

In Your Words Report

A Summary of Draft Regional Land Use Plan Engagement and Feedback

August 2022

Appendices

Produced by



Dawson Regional
Planning Commission

*On The Land We Walk Together
Nän kāk ndä tr'ädäl*

APPENDIX 1: TIMELINE

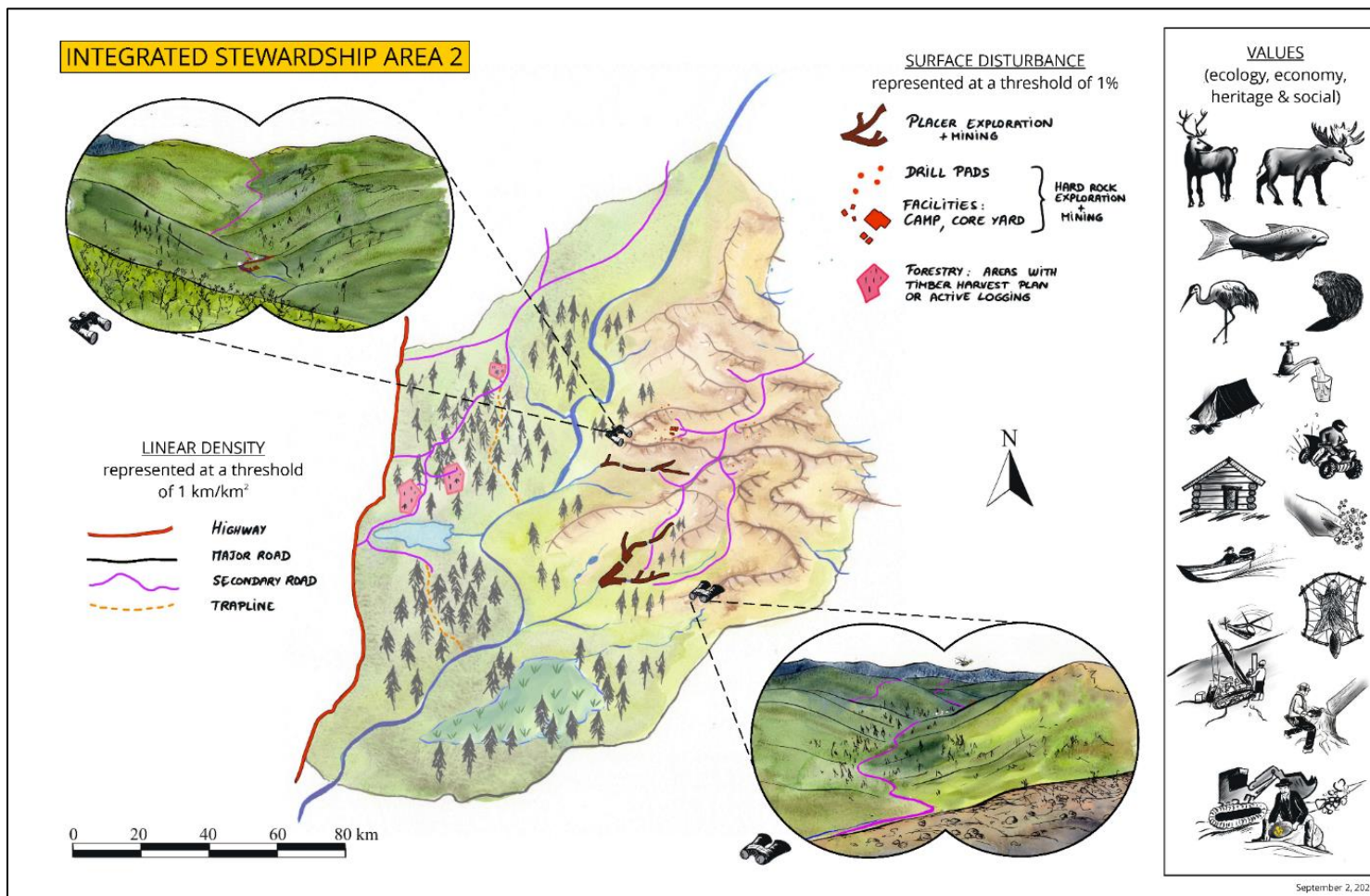
Community Conversation
Tour
Meeting
Technical Workshop
Community Workshop
Online Workshop

Event	Date
Yukon Environmental and Socio-economic Assessment Board (YESAB)	June 16, 2021
Yukon Chamber of Mines (YCM)	June 16, 2021
Klondike Placer Miner's Association (KPMA)	June 16, 2021
Yukon Conservation Society (YCS)	June 17, 2021
Yukon Conservation Society (YCS)	June 22, 2021
Canadian Parks and Wilderness Society (CPAWS)	June 23, 2021
Ducks Unlimited Canada (DUC)	June 25, 2021
Tourism Industry Association (TIA)	July 2, 2021
Environment and Climate Change Canada	July 5, 2021
Yukon Agricultural Association (YAA)	July 6, 2021
Yukon Prospectors Association (YPA)	July 6, 2021
Sub-Beringia Group	July 6, 2021
Tourism Industry Association (TIA) & Wilderness Tourism Association of the Yukon (WTAY)	July 7, 2021
Klondike Visitors Association (KVA)	July 7, 2021
Yukon Wood Products Association (YWPA)	July 9, 2021
Yukon Fish and Wildlife Management Board (YFWMB)	July 13, 2021
Wildlife Conservation Society (WCS)	July 14, 2021
Yukon Water Board (YWB)	July 15, 2021
Klondike Placer Miners Association (KPMA) – Staff Tour	July 17, 2021
ATAC Resources	July 20, 2021
City of Dawson - Council	July 27, 2021
Klondike Farmers Forum	July 27, 2021
City of Dawson – Administration	July 29, 2021

Event	Date
Wetlands Online Workshop	August 4, 2021
Conservation Areas Community Workshop	August 4, 2021
Wetlands Community Workshop	August 4, 2021
Conservation Areas Online Workshop	August 5, 2021
Future Planning Areas Community Workshop	August 5, 2021
Porcupine Caribou Management Board	August 12, 2021
Northwest Boreal Partnership	August 24, 2021
Wildlife Conservation Society	August 26, 2021
Klondike Placer Miners Association – Commission Tour	August 31, 2021
Transboundary Dialogues – Yellowstone to Yukon (Y2Y)	September 2, 2021
Klondike Placer Miners Association AGM	September 3, 2021
Tr'ondëk Hwëch'in Elder's Council	September 14, 2021
Hon. Nils Clarke, Minister of the Environment	September 17, 2021
Fisheries and Oceans Canada	September 17, 2021
Tr'ondëk Hwëch'in Citizen Engagement – C4 Subdivision	September 21, 2021
Tr'ondëk Hwëch'in Citizen Engagement – DRPC Office	September 22, 2021
Cumulative Effects Technical Workshop	September 28, 2021
Cumulative Effects Technical Workshop	September 29, 2021
Community Conversation (Drop In) – Dawson City	October 11, 2021
Community Conversation (Tea Circles) – Dawson City	October 12, 2021
Dawson District Renewable Resources Council	October 12, 2021
Community Conversation – Dawson City	October 13, 2021
Klondike Active Transport and Trails Society	October 13, 2021
Friends of Dempster	October 13, 2021
Community Conversation – Mayo	October 14, 2021
First Nation of Na-cho Nyäk Dun Council	October 15, 2021
Yukon Woods Products Association	October 18, 2021
Mayo Renewable Resources Council	October 18, 2021
Community Conversation – Whitehorse	October 19, 2021
ATAC Resources	October 20, 2021
Truepoint Exploration	October 20, 2021

Event	Date
Tr'ondëk Hwëch'in Citizen and Commission Gathering	October 20, 2021
Vuntut Gwitchin First Nation Council	October 22, 2021
Wetlands Technical Workshop	October 27, 2021
White River First Nation	November 4, 2021
Newmont Corporation	November 10, 2021

APPENDIX 2: CUMULATIVE EFFECTS ILLUSTRATIONS



The image above is an example of one of a series of illustrations that were created for the Commission to communicate the concept of Surface Disturbance and Linear Density thresholds on the landscape.

APPENDIX 3: SURVEY

Section 1: Survey Introduction

The Commission wants to hear from you! This survey is an opportunity to share with the Commission your thoughts on the Draft Plan. For two years the Commission and staff have been working in partnership with technical staff from the Yukon and Tr'ondëk Hwëch'in governments, Tr'ondëk Hwëch'in citizens, community members, and all of our planning partners (stakeholders), and they are grateful for everyone's contributions.

The Commission is made up of six dedicated members of the Dawson community. If you want to learn more about the Commission and hear what they have to say you can visit our website engagedawson.planyukon.ca

Land Use Planning (LUP) arises directly from the Tr'ondëk Hwëch'in Final Self Government Agreement signed in 1998. LUP process is designed to support the development of a vision for the sustainable use of land, water, and other renewable and non-renewable resources in the region.

The Commission still has a lot of work to do to as it enters the next stage of the process: producing a Recommended Plan. They are asking for your feedback on the Draft Plan. Everyone's voice is important, so thank you and Mähsj cho for taking the time to share your thoughts on the Draft Plan by responding to this survey!

If you would like to access the draft plan, the plan highlights, or the summary please visit engagedawson.planyukon.ca

Our Commitment

The Commission will consider all feedback fully and fairly when it comes time to write the Recommended Plan, and we are committed to provide clear information on how the input was considered.

We promise that all input we receive will be considered fully and fairly by the Commission. Once collected, public input may be summarized and made publicly available in Commission documents (e.g. Commission minutes, summary reports, etc.)

We may also share what you tell us (in part or whole) on this website, affiliated websites, or any other Commission documents.

GETTING TO KNOW YOU

The following questions are included in this survey to make sure we have reached a broad cross-section of people who are connected with the Dawson Region.

Are you familiar with the Dawson Region? [choose all that apply]

- Yes, I am a full time resident
- Yes, I live in Dawson seasonally (e.g. sometimes for work)
- I am a regular visitor to the Dawson Region
- No, I have never been to the Dawson Region
- Other _____

If not, where do you live?

- Another Yukon community
- In Canada (outside of the Yukon)
- Elsewhere

Are you a member of a Yukon First Nation?

