

# Tr'ondëk Hwëch'in Comments on DRLUPC "Plan Alternatives"

Tr'ondëk Hwëch'in thanks the Dawson Regional Land Use Planning Commission for their release of their "Plan Alternatives". Below are TH's thoughts on these Alternatives. Summary points are provided on (1) general issues, (2) proposed Land Use Designations, (3) specific Land Management Units associated with the Plan Alternatives, and (4) the various (A-E) Plan Alternatives.

## Contents

<b>(1) General Issues .....</b>	<b>2</b>
<b>(1.1) Inadequate Information.....</b>	<b>2</b>
<b>(1.2) Regulatory Issues.....</b>	<b>2</b>
<b>(1.3) Boreal Forest Protection .....</b>	<b>2</b>
<b>(1.4) 'Grandfathered' Access Corridors for Wildlife .....</b>	<b>2</b>
<b>(1.5) Temporal Scope of Planning .....</b>	<b>2</b>
<b>(2) Land Use Designations.....</b>	<b>3</b>
<b>(2.1) Integrated Management Area (II-IV) .....</b>	<b>3</b>
<b>(2.2) Conservation Area .....</b>	<b>3</b>
<b>(2.3) Traditional Economy Area.....</b>	<b>3</b>
<b>(2.4) Yukon River Corridor .....</b>	<b>4</b>
<b>(2.5) Protected Area.....</b>	<b>4</b>
<b>(3) Land Management Units.....</b>	<b>5</b>
<b>(3.1) General Comments by LMU in regards to Settlement Land/Plan Alternatives .....</b>	<b>5</b>
<b>(4) Alternatives Comments .....</b>	<b>8</b>
<b>(4.1) Alternative A.....</b>	<b>8</b>
<b>(4.2) Alternative B.....</b>	<b>9</b>
<b>(4.3) Alternative C.....</b>	<b>11</b>
<b>(4.4) Alternative D.....</b>	<b>12</b>
<b>(4.5) Alternative E .....</b>	<b>13</b>

## **(1) General Issues**

### **(1.1) Inadequate Information**

- As members of the public and stakeholder groups have noted, there is a real lack of information regarding differences between the Integrated Management Units. It is difficult to discuss and comment on the various IMA zones as a result.
- Suggest that the Commission relate their land designation choices back to each specific LMU and include the rationale/important values they considered in their land designation choice.

### **(1.2) Regulatory Issues**

Existing mining laws and regulations must be changed so that aboriginal and treaty rights are protected; and so that mining does not trump all other uses of land. As a starting point we need:

- Mandatory notification of all Class 1 activities throughout planning region
- Consent from the owners for all mineral staking on private lands, including Cat B.
- Mandatory salvaging of all marketable timber on mining claims
- Placer royalties, fees, reclamation security and assessment requirements to be modernized
- A prohibition on placer and quartz staking within Municipal Boundaries and within 1 KM of Municipal Boundaries/Community Areas.
- Higher land use standards and bigger reclamation bonds for existing mining within Municipal Boundaries/Community Areas.
- Existing use of mining claims throughout the region is grandfathered. However, within the Yukon River Corridor, Protected Areas and TEAs, new access is not to be provided through MLUR, but rather Territorial Land Use Regs.

### **(1.3) Boreal Forest Protection**

- The DRLUP needs to provide some overall protection goals for intact representative boreal forest and their ecosystems, with a target that it never fall below 50% of current levels.

### **(1.4) 'Grandfathered' Access Corridors for Wildlife**

- TH feels it important that the plan designate access – movement - corridors for wildlife, notably for larger species including caribou and grizzly bears. This is best done with Protected Areas and thresholds for linear disturbance thresholds. Information about range and need for undisturbed movement corridors remains critically important and the plan needs to incorporate this consideration.

