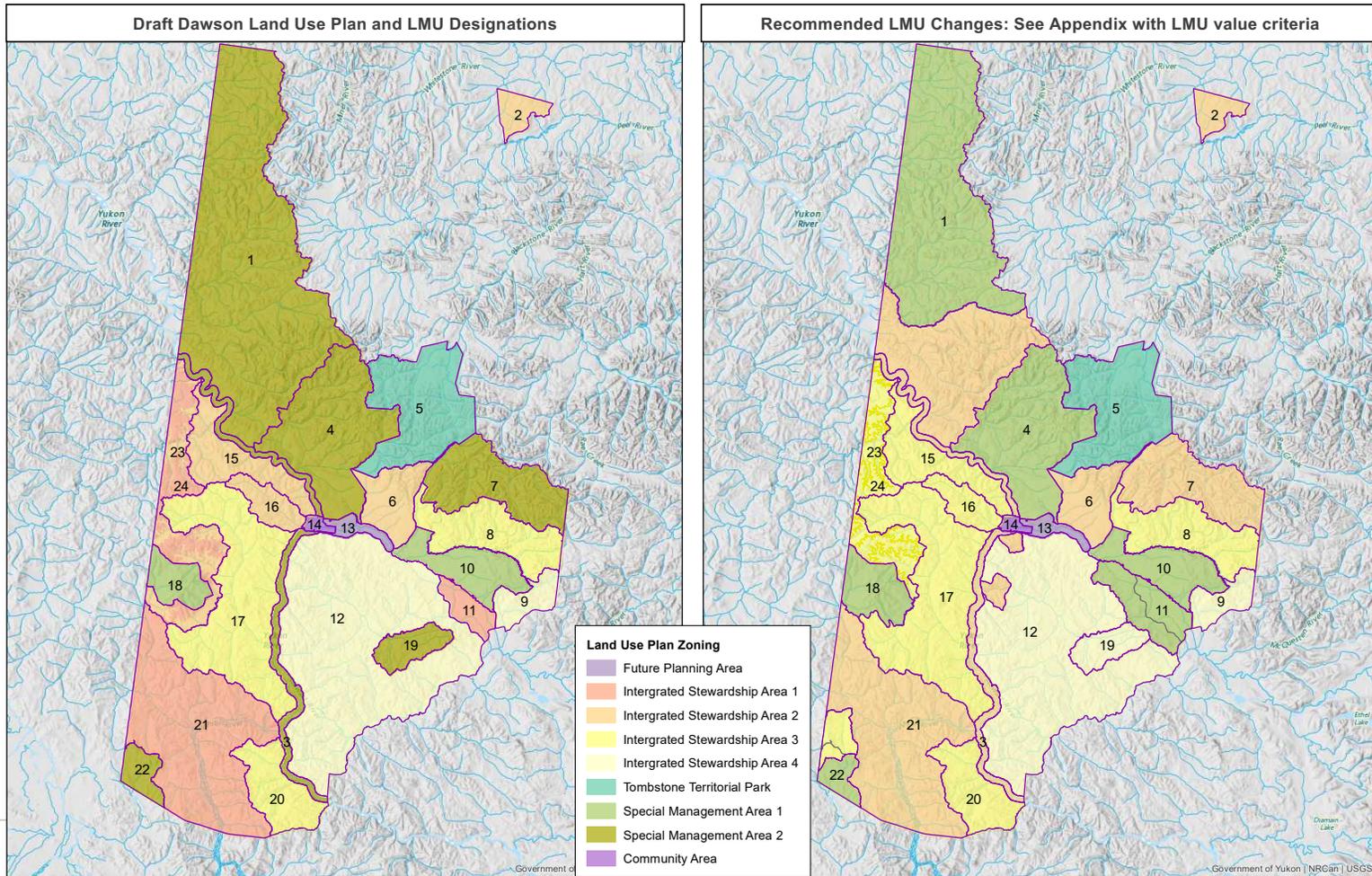
## 2. Implementation & Simplification

The Draft Plan currently has six (6) Land Use Designations. We recommend these categories be clearly distilled down into four (4) Land Use Designations for ease of implementation. Additionally, the SMA 2 designation is unclear and ineffective as currently defined. Conservation groups will interpret it as areas open for development, while the mineral industry interprets it as a protected area.

→ *Recommendations:*

<b>2A</b>	<p><i>Simplify the LUDs to three levels of Integrated Stewardship Areas (ISAs): low, moderate, and high development; and a single level of Special Management Area with full conservation (SMA 1)</i></p> <p>✓ Improve Clarity    ✓ Simplify Implementation    ✓ Reduce Conflicts</p>	
<b>2B</b>	<p><i>Increase SMA1 areas where there are no conflicting land uses to minimize habitat fragmentation and provide buffers</i></p> <p>✓ Improve Clarity    ✓ Increase Protection</p>	
<b>2C</b>	<p><i>Merge adjacent LMUs with the same designation and similar management objectives</i></p> <p>✓ Improve Clarity    ✓ Simplify Implementation</p>	