- Yes, TH Citizen
- Yes, Other YFN
- No

Do you work in the Dawson Region?

- Yes
- Yes, seasonally
- No

If so, what sector do you work in? (for example, tourism, mining, government, arts and culture, etc.)

If you prefer that we keep your comments and/ or any other information confidential, please let us know by checking here.

- Please keep my comments confidential
- My comments can be public

How would you like to be identified in this survey? [choose one]

(for example “Quoted from a ...”)

- “Survey respondent”
- “Dawson Resident”
- “TH Elder”
- “TH Citizen”
- “Industry Specialist”
- “Ecological Expert”
- “Local business owner/operator”
- “Yukon Resident”
- Other (please specify)_____

Section 2: Draft Plan Concepts and Principles

PLAN FAMILIARITY

There are many ways to learn about the Draft Plan. The Commission have provided the full plan, a highlights document and a plain language summary for people to read. We also encourage people to visit our offices in Dawson and Whitehorse to ask questions in person about the Draft Plan, attend info sessions and workshops, and explore our websites.

The things I like about the Draft Plan are...

The things that are missing from the Draft Plan are...

The things I would change in the Draft Plan are...

STEWARDSHIP

The plan is based upon the guiding principle that we have a shared responsibility to respect and care for the land. Stewardship means we take collective care and actions to ensure the health and wellness of the land and waters - for today and for future generations. Stewardship is based on the understanding that if we take care of the land, the land will take care of us.

I see myself as a steward of the land (circle one)

Yes Somewhat No

The different ways that I take care of or connect to the land are...

DAWSON LAND STEWARDSHIP TRUST

The Commission is recommending the creation of a ***Dawson Land Stewardship Trust***. The mandate of this initiative would be to fund projects to promote the ongoing practice of stewardship in the Region. Project proposals considered for the Trust should foster community and cultural connections to the land (i.e. outings for children/youth), encourage and support industry stewardship innovations (i.e. creative/innovative advances in reclamation, programs promoting collaborative land uses, etc.), and provide educational/research opportunities.

Do you support the Dawson Land Stewardship Trust recommendation proposed in the Draft Plan? [choose one]

- Yes
- No
- Not sure

Please tell us your thoughts and ideas on the Dawson Land Stewardship Trust

ARE YOUR CONCERNS/INTERESTS ADDRESSED IN THE DRAFT PLAN?

In the Fall of 2019 we held public engagement sessions and surveys to find out what the important issues and interests were. We took what was said and created an *'In Your Words Document: A report on public engagement (June 2020)* and an *Issues and Interests Report (July 2020)*. The Commission used this information to create the Draft Plan.

Please tell us briefly what matters to you most in the Region?

Do you feel that most of the things that matter to you were included in the plan?

REGIONAL PLANNING UNDER CHAPTER 11 OF THE TR'ONDĚK HWĚCH'IN FINAL AGREEMENT (THFA)

Working with the Parties, and through public participation, the mandate of the Commission is to develop a Recommended regional land use plan for Settlement Land and Non-Settlement Land that is consistent with and achieves the objectives of Chapter 11 (Regional Planning) of the THFA.

One key objective of Chapter 11 is:

11.1.1.6 *to ensure that social, cultural, economic and environmental policies are applied to the management, protection and use of land, water and resources in an integrated and coordinated manner so as to ensure Sustainable Development.*

Sustainable Development as defined in the Final Agreement as: *“beneficial socio-economic change that does not undermine the ecological and social systems upon which communities and societies are dependent”.*

In your opinion, does the Draft Plan achieve the objective of Sustainable Development?

- Yes
- No
- Not sure

Please provide explanation

Do you have any other comments on whether the Draft Plan is meeting the Chapter 11 Objectives and / or the spirit and intent of the Tr'ondëk Hwëch'in Final Agreement.

Section 3 Key Issues

CUMULATIVE EFFECTS

Similar to the other regional plans that have been completed in the Yukon, the Commission is using a Cumulative Effects Framework to respectfully manage development on the land.

Cumulative Effects, in simple terms, is the buildup (or accumulation) of the effects of all human activities (i.e. forestry, mining, roads, agriculture, residential development, climate change, etc.) on the health of the land and waters and the things that we care about or value. An assessment of Cumulative Effects needs to consider past, present, and future activities.

Example: *One small mining project in known caribou summer habitat might not cause caribou to avoid the area, however many small mining projects (past and present), AND forestry, AND an active hiking trail all happening in and around the area might cause caribou to change their behavior and not be as accessible for people to hunt.*

In this example, access to caribou could be a 'value' and the number of caribou harvest in that area could be in 'indicator'

The Commission is interested in hearing back from the public on what values should be considered to help make decisions about what the land can sustain to remain healthy. Values can be measured or monitored to help decision makers know when acceptable limits have been reached.

The things that you value or care about on the land can range from the presence or absence of a species – like moose, salmon, or berries to the ability to do an activity like hunt, work, hike, or harvest.

Please share with us values you feel should be included in helping to make decisions about what is allowed to happen on the land.

Please share your experience / knowledge with the Commission about how the amount of some human activities or infrastructure (i.e. roads, mining, agriculture, tourism) on the land affect the things that you value or care about (land, water, community, access to hunting grounds, etc.) Feel free to be specific to an area

For example: *'Each hunting season I feel like I have to go further and further along the trail to find a moose to harvest'*

or

'The improved trail system brings in more tourists which is great for my business'

Do you feel that the amount of human development should be limited to help maintain the things you value? [yes, no, not sure, please provide a brief explanation]

WETLANDS

The Commission acknowledges that the topic of development or industrial activity within wetlands is a difficult one that has a long history in the community. People look to Regional Planning to help to resolve conflict and create certainty for land users and managers. The Commission wants to find a solution for the Recommended Plan that works for the community and is respectful to the environment. The Commission recognizes that

- Yukon wetlands contain valuable one-time-removal (non-renewable) resources that generate wealth and supplement livelihoods for Yukoners and others (gold, cultural artifacts, building materials, etc.), and
- Wetlands provide several valued renewable things and services including water, salmon, moose, ducks, flood prevention, water filtration, and carbon storage.

The Commission strongly feels that input from the community is necessary to come to a decision based on the best available scientific information, and consideration of the important cultural, ecological and economic values held within our wetlands.

Here is what the Commission is recommending for wetlands in the region (For a quick explanation of the different wetland types (ie. bogs, fens, marsh, swamp)

- No development in bogs or marshes across the whole region
- No development in bogs, marshes, and fens in Special Management Areas
- Consideration of some level of development in fens in Integrated Stewardship Areas

Development that occurs in wetlands in the Region should be avoided where possible and reclaimed to the highest standard reasonable after activity is complete.

What do you like or dislike about this the approach to wetlands?

When considering development in wetlands, what impacts to your values are you most concerned about?

The Commission have highlighted two wetland areas as of special importance, **Scottie Creek Wetlands** and the **Upper Indian River Wetlands**.

Do you agree or disagree with the choice of these two wetlands? [choose one]

- Agree**
- Disagree**
- Not Decided**
- Have no opinion**

Please tell us why you agree or disagree

Are there other areas of wetlands in the region that you feel are of equal or greater importance that should receive a similar level of protection? If so, where are those wetlands (Use LMU # if possible) and why are they of high value to you?

In exploring how to find an approach to wetlands that is in keeping with our stewardship responsibilities and also respects the values and interest in these areas, the Commission is considering a development threshold for fens between 25% and 75% in the Integrated Management Areas.

Fens are a type of wetland that accumulates peat (partially-decomposed organic matter) over long periods of time. What this means simply is that it can take a long time (hundreds or thousands of years) to form and that they have an important role to play in the ecosystem (like carbon storage [in the peat] and providing habitat). They are considered very hard or impossible to be replaced once disturbed.

Please tell us what you think about development in fens [choose one]

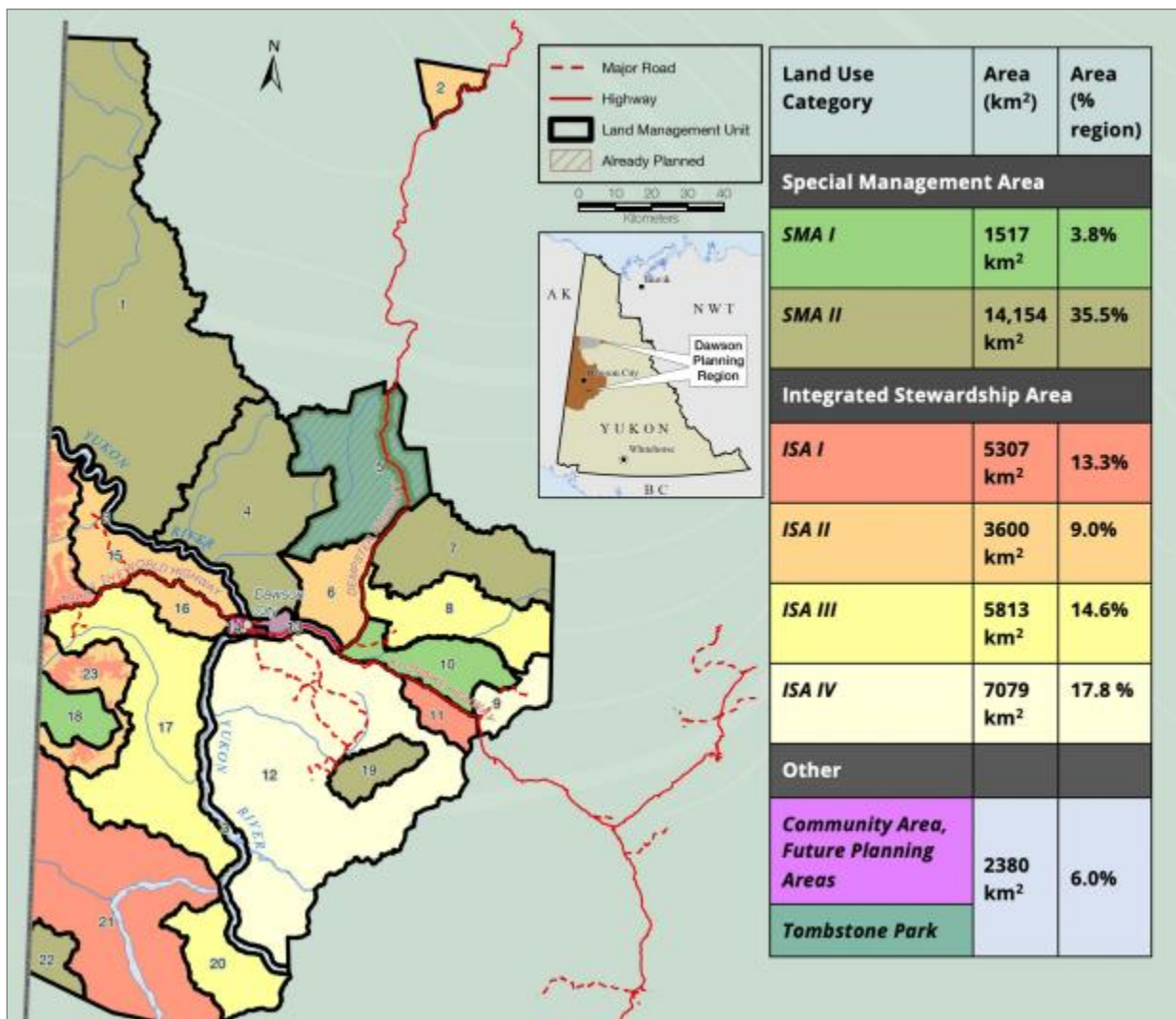
- Development should be allowed to occur in fens (no limit).**
- Limited development should be allowed to happen in fens.**
- No development should occur in fens anywhere in the region.**
- I do not know (This is a hard question, please feel free to contact us if you want more information)**

