

5 Harbottle Road

Whitehorse Y1A 5T5

2 March 2014

Chair Casselman, Commission Members and Staff,

Dawson Regional Planning Commission

Re: Comments on the plan alternatives document

Thanks for the opportunity to comment. As a wildlife biologist of 31 years with the Yukon Government, I did the sheep surveys in the portions of the planning region north of the Yukon River, bear studies in the south Tatonduk river area, caribou work along the Dempster with Dorothy Cooley and Martin Kienzler, and I worked with placer miners to install electric perimeter fences around some camps (Tek). I investigated the bear attack on the people salmon fishing at the mouth of the fifteen mile creek in the mid 1980s. I spent time with Stan Reynolds, Doug Low and Pete Jensen and their families when they were outfitting. I have also hunted moose along the Stewart for 4 years, in the upper Sixty mile and in Browns creek in the Forty mile drainage. I flew up the White several times. So I am pretty familiar with the planning area, having backpacked, skied, ridden on horseback, canoed and flown in both helicopters and small planes in the area. I also helped with wildlife planning exercises, the Tombstone planning team, and worked for 3 years on the Yukon government's Forest Strategy. I have also spoken with Alex van Bibber and Edith Josie about their time on the land in the northern part of the planning region. I attended the March meeting in Whitehorse, but the 7:00 presentation was cancelled.

To make it easier for your team to assemble comments, my comments below are in point style. The ones with letters at the outset are general comments and the ones in numbers refer to your questions in the consultation guide. You may reach me at 668-2802 if you require any clarification.

- A. Your documents are particularly well designed and written. Good work! Really, this is the best consultation document I have seen. The humour is great.
- B. There are important habitats on the western flanks of the Ogilvie Mountains that are not emphasized or noted in the resource assessment report. These slopes green up early and get substantially more rainfall than the drier bald ridges to the east. The soils are much thicker and there is a lot of vegetation. These are also important headwaters for the salmon bearing Kandik, Nation, Tatonduk and Eagle Rivers flowing into the Yukon River on the Alaskan side. Be careful not to underestimate the values here. Please check with the Alaskans re the salmon spawning and rearing potentials of these rivers, as this is not noted in your map. **I am concerned that there was no habitat suitability work in this area.** Dan Reynolds can provide more information.

- C. I think the boundary of the Yukon River Corridor will be **unworkable** with the wiggley boundary. Please consider straight lines between landmarks so that users know where they are. It is hard to know if you are 3 km off when the river wanders from side to side and changes course. People in the region know this from the 500 m no-hunting corridor along the Dempster.
- D. I am confused how the Yukon River Corridor can be **both** a landscape unit and a planning zone. I appreciate that the river floodplains and adjacent slopes are particularly important in the planning area and deserve special consideration, but **encourage you to keep the Yukon River corridor as a landscape unit and give this planning zone type another name**. This way you can assign the special planning zone qualities to a number of important riverine areas, such as places along the Stewart River. This will be important to people who are tasked with implementing your plan.
- E. Your choice to assign one planning zone to each landscape unit is a **major flaw in the set of alternatives you present in the document**. Landscape units are useful in the plan to summarize descriptions and values in different parts of the region. Having to assign one of 6 zones from your land designation system to a whole landscape unit is like planning at a 1 to 5 or 10 million scale. I strongly encourage you to spend a few hours with 7 different coloured felt pens (all the zone types) on acetate over a 5 foot tall planning region map that has no landscape units, and colour in where you think the zones should go. Maybe each member could do this separately and then you could compare the maps. You know the country, you have been through all the resource assessment presentations, and I expect you can do a good job of building the workable plan that will actually be what people are expecting. Just try it! Ignore the people who are telling you that you have to do it their way. Or the rabid decision theorists who are saying that computers can do the hard work of sorting through the values. People expect that for all the money that has been spent that you will come up with a plan.
- F. I am alarmed that you are asking me to comment on the land use designation system when the “development” zones are not described. This is both wrong and unfair. Please send me the draft of these zone type descriptions. (Recall Monica that I asked that you publish these in the Yukon News) I am concerned about thresholds based on the percentages of land area with surface disturbance, particularly when applied over a huge land area like a LMU. And I note in your resource assessment that the Klondike Gold Fields have only a 4% level of surface disturbance- it seems like way more than this when you fly over the area.
- G. The Stewart River valley deserves a high level of consideration in the plan. This regional plan covers the important south facing slopes and presumably half the floodplain. There are a lot of heritage and wildlife values in this valley. Please note that when we have hunted here we needed to drink rain water off our tarps- there was too much silt coming down the creeks.
- H. I appreciate that you note that the Forest Plan needs to be consistent with the Regional Land Use Plan. This does not mean that your plan needs to follow the Forest Plan, but in fact your plan may lead to revisions of the Forest Plan. The RLUP is the over riding plan, it is not first-out-of-the-gate planning. In this regard, I would ask you to reconsider the Forest Fire Fighting Plan. I have been alarmed in recent years at how much of the Fortymile Caribou habitat has burned, and believe conserving old growth stands with abundant lichen from wildfire may be warranted.