### **(1.5) Temporal Scope of Planning**

- The Yukon River Corridor should be planned as part of the DRLUP process, not bumped into an unsure sub-regional planning timeframe. An interim subsurface mineral staking withdrawal needs to be a part of this, as soon as possible.
- If it is proposed that the YRC and TEA zones are referred to a sub-regional planning process, an interim staking withdrawal must be put in place now to protect future planning options

## (2) Land Use Designations

### (2.1) Integrated Management Area (II-IV)

- The Commission has not adequately defined the differences between different LUDs, particularly with respect to the differences between the three IMA types. Without concrete management tools, it is very difficult to comment on the IMAs.
- IMA II (and IMA 1 if applicable) Quartz mineral exploration achieved with special operating conditions which enable low impact quartz exploration methods only (For example: Sean Ryan/Ground Truth Exploration techniques).

### (2.2) Conservation Area

- Without the withdrawal of subsurface mineral rights, the CA designation should not be considered as is. It is deceptive to use the CA designation where subsurface rights remain available for disposition because this is inconsistent with Yukoners' understanding of a Conservation Area (a possible legal designation cited for CAs on p. 27 of the Alternatives Package). In the Peel Commission's Final Recommended Plan, the Conservation Area concept encompassed Special Management Areas, with permanent subsurface withdrawal, and Wilderness Areas, with interim subsurface withdrawal.
- TH recommends that this designation should be deleted, and renamed IMA 1, with existing mineral claims grandfathered but with access provided through the Territorial Land Use Regulations, not with the MLUR. This designation would be more in line with the industrial activity and roads inherent with mineral activity, even if there is also a conservation intent. Adaptive and active management needs to be based on density of disturbance, including linear disturbance, and seasonal considerations.

### (2.3) Traditional Economy Area

- TH supports the use of this land designation
- The TEA areas proposed under the different Plan Alternatives do not alter the jurisdictional management of the lands within them. TH does not become the managers of the entire LMUs; rather, these areas are planned in a common process, with final management of Settlement Land falling to TH and management of Crown land falling to YG. Nothing about the TEA area implies that jurisdiction would change in any way.
- 'Traditional Economy' is used in a modern way that does not limit its applicability to Yukon First Nation citizens. It is for all users of the land engaged in renewable resource activities. Traditional economy activities are sustainable renewable resource activities, including:
  - Forestry and Non-Timber Forest Products
  - Tourism
  - Agriculture
  - Small-scale energy projects
- Key management tools in a TEA include a higher level of stewardship/monitoring and access planning
- Mining claims and any existing use of those claims are grandfathered
- New access for all activities provided through Territorial Land Use Regulations

- Weight limits to be put on machines which can be used for grandfathered mining claims, and for Agriculture and Forestry. Potential for larger machines on seasonal basis (winter)
- The TEA requires an interim staking withdrawal, to be reviewed during a future plan review
- **TEA in LMU zones 10, 11, 14, 15 and 16**

#### (2.4) Yukon River Corridor

- TH supports the YRC zone.
- Planning should occur now under the RLUP process
- Mining claims and any existing use of these claims to be grandfathered
- New access not provided through Mining Land Use Regulations, but instead through Territorial Land Use Regulations
- An interim subsurface rights withdrawal needs to occur within this area to protect future planning options

#### (2.5) Protected Area

- TH supports the use of Protected Areas
- Subsurface mineral rights withdrawal
- Existing use of mining claims is grandfathered
- New access for grandfathered claims provided through Territorial Land Use Regulations
- **New protected Areas in LMU zones 2, 3, 4, 5, 7, 8 and 27, 28, and part of 22**