Please explain your answer.

INTRO: LAND DESIGNATION SYSTEM

The Commission has created a land designation system based on what has been done in past Regional Plans in the Yukon and added Stewardship as a guiding principle. There are two broad categories of designation and varying degrees of allowable development and protection within those categories. The proposed land designation and the map of the Region illustrating the zoning is below.

The Integrated Stewardship Areas (ISAs) are areas where development can occur (from a low to a higher scale) and the Special Management Areas (SMAs 1&2) are areas where conservation is the main focus, but in some cases (SMA 2) development can still occur in a careful way. The Draft Plan provides an in-depth look at what each of these designations mean, and all of the general management directions that would apply in the Region.



When answering the following questions **please provide specific LMU #s or area names** where possible.

<p>What are your first impressions of this map and the land designation system?</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<p>The things I feel the Commission <u>got right</u> about the land designations are...</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<p>The things I would <u>change</u> are...</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

What advice do you have for the Commission as they develop the Recommended Plan?

CONTACT INFORMATION:

If you would like be on our e-mail list for upcoming workshops and other engagement opportunities, please email dawson@planyukon.ca or call us at 867-993-4400

Thank you and Mähsj cho for sharing your thoughts with us today. Please stay tuned for further conversations on land use planning in the region. Together we will develop a sustainable future for our community and for future generations.

Check our engagedawson.planyukon.ca website in the coming months to read the results of this survey.

APPENDIX 4: LMU SUMMARY OF FEEDBACK

LMU 1: NORTH – TTHETÄWNDĚK

Tr'ondëk Hwëch'in

- Area should be a Special Management Area, which aligns with their Final Agreement and consistent with PWRLUP and protects important heritage values/use.
- Indicated that greater emphasis needs to be added with respect to historic and traditional use of the area.

Government of Yukon

- There is a significant cobalt deposit in the region, a mineral that supports green technology. Would like to see this kept accessible for development. Suggested carving exploration areas out of a Special Management Area if one is established.
- Plan variances and amendments are not feasible for allowing access to claims.

Vuntut Gwitchin Government

- Identified the need to address potential incompatibilities between this LMU and adjacent LMUs in North Yukon planning region.

Tr'ondëk Hwëch'in Citizens

- Need to be restrictive up there. It is the last piece of wilderness we have.
- The recommendation for no new mining claims in this area is supported.
- No oil and gas exploration on our Land.

Public and Stakeholder Feedback

Industry Plan Partners provided the following feedback:

- Advised that LMU contains significant rare metal required for battery production.
- Access to mineral claims is needed.
- LMU could be split into two to allow mineral development.

Conservation Plan Partners provided the following feedback:

- Concern about a future oil and gas play.
- SMA 1 to protect a portion of the McQuesten Highlands and N. Ogilvie ecoregions. Access recommendations in Draft Plan are supported.

- Must be a Special Management Area 1.

General Feedback:

- There is wide support to leave area intact and wilderness protected.
- Special Management Area designation may put a “bullseye” on the area, but it is currently not easy to access.
- Hunting and trapping infrastructure is not addressed (traditional economic activities).

LMU 2: EAGLE PLAINS - CH'ÉZHÄN WĒCHÈL

Tr'ondëk Hwëch'in

- Include Dempster Highway Corridor in SMDs.
- Important caribou harvest area.
- Potential for undiscovered archaeological sites and infrastructure related to historic harvest activities.

Government of Yukon

Most significant harvesting area for the Porcupine Caribou Herd in region.

Vuntut Gwitchin Government

- Suggested a coordinated approach to access planning for oil and gas is needed for this area and that oil and gas activities could impact the Porcupine Caribou.
- Commented on the transboundary implications of oil and gas as headwaters of the Porcupine River.
- Suggested the recommendations of this unit be aligned with the nearby units in the North Yukon Plan, including cumulative effects thresholds.

Tr'ondëk Hwëch'in Citizens

Suggestion that there should not be any oil and gas development on Tr'ondëk Hwëch'in lands.

Public and Stakeholder Feedback

- Appreciation of balance between caribou and oil and gas interest by making this area an ISA 2 and allowing for co-management.
- This area should be designated as a Special Management Area with priority for Tr'ondëk Hwëch'in hunting and gathering rather than oil and gas development.

- Allowable trapping and hunting activities should be specified in Plan.
- Concerned with the impact of oil and gas activity on Porcupine Caribou.
- Support for further identification and management of priority habitats in this LMU.
- Balance needed which considers both conservation priorities as well as oil and gas development, and recommendations for specifics related to management approaches that need to be undertaken.

LMU 3: YUKON RIVER – CHU KON DĚK

Tr'ondëk Hwëch'in

- Support sub-regional planning. Suggest timeline and framework for joint sub-regional planning and continuation of mineral withdrawals.
- Would like interim management measures to provide clarity and guidance.
- Recommended change to SMA 1 designation.
- Increasing the corridor from 1km to 2km.

Government of Yukon

- Recommended change to ISA 1 designation.
- Support for tourism activities.
- Linked to access points, sees this LMU as an important transportation corridor and recommends a barging study.

White River First Nation

- Recommended that sub-regional planning involve all Affected First Nations.
- Stated that main threats to the Yukon are climate change and habitat loss.

Tr'ondëk Hwëch'in Citizens

Some thought too many minerals from public and settlement lands were withdrawn and some want permanent protection of the river itself.

Public and Stakeholder Feedback

- Overwhelming support for sub-regional planning of the Yukon River Corridor.
- Desire for an explicit timeline for subregional planning and it be expedited.
- Difference in opinions regarding what happens in the interim:
- Some want staking ban lifted and access to mining claims to continue. Measures currently in place could have “seriously negative impacts”.

- Some think that ISA 2 levels are too high and would like to see stronger management direction for protection and keep the withdrawal.
- DDRRC advised: “Tr’ondëk Hwëch’in elders and other Dawson locals have long voiced concerns that salmon rearing and spawning habitat have been diminishing within the Tr’ondëk Hwëch’in traditional territory... (sub-regional planning) may go a long way towards protecting salmon habitat within the planning region.”
- Salmon are a major concern.
- Important traditional route for First Nation gatherings.
- Climate change impacts are an important consideration including the possibility of a bridge at Dawson City, riparian habitat, and endemic species.
- There needs to be better management of tourism use on the river.
- Importance of the Yukon River for access – accessing claims, barge landings.
- Consider alternate designations such as Heritage River status.
- Encourage the use of the river as a travel corridor, with strong stewardship.

LMU 4: FIFTEEN/CHANDINDU – TSEY DĚK/TTHEN DĚK

Tr’ondëk Hwëch’in

- Would like the area to be a Special Management Area 1. Suggest this is also consistent with Peel Watershed and protects important heritage values/use.
- Would like to see co-management of this area.

Government of Yukon

Wanted to see more clarity related to what other land uses activities are allowed and how access would be permitted, given the Draft Plan direction on access.

Tr’ondëk Hwëch’in Citizens

- Wilderness needs to be protected
- Manage for wilderness recreation.
- The recommendation for no new mining claims in this area is supported.

Public and Stakeholder Feedback

- Support for IPCA and protected area under legislation.
- Support for a SMA that respects existing mineral rights. Supported as a protected area to offset/trade-off complete wetland protection elsewhere.
- There are ten claim holders and they should be allowed to develop under ‘ISA’ mitigations or be compensated for claims.

- This LMU has very high ecological habitats (e.g., vast Tintina Trench Flyway), a high proportion of First Nation Settlement Lands and shares a border with Tombstone Park, so this is an excellent opportunity for a sizable high-preservation area.
- If protected, the fish and wildlife populations can support people indefinitely.
- Special Management Area designation may put a “bullseye” on the area; however, much of this area is significantly more inaccessible than Tombstone and it is possible to legislate higher protection.

LMU 5: TOMBSTONE PARK

As Tombstone Territorial Park is a protected area established pursuant to Schedule A of Chapter 10 of the THFA and designated under the Parks and Lands Certainty Act, the Commission did not seek direct feedback on the management direction of the park. As indicated in the THFA, in developing a land use plan that includes all or parts of the Park, a Regional Land Use Planning Commission shall consider the Tombstone Territorial Park Management Plan (2009).

LMU 6: KLONDIKE

Tr'ondëk Hwëch'in

- Suggested LMU be designated as a SMA 1 with conservation emphasis for the Klondike River and surrounding area. It contains salmon habitat, several active trapping concessions, and areas for the traditional economy.
- Emphasized that Yukon Ditch is within this LMU.
- Potential for Indigenous tourism and interpretation along the Dempster Highway.

Government of Yukon

- Suggested boundary may need to be adjusted to incorporate lynx habitat.
- Area is important for commercial saw log harvesting, not just fuelwood.

