

February 24, 2014

Dawson City Land Use Planning Commission  
Box 8010  
Dawson City, Yukon  
Y0B 1G0

Dear Monica Krieger

Re: Plan Alternatives Comments:

Thank you for the opportunity to provide comments to the planning commission with regard to plan alternatives for a balanced approach to land use in the Dawson planning area. The Commission is to be commended for its recognition of the good work of those who participated in the development of the Dawson Forest Resources Management Plan. The alternatives document under consideration at this time is well written and for the most part has been successful in its effort to avoid ambiguity. It does a good job of outlining the issues in a manner that does not exacerbate potential conflict between the interested parties involved in the process.

There are a few things that could be done from the perspective of the forest industry that would enhance the plan. The following suggestions are offered with the intent of contributing positively to the important conversation that is taking place in Dawson regarding the use of lands in the area.

1. Land Use Designation System:

The zones proposed in the plan adequately describe and present alternative land uses. There is a tendency in document language to favour conservation. They are subtle and with slight changes in wording an even more balanced product may be possible.

- a. Protected Area: no concerns with this zone the forest industry accepts that protected areas provide ecological benchmarks for monitoring natural systems. These areas provide foresters with the means to compare forest management prescriptions on timber lands with natural forests. This ensures that management outcomes emulate natural systems to the greatest extent possible. If there are concerns it would be focused on where and how big the protected area would be. Under the alternatives offered this concern is fairly mitigated.
- b. Conservation Area: the word 'may' in the third sentence should be changed to 'is'. The resource use emphasis is made very clear in this paragraph. Using the word 'may' creates the impression that the opportunity is not really there and if one tries to operate in the zone it will be so difficult that the area should have been zoned as protected. There is no risk in stating that forest industry activities are an acceptable activity in the zone with strict rules of conduct. Changing the

word to 'is' will improve clarity and provide certainty to both industry and conservation groups alike.

- c. Traditional Economy Area; it is not clear what the purpose of this zone is. On first reading it seems to be a reasonable approach to land use for some lands. On second reading it seems like an additional layer of approval authority is being suggested. If this is the case the forest industry would not be in favour of its inclusion. There are already significant and sufficient regulatory safe guards built into the current regulatory and management regimes to protect traditional economies. If there are values, issues and concerns on specific lands within landscape units then conservation area designations for those specific features may be an alternative. This is an important subject and deserves careful consideration and clarification prior to inclusion in the final plan.
- d. Yukon River Corridor; if there is to be further work done on a sub-regional plan for this zone the forest industry would be interested in providing input at that time.
- e. Integrated Management Area; this zone is the working forest zone for industry and a reasonable expectation that forest based operations are allowed is provided. The subdivision of this zone into three categories might be served just as well by having only two categories; Zone IV would become Zone 1, where the current regulatory regime in the Yukon is adequate to insure the industry can operate within acceptable limits of change on the land; the second would roll Zones II and III into Zone 2, this zone would require a higher degree of care for industry operations for identified values. If this approach is adopted the wording in Zone 1 should clearly state that the current Acts, regulations, standard operating procedures and best practices are sufficient to manage resource extraction in the zone. If this suggestion is not accepted then the language in Zone IV should include the wording proposed for Zone 1 above. It should be noted that the value/resources that require mitigating management prescriptions need to be clearly identified in the IMA's. This will ensure appropriate directions are provided to lower level tactical and operational plans.

## 2. Plan Alternatives:

Forest operations in the Dawson area are currently focused on the eastern edge of landscape unit (LU) 15, southern tip of LU 16, LU 17, LU 21 and LU 20. There may be opportunities for the forest industry in LU's 10, 11, 13, 14 and 18 in the future but at this time the timber values in them is beyond the economic ability of the industry. The alternatives presented provide reasonable land use designations for inclusion of forestry operations. Some of the alternatives provide a higher degree of available timber than others. There is a need to balance forest industry access to timber and other resource user's ability to access the goods and services provided by forest lands within the land use planning area. By combining the alternative maps and the decision framework matrices it is possible to rank one alternative as more acceptable than another.

- Alternative A; this alternative does not provide the certainty that the forest industry is seeking in the plan. LU 15 and 16 are within in the TEA zone and as discussed earlier clarity with this designation is required. LU 17 and 21 are within IMA II which requires a higher level of care for forestry operations. This designation is likely higher than is required to manage and conserve all of the resources in the units. Therefore, this alternative is not supported at this time.
- Alternative B; in theory this alternative would provide the greatest access to timber resources. Upon reflection the timber in the largest LU's in the area that allow forest operations are geographically situated where the economics of timber harvesting and manufacturing is not possible. With the exception of LU 16 the four areas of greatest opportunity for forest operations are available. But this alternative does a relatively poor job of balancing industrial operations with non-industrial values. Therefore, this alternative is not favoured at this time.
- Alternative C; this alternative is the most constrained for forestry operations. It creates the lowest level of forest industry access to timber of all the alternatives. The cost of meeting the higher level of management care likely eliminates the opportunity to maintain profitable operations. Therefore, this alternative is not an option for the industry.
- Alternative D; this alternative provides for the second highest level of access to timber resources in the plan. LU's 15 and 16 are in IMA II which is a positive designation for the industry. The alternative does a better job of balancing industrial operations with non-industrial values. Therefore, this alternative the "best" and is acceptable. However, as outlined below Alternative F will likely be the most acceptable to industry.
- Alternative E; the land use designations in this zone appear to favor forest operations if LU 16 was the only concern. However, by placing LU 16 into the IMA IV it likely creates unnecessary tension between the forest industry and conservation interests. The designation in alternative D for LU 16 is likely more appropriate. Therefore, this alternative is not a preferred option.