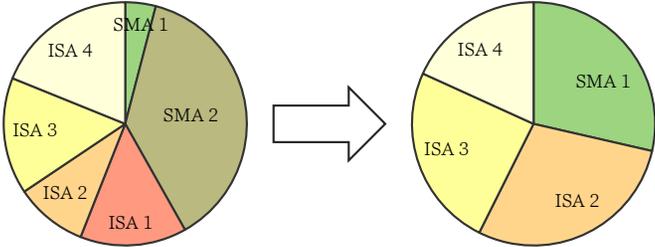
# Recommended LMU Changes



# Recommended LUD Changes

Draft Land Use Plan			Proposed Changes	
LUD	% of Region	Max % of Region Disturbed (at Critical Threshold)	% of Region	Max % of Region Disturbed (at Critical Threshold)
SMA 1	3.81%	0.00%	26.88%	0.00%
SMA 2	35.52%	Classified Under ISA 1 & 2	Removal of designations - placement into SMA 1 and ISA categories	
ISA 1	13.32%	0.11%		
ISA 2	9.04%	0.13%	27.07%	0.27%
ISA 3	14.59%	0.36%	22.95%	0.57%
ISA 4	17.76%	0.89%	17.13%	0.86%

- ✓ Increases the total fully conserved area (SMA 1) from 3.8% to 26.9% - a **700% increase in fully protected areas**
- ✓ Decreases maximum-development areas from 17.8% to 17.1%
- ✓ Permits **sustainable development** of more areas with high mineral potential and **reduces potential conflicts**
- ✓ Simplifies implementation whilst providing for **sustainable, responsible, economic development**



# Key Points & Considerations

## 3. Cumulative Disturbance Thresholds

Threshold values are low compared to land use plans in similar sub-arctic, low-density populated areas; particularly relative to ecologic thresholds in scientific studies which generally indicate threshold preservation of ~60% of habitat or up to 80% for rare species. Furthermore, net zero cumulative disturbance is possible, and the Plan should emphasize the importance of reclamation & restoration.

### → Recommendations:

3A

*Promote stewardship by incentivizing progressive reclamation of Quartz and Placer projects through MLUP processes and tracking of cumulative disturbances through Post-Season Reporting.*

✓ Increase Protection

✓ Simplify Implementation

✓ Utilizes Existing Permitting Framework & Capacity

3B

*Encourage reclamation of modern and historic disturbances by removing reclaimed areas from calculation of total disturbance amounts, and facilitate wetland stewardship initiatives.*

✓ Reduce Conflicts

✓ Balanced Economic Development

3C

*Form a Technical Working Group to develop revised cumulative disturbance thresholds utilizing existing research and predictive modelling.*

✓ Reduce Conflicts

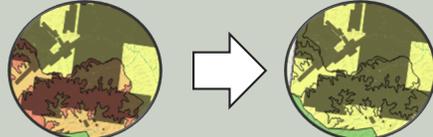
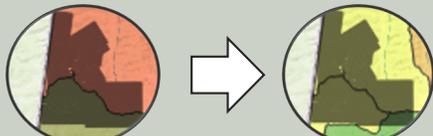
✓ Balanced Economic Development

# Key Points & Considerations

## 4. Subdivision of Known Mineral Districts

Mineral deposits and areas of elevated geologic potential frequently occur in districts relating to key geological structures. This tends to cluster areas of exploration interest, deposits and potential mines. Splitting a mineral district negatively impacts the economic potential of the entire district, as infrastructure is commonly shared. Several known mineral districts within the Dawson area already have established infrastructure and existing disturbances and are subdivided by LMU designations in the draft plan.

→ *Recommendations:*

4A	<p><i>Maintain uniform LUDs for known mineral districts that do not overlap key values (ecosystem, heritage etc.)</i></p> <p>✓ Improve Clarity    ✓ Reduce Conflicts    ✓ Balanced Economic Development</p>	
4B	<p><i>Adjust LMU boundaries to minimize subdivision of areas with established high mineral potential.</i></p> <p>✓ Improve Clarity    ✓ Reduce Conflicts    ✓ Balanced Economic Development</p>	

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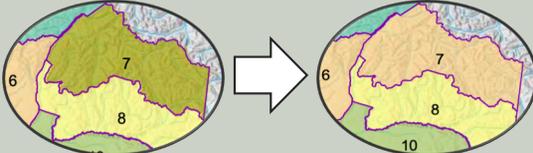
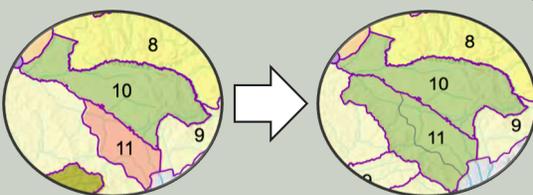
# Key Points & Considerations

## 5. Preserving A Bright Economy for Future Generations

The Draft Plan does not seem to fully meet the objectives for environmental and heritage conservation efforts, with only 3.8% of the area being designated for full protection. Nor does it ensure a bright, stable, economic future for generations to come with restrictive designation of LMUs with high mineral potential.

The current draft will result in significant land use conflicts, reduced economic sustainability, and the need for significant economic compensation to existing mineral rights holders. Many of these areas of conflicts lie within regions that have lower heritage and habitat resource values.