Public and Stakeholder Feedback

- Having an ISA 2 adjacent to Tombstone Park and proposed SMAs lowers the protection of those areas.
- Some observed that the human use of the area closer to the Dempster Highway (e.g., forest harvest) is much higher than the rest of the unit. One suggestion is that the active area be amalgamated with LMU 8 (Lower

Brewery) as an ISA 3 and the remaining portion be assigned a Lowest Development (ISA 1) or Special Management Area designation.

- There is high mineral prospectivity in the area: management directions should consider current and future mineral interest.
- Some suggested that this LMU become a Special Management Area due to adjacency to Tombstone, its ecological values, and the current limited mineral activity.
- Impacts from jetboats: research recommendation into how this activity can affect water quality and salmon habitat be extended to include LMU 6.
- Definition of activities that have the potential to disturb salmon be clarified for proponents and regulators.
- Industry recommends it be downgraded to an ISA 3.
- Tourism is a major economic driver and LMU 6 is a good place for tourism values, and more infrastructure will be needed to support this.
- Discussion of North Fork Hydro – operated 1911 to 1966. Proposal ongoing to re-establish.

LMU 7: UPPER BREWERY/HAMILTON

Tr'ondëk Hwëch'in

- Recommended that the LMU should be an SMA, which would protect Hart River caribou herd habitat, align with their Final Agreements and create connectivity between PWRLUP and Tombstone Park.
- Identified multiple values that should be emphasized, including:
- Ecological Value: important harvest area of high cultural value.
- Heritage and Cultural Resources: includes archaeological sites and settlement lands of cultural significance.
- Recreational/Tourism: canoeing and pack rafting the North Klondike River.

Government of Yukon

- Suggested adjusting the boundary so that:
- The concentration of mineral interests is within ISA 8.
- Eastern portion be expanded to capture Clear Creek caribou herd habitat.
- There are critical minerals and existing claims in this LMU and access will be needed. Access off the Dempster should be accommodated.

First Nation of Na-Cho Nyäk Dun

Recommended that LMU be an SMA to protect Hart River caribou herd habitat.

Public and Stakeholder Feedback

- Some suggested changing to an ISA 2 to reflect development potential for both placer and hard rock mining, while still recognizing the ecological values.
- Others suggested an SMA 1 because of ecological and cultural importance.
- A submission advised that this LMU be an ISA 4 to account for the significant mineral potential, and existing mineral dispositions.
- Hart River Caribou herd habitat: “there is little reason to potentially undermine the health of the Hart River herd by permitting exploration disturbance in this LMU.” (Plan Partner Submission)
- Some suggested boundary changes: incorporate the habitats of both the Hart River and Clear Creek caribou herds; focus on high cultural and ecological values; and not include the high mineral potential in the LMU.
- Might be suitable for an ORV management area.
- A Special Management Area designation would provide habitat connectivity.
- Several felt more water protection is required as per Chapter 14 of the First Nation Final Agreements, particularly for Antimony Creek.
- Several advised that if access is not allowed the claims will be ‘worthless’.

LMU 8: LOWER BREWERY/HAMILTON

Tr’ondëk Hwëch’in

- Advised that the Plan must not limit Tr’ondëk Hwëch’in’s ability to access the land for traditional land use activities, including the peaceful enjoyment of settlement lands.
- Noted that there are canoeing and pack rafting opportunities on the North Klondike River.
- Hart River caribou herd should be added to the values.
- Important area for harvest.
- Several archaeological resources are documented in this LMU.

Government of Yukon

- Would like all-season access off the Dempster Highway to be allowed into the mining claims to allow for future production.
- Yukon Ditch should be added as a potential tourism feature.
- Would like the active area in LMU 7 incorporated into this unit.

First Nation of Na-Cho Nyäk Dun

- Concerned about the displacement of the Clear Creek Caribou herd.
- Noted their traditional camps, land use and habitat.
- Values along the Dempster Highway.

Public and Stakeholder Feedback

- Support for the SMDs for this area, including restricting access from the Dempster Highway. Access from the highway would require crossing the North Klondike River.
- Eastern section be incorporated into LMU 7.
- LMU should be extended northward to capture the development area.
- Suggestions for an access management plan. Specifically, they feel access from the south is preferred, not from the Dempster Highway.
- Adaptive management approach to access from the Dempster Highway that considers future Resource Roads Regulations and Lands Act amendments; access could be increased with monitoring in place under new legislation. Should consider balancing public and commercial use of off-road vehicles too.
- Concern about the expansion of heap leaching at the Brewery Creek mine.
- Some public suggested that protection of caribou be considered at higher elevations.
- North Klondike River protection is another broad concern.
- Many Tr'ondëk Hwëch'in Citizen concerns about cyanide leaching from Brewery Creek.

LMU 9: CLEAR CREEK

Tr'ondëk Hwëch'in

- Recommended a lower ISA designation due to the Clear Creek caribou herd.
- Advised that wetlands exist throughout this unit.
- Portions of area used for harvest activities, particularly along Klondike Highway.

Government of Yukon

Suggested more management direction related to seasonal activities to reduce the impact on Clear Creek caribou.

First Nation of Na-cho Nyäk Dun

- Would like this unit designated an ISA 1 (Lowest Development). There are multiple traditional camp and fishing locations and caribou range. It includes a moose corridor.
- The Clear Creek caribou herd is a central value and access should be disallowed in fall rut habitat.
- Also noted that the wetlands must receive attention as a key value. “Wetlands and Indigenous lifeways are inextricably linked”.

Public and Stakeholder Feedback

Industry Plan Partners provided the following feedback:

- Concerned with the impact that seasonal closures would have on industry. Closures can result in negative impacts to the Dawson service sector, bankruptcy of family businesses, and impact the local economy.
- Advised that better access management and harvest management is needed to protect the caribou.
- Would like reclamation to be linked to cumulative effects.
- Support ISA 4, as the area has 1274 mineral claims. Suggests adaptive management based on ongoing studies of caribou and other values.

Conservation Plan Partners provided the following feedback:

- Concerned with the ISA 4 designation and caribou habitat fragmentation and direct loss of habitat.
- CE study of the Clear Creek caribou herd and their range as well as access restrictions.
- Recommend ISA 1 – no new access or development.

General Feedback:

- Mayo RRC concerned about placer mining’s ecological impacts in Clear Creek area.
- Suggested ISA 3 with new development permitted once reclamation completed.
- Surveys noted the importance of this area for placer mining and to take a similar approach as with the Goldfields.

LMU 10: UPPER KLONDIKE

Tr'ondëk Hwëch'in

- Advised that the unit should be expanded eastward to protect more of the Clear Creek herd important habitat.
- Recognised that the THFA includes the potential for development of the North Fork Hydro Project.
- Plan recommendations should not impede TH's ability to develop this important area for cultural use.
- Noted that clarity is needed regarding the North Fork Access Road which is also in the THFA. This existing right of way goes to the Brewery Creek mineral claims.

Government of Yukon - no comments.

First Nation of Na-Cho Nyäk Dun

Like Tr'ondëk Hwëch'in, they recommended expanding the unit eastward to protect Clear Creek herd habitat.

Public and Stakeholder Feedback

- Some feedback suggested combining this LMU with LMU 11 (Flat Creek Wetlands) to make a larger Special Management Area. Some also suggested also including LMU 19 within this larger area.
- Suggestions to focus this LMU around the Klondike River, which has a concentration of high ecological and cultural values.
- Designate this area an ORV management area under the ORV Regulations to limit off-road vehicle access.
- Industry support for SMA 1 but advised that exiting access to LMU 8 needs to be maintained.
- Very wide support for a Special Management Area designation.
- Some advised that the Recommended Plan should consider, and either accommodate or reject the potential for micro-hydro development.

LMU 11: FLAT CREEK WETLANDS

Tr'ondëk Hwëch'in

Would like to see Flat Creek Wetlands be designated as a Special Management Area in recognition of its ecological importance as well its significance for cultural education and their traditional economy.

Government of Yukon

- Indicated that forestry activities in the LMU are overstated in the Draft Plan.
- Agriculture highlighted as a value: the area contains promising agricultural potential.

First Nation of Na-cho Nyäk Dun

Advised that Flat Creek Wetlands should be designated as a Special Management Area to preserve ecological and cultural integrity, and to maintain consistency with Chapter 10 of the Final Agreements.

Public and Stakeholder Feedback

- There was industry support for the Draft Plan designation of ISA 1 or even SMA 1. However, suggest that Flat Creek wetland protection offset development in LMU 19: Upper Indian River Wetlands.
- Conservation groups recommended that LMU 11 become a SMA 1 due to its ecological importance, especially for the Klondike River watershed.
- Recommendation to designate as a SMA and incorporate the undisturbed portion of the Upper Indian River watershed.
- Survey feedback indicated support for increasing this LMU's protection, including some that supported the industry position to 'offset' protection of LMU 11 with LMU 19.

LMU 12: EAST - NÄCHO DĚK

Tr'ondëk Hwëch'in

- Recommended the boundary be reconfigured.
- Highlighted the need to protect a riparian corridor along the Indian River.
- Relatively intact areas closer to the Stewart River may require different management objectives than the Goldfields.

Government of Yukon

- Forestry should be added as an important value in this unit. Six of the region's ten timber harvest plans are in this unit.
- Limiting access infrastructure would preclude a lot of placer activities that are ongoing or intended to occur.
- Boundary could be redrawn to split LMU in two. Both retain ISA 4 designation to ensure even distribution of development within CE thresholds.

- Recommended plan could include wetland avoidance thresholds (not exceeding 50% fen).

First Nation of Na-Cho Nyäk Dun

FNNND's traditional knowledge information indicates a significant concentration of traditional use and habitat values along the Tagé Cho corridor. These values are centered on the river itself but also involve adjacent lands, wetlands, and tributaries that can stretch over 2km from the river on either side. FNNND therefore endorses TH's recommendation of an SMA designation and specific waterway management directions developed for the Tagé Cho corridor.

Tr'ondëk Hwëch'in Citizens

- A strong vision for reclamation is needed for this unit.
- Stewardship seems like a token word when it comes to ISA 4 designations.

