



## **EXECUTIVE SUMMARY**

In June 2021 the Dawson Regional Planning Commission released a Draft Regional Land Use Plan for the Dawson Region. A public engagement campaign was launched on June 15, 2021 and ran until November 1, 2021. It was the second major engagement campaign the Commission have undertaken as a part of the planning process. The main objective for this round of public engagement was to gather information, reactions, and thoughts on the Draft Plan to inform the development of the Recommended Plan.

### **WHAT DID WE DO?**

During the roughly 5-month engagement period, the Commission and staff put extensive effort into reaching a variety of community members, stakeholders (Plan Partners), First Nations, and other organizations to ensure a broad spectrum of input on the Draft Plan was received, and people were able to easily express their thoughts and concerns.

Recognizing the difficulties of community participation due to the constraints of work seasons, COVID-19 restrictions and other barriers to accessibility, the Commission held a wide range of events and opportunities for participation. This included meetings and workshops that were designed to promote small group conversations; these were offered in-person and online on multiple dates and at different locations. Meetings varied in style: some were sometimes technical, or topic-focused, while others were more focused on Traditional Knowledge or community gathering. In addition, staff and Commission held individual meetings with stakeholders and First Nations, provided a survey (both online and paper), accepted written and oral submissions, and used social media, household mailers, and an engagement-specific website to connect with people.

### **RESULTS**

Overall, the Draft Plan was received well. It was acknowledged that the Commission was trying to create a plan that offered compromise and balance in the Planning Region. The Commission received:

- Over 250 letters and emails from the public, including 60+ submissions from Tr'ondëk Hwëch'in citizens.
- Over 20 submissions from Plan Partners
- 80+ survey responses
- 40+ meetings with stakeholders

## Parties

### *Tr'ondëk Hwëch'in Government*

The main priority expressed by the Tr'ondëk Hwëch'in Government was to ensure that the Recommended Plan align with Chapter 11 of the Tr'ondëk Hwëch'in Final Agreement. The feedback was centered around six themes they want to see addressed further in the Recommended Plan.

### *Government of Yukon*

The Government of Yukon's feedback was also centered around six themes: the designations of land management units and their boundaries, cumulative effects management, wetlands, culture and heritage, MMIWG2S+, and implementation.

## Engagement Highlights

**Implementation of Plan:** Feedback indicated a need for more clarity and direction, including processes for monitoring, adaptive management and measuring plan success.

**Key Species:** Caribou, moose, and salmon were raised as an ongoing concern for their cultural and ecological importance.

**Mineral Development:** The importance of the mineral industry to the Regional and Territorial economy was emphasized. The main comments received were in relation to the potential for critical minerals, access to claims, lack of certainty for operators, the need for reclamation guidance, and available land for exploration.

### **Protection and the Special Management Area 2 (SMA 2) land designation:**

Many were concerned that the SMA 2 designation did not offer enough protection and therefore it was not an effective tool to achieve protection objectives. The amount of protection was the predominant theme in the feedback, and opinions varied widely. Many suggested there was too much land 'off-limits' to industry, while others believed the Draft Plan did not do enough to protect the land, water and animals.

**Stewardship:** The concept of stewardship and 'On the land we walk together' / Nän kāk ndä tr'ädäl, was met with overwhelming positivity. The need for the distinction between stewardship as an ancestral responsibility and as a broader community concept was highlighted.

**Sustainable Economy:** The importance of the agricultural and tourism economies was discussed, especially surrounding issues of food security, and coordinated mixed land use (e.g., farming and mining).

**Traditional knowledge and values:** The importance of including traditional knowledge and values was broadly expressed. This inclusion not only refers to the Recommended Plan, but also in the ongoing monitoring and assessment activities and research recommended in the Draft Plan, and in any further subregional planning that is recommended by the Commission.

**Wetlands:** Feedback centered on the need for absolute protection of wetlands, and concerns surrounding thresholds of development in some wetlands and wetland types. Wetland thresholds in particular were a huge concern for the placer mining industry.

### NEXT STEPS

The Recommended Plan will be released by the Parties in Fall 2022. Chapter 11 of the First Nation Final Agreements provides direction as to how the Parties must proceed with Consultation following the submission of a Recommended Plan by a Planning Commission.



*Commission members Alice McCulley and Angie Joseph-Rear at the Draft Plan launch*

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## LIST OF ACRONYMS

CE	Cumulative Effects
ISA	Integrated Stewardship Area
LMU	Land Management Unit
NAR	Northern Access Route
SMA	Special Management Area (1 or 2)

## LIST OF ORGANISATION ACRONYMS

Many organisations that provided feedback to the Dawson Regional Planning Commission are listed in this report using acronyms. This list provides their full name.