- I. I am pleased that the Draft Plan will include **Special Management Considerations** within each Landscape Management Unit. This is really important. I wish you had asked what some of these considerations might be in this consultation document, but do request that you make a particular point of including requests for input on this in the consultations on the draft plan.
- J. The General Management Directions in the draft plan will be important, but please be careful not to dump all the hot issues there with vague direction that others need to sort them out. Please provide clear directions not just on what needs to be resolved but what a workable solution looks like to you. Again, you know the region, the issues and need to tell the bureaucrats what you expect.
- K. Please pay attention to recommendations regarding reclamation of valley floors that have been placer mined. **I do not see any best management practice documents regarding the design and structure of valley floors following placer mining in section 13-17.** The valleys with “shelves” of flat silt upstream from small settling pond dams, meandering creeks and soils pulled back over the gravel will have a lot more useful habitat than the straight creeks through molded soil-less boulder hills.
- L. The Implementation Direction- Have you consulted YESAB staff who have been trying to respect the North Yukon Plan as they have made their assessments? In particular the Special Management “Considerations” should have more teeth in the plan.

Plan Alternatives Survey and Comment Form. Note I have not gone into a lot of detail re your alternatives as I find the allocation of one designation zone to the huge landscape units unrealistic and I have little idea of what constraints on development will be in the 3 development designation zones.

1 b

2a

3a

4. Some HPAs will need subsurface protection. All the conservation option zones seem to leave a lot of wiggle room re industrial access provision. Perhaps you can layout some routes. I like the notion of a traditional economy zone, and think it is worth testing for the 10(?) year life of this plan. Protected areas are important as well as connections between them. Most of the landscape units should include some HPAs and Protected Areas. You have a good idea of where these should be. Having Land Use Planning situated in the Yukon Government within Energy Mines and Resources is a problem, but this is not a commission problem. It is a challenge for other departments however.

5. These are not adequately described in this document, so I can not comment. I do not think percentage thresholds for surface disturbance applied over vast land areas have any use at all. There will be sites where the industrial disturbance is solely physical, other areas where the disturbance will involve treatments with industrial chemicals (eg heap leaching), some areas where the exposed tailings will have dangerous acid drainage, and some areas where ponds will be created that have dangerous chemicals. The plan could say that this is YESAB’s job to make appropriate assessments and keep the risks low, but I think the land designation system should consider risks and say that in some areas we

have a zero tolerance for anything but physical disturbance. I am particularly concerned with the construction of all weather roads, and think the designation system should be clear on roads. I note that you have referred to the access road policy etc, but think that the policy should be described as it applies to landscape units.

6. Riverine habitats, the floodplains and adjacent slopes with tall spruces, and viewscapes deserve special land designation. I have suggested earlier in my comments that the Yukon River Corridor should not be both a landscape unit and a land use type designation. River corridors are so important that we should have some special guidance in this plan re how we make decisions regarding effects that accumulate spatially over a watershed.