Public and Stakeholder Feedback

Industry Plan Partners provided the following feedback:

- General support for the designation and Special Management Directions in the Draft Plan.
- High mineral potential and activity.
- As the most significant area to the placer industry, industry would like to see higher thresholds for this area. Reclamation should also be part of the cumulative effects calculations.
- Would like to see pilot projects in this area that would support moose population health, including reclamation approaches and access management.
- Recommended that ISA designated Bonanza Creek and Indian River be utilized for water quality monitoring and fish-studies. These two locations would be ideal for ecological research given they are downstream from high-development areas.

Conservation Plan Partners provided the following feedback:

- Noted that the Coffee Project and Northern Access Route will have a big impact on this area, as it will increase ease of access to the south.
- Recommendation for sub-regional planning for this area.
- Concerned about a potential loop road at: Sulfur, Dominion and Quartz Creeks to the Indian River valley.

- Concentration of development in valley bottoms mean that the thresholds levels do not have the desired outcome in terms of limiting cumulative effects. Therefore, smaller units are preferred.
- Would like to see protection along ridge lines and river corridors.
- Sheep are found at lower elevations in the southern part of the region.
- Historic imagery of this area should be researched to understand the cumulative effects.
- Suggested access controls and specifically recommends gating the NAR.

General Feedback:

- Some members of the public suggested a lower designation to protect what is remaining in this unit and allow more development elsewhere in the region. Of particular concern are the wetlands and waterways.
- Others expressed the opposite: that mining should continue in areas that are already being mined.
- Other members of the public suggested that mining in the wetlands in this LMU is acceptable given the protection in other areas.
- The Indian River is so 'torn up' that it can no longer be used for traditional activities.
- There needs to be a strong vision for reclamation in the East LMU.

LMU 13: KLONDIKE VALLEY

Tr'ondëk Hwëch'in

- Would like to see timelines established for sub-regional planning and would like this to be done jointly and a framework provided.
- Would like to see more direction for what happens in the interim for future planning areas.
- More reference to Tr'ëhudè in description and LMU values, noting that the Klondike Valley contains 'important areas for connecting to the land through the practice of land use activities'.
- Noted that area is at flooding risk and permafrost degradation is also a risk; suggested adding to Special Management Directions in this regard.
- The Klondike Highway Corridor is an obvious area for agricultural growth and expansion.

Government of Yukon

Suggested a Local Area Plan could be an alternative to sub-regional planning for the Klondike Valley.

First Nation of Na-Cho Nyäk Dun

Indicated they would like to be part of the Klondike Highway Corridor Advisory Committee that is currently recommended within the Draft Plan.

Tr'ondëk Hwëch'in Citizens

Citizen letter urged greater protection of water in the Klondike River.

Public and Stakeholder Feedback

- Broad support for sub-regional planning from across the spectrum and indication that there would be strong participation from industry and Conservation Plan Partners.
- Firmer timelines should be indicated within the Recommended Plan.
- Interim measures – clear direction for protection and development needed.
- Development should be permitted in the interim to ensure current operators aren't forced to stop working.
- Suggested there are many opportunities in this area, especially the opportunity to reclaim historically mined ground.
- Support for both preservation of the dredge tailings piles, and for their eventual reclamation.
- Some support for withdrawal of mineral staking until sub-regional plan approved.
- Indicated support for micro-hydro development.
- Jet boat use disturbance and recommend the Klondike Valley be added to research recommendation.
- Several submissions indicated support for a Planning Commission to undertake subregional planning.
- Opportunities for sustainable development activities in the Klondike Valley.
- Concerns about cyanide leaching from Brewery Creek operations.
- There needs to be clear expectations and timeframes set out in the Draft Plan for future Klondike Valley planning.
- Water is important: the Klondike Valley is a major drinking water source and important for wildlife.

- Conservation values in the Klondike Valley need to be considered carefully. There are many values in this LMU that are not protected.
- Consideration of the City of Dawson's future is very important and sub-regional planning will need to consider this.

LMU 14: DAWSON CITY

The City of Dawson is out of scope for the Regional Plan and thus this LMU did not receive specific feedback. Generally:

- It was acknowledged that the Regional Plan will have considerable impact on the municipal area and the Recommended Plan should consider this.
- Condensing development around existing developed areas is important and supported.
- The dredge tailings on the outskirts of the City could be used for reclamation and restoration research.
- Dawson will likely become attractive in future due to climate change and the region should prepare for potential population increases.

LMU 15: FORTY MILE RIVER - CHĒDÄHDĒK

Tr'ondëk Hwëch'in

- Recommended this area become an SMA as the Fortymile area is important for cultural continuity and cultural education.
- Want protection of area surrounding Forty Mile by establishing a no activity buffer.
- Noted various values are missing in the Draft Plan including pre-contact archaeological sites, non-timber forest products, and traditional land pursuits.

Government of Yukon

Some detailed edits provided to amend the Draft Plan.

Tr'ondëk Hwëch'in Citizens

- Traditional access route - an old access route can be found on the ridge line to the south of the Yukon River around Fanny Creek and Clinton Creek.
- There are ancestral camps along the river: Grandma Cookie's camp on Fifteen Mile and Grandma McLeod's camp on Eight Mile.

- Clinton Creek asbestos mine site needs to be cleaned up; big pits, hazard to wildlife. The dam is ready to bust. The water is contaminated. “We drink the water that comes into the river.”

Public and Stakeholder Feedback

- Industry feedback recommended the area be an ISA 3 – Moderate Development due to the mineral interests. Many active and prospective for the future claims exist here. Would like clearer wording about what activities are permitted.
- Suggested adaptive management approach based on fish habitat surveys, new prospectivity data, placer method advances, and successor legislation.
- Would like more clarity about what activities can occur along Mickey Creek.
- Suggested highway signage to inform about cultural importance.
- Do not support the SMD for industrial pursuits to communicate activities to other rights holders as this is a requirement under YESAA.
- The Fisheries Act prohibits unauthorized activities that result in the death of fish by any other means other than fishing (Re: SMD)
- Possibility of Heritage River status for the Fortymile River.
- Jet boat research recommendation for research into impacts on salmon.
- ORV use is identified as an issue along Top of World Highway, but there is no recommendation for ORV Management Areas here or elsewhere.
- Several responses suggested merging this LMU with Swede Creek.
- Some survey respondents recommended ISA 1, while others supported ISA 2.
- Fortymile Caribou migration area.

LMU 16: SWEDE CREEK

Tr’ondëk Hwëch’in

Advised that several values are missing from the description of this unit. Tourism, access, traditional economy, archaeological sites, recreation.

Government of Yukon

- Advised that the Forest Management Branch is in the middle of developing a new THP in partnership with a forest operator in this area: DRAFT 20 Pup THP. They support the THP as it is in very close proximity (14km) to Dawson City and very importantly, would provide a source of emergency fuelwood to West Dawson during break-up.

- Advised that the 20 Pup THP is well up the slope of Swede Creek and therefore would not have any impact on Swede Creek. This is in addition to timber harvesting having strict guidelines and standards for riparian areas and waterbodies with buffers required.

Public and Stakeholder Feedback

- Suggestion of merging all of the units in this area into a large Special Management Area.
- Higher ISA designation; ISA 2 is too low for an area with mineral potential. An ISA 3 designation would provide clarity as to what class of mining is allowed.
- More clarity is needed for reclamation.
- Some public feedback supports this LMU with no changes.
- Some surveys suggested changing to an ISA 1, others suggested ISA 3, and others suggested combining with Top of the World Highway LMU.

LMU 17: SIXTYMILE – KHEL DĚK

Tr'ondëk Hwëch'in

- Recommended that this area be an ISA 2 (Low Development) due to the following:
 - To protect the landscape.
 - Its remoteness.
 - To limit access.
 - To maintain traditional economic activities.
- Want to add reclamation and decommissioning of access routes to the priority objectives.
- Caribou should be the first priority.
- Areas visible from the highway should be preserved.

Government of Yukon

- Advised that Special Management Direction regarding 'key caribou migration pinch points' was too vague and needed clarification.
- Access across or via the Yukon River is needed for development of the LMU.
- Recommended a boundary amendment should be more in line with adjacent LMUs to encourage a gradual development gradient.
- Suggested that reclamation in the area should focus on supporting caribou.

Public and Stakeholder Feedback

- Stronger recommendations to limit harvesting in this LMU.
- A more adaptive approach that takes into consideration that caribou are not here year-round is needed.
- Preference for mitigations and monitoring instead of complete avoidance of areas where caribou occasionally migrate.
- The northwest portion of this unit should be a Special Management Area, based on caribou key summer habitat and migration routes. There is concern about the amount of staking and potential disturbance.
- Support for the access management plan. Decommissioning roads and permanently closing roads and trails, especially in the high country should happen.
- Suggestion to merge this LMU with Fortymile Corridor (LMU 23).
- At the tea circles conversations, there was concern over the development of the highland areas.
- The survey responses included opinions that wanted more protection and others that wanted placer opportunities preserved.
- One stakeholder suggested including Bedrock Creek in this unit as it is an active area.
- Some people identified that salmon is a value in this unit.

LMU 18: MATSON UPLANDS

Tr'ondëk Hwëch'in

Advised that the unit should be larger, using natural features instead of mineral claim boundaries. The priority should be the Fortymile caribou herd.

Government of Yukon

Recommended amending the boundary to incorporate core Fortymile caribou herd habitat, LMU should exclude currently staked areas.

Public and Stakeholder Feedback

- Protecting this area is widely recognized and supported, however many submissions stated that this area is not large enough to protect the core summer habitat of the Fortymile Caribou.
- Main recommendation received from public and stakeholders was to expand the LMU to include more of the range (to incorporate LMU 23 specifically).
- Matson is also the area that is least at risk for the caribou (low mineral interest).

- Climate change impacts create the need for adaptability of the herd (and therefore a larger protected area is needed).
- Connects to important habitat in Alaska.
- Concern that although the Draft Plan states caribou habitat protection as a primary goal, the size of Matson does not achieve this goal.
- Industry broadly supportive of the SMA designation providing that year-round access remains, including the continued use of Matson Creek Road.
- Suggested to consider as an ORV regulation area.
- Secondary trails and airstrips in this proposed protected area should be decommissioned and permanently closed except where required for the establishment of Tr'ondëk Hwëch'in hunting camps.