### → Recommendations:

<b>5A</b>	<p><i>Re-classify LMUs with significant existing development and lower heritage and habitat resource values to ISA designations.</i></p> <p>✓ Reduce Conflicts      ✓ Balanced Economic Development</p>	
<b>5B</b>	<p><i>Re-classify LMUs with low mineral development and higher heritage and habitat resource values to SMA 1. This results in an increase in total SMA 1 area from <u>3.8% to 26.88%</u> of the Dawson region.</i></p> <p>✓ Improve Clarity      ✓ Increase Protection</p>	

## APPENDIX – RATIONALE FOR RECOMMENDED LMU-DESIGNATION CHANGES

LMU #1		Current Designation in Draft Plan		SMA 2		
Label - North		Tr'ondëk Hwëch'in Traditional Name		Tthetäwndëk		
Values Identified			Value Feature Present	Number Identified or Present	% of Total LMU	
Ecological	Rare or Important Ecoystems	Unglaciated Limestone or Dolostone (km <sup>2</sup> )	✓	735.85		
		In-tact Forest (km <sup>2</sup> )	✓	251.89	3.17%	
		Wetlands (km <sup>2</sup> )	✓	0.57	0.01%	
		Tintina Trench Fly-way (km <sup>2</sup> )	✓	340.18	4.28%	
	Fish & Wildlife	Movement of Adult Chinook Salmon				
		Chinook Spawning Habitat (km <sup>2</sup> )	✓	27.92	0.35%	
		Migratory Bird - High Concern	✓	120.21	1.51%	
		Sharp tailed Grouse - Key Area	✓	11.21	0.14%	
		Waterfowl - Key Area				
		Raptors - Key Area (km <sup>2</sup> )	✓	825.26	<b>10.38%</b>	
Heritage	THFN Settlement Lands	<100 Ha	✓	3		
		>100 Ha - Category A (km <sup>2</sup> )	✓	89.27	1.12%	
		>100 Ha - Category B (km <sup>2</sup> )	✓	20.04	0.25%	
	Sites & Trails	TH Traditional Trails		✓	3	
		Land Use Sites				
		Important Community Sites				
		Recorded Historic Resouce	✓	2		
		Archaeological Site	✓	1		
Economic	Quarz Claims	Claims	✓	804 cl. (~165 km <sup>2</sup> )	2.08%	
		Number of Stakeholders	✓	5		
<b>Recommended Changes:</b> Recommend dividing large LMU into Northern (Tatonduk River - 1a) and Southern (Yukon River North - 1b) Domains to reflect overlap of high-ecological and heritage features in the North. All pre-existing development occurs in the Southern Domain incl. historical mining and 804 quartz claims. There are no placer claims in proposed LMU 1b - so very little surface disturbance would occur in areas defined as wetlands.						
<b>Recommended Designation: Divide into 2 Domains</b>			Rec. Design.	Area (km <sup>2</sup> )	Region %	
Northern (Tatonduk River)			SMA 1	5,021.3	12.60%	
Southern (Yukon River North)			ISA 2	2,929.1	7.35%	

**\*NOTE\*** For all following Appendix Tables, no spatial data extraction could be completed on high-unglaciated, rare plant & animal species and high-concern migratory birds.

**\*NOTE\*** PER RECOMMENDATION FOR SIMPLIFICATION TO A 3-TIERED LMU CATEGORY. REFERENCE TO ALL ISA 2's IN THESE TABLES REFERS TO A LOW DISTURBANCE ISA-CATEGORY.

LMU #4		Current Designation in Draft Plan		SMA 2		
Label - 15 - Chandindu		Tr'ondëk Hwëch'in Traditional Name		Tsey dëk - Tthen dëk		
Values Identified			Value Feature Present	Number Identified or Present	% of Total LMU	
Ecological	Rare or Important Ecosystems	Unglaciated Limestone or Dolostone (km <sup>2</sup> )				
		In-tact Forest (km <sup>2</sup> )	✓	30.14	1.09%	
		Wetlands (km <sup>2</sup> )	✓	0.33	0.01%	
		Tintina Trench Fly-way (km <sup>2</sup> )	✓	472.21	<b>17.11%</b>	
	Fish & Wildlife	Movement of Adult Chinook Salmon				
		Chinook Spawning Habitat (km <sup>2</sup> )	✓	82.87	3.00%	
		Migratory Bird - High Concern (km <sup>2</sup> )	✓	56.29	2.04%	
		Sharp tailed Grouse - Key Area				
		Waterfowl - Key Area				
		Raptors - Key Area (km <sup>2</sup> )	✓	64.45	2.33%	
Heritage	THFN Settlement Lands	<100 Ha	✓	4		
		>100 Ha - Category A (km <sup>2</sup> )	✓	381.49	<b>13.82%</b>	
		>100 Ha - Category B (km <sup>2</sup> )	✓	299.87	<b>10.86%</b>	
	Sites & Trails	TH Traditional Trails	✓	6		
		Land Use Sites				
		Important Community Sites				
		Recorded Historic Resouce	✓	10		
		Archaeological Site	✓	16		
Paleontological Site						
Economic	Placer & Quarz Claims	Claims	✓	10 Quartz cl.	<b>0.07%</b>	
		Number of Stakeholders	✓	3		
<p><b>Recommended Changes:</b> This LMU has very high ecological habitats and a high proportion of First Nation Settlement Lands. In addition, is shares a border with Tombstone Territorial Park . With very few non-renewable resources highlighted, this is an excellent opportunity for a sizable high-preservation area.</p>						
<b>Recommended Designation: Unchanged Size</b>			<b>Rec. Design.</b>	<b>Area (km<sup>2</sup>)</b>	<b>Region %</b>	
15 - Chandindu			SMA 1	2,760.6	6.93%	