### (3) Land Management Units

#### (3.1) General Comments by LMU in regards to Settlement Land/Plan Alternatives

Hectares per Land Use Designation						Settlement Land in Land Management Units			
	A	B	C	D	E	LMU	LMU Name	Ha.	%
IMA IV	42,482.68	82,815.43	49,060.38	49,344.86	50,386.96	1	Kandik River	4,131.49	1.62%
IMA III	9,634.21	46,501.78	2,237.08	98,146.38	178,579.37	2	Fishing Branch	148.76	0.06%
IMA II	103,730.20	51,103.05	129,004.98	85,716.44	4,139.45	4	Miner River	113.12	0.04%
TEA	77,360.60	52,568.20	52,795.39	0.00	0.00	6	Eagle Plains	31,678.10	12.45%
CA	1,079.23	1,298.46	1,068.02	966.11	0.00	7	Upper Miner River	809.39	0.32%
PA	378.47	378.47	499.55	491.59	1,559.61	10	Coal Creek	3,015.09	1.19%
YRC	19,689.28	19,689.28	19,689.28	19,689.28	19,689.28	11	Twelve Mile	52,568.20	20.67%
						12	Tombstone Park	378.47	0.15%
TOTAL	254,354.68	254,354.68	254,354.68	254,354.68	254,354.68	13	Forty Mile River	243.07	0.10%
Percentage of total hectares per Land Use Designation						14	Swede Creek	2,195.66	0.86%
	A	B	C	D	E	15	Rock Creek	22,369.56	8.79%
IMA IV	16.70%	32.56%	19.29%	19.40%	19.81%	16	North Klondike River	227.19	0.09%
IMA III	3.79%	18.28%	0.88%	38.59%	70.21%	17	South Klondike River	49,356.81	19.40%
IMA II	40.78%	20.09%	50.72%	33.70%	1.63%	18	Sixty Mile River	41.42	0.02%
TEA	30.41%	20.67%	20.76%	0.00%	0.00%	19	Caribou Creek	5,230.89	2.06%
CA	0.42%	0.51%	0.42%	0.38%	0.00%	20	Goldfields	6,673.09	2.62%
PA	0.15%	0.15%	0.20%	0.19%	0.61%	21	Flat Creek	48,789.57	19.18%
YRC	7.74%	7.74%	7.74%	7.74%	7.74%	22	Ladue River	109.86	0.04%
						23	Lower White River	7.96	0.00%
TOTAL	100.00%	100.00%	100.00%	100.00%	100.00%	26	Stewart River	6,577.70	2.59%
						30	Yukon River Corridor	19,689.28	7.74%
							TOTALS	254,354.68	100.00%
							*LMU coloured where at least 4/5 alternatives propose same designation		

**1 (Kandik River):** 4,131.49 hectares Settlement Land

**2 (Fishing Branch):** 148.76 hectares Settlement Land

LMUs 2 and 7 have the largest Porcupine Caribou “concentrated use areas” (fall/winter) in the planning region.

**3 (Miner River West):** No Settlement Land

**4 (Miner River):** 112 hectares Settlement Land

**5 (Whitestone River):** No Settlement Land

**7 (Upper Miner River):** 809.39 hectares Settlement Land

LMUs 2 and 7 have the largest Porcupine Caribou “concentrated use areas” (fall/winter) in the planning region.

**6 (Eagle Plains):** 31,678 hectares Settlement Land

Known oil and gas basin.

**8 (Tatonduk River):** No Settlement Land

IMA II seems too permissive here given its location. Making this a PA would make management somewhat consistent with Charlie Rivers across the border, and if the more northerly LMUs (2-5, 7) are also classified PA, this would provide great continuity between Charlie Rivers and Fishing Branch. It's not a high-potential mineral area, and the overlap with known oil and gas basins is minor.

**9 (Eagle Creek):** No Settlement Land

The presence of an oil and gas basin may be the reasons for its classification as IMA III under alternatives A and B. There are also some known lead, zinc and copper prospects in the eastern part of this LMU. Access would be an issue.

**10 (Coal Creek):** 3,015 hectares Settlement Land

There are known copper, gold, iron zinc, tungsten prospects, and past-producing coal mines in the southern part of this LMU. However, there are only a small number of quartz claims and little placer potential. There might be quartz potential, but there's not a lot of interest so far. Sensitive sheep habitat exists in this LMU.

**11 (Eagle Creek):** 52,568.20 hectares Settlement Land

This LMU buffers Tombstone Park along its western boundary. TEA or some other ecologically protective designation is most appropriate here. IMA III is not appropriate.

**12 (Tombstone):** 378 hectares Settlement Land

Currently the only protected area in the region.