LMU 19: UPPER INDIAN RIVER WETLANDS

Tr'ondëk Hwëch'in

- Recommended that this LMU should be a Special Management Area, and further, they recommended extending the boundary along a corridor down the Indian River to protect other wetlands.
- Stated that this area is important for maintaining Tr'ondëk Hwëch'in way of life and connection to the land.

Government of Yukon

- Change from SMA 2 to an ISA 1
- Would like to see the boundary modified so that the south west of the LMU is incorporated into LMU 12 (East).
- Would like more clarity regarding what activities may happen on existing claims and under existing permits in terms of wetlands.
- Do not support Wetland of Special Importance recommendation. Acknowledges cultural values, but LMU is also a 'working landscape'.
- Thresholds on wetland development in this LMU.

First Nation of Na-cho Nyäk Dun

Recommended changing the designation to a Special Management Area to ensure long-term protection of key identified values, particularly the remaining undisturbed wetland complex.

Tr'ondëk Hwëch'in Citizens

- The area used to be good for fishing but now the waters are too murky.

- The area used to be good for fishing but now the waters are too murky.
- “The Indian River wetlands (IRW) used to be really good hunting areas. We can’t go there anymore, it’s no good for every (mining) camp that is set up there erodes First Nation rights.”

Public and Stakeholder Feedback

A significant amount of feedback was received regarding this LMU.

Industry Plan Partners provided the following feedback:

- This area should be designated as ISA 4 and instead expand LMU 11 – Flat Creek Wetlands as a trade-off and make this a Special Management Area. The area is too important to the region’s (and the Yukon’s) economy to remove from development.
- Highlighted the significant new opportunity for placer in this LMU and state that with current direction (threshold and wetland limitations) that it will destroy the industry and put ‘families directly out of business’.

Conservation Plan Partners provided the following feedback:

- Remove the area permanently from mineral development.
- More protection to protect the ecological and cultural resources.
- To extend the area to improve connectivity and incorporate the Flat Creek Wetlands.
- Currently the only effective management strategy for protection of this area is that ‘undisturbed wetlands’ are not disturbed.
- Not calling for ‘expropriation by regulation’. Reclamation and restoration standards be substantially higher in SMAs that allow for mining.

General Feedback:

- Understand the proposition of an SMA 2 within the Goldfields to protect some of the remaining Indian River Wetlands Complex, but that the LMU is an ‘island of green in a sea of brown’.
- Historic use of Indian River Watershed compromised by current activities.
- “There’s nowhere to hunt/trap/harvest in IRW anymore. The moose are stagnant in the water. People are overharvesting even cranberries.”
- New development is being proposed right through a quality berry patch.

- “Over 45 years of living in Yukon I’ve always heard about the value of the IRW before the mining. The historic value seems all but gone. Can we reclaim it? Can we heal the landscape?”
- “If there are values to protect – we should protect them now.”
- The placer community is very concerned about the SMA 2 designation. Specifically, Australia Creek:
 - Upper Indian River has huge potential that was unknown even just five years ago – extensive drilling and exploration has taken place and a viable gold seam has been discovered.
 - There is a brand-new deposit on Wounded Moose.
 - There is thought to be 30 miles of minable ground.
 - There are four operators there at the moment.
 - Current water licenses are not anticipated to be extended based on the current Draft Plan.
 - The lack of certainty is damaging to the industry.

LMU 20: COFFEE

Tr’ondëk Hwëch’in

Noted that this is an important area for traditional land use activities.

Government of Yukon

Wants to see access to this unit maintained to ensure access to critical minerals.

White River First Nation

- Wish to be involved in the future management of this area.
- Wants decommissioning of the NAR as per the YESAA submission (after 15 years) and wants limits to development that would impact their traditional pursuits and connection to the area, water quality, and wildlife populations.
- Concerned about the additional hunting that would result from the NAR.
- Want Plan to reflect their cultural connection and current uses.

Public and Stakeholder Feedback

Industry Plan Partners provided the following feedback:

- Suggest that sheep mitigations should include the existing Government of Yukon guidelines for flying near wildlife.
- Support for the protection of caribou and suggest that harvesting needs to be addressed to reduce mortality rates.

- The SMD for 'enhancing' the area for traditional economic activities is not clear.

Conservation Plan Partners provided the following feedback:

- Support the recommendation for an access management plan.
- Sub-regional planning for the NAR and that no access south to a potential Casino Mine be allowed.
- The NAR should include gated access on the south side of the Stewart River.

General Feedback:

- Some responses are concerned about the impact of mines on caribou herds while others thought this should be ISA 4 (high development).
- Placer mining is missing from the list of economic values.
- This is a traditional use area and historic site/traditional trail.
- Should be a higher designation (more protection).

LMU 21: WHITE – TÄDZAN DĚK

Tr'ondëk Hwëch'in

- Stated that this is an important area for connecting to the land through the practice of traditional land use activities.
- This area is important for maintaining Tr'ondëk Hwëch'in way of life and connecting to the land.
- **Government of Yukon**
- Suggested splitting the LMU into two units. The northern portion would have a higher development designation than the southern portion to allow for "stepping" between Special Management Areas and ISAs.
- Access across or via the Yukon River is needed for development in this LMU.
- They noted the significant mineral prospectivity in the area as well as the potential for more wilderness tourism due to its remoteness.
- Wetlands avoidance thresholds could apply in this LMU.

White River First Nation

- Supports an ISA 1 designation.
- Concerned about wetlands and want to ensure protection in and around fens, marshes, and bogs until they can be mapped.
- The LMU is an area of both current and ancient/traditional importance.

Tr'ondëk Hwëch'in Citizens

- Noted that the mouth of the White River is a traditional gathering place.
- White River Hill has to be protected.

Public and Stakeholder Feedback

- There is active placer interest in this area with significant mineral potential.
- ISA 2 (low development) designation with stringent reclamation standards, due to the values for wetlands, sheep, and migratory birds.
- Suggest ISA 4 in existing claim areas and ISA 2 where there are no claims.
- Concerned that disturbance thresholds are too low and that exploration is already nearing the thresholds, noting there are 2600 claims in the area.
- Some concerned with the recommendation for no disturbance for marshes, bogs and fens and the impact this will have on placer mining.
- Suggestions that the wetland areas in LMU 21 be an SMA or nominated as Wetlands of Special Importance.
- Whole LMU designated as an SMA.
- Rationale: the Beringia ecosystem, low mineral claims, pristine nature, and historic range of Fortymile Caribou, connectivity, and rare mammoth steppe ecosystem.
- There are downstream effects of wetlands disturbance.
- The wetlands along the Ladue River are significant.

LMU 22: SCOTTIE CREEK WETLANDS

Tr'ondëk Hwëch'in

- Would like to see this area designated as a Special Management Area, in alignment with their Final Agreement and to create greater certainty for protection.
- They stated that this is an important area for connecting to the land through the practice of traditional land use activities.

Government of Yukon

- Recommended amending the boundary to remove an area of high placer potential. There is high placer potential coming off the uplands, which they suggested will not affect the wetlands in terms of surface disturbance.
- Government of Yukon has stated that SMA designations can provide enough flexibility to allow for activities such as mining.

- There are currently two active placer mining operations and two Class 3 quartz exploration projects in the LMU.

White River First Nation

- Advised that this area should be an SMA 1.
- Would like designation of Habitat Protection Area with co-management planning with Tr'ondëk Hwëch'in, Government of Yukon and White River First Nation.
- Would like existing mineral tenure removed.
- Recommended Plan should recognize WRFN cultural connection to the area.

Public and Stakeholder Feedback

Industry Plan Partners provided the following feedback:

- Boundary change to exclude mineral potential areas, especially where these are not part of the Scottie Creek wetlands complex. If the boundary cannot be changed, then apply ISA 1 to claim areas and have clear reclamation objectives.
- Continue allowing access to claims using existing winter roads.
- Redraw boundary to exclude claims.
- Generally they support designation of this area as an SMA.

Conservation Plan Partners recommended:

- Removing mineral claims.
- Establishing as a protected area.

General Feedback:

- Support from the public and stakeholders to make this area an SMA 1.
- Support in adjacent Alaska of SMA designation potential for connectivity from Dawson region to St. Elias National Park in Alaska.
- SMA designation: based on the importance of the area for waterfowl habitat, and the relative rarity of wetland complexes of this size.

LMU 23: FORTY MILE CARIBOU CORRIDOR

Tr'ondëk Hwëch'in

- Suggested that this area be combined with the Matson Uplands as a Special Management Area. This would protect summer habitat for the Fortymile caribou herd with a buffer.
- Identified this as an important area for connecting to the land through the practice of traditional land use activities.

Government of Yukon

- Advised that the area has high mineral prospectivity.
- Commended innovative approach for dividing LMU across two different designations based on elevation.
- Need access via or across Yukon River for development activities in LMU.
- Guidance needs to be added for reclamation standards.

Public and Plan Partner Feedback

A significant amount of feedback was received regarding this LMU.

Industry Plan Partners provided the following feedback:

- Are concerned about this area having such a low development threshold.
- Suggested designation as an ISA 2 overall, saying that the split designation is complex.
- Recommended stronger conservation directions to allow for responsible development and caribou habitat to coexist.
- Identified a future research opportunity for placer mining and lichen cultivation as part of reclamation.
- High mineral potential.
- Draft Plan lacks clarity on what is permitted in LMU (especially exploration).
- Advised that LMU would not permit a 'single modest sized mine' at cautionary or critical levels; in this LMU such development would exceed critical.
- Split designation by elevation is 'unusual' and would pose challenges for proponents and regulators.
- Mineral potential is very high in this LMU and suggested that areas that have historic disturbance be redesignated to allow development.
- There are 2506 claims at higher elevations, 1960 at lower elevations, LMU total is 4466 claims.

- Want to understand more about why elevations were chosen when there is little public data available on the Fortymile herd and its habits/needs.

Conservation Plan Partners provided the following feedback

- Doubts as to whether the designation is appropriate for caribou.
- General consensus is that the area should be fully protected (SMA 1).
- Commends approach of Commission for trying to balance mineral interests and caribou but suggests that this isn't truly possible.
- Recommend following Precautionary Principle and designating as a Special Management Area thereby allowing existing claims to be worked but under stringent standards.