LMU #7		Current Designation in Draft Plan		SMA 2		
Label - Upper Brewery/Hamilton						
Values Identified		Value Feature Present	Number Identified or Present	% of Total LMU		
Ecological	Rare or Important Ecoystems	Unglaciaded Limestone or Dolostone (km <sup>2</sup> )				
		In-tact Forest (km <sup>2</sup> )	✓	7.78	0.46%	
		Wetlands (km <sup>2</sup> )	✓	0.04	0.002%	
		Tintina Trench Fly-way (km <sup>2</sup> )				
	Fish & Wildlife	Movement of Adult Chinook Salmon				
		Chinook Spawning Habitat (km <sup>2</sup> )				
		Migratory Bird - High Concern (km <sup>2</sup> )	✓	17.09	1.02%	
		Sharp tailed Grouse - Key Area				
		Waterfowl - Key Area				
		Raptors - Key Area (km <sup>2</sup> )	✓	62.07	3.69%	
Heritage	THFN Settlement Lands	<100 Ha	✓	4		
		>100 Ha - Category A (km <sup>2</sup> )				
		>100 Ha - Category B (km <sup>2</sup> )	✓	1.10	0.07%	
	Sites & Trails	TH Traditional Trails				
		Land Use Sites	✓	1		
		Important Community Sites	✓	2		
		Recorded Historic Resouce	✓	2		
		Archaeological Site	✓	6		
		Paleontological Site				
	Economic	Placer & Quarz Claims	Claims	✓	1,468 cl.	<b>16.59%</b>
Number of Stakeholders			✓	10		
<p><b>Recommended Changes:</b> LMU-7 is characterized by both large mammal habitat for sheep, moose, and caribou as well as significant mineral potential. Recommend the addition of further MLUP guidelines to reflect ungulate habitat and seasonality's. LMU-7 is an area with significant mineral potential with over 16% of the area covered by existing mineral claims and leases raising the potential for conflicts &amp; economic takings. Recommend continued monitoring and ecological modelling through integrated stewardship initiatives with land-users.</p>						
<b>Recommended Designation: Unchanged Size</b>		<b>Rec. Design.</b>	<b>Area (km<sup>2</sup>)</b>	<b>Region %</b>		
7 - Upper Brewery		ISA 2	1,681.3	4.22%		

<b>LMU #11</b>		<b>Current Designation in Draft Plan</b>	<b>ISA 1</b>	
<b>Label - Flat Creek Wetlands</b>				

Values Identified		Value Feature Present	Number Identified or Present	% of Total LMU	
Ecological	Rare or Important Ecoystems	Unglaciaded Limestone or Dolostone (km <sup>2</sup> )			
		In-tact Forest (km <sup>2</sup> )	✓	2.65	0.72%
		Wetlands (km <sup>2</sup> )	✓	17.58	4.78%
		Tintina Trench Fly-way (km <sup>2</sup> )	✓	307.46	<b>83.60%</b>
	Fish & Wildlife	Movement of Adult Chinook Salmon			
		Chinook Spawning Habitat (km <sup>2</sup> )			
		Migratory Bird - High Concern (km <sup>2</sup> )	✓	126.88	<b>34.50%</b>
		Sharp tailed Grouse - Key Area (km <sup>2</sup> )	✓	105.96	<b>28.81%</b>
		Waterfowl - Key Area	✓	8.04	
		Raptors - Key Area (km <sup>2</sup> )			
Heritage	THFN Settlement Lands	<100 Ha	✓	2	
		>100 Ha - Category A (km <sup>2</sup> )			
		>100 Ha - Category B (km <sup>2</sup> )	✓	0.0002	0.0000004%
	Sites & Trails	TH Traditional Trails			
		Land Use Sites	✓	2	
		Important Community Sites			
		Recorded Historic Resouce	✓	1	
		Archaeological Site	✓	4	
Paleontological Site	✓	1			
Economic	Placer & Quarz Claims	Claims		None	<b>0.00%</b>
		Number of Stakeholders		None	

**Recommended Changes:** Increase LMU-11 to SMA1 and increase its size from adjacent LMU-12 ISA4 (see recommendations for LMU-12 and 19). This LMU is 84%-covered by Tintina Trench Fly-way and is the 2nd highest waterfowl habitat of all LMU's reviewed. In addition, it contains a high percentage for modelled high concern habitat for migratory birds and is contiguous with the Upper Klondike LMU (SMA1). Despite being adjacent to LMU-12 there is currently NO active mining lease or claim activity and it represents an area of high value, pristine wetlands. **This LMU could expand to more than double it's current size (520.7km<sup>2</sup> or 1.31% of total Planning Region) to include increased wetland value and their upland watersheds with no land-use conflicts.**