7/8. The traditional economy area seems well located given how families are using the region, except that the Stewart River valley's importance as a traditional economy area is not noted. I disagree with the industrial use focus for the Kandik LMU. The oil and gas potential is very limited given how remote this area is and the unit, particularly the west flanks of the Ogilvie Mtns are excellent wildlife and recreational potential (albeit they are remote, there are a lot of small airstrips the Reynolds have made). These headwaters are also important for salmon downstream. The Stewart River valley deserves more protection as there are many cultural, heritage and ecological values here. LMU 20 could have higher development intensity, at least for the life of this version of the plan. I like the conservation area status for the miner, nahoni, and white, but feel this should be extended to the ladue and parts of the forty mile with good caribou winter habitat. Area 9 has important wildlife values and roading is a concern to me. Yukon River Corridor LMU needs to be wider and have sensible boundaries.

9/10. The development intensity is too high in this alternative. I disagree with the industrial use focus for the Kandik LMU. The oil and gas potential is very limited given how remote this area is and the unit, particularly the west flanks of the Ogilvie Mtns are excellent wildlife and recreational potential (albeit they are remote, there are a lot of small airstrips the Reynolds have made). These headwaters are also important for salmon downstream. The conservation areas way up north in 4 and 7 are useful to protect some porcupine caribou values. Area 8 is particularly rich ecologically, note the high frequency that this area is used by wintering porcupine caribou, and deserves more protection. The Stewart River valley deserves more protection as there are many cultural, heritage and ecological values here. Yukon River Corridor LMU needs to be wider and have sensible boundaries.

11/12. I disagree with the industrial use focus for the Kandik LMU. The oil and gas potential is very limited given how remote this area is and the unit, particularly the west flanks of the Ogilvie Mtns are excellent wildlife and recreational potential (albeit they are remote, there are a lot of small airstrips the Reynolds have made). These headwaters are also important for salmon downstream. The industrial focus of 20, 25 and 26 seems to reflect the current development interests. I like the conservation focus for the Nahoni, Miner, Tatonduk and White, but am concerned about the Stewart river floodplain. Yukon River Corridor LMU needs to be wider and have sensible boundaries.

13/14. The forty mile caribou herd winter range gets limited conservation attention in this alternative. I disagree with the industrial use focus for the Kandik LMU. The oil and gas potential is very limited given

how remote this area is and the unit, particularly the west flanks of the Ogilvie Mtns are excellent wildlife and recreational potential (albeit they are remote, there are a lot of small airstrips the Reynolds have made). These headwaters are also important for salmon downstream. The proportion of the region with a high development priority in this alternative concerns me. Yukon River Corridor LMU needs to be wider and have sensible boundaries.

15/16. The connectivity between the protected areas in the Miner, Tatonduk and Yukon Charley Preserve in Alaska looks useful. Yukon River Corridor LMU needs to be wider and have sensible boundaries. I think the conservation focus for the Ladue is good.

17. Please see points B, C, F, K, and L in my general comments. The caribou winter habitat polygons for the porcupine caribou confuse me, but I am not up on the latest reports. I do recall a report by CWS Don Russell that showed the areas where the porcupine caribou wintered most frequently in the previous 20 years that had polygons in different areas than shown in the resource report. Thinhorn sheep distributions in the wildlife key areas seem to miss a lot of mountainous areas that have sheep southeast of the Tatonduk, based on the surveys I was on in 1978 (note the sheep key areas in the map in the resource assessment looks quite different from map 45 in the plan alternatives package). I am not sure how the "Key" is defined. Raptors in the lower Tatonduk are not noted. Salmon spawning habitat on the Alaskan side of the planning region from the Kandik, Nation, Tatonduk, Eagle etc are not shown. The potential for increasing salmon spawning in the Coal, Fifteen mile etc could also be noted. A lot of the northern part of the Ogilvie Mtns has really weak assessment information. I know it is remote, but given the lack of assessment information perhaps it should go into a "not enough information" category in this version of the plan. Some areas there have very high ecological and heritage values (eg the caribou fence near the upper Miner).

18. d, especially with the resource assessment report. Note comment F.

19. Roads trails and winter roads

20. Please see comments A to L.