General Feedback:

- The two ISA levels are complicated. Some say this will be very difficult from a management perspective, and some say they appreciated the effort and intent.
- We heard the current regulatory framework has been effective in supporting the recovery of the Fortymile Caribou herd.
- High value caribou habitat is located in the southern portion: that area should be added to Matson Uplands LMU.
- More mining will negatively affect the caribou.
- ORV restrictions considered under the ORV Regulations.
- Boundary
- Protect caribou range and combine with LMU 18.
- Landscape connectivity was heard repeatedly, especially regarding:
 - Alaska adjacency.
 - Maintaining connectivity of migration routes.
 - The need for more connectivity.
- Climate change – more of the area needs to be protected for the caribou for resiliency. “What if there is a fire at Matson uplands?”
- Access – roads tend to be built on ridgetops, and advanced exploration and mines need roads.

APPENDIX 5: FORM LETTERS

TR'ONDĒK HWĒCH'IN CITIZEN LETTER: GENERAL RECOMMENDATIONS

RE: Draft Dawson Regional Land Use Plan Input

As a Citizen of Tr'ondĕk Hwĕch'in First Nation, I am writing in response to the Draft Plan. The Planning region is 75% of my Traditional Territory. Please consider my concerns as you develop a Recommended Plan.

Obligations under the Final Agreements

Our past leaders negotiated our Final Agreement in order to ensure the health of our land and waters.

Our Final Agreement is legally binding under the Canadian Constitution. We expect that it be honoured.

We are caretakers of this land, and have the right and responsibility to act as co-managers of these lands. The land cannot speak for itself, therefore we must.

We ask the Commission to:

- Guarantee our Treaty Rights in relation to have on-going access to healthy fish and wildlife populations.
- Ensure protection and connectivity of habitat so that birds and wildlife have access to the healthy land and clean water that they need to survive.
- Ensure the sacrifices made, as a community, to allow the Fortymile Caribou herd to recover is not lost. Please protect core summer and winter habitat for this herd.
- Water is Life. Clearly reflect our understanding of what stewardship is in relation to water by increasing protection for all significant waterways and riparian areas; and wetlands;
- Decisions on what is and is not allowed to happen on our lands has to include our values, and be tied to our Treaty rights that ensure healthy populations of fish, moose, caribou, birds, sacred plants, and clean water.

Protection of Land and Natural Resources

Tr'ondĕk Hwĕch'in Citizen knowledge informed our Conservation Priority map. That map represents our understanding of what is needed to ensure the health of the

region, our culture and the people who live here, in the long term. That map proposed 60% protection.

The Draft map suggests 3.8% of the planning region to receive full protection. This is inadequate and not acceptable and does not uphold our Final Agreement. I call on the Commission to significantly increase the amount of protected and conserved areas to ensure the health of future generations.

We Are In a Climate Emergency

The Yukon First Nations Climate Change Emergency Declaration states “there is no greater threat today to our culture and way of life and the wellness of our citizens and communities than the impacts of climate change.”

Currently, the Draft Plan does almost nothing to effectively address the causes of climate change or its impacts on First Nation Citizens. The Commission needs to consider how the land is changing and how climate change is affecting our way of life. I call upon the Commission to effectively consider the impacts climate change is having on our Traditional Territory and what we need to do to reduce its causes and effects.

TR’ONDĚK HWĚCH’IN CITIZEN LETTER: CLIMATE CHANGE RECOMMENDATIONS

RE: Climate Change Recommendations for the DRLP.

I am writing to express the need for the Commission to address Climate Change more fulsomely in the Draft Plan.

The Yukon First Nations Climate Change Emergency Declaration states “there is no greater threat today to our culture and way of life and the wellness of our citizens and communities than the impacts of climate change”. The North is warming two to three times faster than anywhere else in Canada, and our region is projected to experience some of the highest increases in temperature anywhere on the planet.

We have already seen significant changes in our Traditional Territory - including increased snow an rainfalls, rivers not freezing, melting permafrost, erosion and landslides, flooding, damage to infrastructure, and extreme weather events. These impacts are contributing to distribution and depletion of migration of wildlife, fish, and plant species.

I call on the Commission to integrate considerations of climate change and its impacts throughout the Plan. The Recommended Plan needs to:

Conserve more land: Disturbing the natural environment, especially wetlands, releases CO₂ and reduces the region's capacity to absorb harmful emissions. Conserving as much land and water as possible will help all species adapt to changes.

Address cumulative effects of climate change: Include indicators the Cumulative Effects Framework to track and monitor the impacts of climate change in the region to ensure our subsistence rights are protected in the Recommended Plan.

Improve monitoring and information: Make a strong recommendation for robust monitoring, reporting, and adaptive management, including community-based approaches. This information will be useful to Citizens when making informed choices about where, and when, to harvest. Support community based approaches to increase local capacity and stewardship.

Promote self-sufficiency: Recommend the highest level of conservation in both SMA I and SMA II to help assure the continuation of traditional practices. Promote sustainable agriculture and renewable energy development for the region.

If the Commission is to meet its commitments to the Final Agreement, we must be assured of our right to continue our Way of Life. If that is at risk due to Climate Change as one of the contributors, the Commission must consider how to best protect our Rights this in this difficult and uncertain time.

Mähsj Cho for considering more fully the impacts climate change on First Nations rights and traditional ways of being.

TR'ONDĚK HWĚCH'IN CITIZEN LETTER: WATER PRESERVATION AND PROTECTION RECOMMENDATIONS

Re: Water Preservation and Protection for the DRP Region

I am writing to encourage the Commission to strengthen the protection for water in the Recommended Plan.

One of the Chapter 11 Tr'ondëk Hwëch'in Final Agreement (THFA) Objective states the Commission is to: "consider the knowledge and experience of Yukon Indian [sic] people to achieve effective land use planning."

As a Tr'ondëk Hwëch'in Citizen, I understand that water to be the life force of all creation and our collective survival depends upon it. Water is essential for the health of every part of the land and for every aspect of survival, and is central to our culture and traditional activities. For these reasons, many of our TH Settlement Land parcels are located in major river corridors. Ensuring the protection of major water will uphold Tr'ondëk Hwëch'in rights under Chapter 14, Chapter 5 and Chapter 16 of the THFA.

I urge the Commission to develop specific Management Directions for water, that include, at a minimum, the protection of water quality, quantity, and rate of flow through and adjacent to Settlement Land as per Chapter 14 of the THFA. Additionally, I request that the Commission provide the highest level of conservation for important waterways riparian areas, such as, but not limited to, the Yukon, Klondike, North Klondike, Fortymile, Stewart, and Chandindu Rivers including creek tributaries stemming from these rivers and creeks in the Dempster region, not limiting Wolf Creek, Antimony Creek.

TR'ONDĚK HWĚCH'IN CITIZEN LETTER: WETLANDS PROTECTION RECOMMENDATIONS

RE: Wetland Recommendations for the DRLUP

I am writing you today to urge the Dawson Regional Planning Commission (the Commission) to provide greater certainty in the protection of all wetland habitat, as they play a significant role in the overall health of the land.

Wetlands provide critical habitat for moose, waterfowl, fish, and unique plants, and play a crucial role in cleaning and purifying water, flood prevention, and carbon storage. Importantly, wetlands are of immense cultural value to the Tr'ondëk Hwëch'in in their intact state.

I understand that the Commission has asked for feedback from the public as to how much fen wetland habitat can be disturbed, and has offered a range of between 25% and 75% for our consideration.

Fens, more than most wetlands, are defined by the groundwater that moves through them. Anything that interrupts this slow creeping groundwater flow fundamentally alters the fen. It is like removing the wings from a bird and expecting the bird to fly and to survive. Fens are like a living organism that cannot lose vital parts without the remainder dying. In this way, fens are heavily impacted by disturbances that occur directly to them, as well as around them. Even small changes at the headwater source of a fen can destroy the remainder of the fen. In this way, fens are not as amendable to change as marshes and swamps.

Because of this, I urge the Commission to provide equal consideration to fens as is recommended for bogs and marshes. All wetland is important, and we need to protect as much of it as possible in its intact state. As such, I urge the Commission to allow no more than 25% of fen habitat to be disturbed in the Dawson planning region.

Wetland are too ecologically, and culturally important to receive any disturbances, at all. It is good to see recognition of the Upper Indian River wetlands and the Scottie Creek wetlands as Conservation Areas for this purpose. However, I urge the Commission to expand the boundaries of the Upper Indian River wetland complex so that the entire expanse of this important wetland habitat be offered the same level of protection. In addition to the Flat Creek and Tintina Wetlands.

CPAWS – ALL MY VISION

I support Tr'ondëk Hwëch'in's conservation priorities for the Dawson Region, and urge the Commission to put the health of the lands, waters, wildlife and people at the heart of the Dawson Region Plan. The draft plan provides a strong vision for the region, but there are areas that need to be strengthened.

For example:

1. The Commission should upgrade conservation areas with weak protections to 'Type I' Special Management Areas. This would provide lasting protections for conservation areas, and put tools in place for Tr'ondëk Hwëch'in to co-manage their traditional lands.
2. The plan should better protect lands that are critical for wildlife and subsistence, like river corridors and the range of the Fortymile caribou herd.
3. Wetlands need the best possible level of protection. These ecosystems are natural carbon reservoirs and help to buffer the effects of climate change. They provide unique habitats for wildlife and cannot be restored after being disturbed.
4. Some areas will remain open to developments like mining, but the health of lands, waters and wildlife needs to be prioritized in these places too. Limits on development in some areas are too high and allow development to be concentrated within sensitive habitats like river valleys. The Commission should use traditional knowledge and conservation science to set limits that ecosystems can tolerate.

The Tr'ondëk Hwëch'in Final Agreement speaks about needing to “protect a way of life that is based on an economic and spiritual relationship between Tr'ondëk Hwëch'in and the land.” The Commission has expressed a similar desire to safeguard the ecological and cultural values of the Dawson Region, and I fully support this.

However, meeting these ambitions — and living up to our treaty obligations — requires bolder action than what's in the draft land use plan. I encourage the Commission to go further, and create a plan that makes these visions a reality.