Recommended Designation: INCREASE size by 520.7km <sup>2</sup> (1.31%)	Rec. Design.	Area (km <sup>2</sup> )	Region %
11 - Flat Ck Wetlands (existing LMU)	SMA 1	367.8	0.92%
11'b' - Expansion west-ward (removal from LMU12)	SMA 1	520.7	1.31%

LMU #12		Current Designation in Draft Plan		ISA 4		
Label - East		Tr'ondëk Hwëch'in Traditional Name		Nächo dëk		
Values Identified		Value Feature Present	Number Identified or Present	% of Total LMU		
Ecological	Rare or Important Ecoystems	Unglaciated Limestone or Dolostone (km <sup>2</sup> )				
		In-tact Forest (km <sup>2</sup> )	✓	46.25	0.70%	
		Wetlands (km <sup>2</sup> )	✓	89.66	1.36%	
		Tintina Trench Fly-way (km <sup>2</sup> )	✓	57.18	0.87%	
	Fish & Wildlife	Movement of Adult Chinook Salmon				
		Chinook Spawning Habitat (km <sup>2</sup> )	✓	121.45	1.84%	
		Migratory Bird - High Concern (km <sup>2</sup> )	✓	122.71	1.86%	
		Sharp tailed Grouse - Key Area (km <sup>2</sup> )	✓	944.97	<b>14.30%</b>	
		Waterfowl - Key Area				
		Raptors - Key Area (km <sup>2</sup> )	✓	520.46	7.88%	
Heritage	THFN Settlement Lands	<100 Ha	✓	4		
		>100 Ha - Category A (km <sup>2</sup> )	✓	122.15	1.85%	
		>100 Ha - Category B (km <sup>2</sup> )	✓	55.02	0.83%	
	Sites & Trails	TH Traditional Trails	✓	1		
		Land Use Sites	✓	2		
		Important Community Sites				
		Recorded Historic Resouce	✓	156		
		Archaeological Site	✓	73		
Paleontological Site	✓	101				
Economic	Placer & Quarz Claims	Claims	✓	32,633 cl.	<b>76.93%</b>	
		Number of Stakeholders	✓	455		
<p><b>Recommended Changes:</b> LMU-12 has the most historic disturbance from economic development and is one of the most important areas of economic activity in the region. There is opportunity to move a large area of pristine wetland from LMU-12 to adjacent LMU-11 (see LMU-11 recommendations). Removal of two smaller LMUs (Bonanza Creek and Indian River) from LMU-12 ISA4 at confluence with the Yukon River, could provide ideal water quality monitoring sites for unique Integrated Stewardship to improve salmon habitat. Salmon will not re-populate inland areas if the confluences themselves are not protected and water quality observed. Additional opportunities to research and develop wetland restoration techniques via collaborative stewardship informing best management practices for industry. See also LMU-19.</p>						
<b>Recommended Designation: REDUCE Size with removal of 2 LMUs</b>		<b>Rec. Design.</b>	<b>Area (km<sup>2</sup>)</b>	<b>Region %</b>		
12a - East		ISA 4	5,871.4	14.73%		
12'b' - Bonanza Confluence - removal for water/fish monitoring		ISA 2	75.1	0.19%		
12'c' - Indian River Confluence - removal for water/fish monitoring		ISA 2	138.9	0.35%		

LMU #15		Current Designation in Draft Plan		ISA 2	
Label - 40 Mile River		Tr'ondëk Hwëch'in Traditional Name		Chëdähdëk	
Values Identified		Value Feature Present	Number Identified or Present	% of Total LMU	
Ecological	Rare or Important Ecosystems	Unglaciated Limestone or Dolostone (km <sup>2</sup> )			
		In-tact Forest (km <sup>2</sup> )	✓	5.47	0.49%
		Wetlands (km <sup>2</sup> )			
		Tintina Trench Fly-way (km <sup>2</sup> )			
	Fish & Wildlife	Movement of Adult Chinook Salmon			
		Chinook Spawning Habitat (km <sup>2</sup> )			
		Migratory Bird - High Concern (km <sup>2</sup> )	✓	13.10	1.17%
		Sharp tailed Grouse - Key Area (km <sup>2</sup> )	✓	74.44	6.66%
		Waterfowl - Key Area			
		Raptors - Key Area (km <sup>2</sup> )	✓	162.95	14.58%
Heritage	THFN Settlement Lands	<100 Ha	✓	3	
		>100 Ha - Category A (km <sup>2</sup> )	✓	12.64	1.13%
		>100 Ha - Category B (km <sup>2</sup> )			
	Sites & Trails	TH Traditional Trails	✓	2	
		Land Use Sites			
		Important Community Sites			
		Recorded Historic Resouce	✓	1	
		Archaeological Site	✓	2	
Paleontological Site					
Economic	Placer & Quarz Claims	Claims	✓	933 cl.	9.93%
		Number of Stakeholders	✓	29	
<p><b>Recommended Changes:</b> A portion thereof is very important for THFN heritage. Tremendous overlapping land-use values including historic mining, placer mining, trapping, forestry, recreation and harvesting pursuits along the Fortymile River. LUP should look to implement ISA-practises to educate community/tourists and encourage YG to regulate via (seasonal) MLUP conditions (water quality, fish monitoring), to support potential for increase Chinook spawning habitat. In addition, proximity to Dawson and cultural heritage present oppurtunities for Stewardship practises &amp; cultural education.</p>					
<b>Recommended Designation: Unchanged Size</b>		<b>Rec. Design.</b>	<b>Area (km<sup>2</sup>)</b>	<b>Region %</b>	
15 - 40 Mile		ISA 3	1,118.0	2.81%	