**13 (Forty Mile River):** 243.07 hectares Settlement Land – **14 (Swede Creek):** 2,195.66 hectares Settlement Land – **18 (Sixty Mile River):** 41.42 hectares Settlement Land – **24 (Excelsior Creek):** No Settlement Land

All of these LMUs seem like consensus IMAs. Indeed, these four LMUs are the most likely areas for long-term mining activity outside of LMUs 20, 25 and 26. All boast very high mineral values; 13, 14 and 18 have lots of active quartz claims, and 13 and 14 have established access via the Top of the World Highway. There are still many high-potential placer creeks that haven't been staked. One concern is the Fortymile herd; there is a fair bit of high-suitability habitat in the area. Quartz mining is more of a concern here than placer mining, which takes place in valley bottoms. Caribou use of higher altitudes may not coincide that much with summer hard-rock exploration, however.

**15 (Rock Creek):** 22,369.56 hectares Settlement Land

**16 (North Klondike River):** 227.19 hectares Settlement Land

These LMUs buffer Tombstone Park along its southern boundary. TEA or some other ecologically protective designation is most appropriate here. IMA III and IV are decidedly not. There are also serious Settlement Land use issues with respect to these parcels, which are discussed in the following section (LMU 17).

**17 (South Klondike River):** 49,356 hectares Settlement Land

Assuming there are meaningful differences between IMAs, this appears to be one of the toughest LMUs to designate. On the conservation side, it has high moose habitat value and contains Wildlife Key Areas for moose. It also overlaps a large woodland caribou WKA, which encompasses the ranges of two smaller caribou herds, the Hart River and Clear Creek herds, which are already facing significant development pressures. Finally, as the following section notes, it contains a significant amount of Settlement Land selected for traditional pursuits, though most of that land is Category A and protected against staking. On the development side, there is high probability placer potential (though almost no current activity) in the area that includes the Brewery Creek mine. The region between Brewery and Hamilton Creeks is blanketed with quartz claims and includes several large active exploration projects. The important wildlife values should preclude this area from being designated IMA IV.

**19 (Caribou Creek):** 5,230.89 hectares Settlement Land

LMU 19 deserves mention for two reasons. First, it is the only LMU south of the Klondike and east of the Yukon without extensive placer development. Claims exist only on Ensley Creek. It also contains part of the Hän Migration Route under 13.4.6.3 and Schedule C of the Final Agreement. Because of the limited development to date, it should get a relatively low-development designation; three of the five alternatives designate it as IMA II. Note that because of uncertainty about the extent of the YRC, the heritage trail may actually be in LMU 30 (YRC), and not in 19.

**20 (Goldfields):** 6,673.09 hectares Settlement Land

**21 (Flat Creek):** 48,789.57 hectares Settlement Land

LMU 21 values are similar to those of 17 (South Klondike), but less disturbed and without the complication of wall-to-wall mining claims. Placer potential is high, but largely unexploited. Quartz exploration seems to be focused on White Gold and the Brewery Creek area, and the placer miners are looking west of the goldfields into the Sixtymile, rather than east into the Flat Creek area. Also worth noting: 19 percent of Settlement Land in the planning region is located in 21, and most of it is Category B selected for traditional pursuits reasons.

**22 (Ladue River):** 109.86 hectares Settlement Land

**23 (Lower White River):** 7.96 hectares Settlement Land

**25 (Henderson Creek):** No Settlement Land

**26 (Stewart River):** 6,577 hectares Settlement Land

**27 (Scottie Creek Wetlands):** No Settlement Land

**28 (Upper White River):** No Settlement Land

The alternatives are all over the map in this LMU. There are strong arguments for a protective designation. Many of the White and Yukon tributaries have moderate-to-high suitability fish habitat in their lower reaches. The Wildlife Conservation Society identifies 28 as one of the two best LMUs for ecological benchmarking in the Boreal Cordillera ecozone because it has a variety of characteristic conditions and looks to be the least disturbed southern LMU. There are still many active quartz claims on LMU 28, but a large portion of those have been allowed to expire, and there is only one active quartz mining land use permit: a Class 3 held by Ethos Capital that expires in 2016.