INDUSTRY – COMMISSION DRAFT PLAN

RE: Dawson Regional Planning – Commission Draft Plan

Please accept this letter as a formal commentary on the Dawson Regional Planning Commissions (DRPC) Draft Land Use Plan (June 2021) and supporting documents. We appreciate the challenges associated with the DRPC's mandate, the scope and the many years of work that have culminated in the 2021 DRLU Draft Plan. As this plan is part of fulfilment of the 11 (Land Use Planning) of the Umbrella Final Agreement (dated July 16, 1998) we are grateful to be part of the discussions for planning the future and the stewardship of land management and resources of the Dawson Region in Tr'ondëk Hwëch'in (THFN) Traditional Territory.

Recognizing that the documents are first drafts, the intention is nonetheless to utilize these documents as the basis for refining, developing, and finalizing a more balanced and defensible Regional Land Use Plan. A high level summary of process and technical issues identified through reviewing the Draft Plan are provided below:

1. Publicly available information and timeframe provided for comment

- i. The Draft Plan was released June 2021 with November 1st comment closure. Industry is most active during the snow-free months. As a result, the allotted timeframe provided for comment left little time to provide adequate review and constructive input.
- ii. Limited information was released to outline the basis for many of the current Draft Plan proposals, including important maps for wildlife habitat and migration corridors, heritage areas, wetland mapping, watershed boundaries, as well as datasets and scientific studies that support the basis for the proposed disturbance thresholds.
- iii. More time and information are required to properly assess and comment on this important Regional Planning framework.

2. Land Use Designations Methodology

- i. The methodology described in 1.6.2.5 (Priority Criteria for Candidate Conservation Areas) do not appear to match Draft Land Management Units (LMU's) and currently proposed Land Use Designations (LUD's). Based on the methodology described in the Draft Plan, high-protection LMU's should be defined by high-density overlap of high-value

features, such as habitat and heritage, and thus result in a more restrictive LUD's. High potential economic areas with low heritage and habitat values should be classified as less restrictive LUD's.

- ii. Simplifying the number of LUD's Integrated Stewardship Areas (ISA's) to three categories (low, moderate, and high development) and a singular Special Management Area zoning delineating full protection (SMA 1) should reduce potential management challenges in implementation and the need for increased capacity within YG and THFN.
- iii. Transitions from higher-protection LMU's to higher-development ones should be more gradational. Higher protection LMU's should logically cover areas with high habitat and/or high cultural values. Areas with high economic potential and lower habitat and cultural heritage values should allow for future economic development with corresponding higher disturbance thresholds, with such thresholds based on sound scientific studies for species and habitats of focus.
- iv. Implementation of Integrated Stewardship Practises could provide excellent holistic, opportunities for the Planning Region. However, no concrete examples or techniques for connecting various land-users from seemingly different usage backgrounds, is provided.
- v. Some high protection LMU's partly or wholly enclose areas of high historic and current placer and hard rock mining activity. These areas have significant potential future economic value, have extensive mining claims within them and have already seen substantial disturbance. Designating these areas as high protection LMU's will result in land use conflict and the potential need for economic compensation to mineral rights holders. These areas should be recognized for the current and future economic value and placed into more appropriate LMU designations.

3. Cumulative Disturbance Thresholds Methodology

- i. It is unclear in the Draft Plan if the Cumulative Disturbance Thresholds are based off of Ecological derived habitat needs or are more arbitrary Management thresholds.
- ii. The Draft Plan does not appear to draw from the referenced Land Use Planning Conservation Thresholds (Environmental Law Institute, 2003).

Threshold values presented are very low compared to other land use plans in comparable sub-arctic, low-density populated areas and particularly relative to ecologic thresholds from scientific studies which generally indicate threshold preservation of 60% of habitat or perhaps 80% for rare species. This compares with preservation of 95%, 97.5% and 99% of habitat for the high, medium and low development LUD's that are proposed.

- iii. 3.5.1 (Cumulative Effects Indicators) specifies that surface disturbance does not include areas deemed as recovered. This could be interpreted to align with in-place regulatory practises which incentivize restoration efforts in economically developed areas. However, it is unclear whether this means industry could operate in net-zero land disturbance if areas are progressively recovered, thus lowering the LMU's active disturbance threshold.
- iv. On October 12th 2021, the DRPC released 'Analysis of "Current" Disturbance Levels'. The outdated 2014 dataset provided was indicated to be the result of a lack of information, however figures from the document show recent satellite images mapping disturbance. If current disturbance levels are not defined, how can thresholds be proposed for each land management unit, especially if the thresholds are arbitrary management levels and not based on habitat needs or species criteria?
- v. How Disturbance Classes (Industry, Forestry, Agriculture, Road-development including aggregate resource extraction) are categorized and monitored is not described in the Draft Plan. Would future disturbance totals include all categories? The draft document states that only mining related disturbances were utilized in the development of thresholds.
- vi. In ISA areas that are open for development the thresholds need to allow for future economic activity; it is unclear based on "current" disturbance whether that would be the case for the 5%, 2.5% and 1% disturbance thresholds that are proposed in the Draft Plan.

4. Wetlands

- i. Outlined thresholds could have serious economic development consequences (in particular to placer mining which occurs in wetland areas) but are unclear in the Draft Plan.
- ii. The Federal Policy on Wetland Conservation (Government of Canada, 1991) describes no net loss of socioeconomic or ecological wetland function. Restoration of wetland function has been demonstrated globally on various projects in various biogeoclimatic ecozones. Therefore, it is recommended that criteria be developed for habitat and functional wetland restoration.
- iii. Why is there no development allowed in undisturbed bogs and marshes throughout the region within only specified SMAs and ISAs? Why is there inconsistent policy towards specified habitats?
- iv. What are the factors included in the scientific basis considered with allowing development of an arbitrary 25-75% range for fens in each applicable LMU?
- v. The Draft Plan states that effective restoration of wetlands is impossible. This is inconsistent with results from a number of successful wetland restoration projects in Canada. It also contrasts with the surface disturbance recovery objectives and may discourage Operators from implementing costly best management restoration practices.

5. Economic Plan

- i. Plans to maintain the economic health of the region are not discussed in detail. Management intent is unclear throughout the document and certain proposals could have far reaching negative economic impacts on the region.
- ii. 4.1.9 and 4.3.3 on Traditional Economy recommends buffers and avoiding or reducing the level of land-use activities in areas identified as having cultural value. Map 5 (Appendix A) shows virtually the entire area as having traditional-use value. It is unclear what exactly this would mean for stakeholder-use in the entire planning area.
- iii. Sustaining a healthy placer mining industry is key for the economic security of the Planning Region as the single largest economic sector. While this natural resource has been developed in the region for over

a century, many placer deposits have been depleted in the heavily developed areas. While there are opportunities to reclaim and restore these historically disturbed areas, the industry will continue to move into adjacent prospective areas that share the same geologic settings. This movement into adjacent areas needs to be accommodated to allow for a healthy placer mining industry and regional economy. For instance, in LMU 12 the natural progression is to move further eastward to the Upper Indian River (LMU 19), which has same geological setting, and is demonstrating comparable economic placer values. This area is the economic future for the Klondike Goldfields.

- iv. Though the focus in LMU's such as 12 and 19 have mostly been on placer mining. However, these areas are also highly prospective for future hard rock developments - as the source of the alluvial gold. Accommodation should be made for such future potential in these areas.
- v. Maintaining a healthy mineral resource economy is key to ensuring long-term socioeconomic health of the Planning Region. The Mining industry generates significant economic benefits for communities that are often not well understood. A substantiated figure used in the mineral industry shows that typically every dollar spent in mining generates \$5 in the local economy including indirect supporting industries & local-work force (hotels, restaurants, equipment sales and maintenance, supplies, fuel, etc.). A similar multiplier value relates to jobs supported by indirect and induced economic activity. A recent study of mining related jobs in British Columbia indicates that for each (1) mining related job, 4.6 jobs indirect, or induced, jobs are created. The DLUP Resource Assessment Report does not accurately reflect economic contributions from these types of economic activity (refer to PWC 2012, Mining Industry Economic Impact Report).

6. Regulatory Policy and Implementation

- i. There is currently no implemented monitoring of disturbance or impact assessment in the Dawson Planning Region.
- ii. It is imperative that the Plan reflects the current, effective, in-place regulatory regime for permitting. This process incentivizes concurrent

- restoration efforts and includes permitting conditions that guide land-users to mitigate potential impacts whenever possible.
- iii. The Senior Liaison Committee should encourage YG to use more consistent policy towards both Placer and Quartz operations. Pre- and Post-Season reporting should be conditions of Mining Land Use Permits (MLUPs). Presently, quartz operations are given thresholds of allowable disturbance within their projects. This incentivizes operators to progressively reclaim. Implementation of appropriate thresholds for placer operations with permitting conditions outlining reasonable allowable open disturbances, would allow for tracking disturbance and avoid LMU's from reaching critical thresholds of cumulative disturbance.
 - iv. Understanding the current level of disturbance in the LMU's is critical to avoid potential for ceased operations and operators having large areas of open disturbance and no incentive to reclaim.
 - v. Creation of wetland restoration policies outlining acceptable industry practises are required to provide a clear path for economic development in regions within, and proximal to wetlands (i.e., placer mining, road management). Policies concerning wetland restoration should be consistent regardless of LUD and should be standardized for consistent stewardship in the Planning Region and follow sound scientifically based criteria.
 - vi. The view that restoration of functional wetland habitat is effectively impossible is not backed by science and negates the incentive for land-users to implement best possible management practices in reclamation efforts. It is imperative for maintaining function of these ecosystems that wetland restoration policy encourages incentivized restoration efforts. Historic disturbances in wetlands would see little industry investment if the messaging presented is discouraging towards restoration of wetland function. Although a bog cannot be restored to be a bog, there is no scientific basis that effective wetland functions cannot be restored in disturbed areas.
 - vii. Current regulatory processes within the hard-rock industry not only incentivize habitat restoration of modern disturbance, but also historic disturbances. Additionally, these processes ensure that land-users abide by specific conditions that reflect habitat preservation of

ecological sensitivities. Implementing restoration procedures through permitting conditions across the industry, as a whole, is key to successful execution of the Plan ecological goals and integrated stewardship practises.

It is our belief that a balanced final plan would set the tone for future land use planning and inspire other Yukon First Nations and Land Use Planners to see this as an opportunity for the Yukon Territory and its future.