LMU #16		Current Designation in Draft Plan		ISA 2	
Label - Swede Ck.					
Values Identified			Value Feature Present	Number Identified or Present	% of Total LMU
Ecological	Rare or Important Ecosystems	Unglaciaded Limestone or Dolostone (km <sup>2</sup> )			
		In-tact Forest (km <sup>2</sup> )	✓	3.09	0.65%
		Wetlands (km <sup>2</sup> )			
		Tintina Trench Fly-way (km <sup>2</sup> )			
	Fish & Wildlife	Movement of Adult Chinook Salmon			
		Chinook Spawning Habitat (km <sup>2</sup> )			
		Migratory Bird - High Concern (km <sup>2</sup> )	✓	3.15	0.67%
		Sharp tailed Grouse - Key Area (km <sup>2</sup> )			
		Waterfowl - Key Area			
		Raptors - Key Area (km <sup>2</sup> )	✓	0.40	0.085%
Heritage	THFN Settlement Lands	<100 Ha	✓	2	
		>100 Ha - Category A (km <sup>2</sup> )			
		>100 Ha - Category B (km <sup>2</sup> )			
	Sites & Trails	TH Traditional Trails	✓	1	
		Land Use Sites			
		Important Community Sites			
		Recorded Historic Resouce			
		Archaeological Site	✓	1	
Paleontological Site					
Economic	Placer & Quarz Claims	Claims	✓	388 cl.	8.53%
		Number of Stakeholders	✓	11	
<p><b>Recommended Changes:</b> LMU-16 borders developments along Sunnysdale which include various agricultural and residential properties. Swede Creek is utilized by these properties for a local water source. As such, it is key this LMU utilizes integrated stewardship opportunities and industrial activities minimize impacts to water quality. This could be implemented through land-use permitting requirements. Both ISA 2 or ISA 3 designation of this LMU are logical to ensure shared responsible land-use - recommend ISA 3 to amalgamate with bordering LMUs 15 and 17 to simplify and reduce requirements for capacity increases.</p>					
<b>Recommended Designation: Unchanged Size</b>			<b>Rec. Design.</b>	<b>Area (km<sup>2</sup>)</b>	<b>Region %</b>
16 - Swede Creek			ISA 3	472.5	1.19%

LMU #18		Current Designation in Draft Plan		SMA 1	
Label - Matson Uplands					
Values Identified			Value Feature Present	Number Identified or Present	% of Total LMU
Ecological	Rare or Important Ecosystems	Unglaciaded Limestone or Dolostone (km <sup>2</sup> )			
		In-tact Forest (km <sup>2</sup> )	✓	3.09	0.58%
		Wetlands (km <sup>2</sup> )			
		Tintina Trench Fly-way (km <sup>2</sup> )			
	Fish & Wildlife	Movement of Adult Chinook Salmon			
		Chinook Spawning Habitat (km <sup>2</sup> )			
		Migratory Bird - High Concern (km <sup>2</sup> )	✓	5.51	1.03%
		Sharp tailed Grouse - Key Area (km <sup>2</sup> )			
		Waterfowl - Key Area			
		Raptors - Key Area (km <sup>2</sup> )	✓	0.40	0.076%
Heritage	THFN Settlement Lands	<100 Ha	✓	2	
		>100 Ha - Category A (km <sup>2</sup> )			
		>100 Ha - Category B (km <sup>2</sup> )			
	Sites & Trails	TH Traditional Trails	✓	1	
		Land Use Sites			
		Important Community Sites			
		Recorded Historic Resouce			
		Archaeological Site	✓	1	
Paleontological Site					
Economic	Placer Claims	Claims	✓	1	0.04%
		Number of Stakeholders	✓	1	
<p><b>Recommended Changes:</b> The Matson Uplands are key habitat for the Fortymile and Nelchina caribou herds. Although this LMU has potential for future mineral development, it has seen little disturbance to date and provides the Commission with an opportunity to protect the integrity of this <b>unique upland habitat</b> and thus the population/health of these herds. It is recommended this LMU increase in size by 240.2km<sup>2</sup> (or 0.6% of the total Planning Region).</p>					
<b>Recommended Designation: INCREASE size by 240.2km<sup>2</sup> (0.6%)</b>			<b>Rec. Design.</b>	<b>Area (km<sup>2</sup>)</b>	<b>Region %</b>
18 - Matson Uplands			SMA 1	773.4	1.94%