*At this time the preferred alternative for the forest industry would be Alternative D. It provides a relatively high level of access and balances that access with other resource values in other zones. It would be useful to do an analysis on a sixth option using Alternative D as the base. By shifting LU's 17 and 21 to IMA IV and LU's 13 and 18 to IMA II or III greater certainty and access to timber resources may result while providing a good balance with regard to conservation of non-timber values. Therefore, it is recommended that an Alternative F be considered prior to finalizing the plan. Please provide YWPA with the opportunity to comment if this alternative is tested.*

### 3. Next Steps

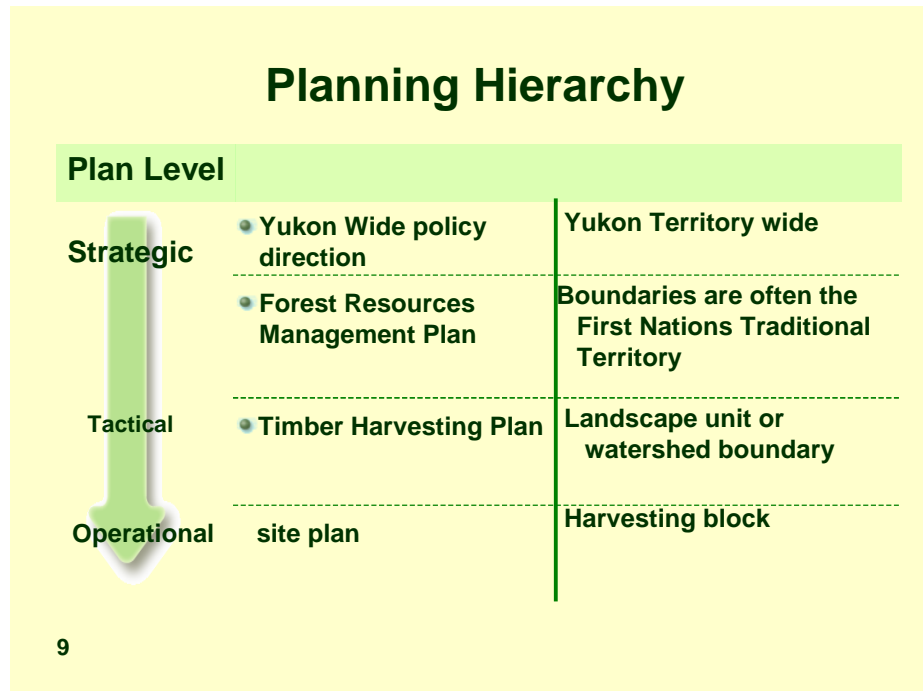
The next steps phase of the Dawson land use plan is going to be the most important part of the plan in terms of gaining consensus amongst participants in this process. The descriptions of the land use designation system and the prescriptions in the general

management direction are of interest to the forest industry. The next steps are the parts of the plan that will dictate “if” the forest industry will have access to the timber land base. In other words if thresholds are too conservative and prescribed actions are too restrictive opportunities for economic development in the area will not be possible.

The cumulative effects concept is already built into the environmental assessment process and the legislation that regulates the forest industry. The way this concept is applied will dictate if and where forestry operations can occur. The YWPA feels that the Yukon’s regulatory regime will adequately manage potentially harmful effects of forest industry operations. Rather than establishing cumulative effects thresholds a risk evaluation of potential harm may be a better alternative. *Therefore, it is essential that the forest industry is included in any discussions or interest based negotiations with regard to developing thresholds and indicators.*

When developing general management directions it is important to remain strategic. It is tempting for participants in land use planning to abandon strategic level goals and objectives in favour of tactical or operational planning prescriptions. If land use plans move away from strategic or higher level management direction and move into tactical level prescriptions the plan will handcuff industrial development. Please refer to page 17 of the Dawson Forest Resources Management Plan, a description of the planning framework is provided. It should be noted that the forest resources management plan is strategic and the timber harvesting plan and site plans are tactical and are designed to prescribe and mitigate industry activities. *Therefore, it is essential that the forest industry be included in any process that establishes management prescriptions that directly affect it. This is especially important if the prescribed management direction is not the same as those in the approved forest resources management plan.*

In the table below Land Use Plans fall into the top category of the hierarchy



*Copied from the draft Kaska Forest Resource Management Plan*

The Yukon Wood Products Association appreciates the chance to provide input into the Dawson Land Use Planning process. YWPA interests are to ensure our industry is provided with certainty with regard to access to timber resources. The Commission has done a good job of providing clarity of language in each of the sections discussed above. The suggestions offered are provided with the objective of minimizing misunderstandings and confusion post plan approval.

If there are any questions or clarifications required please contact the undersigned.

Yours Truly

Myles H Thorp RPF  
Executive Director  
YWPA  
867-335-1914