

Aug. 12, 2011

To: Dawson Land Use Planning Commission

From: Sebastian Jones, Yukon Conservation Society

Re: Issues and Interests Submission, Dawson Land Use Plan

Thank you for the opportunity to provide input into this very important Plan. We hope this will be but one of many submissions, as the use of the land in the Dawson region is of deep interest to residents and indeed many Yukoners and other Canadians. In the interest of clarity, I have highlighted our specific recommendations in **bold**.

It is always difficult to summarize the most important issues, as there will always be short term immediate issues related to current activities that may be seen to be less vital at a later date.

The Peel Watershed Planning Commission's Final recommended Plan makes it clear that the Peel Plan is not meant to be a template for future land use plans. Nonetheless, some aspects of both the Recommended Peel Plan and the North Yukon Plan do not need to be re-invented in the Dawson Plan.

For example, the Dawson Commission should use the PWPC's definition of sustainable development and adopt sustainable development as a core principle; the definition of sustainable development is drawn from the UFA:

—beneficial socio-economic change that does not undermine the ecological and social systems upon which communities and societies are dependent.

The ecosystem is the basis for a sustainable society and a sustainable economy.

Similarly, the Recommended Peel Plan's definitions of three types of activities and their relative sustainability are useful:

1. That which is sustainable indefinitely *if properly managed*. Trapping, fisheries, hunting and tourism are examples.
2. That which is not sustainable, but which ecosystems can tolerate or recover from. Some kinds of mining and oil and gas development are examples of this. Best management practices and effective restoration make this possible in some, but not all areas.
3. That which is not sustainable, and causes irreparable or unacceptable impacts on ecosystem integrity or communities and social systems.

Currently, there is unprecedented mining exploration taking place in the Dawson Region; there may have been more people involved during the Klondike era but modern tools and equipment and techniques have given us greatly expanded ability to impact land compared to the foot slogging Argonauts of yore.

The nature of mining is to be short-lived; once the deposits are exhausted, the activity ceases but the aftereffects can linger indefinitely. According to the 2008 Faro Mine Closure Plan, the mine at Faro will be undergoing a remediation and monitoring program for hundreds of years. It is not out of the question to suppose that there will be long term remediation and monitoring needed at new mine sites in the Dawson region.

- Roads: Overland access, particularly all-season roads, makes many deposits viable. Roads, however, mean access for more than the immediate mining operation; other people will use the roads and people have impacts, whether it is hunting or developing land for other uses. A road built for a superior deposit can enable other, more marginal deposits to become viable; while a benefit from a purely economic development perspective, this makes assessing the environmental impacts more complicated. Roads also directly affect fauna; wolves and other predators use roads much as humans do to access resources. The footprint of roads is much larger than their physical area and typically extends further temporally and spatially than initially expected.

- Mine footprints: The experience we gained at Faro, Clinton Creek, Mount Nansen and the Klondike Valley show that mining forever alters the landscape and wildlife and human activities will likewise be changed.

While part of the Planning Region has already been impacted by placer mining and may be considered as either industrial or post industrial, in the rest of the Region the human foot print is relatively modest: one small town, three highways and a few camps and a farm or two comprise the physical infrastructure. Again the footprint of these activities is greater than their immediate appearance. However, there are still extensive areas that are almost **untouched** except for limited trapping and hunting and gathering. These **areas should have a higher level of protection** than the already impacted areas.

A very special feature of the Dawson Region is the Yukon River; it is of importance as a prehistoric and historic transportation route and to this day supports fishing, commercial and residential river traffic and recreational travelers. These are important economic drivers and, properly managed, can be sustainable. The river is also ecologically important; the lush lowlands and islands of the valley bottom provide ideal moose nurseries, extensive stands of large trees, and the most productive agricultural land in Yukon.

The only known sites where the plant Spiked Saxifrage (*saxifrage spicata*) occurs in Canada were recently rediscovered in two small tributaries that are staked for placer mining. There are also numerous culturally important sites, indeed , according to the advice of an archeologist who was instrumental in gaining this status for “Painted on Rock” National Historic Site in Alberta, the inclusion of Dawson and the Yukon River Corridor as a candidate for UNESCO world heritage status would partially depend on the existence of a management plan for the Yukon River . For these reasons alone, a **Yukon River Corridor** should be recognized that would be a **Special Management Area**. Additional reasons to recognize the special status of the Yukon River will doubtless be brought up by other responders.

The land to the North of and adjacent to the Yukon River downstream of Dawson affords some of the most spectacular and accessible viewsapes anywhere in Yukon.

There are places where the Ogilvie Mountains tower directly from the banks of the Yukon, sheep, moose and caribou may be seen and major salmon spawning streams flow in from the North. Despite some limited mineral staking and exploration, most of this land is in a relatively natural state. It is the only home in the world to the Yukon's only unique species, the Ogilvie Mountain Lemming; it is the site of some of the best quality Dall Sheep lambing habitat in North Central Yukon and is in the range of both the 40 Mile and Porcupine Caribou herds. For these (and many other) reasons, the area of **land north of the Yukon and Twelve Mile Rivers** deserves a **higher level of protection. Areas adjacent to Tr'ondëk Hwëch'in lands and already established Parks (Tombstone, Yukon Charley) should be granted an even higher level of protection.**

Considering the level of development and interest already undertaken in the region, a **threshold approach** similar to that of the North Yukon should be considered.

Areas that are already highly impacted (e.g. lower Klondike, Indian and Sixty Mile Rivers), should be managed so that properly managed non-sustainable activities would be acceptable and the allowable cumulative effects limit would be higher, a lower threshold, while other areas (e.g. White River, North Klondike) would be managed to a higher threshold. The **Forty Mile River** is managed as a Wild and Scenic River in Alaska, at the very minimum; it should be managed equivalently in Canada. Subject to negotiation with the current placer claim holder the watershed should be **withdrawn from mining activity.**

A considerable number of mineral claims have been staked in the region over the past three years, history in Yukon shows us that once land is staked it presupposes its use and makes Land Use Planning even more challenging. For this reason, a page should be taken from the Peel playbook and **a staking and exploration moratorium** should be imposed in the parts of the planning region where protection is being considered, until the Plan is complete.

Some of the most important salmon spawning streams in Yukon flow into the Yukon in the Dawson Region, they are: Coal Creek, the Fifteen Mile, the Twelve Mile/ Chandindu

and the Klondike Rivers. In recent years, high powered jet boats have taken to hunting on these rivers. The use of jets over shallow spawning substrate has been shown to be detrimental to salmon redds and therefore the **use of jet boats on these rivers should be restricted**. The destruction of fish or fish habitat is of course regulated under the Fisheries Act.

Forest management and Land Use Planning. While there is a DRAFT forest resource Management Plan for the Dawson Region, it is still a draft and has not been promulgated into policy. The Commission is urged to treat it as though it is already in effect pending its final approval, expected during the development of the DLUP.

It is possible that one or more large mines will be developed south of Dawson, likely in association with the recently discovered White Gold, Coffee and other deposits. These operations will need access other than by fixed or rotary winged aircraft. The Commission should consider the **use of river barges rather than roads** if mines are developed. Roads tend to attract other users, thus have footprints larger than originally envisaged both spatially and temporally. Rivers, while they can be grievously injured by poorly designed transportation operations, have, given their dynamic nature, a better capacity to restore themselves once the operation ceases. The plan would need to examine potential impacts from barging, and propose ways to avoid them.

Thank you for considering this submission,

Sincerely,

A handwritten signature in cursive script that reads "Sebastian".

(Sebastian Jones)