**29 (Coffee Creek):** No Settlement Land

**30 (Yukon River Corridor):** 19689.28 hectares Settlement Land

The Yukon River Corridor parcels were in large part chosen for traditional economy pursuits and heritage resources. The concept of cultural landscapes here is important, and TH recognizes the role of the river for tourism and also as a transportation corridor. Please also see comments on the YRC in Section 1 of this document above.

## (4) Alternatives Comments

### (4.1) Alternative A

#### LIKE:

1. So-called “Conservation” areas in the northern and southern parts of the region. These are areas of ecological and cultural importance. Participants interviewed for the TH Resources Report consistently referred to the north as an area to preserve and felt the northern part of the region was of high value. As such connectivity and similarity of designation of these northern LMU’s is important. It is also important to maintain similar management intent the adjacent borders of Fishing Branch and Yukon Charley Rivers National Preserve. The large amount of conservation intent in the north is appealing but only appropriate if conservation actually means conservation and the area is not open to industrial activity. Roads to be limited to a corridor.
2. LMUs 2, 4 and 7 provide an appropriately high level of protection (CA) for Settlement Land parcels selected because of their history as traditional village sites and hunting areas. Note that LMUs 2, 4, 7 may be even better classed as PA to provide continuity between Fishing Branch to the North and Charlie Rivers to the east of LMU 8, which is also classified CA under Alternative A.
3. TEA is an appropriate designation for LMUs 11, 15 and 16, which all contain multiple Settlement Land parcels selected for traditional pursuits or renewable resource development activities. The 11 parcels overlapping LMU 11 account for over 20 percent of all Settlement Land in the planning area, and form a core part of the traditional economy for TH citizens and others. The Dempster was considered an important area for hunting, trapping, and renewable resource use within the TH Resource Report. The TEA encapsulates important trapping areas on the



Dempster. It also covers leisure areas, berry picking locations, and Fortymile caribou habitat on the Top of the World highway. Trapping, hunting, timber harvest, and leisure are values of the between Moosehide, the Klondike and Tombstone park. It is also very appropriate to have the LMU's around Dawson city designated as TEA. The proximity to town and the accessibility make these areas best suited to community use for renewable resource purposes.

**DISLIKE:**

1. There are no new Protected Areas. TH supports the protection of land to ensure an intact landscape. The conservation designation does not fully ensure the Protection of land for all time.
2. LMU 1 & 6 are IMA IV. These are intact landscapes. Potential for oil does not necessarily warrant this having the highest level of development. It may be more appropriate to designate these IMA II or III. This northern portion of the region is considered highly valued by Tr'ondek Elders because of its pristine nature, the history of trapping and hunting in the area, and also as it is within the winter range of the Porcupine Caribou Herd.
3. LMU 10 contains over 3,000 ha of Settlement Land that was selected mainly for traditional pursuits and heritage reasons. Two parcels have individual citizen interests. The relatively high level of development allowed under IMA III may undermine the purposes for which these parcels were selected. LMU 10 also contains highly sensitive sheep habitat.
4. LMU 17. This is highly intact landscape. The area supports Hart River Caribou. The area is also important for trapping and cultural pursuits. Dissecting the LMU may separate development interests from ecological interests. Could special management considerations address industry concerns?
5. LMU 18. The Fortymile Caribou are a priority for TH Elders. This means protecting the landscape that supports the Caribou. Fortymile caribou need to be adequately addressed through access management, cumulative effects considerations, and specific management directions for the herd within the LMU's which contain key Forty mile habitat. Though seasonal limitation address some of the conflicts in the area, the increasing impact and pressures from industry in this area need to be considered.

**(4.2) Alternative B**

**LIKE:**

1. LMUs 2, 4 and 7 provide an appropriately high level of protection (CA) for Settlement Land parcels selected because of their history as traditional village sites and hunting areas. These LMUs may be even better classed as PA to provide continuity between Fishing Branch to the North and Charlie Rivers to the east of LMU 8.
2. TEA is an appropriate designation for LMU 11. The 11 parcels overlapping LMU 11 account for over 20 percent of all Settlement Land in the planning area, and form a core part of the

traditional economy for TH citizens and others. This area is intact with little mineral interest. This LMU contains the 12 Mile River, which includes a traditional trail and important cultural areas.

