

February 28, 2014

Ducks Unlimited Canada (DUC) is grateful for the opportunity to provide comment on the Dawson Regional Planning Commission's Plan Alternatives Package. Our comments will focus first on generalities of the alternatives and the possibilities within and the details of a single land management unit – Scottie Creek Wetlands – that we suggest should be designated as a Conservation or Protected Area.

Strong land use plans are an important step in achieving sustainable economic development in conjunction with maintaining ecological values. DUC is pleased to see these Plan Alternatives created with this in mind as per the Commission's vision.

The boundaries of the land management units generally follow watershed boundaries with some exceptions as described in the package. DUC agrees that this method for determining boundaries is a logical and sound practice. Water is an important aspect of any ecosystem. How water is distributed across the landscape is often correlated to how plants and wildlife are distributed on that landscape. Water is also a factor in determining where development is likely to occur as well. Using watersheds as boundaries for land management units allows for management of water within that land management unit and therefore aids in the management of other values found there as well.

We are unclear as to what the Conservation Area category would result in with respect to what is and isn't allowed from a development standpoint. Reading the description of Conservation Areas on page 24 of the package raises the question of whether this land use category is analogous to the Restricted Use Wilderness Area of the Peel Watershed Land Use Plan recently implemented by Yukon Government. However, the Land Use Designation System Table on page 27 suggests that Conservation Areas are to be thought of as similar to Habitat Protection Areas (HPA). We realize that there is a wide spectrum of possible management options available if an area is designated as an HPA but were confused that the withdrawal of sub-surface rights was described as "no". DUC suggests that a description stating that withdrawal of sub-surface rights is not necessarily required would be a better approach as many HPA's do have sub-surface rights withdrawn (e.g. Devil's Elbow). This would allow for more flexibility in designating areas and less surprise if an area designated as a Conservation Area and subsequently as an HPA resulted in a withdrawal of sub-surface rights during subsequent management planning. The draft plan should be clearer in stating the intent of this land use category and the methods with which it will achieve its goals.

DUC has a mandate for conserving waterfowl and their habitats. Due to the geography of the planning region there is limited waterfowl habitat. However, one land management unit does have waterfowl value and connectivity to waterfowl habitats outside the planning region. For this reason, we will focus comments on Land Management Unit 27

– Scottie Creek Wetlands. The Scottie Creek Wetlands belong to a different watershed than many other land management units within the planning region. Instead of flowing into the Yukon, White, Stewart, or Klondike Rivers, Scottie Creek drains into the Chisana River in Alaska. This land management unit contains the headwaters of Scottie Creek which has an associated large wetland complex – connected marshes, open water, and fens – throughout its watershed. These wetlands are in both the Yukon and Alaska as part of the Tetlin National Wildlife Refuge – an area known for its high waterfowl value. In the Yukon, Scottie Creek is a Wildlife Key Area for waterfowl and many other species. DUC has surveyed the entire extent of the Scottie Creek Wetlands in the Yukon (both inside and outside the planning region) during the breeding and fall migration period. The breeding survey showed many waterfowl use this area including scaup, a species with declining populations continentally. During fall migration, Scottie Creek Wetlands had the highest bird use days within the region (compared to Wellesley Lake and Pickhandle Lake) with estimates of over 5,000 birds using the area at peak migration.

DUC would like to see this land management unit designated as a Conservation Area – as shown in Plan Alternatives A, C, and D – or as a Protected Area even though this has not been suggested in any of the Plan Alternatives. This will aid in maintaining the waterfowl values of this area by conserving the hydrology of the region. Minimal development allows water to flow naturally through the system both inside and outside the land management unit. Limiting the amount of development within the land management unit will also limit the likelihood of associated development within the Scottie Creek watershed which will help conserve the wetlands outside of the planning region. As well, past land claim negotiations with White River First Nation raised the possibility that the Scottie Creek area may be identified as a Special Management Area. Limiting development within the Dawson Planning region will minimize the impact to the downstream ecology of the Scottie Creek watershed therefore not precluding future options for this wetland complex.

DUC would like to thank the Dawson Regional Planning Commission for this opportunity to provide our input regarding the Plan Alternatives Package. Please feel free to contact us if you wish further information or clarification on any issue we raised.

Sincerely,



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