LMU #19		Current Designation in Draft Plan		SMA 2	
Label - Upper Indian River					
Values Identified			Value Feature Present	Number Identified or Present	% of Total LMU
Ecological	Rare or Important Ecoystems	Unglaciaded Limestone or Dolostone (km <sup>2</sup> )			
		In-tact Forest (km <sup>2</sup> )	✓	5.21	1.08%
		Wetlands (km <sup>2</sup> )	✓	41.78	8.69%
		Tintina Trench Fly-way (km <sup>2</sup> )			
	Fish & Wildlife	Movement of Adult Chinook Salmon			
		Chinook Spawning Habitat (km <sup>2</sup> )			
		Migratory Bird - High Concern (km <sup>2</sup> )	✓	14.40	2.99%
		Sharp tailed Grouse - Key Area (km <sup>2</sup> )			
		Waterfowl - Key Area			
		Raptors - Key Area (km <sup>2</sup> )			
Heritage	THFN Settlement Lands	<100 Ha			
		>100 Ha - Category A (km <sup>2</sup> )			
		>100 Ha - Category B (km <sup>2</sup> )			
	Sites & Trails	TH Traditional Trails			
		Land Use Sites			
		Important Community Sites			
		Recorded Historic Resouce			
		Archaeological Site	✓	4	
Paleontological Site					
Economic	Placer & Quarz Claims	Claims	✓	1,196 cl.	<b>29.10%</b>
		Number of Stakeholders	✓	34	
<p><b>Recommended Changes: LMU-19 has relatively low outlined ecological habitat (&lt;10% wetlands) or heritage elements but very significant mineral potential with 29% of the LMU covered by existing mining claims and leases.</b> Wholly surrounded by LMU-12 (high disturbance ISA 4) LMU-19 has the same geological setting and mineral potential as the Indian River/Dominion Creek and represents one of the most important areas for economic growth in the Klondike. Modern-day operations on the Australia Creek drainage have demonstrated the potential for a sustainable placer mining industry for decades to come with over 34 current operators. LMU-19 may have already exceeded its cautionary threshold of cumulative disturbance for a SMA2 and a SMA2-designation for LMU-19 would result in major long-term economic loss for the region and potential for significant conflict and economic takings. *Recommend combining LMU-19 with surrounding LMU-12, but increasing the designation of the adjacent undisturbed Flat Creek wetlands LMU-11 to SMA1 and expanding it by an area larger than LMU-19 (doubling LMU-11 vs it's size in draft plan). Also see recommended modifications to LMU-12 to protect areas of high-ecological value for salmon.</p>					
<b>Recommended Designation: Unchanged Size</b>			<b>Rec. Design.</b>	<b>Area (km<sup>2</sup>)</b>	<b>Region %</b>
19 - Upper Indian River			ISA 4	481.0	1.21%
*11 - Flat Ck Wetlands w/ suggested expansion			SMA 1	888.5	2.23%

LMU #21		Current Designation in Draft Plan		ISA 1	
Label - White		Tr'ondëk Hwëch'in Traditional Name		Tädzan dëk	
Values Identified		Value Feature Present	Number Identified or Present	% of Total LMU	
Ecological	Rare or Important Ecoystems	Unglaciated Limestone or Dolostone (km <sup>2</sup> )			
		In-tact Forest (km <sup>2</sup> )	✓	5.21	0.13%
		Wetlands (km <sup>2</sup> )	✓	41.78	1.01%
		Tintina Trench Fly-way (km <sup>2</sup> )			
	Fish & Wildlife	Movement of Adult Chinook Salmon			
		Chinook Spawning Habitat (km <sup>2</sup> )			
		Migratory Bird - High Concern (km <sup>2</sup> )	✓	143.90	3.49%
		Sharp tailed Grouse - Key Area (km <sup>2</sup> )			
		Waterfowl - Key Area			
		Raptors - Key Area (km <sup>2</sup> )			
Heritage	THFN Settlement Lands	<100 Ha			
		>100 Ha - Category A (km <sup>2</sup> )			
		>100 Ha - Category B (km <sup>2</sup> )			
	Sites & Trails	TH Traditional Trails			
		Land Use Sites			
		Important Community Sites			
		Recorded Historic Resouce			
		Archaeological Site	✓	4	
Paleontological Site					
Economic	Placer & Quarz Claims	Claims	✓	2,617 cl	<b>11.86%</b>
		Number of Stakeholders	✓	21	
<p><b>Recommended Changes:</b> Though LMU-21 is relatively inaccessible, nearly 12% is currently covered by mineral claims held by 21 operators. The southwest portion of the LMU borders LMU 22 where it overlaps significant placer and hard rock development. Current Draft Plan splits this highly developed area up, into ISA 1- and SMA1-designated LMUs (21 &amp; 22, respectively). Potential conflict could be mitigated through separating this highly developed region out of LMU 21 and LMU 22 and creating a smaller high-development LMU (Also see recommendations in LMU-22).</p>					
<b>Recommended Designation: Reduce Size by 246.7km<sup>2</sup> (0.62%)</b>		<b>Rec. Design.</b>	<b>Area (km<sup>2</sup>)</b>	<b>Region %</b>	
21 - White		ISA 2	3,877.6	9.73%	

<b>LMU #22</b>		<b>Current Designation in Draft Plan</b>	<b>SMA 2</b>	
<b>Label - Scottie Creek</b>				