3. A protective designation like CA is appropriate for LMU 16, provided that it does not interfere with citizens' ability to build small-footprint hunting cabins. This area includes Hart River caribou habitat, and is important for hunting, trapping, and leisure activities.
4. LMU 16 contains relatively little Settlement Land by area (approx. 227 ha.), but these 13 parcels are almost all site-specific selections for traditional pursuits or outdoor recreation.

**DISLIKE:**

1. Alternative B is primarily focused on enabling renewable and non-renewable resource development on the landscape. Under this alternative 77% of the area is within IMA and no new protected areas are presented. A balanced plan should have a considerable amount of LMU's with designation intents other than enabling industrial non-renewable/renewable development (PA's, Conservation, TEA). As it stands, this alternative gives preference to industrial development even in areas where there is very little industrial activity or interest. More consideration needs to be given to wildlife, especially the caribou, and the integrity of intact landscapes.
2. LMU 10 contains over 3,000 ha of Settlement Land that was selected mainly for traditional pursuits and heritage reasons. Two parcels have individual citizen interests. The relatively high level of development allowed under IMA III may undermine the purposes for which these parcels were selected. LMU 10 also contains highly sensitive sheep habitat.
3. LMU 15's designation as IMA IV is problematic with respect to Settlement Land, partly because it is not clear how the overlapping Community Area interacts with the LMU as a whole. TH has many Klondike Highway Settlement Land parcels that fall within both LMU 15 and the community overlap area. Within the Klondike corridor, TH anticipates residential, commercial and infrastructure development consistent with IMA III or IV, but the same is not necessarily true of the larger parcels north of the Klondike Highway, within the Dempster corridor, or east of the Dempster. The TH resource report is clear that the Dempster highway is important area for trapping, hunting and other cultural and traditional economy pursuits. This is also not congruent with the adjacent Tombstone boundary. Intensive extractive industrial development outside any Community Area of IMA 15 would diminish the value of these parcels to TH and its citizens.
4. IMA IV may not be an appropriate designation for LMU 17. Nearly 20 percent of TH Settlement Land in the planning region is in 17, and although much of it is Category A and therefore protected from staking, further intensive development in the area could undermine the purposes for which those parcels were selected. This LMU is within the core traditional pursuits area used by TH citizens. Significant disturbance already exists (Brewery Creek mine, quartz exploration, and agricultural development); further development may threaten harm wildlife populations and undermine TH citizens' traditional pursuits practices within this LMU. This LMU should be designated on the conservation side of the scale with special consideration for

Brewery creek and other established mineral interests. Commission may want to consider splitting this LMU.

5. LMU 13 and 18. There is concern about caribou if this is in an IMA high. Why not IMA low with special consideration for miners in creeks?
6. IMA III may not be an appropriate designation for LMU 19. It contains only 2 percent of the Settlement Land in the planning region – approx. 5,200 ha. – but R-58B occupies roughly the top third of the LMU.

#### **(4.3) Alternative C**

##### **LIKE:**

1. Alternative C is appealing as it contains areas with conservation/protection in both the south and the north. The designations better reflect current uses and reflects some representative/intact landscapes for protection.
2. LMUs 2, 4 and 7 may provide an appropriately high level of protection (CA or PA) for Settlement Land parcels selected because of their history as traditional village sites and hunting areas. LMUs 2 and 7 may be even better classed as PA to provide continuity between Fishing Branch to the North and Charlie Rivers to the east of LMU 8, which is also classified PA under Alternative C.
3. The connectivity of LMU's 8, 7, 3, 2, 4 & 5 as conservation/protection designations allows is congruent with what we hear from Elders about ensuring this landscape is healthy and intact. This can only be done by ensuring large areas are cared for and exempt from industrial activities.
4. TEA is an appropriate designation for LMUs 11 and 16. The 11 parcels overlapping LMU 11 account for over 20 percent of all Settlement Land in the planning area, and form a core part of the traditional economy for TH citizens and others. LMU 16 encompasses many parcels along the Dempster Highway that were selected for individual citizens' exercise of their hunting and fishing rights.

##### **DISLIKE:**

1. LMU 1 & 6. Allowing for the highest level of development in the northern region is contrary to what TH Elders would like. Acknowledging that there are gas/oil interests in the area, a lower IMA (II or III) should be considered. It may also be possible to have as conservation area with caveats for assess corridors and allowances for future oil and gas activities.
2. LMU 14. This should be a lower IMA such as IMA II, or a TEA. This would be a better fit with other values such as the Fortymile Caribou, tourism, moose hunting, traditional plant harvesting, and timber harvest. Swede Creek is also a traditional trail, with cultural values and current traditional use.

3. LMU 26. Though there are industrial interest/activities in this area, Stewart River is important for hunting, leisure, trapping, and other traditional economic pursuits. Suggest this area be designated as a lower IMA such as III.
4. LMU 24. IMA IV does not reflect the landscape values in the area. Sheep and Caribou are wildlife values in the area that should be considered. The area is also a highly intact landscape.

#### **(4.4) Alternative D**

##### **LIKE:**

1. This alternative seems to support a conservation focus in the north and southern portions, while concentrating IMA's in the center of the region. The notion of having less development north of the Yukon River and west of Dawson is congruent with what we have heard through community consultations/interviews (LMU 9, 10, 11)
2. LMUs 2, 4 and 7 provide an appropriately high level of protection (CA or PA) for Settlement Land parcels selected because of their history as traditional village sites and hunting areas. LMUs 2 and 7 may be even better classed as PA to provide continuity between Fishing Branch to the North and Charlie Rivers to the east of LMU 8, which is also classified PA under Alternative D.

##### **DISLIKE:**

1. Other than some conservation-leaning designations in the north and south, there is not enough in the middle of the region that is not IMA. . Introducing TEA and/or a type of conservation area around Dawson city, adjacent to Tombstone Park, and west along the Yukon river (LMU's 9, 10, 11, 15, 16) may balance this out. Also depending on how conservation area is framed, there may be little land base actually set aside from mining and industry to support ecological diversity, wildlife, and traditional/cultural activities and traditional economy development.
2. IMA III may not be an appropriate designation for LMU 17. Nearly 20 percent of TH Settlement Land in the planning region is in 17, and although much of it is Category A and therefore protected from staking, further intensive development in the area could undermine the purposes for which those parcels were selected. This LMU is within the core traditional pursuits area used by TH citizens. Significant disturbance already exists (Brewery Creek mine, quartz exploration, agricultural development); further development may threaten harm wildlife populations and undermine TH citizens' traditional pursuits practices within this LMU.
3. LMU 13 and 18. Should consider lower IMA such as III. These areas are core Fortymile Caribou habitat in Canada. The Top of the World Highway which splits these two LMU's is important for recreation and access for traditional pursuits such as hunting and plant harvest. 'Special management consideration' should be included for Fortymile caribou and Top of World Highway. Might consider recommending access management (ie. using existing roads) and concentrating development activities to certain areas within the region.

4. LMU 1 & 6. See comments regarding LMU 1 & 6 within other alternatives. It is important for TH that these areas maintain their intact character and maintain supporting the Porcupine Caribou that have great subsistence and cultural important for TH.
5. LMU 16. This should be managed under a designation with conservation intent. Important cultural area, within Hart caribou habitat, adjacent to Tombstone and important for trapping.
6. LMU 9 warrants consideration as a protected/conservation area. There is very little industrial/development interest or activity within these LMU's and they are highly intact ecologically. There is no road access to this area.
7. LMU 15. This area, especially along the Dempster, and Klondike highways are important for hunting and trapping. There are also small scale timber interests. Other values include recreation, tourism, and other types of traditional economic activities. This is a good candidate for TEA designation.
8. IMA III may not be an appropriate designation for LMU 21. It contains nearly 20 percent of TH Settlement Land in the planning region, and is part of the core traditional pursuits area used by TH citizens. Intensive development could undermine the purposes for which it was selected. R-22B, the site of the Land of Plenty camp, is within this LMU.