Values Identified		Value Feature Present	Number Identified or Present	% of Total LMU	
Ecological	Rare or Important Ecoystems	Unglaciaded Limestone or Dolostone (km <sup>2</sup> )			
		In-tact Forest (km <sup>2</sup> )			
		Wetlands (km <sup>2</sup> )	✓	13.84	3.90%
		Tintina Trench Fly-way (km <sup>2</sup> )			
	Fish & Wildlife	Movement of Adult Chinook Salmon			
		Chinook Spawning Habitat (km <sup>2</sup> )			
		Migratory Bird - High Concern (km <sup>2</sup> )	✓	29.98	8.44%
		Sharp tailed Grouse - Key Area (km <sup>2</sup> )			
		Waterfowl - Key Area	✓	16.21	
	Raptors - Key Area (km <sup>2</sup> )				
Heritage	THFN Settlement Lands	<100 Ha	✓	1	
		>100 Ha - Category A (km <sup>2</sup> )			
		>100 Ha - Category B (km <sup>2</sup> )			
	Sites & Trails	TH Traditional Trails			
		Land Use Sites			
		Important Community Sites			
		Recorded Historic Resouce			
Archaeological Site					
Paleontological Site					
Economic	Placer & Quarz Claims	Claims	✓	435 cl.	<b>13.24%</b>
		Number of Stakeholders	✓	8	

**Recommended Changes:** The Draft Plan characterizes LMU-22 as having “low perspectivity for mineral potential” when in fact the northern portion of this LMU contains highly developed overlapping placer and quartz claims covering 68% of the area with high-potential for economic value. The remaining southern Scottie Creek area is pristine habitat and has No mineral claims. The existing economic development areas do not overlap with wetland habitat and associated key waterfowl habitat on Scottie Creek. **\*Recommend that the northern portion (68.8km<sup>2</sup> area) of LMU-22 be removed and be given an ISA 3 designation to mitigate conflicts, whilst the Scottie Creek Wetland increase in designation to SMA 1.** This high-development part of LMU-22 could be added to the compatible adjacent LMU-21 to further simplifying regulatory administration.

Recommended Designation: Removal of Northern 68.8km <sup>2</sup>		Rec. Design.	Area (km <sup>2</sup> )	Region %
22 - Scottie Ck		SMA 1	286.3	0.72%
22a - North		ISA 3	68.8	0.17%

LMU #23 & 24		Current Designation in Draft Plan		ISA 1 and ISA 2		
Label - Forty-Mile Caribou (low & high elevation)						
Values Identified			Value Feature Present	Number Identified or Present	% of Total LMU	
Ecological	Rare or Important Ecoystems	Unglaciaded Limestone or Dolostone (km <sup>2</sup> )				
		In-tact Forest (km <sup>2</sup> )	✓	6.11	0.37%	
		Wetlands (km <sup>2</sup> )				
		Tintina Trench Fly-way (km <sup>2</sup> )				
	Fish & Wildlife	Movement of Adult Chinook Salmon				
		Chinook Spawning Habitat (km <sup>2</sup> )				
		Migratory Bird - High Concern (km <sup>2</sup> )		✓	30.97	1.86%
		Sharp tailed Grouse - Key Area (km <sup>2</sup> )		✓	17.97	1.08%
		Waterfowl - Key Area				
		Raptors - Key Area (km <sup>2</sup> )		✓	8.95	0.54%
Heritage	THFN Settlement Lands	<100 Ha	✓	1		
		>100 Ha - Category A (km <sup>2</sup> )				
		>100 Ha - Category B (km <sup>2</sup> )				
	Sites & Trails	TH Traditional Trails		✓	1	
		Land Use Sites				
		Important Community Sites				
		Recorded Historic Resouce				
		Archaeological Site		✓	5	
Paleontological Site						
Economic	Placer & Quarz Claims	Claims	✓	2,506 (LMU 23) 1,960 (LMU 24)	<b>30.73%</b>	
		Number of Stakeholders	✓	48 (LMU 23) 37 (LMU 24)		
	<p><b>Recommended Changes: LMU-23/24 is an area of high mineral potential with 30% of covered by existing mining claims and leases.</b> Recommend the addition of further MLUP-guidelines reflecting caribou habitat and seasonality to be included in MLUP's to ensure the population continues to grow and remain healthy. Implementation of regulatory management along indistinct landscape features (elevation) in LMU-23/24 would be very difficult. Encouragingly, conservation efforts under the current regulatory regime have been successful with the return of the Fortymile caribou-herd. Recommend continued monitoring and ecological modelling through integrated stewardship initiatives with land-users. For ease of implementation, and to mitigate requirements for capacity-increases within monitoring &amp; regulatory bodies, an ISA 3 designation is recommended. Additionally, recommend removal of southern-portion (240.2km<sup>2</sup>) be added to the Matson Uplands LMU-18 for full protection.</p>					
	<b>Recommended Designation: Removal of southern 240.2km<sup>2</sup> higher protection</b>				<b>Area (km<sup>2</sup>)</b>	<b>Region %</b>
23/24 - 40 Mile Car.			ISA 3	1,360.4	3.4%	
18 - Matson Uplands - expand by 240.2km <sup>2</sup>			SMA 1	240.2	0.6%	

**\*NOTE\*** Removal of 240.2km<sup>2</sup> of southern portion of LMU to add to LMU 18 (Matson Uplands). For ease of LMU mapping 65.6km<sup>2</sup> of the eastern boundary of this LMU was added to LMU 17 (Sixty Mile), however, the both have ISA 3 recommended LUD.