#### **(4.5) Alternative E**

##### **LIKE:**

1. The amount of PA. LMUs 2, 4 and 7 provide an appropriately high level of protection (PA) for Settlement Land parcels selected because of their history as traditional village sites and hunting areas. This level of protection in the north is important. It is also important to maintain wildlife connectivity, which needs to be 'grandfathered' into the Plan. TH elders have suggested that it is important to keep this area pristine to protect the animals and land which support their culture and heritage; this is reflected in the Resource Report. Ultimately, this connectivity would be enhanced by making LMU 5 and 9 as a PA area. There are very little industrial/development interests in these and it is highly intact landscape that supports the Porcupine Caribou Herd.

##### **DISLIKE:**

1. Though this Alternative creates a large amount of protected area, everything else besides this is within an IMA, which are intended at enabling renewable and non-renewable resource extraction. This needs to be more balanced with some LMU's having conservation intent in areas of cultural, wildlife and ecological value. For example LMU 16, 5, and 9 are all excellent candidates as areas with Conservation intent. There are also areas such as LMU 19, 29, and 26 which may not need to be the highest level of IMA. As well LMU 27 and 28 are relatively intact landscapes with high ecological diversity making these good candidates for Conservation or PA's.

2. LMU 10 contains over 3,000 ha of Settlement Land that was selected mainly for traditional pursuits and heritage reasons. Two parcels have individual citizen interests. The relatively high level of development allowed under IMA III may undermine the purposes for which these parcels were selected. Should be TEA or Conservation intent area.
3. The designation of LMU 11 as IMA III would seriously undermine the purposes for which TH selected Settlement Land in this parcel. This LMU is within the core traditional pursuits area used by TH citizens, and encompasses 11 parcels and over 20 percent of all Settlement Land in the planning region. Suggest TEA designation.
4. LMU 15's designation as IMA III is problematic with respect to Settlement Land, partly because it is not clear how the overlapping Community Area interacts with the LMU as a whole. TH has many Klondike Highway Settlement Land parcels that fall within both LMU 15 and the Community Area. Within this Klondike corridor, TH anticipates residential, commercial and infrastructure development consistent with IMA III or even IV, but the same is not necessarily true of the larger parcels north of the Klondike Highway, within the Dempster Corridor, or east of the Dempster. Many of the latter parcels were selected for traditional pursuits or recreational purposes. Intensive development outside the Community Area of IMA 15 would diminish the value of these parcels to TH and its citizens. TEA is suggested for LMU 15.
5. LMU 16's designation as IMA IV is unacceptable, and would seriously undermine the purposes for which TH selected land in that LMU. This LMU is within the core traditional pursuits area used by TH citizens. Although it contains relatively little Settlement Land by area (approx. 227 ha.), these 13 parcels are almost all site-specific selections for traditional pursuits or outdoor recreation along the Dempster Highway south of Tombstone Park.
6. IMA III may not be an appropriate designation for LMU 17. Nearly 20 percent of TH Settlement Land in the planning region is in 17, and although much of it is Category A and therefore protected from staking, further intensive development in the area could undermine the purposes for which those parcels were selected. This LMU is within the core traditional pursuits area used by TH citizens. Significant disturbance already exists (Brewery Creek mine, quartz exploration, agricultural development); further development may threaten harm wildlife populations and undermine TH citizens' traditional pursuits practices within this LMU.
7. IMA IV may not be an appropriate designation for LMU 19. It contains only 2 percent of the Settlement Land in the planning region – approx. 5,200 ha. – but R-58B occupies roughly the top third of the LMU.
8. IMA III may not be an appropriate designation for LMU 21. It contains nearly 20 percent of TH Settlement Land in the planning region, and is part of the core traditional pursuits area used by TH citizens. Intensive development could undermine the purposes for which it was selected. R-22B, the site of the Land of Plenty camp, is within this LMU.