DDRRC	Dawson District Renewable Resources Council
YCS	Yukon Conservation Society
WCS	Wildlife Conservation Society
CPAWS	Canadian Parks and Wilderness Society
KPMA	Klondike Placer Miners' Association
YCM	Yukon Chamber of Mines
YPA	Yukon Prospectors Association
PCMB	Porcupine Caribou Management Board
YSSC	Yukon Salmon Sub-Committee
WWF	World Wildlife Fund
YWPA	Yuko Wood Products Association
YFWMB	Yukon Fish and Wildlife Management Board
Y2Y	Yellowstone to Yukon Conservation Initiative

*Photographs with individuals other than Commission members and staff have been blurred to ensure privacy. If you have any concerns about any of the photographs in this document, please contact [dawson@planyukon.ca](mailto:dawson@planyukon.ca).*

## INTRODUCTION

### **NÄN KÄK NDÄ TR'ÄDÄL: ON THE LAND WE WALK TOGETHER**

The Commission and staff would like to express their sincere thanks to community members, Tr'ondëk Hwëch'in citizens and Plan Partners and everyone else who participated in the Draft Plan engagement. All the input received has been carefully considered by the Commission and staff and has helped develop a Recommended Plan that the Commission feel truly meets their vision of "Nän käk ndä tr'ädäl: On the Land We Walk Together".

In the Yukon, regional land use planning is a process outlined in Chapter 11 of the Umbrella Final Agreement. The Dawson Regional Land Use Plan is the third to be produced after the North Yukon and Peel Watershed.

Tr'ondëk Hwëch'in and the Government of Yukon (the Parties) established the Dawson Regional Planning Commission (the Commission) to develop a Recommended Plan for the Dawson region. As part of this process, the Commission released a Draft Plan in June 2021 and actively sought public input and feedback to determine if they were on the right track.

Public engagement is an essential part of developing a regional land use plan, and it required dedication and commitment from the Commission and its staff. Importantly, the time Yukon residents and Plan Partners spent providing feedback to the Commission cannot be understated. The Draft Plan received an overwhelming response and a range of different perspectives. The Commission thanks all those who participated and appreciates the respectful nature of the dialogue and the willingness of Dawson stakeholders to listen to each other throughout the planning process.

This summary is neither exhaustive nor reflective of the Commission's priorities for the development of the Recommended Plan. The Commission has prioritised transparency throughout the planning process and as such, all of the feedback the Commission received during Draft Plan Public Engagement is available on its [website](https://dawson.planyukon.ca/index.php/publications/public-feedback)<sup>1</sup> and is available for anyone to review.

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<sup>1</sup> <https://dawson.planyukon.ca/index.php/publications/public-feedback>

## ENGAGEMENT STRATEGY – WHAT DID WE WANT TO FIND OUT?

### VISION

This is the second major engagement period the Commission has undertaken as a part of the planning process. The first occurred between October 2019 – January 2020. During this time the Commission sought input on the issues and interests that the community and Plan Partners felt were most important, and for feedback on their Plan Goals and Vision. They used this feedback to create the Draft Plan, which was the focus for this round of engagement.

As a part of the Draft Plan feedback phase, the Commission’s main goal for the engagement was to inform Recommended Plan development. The Commission were committed to listening to all concerns and aspirations and reflecting as many as they could in the Recommended Plan.

This Draft Plan was the Commission’s best attempt at balancing cultural, economic and environmental values with an eye to their vision: On The Land We Walk Together / Nän Käk Ndä Tr’ädäl”. Thus, public engagement activities focused on the following, overarching question:

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Thinking of community needs today and future generation needs tomorrow, are we on track?

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### OBJECTIVES

The Commission had specific objectives in mind when developing their engagement strategy:

- To fulfill obligations to undertake regional land use planning under Chapter 11 of the Tr’ondëk Hwëch’in Final Agreement (THFA) in a manner that is respectful and collaborative.
- To design and implement a meaningful, constructive, and objective-driven process.
- To provide participants safe in-person and online engagement options recognizing that different people have different needs and preferences.
- To ensure people with a diverse range of perspectives who live in and use the region have the opportunity to voice their perspectives.

- To champion the purpose and benefit of regional planning in the Dawson Region.
- To congregate people to navigate complex issues, consider trade-offs, and help the Commission find a path forward by supporting empathy, capacity and community.
- To evaluate the Draft Plan’s attempt to balance cultural, economic and environmental values with an eye to their vision “On the land we walk together / Nän kāk ndä tr’ädäl”.

## ENGAGEMENT METHODS – HOW WE REACHED OUT

The Commission released the Draft Plan and launched their public engagement campaign June 15 2021, and this ran until November 1, 2021<sup>2</sup>. The Commission and its staff put extensive effort into reaching a broad range of stakeholders to ensure that the Draft Plan received input from as many people and organisations as possible. Everyone was invited to participate as the Commission wanted to ensure the Dawson community and Yukoners alike would see themselves reflected in the Recommended Plan. [Appendix 1](#) (page 53) is a timeline of all the events and meetings the Commission and staff hosted or attended.

### COMMUNITY CONVERSATIONS

Event	Location	Attendees	Date
<b>Tea Circle Chats</b>	City of Dawson	12	October 12, 2021
<b>Community Conversations</b>	City of Dawson	30+	October 13, 2021
<b>Community Conversations</b>	Mayo	8	October 14, 2021
<b>Community Conversations</b>	Whitehorse	30+	October 19, 2021
<b>Tr’ondëk Hwëch’in &amp; Commission Gathering</b>	City of Dawson	20+	October 20, 2021

In October, the Commission and staff held multiple events designed to engage with people and organisations interested in the future of the Dawson region.

- Events were designed to be accessible and welcoming, and suitable for all.
- There were no theatre-style presentations: - instead Commission members and staff sat at small tables and had conversations.

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<sup>2</sup> While officially DRPC Draft Plan Public Engagement had a November 1<sup>st</sup> cut-off, if the Commission received input or a request to meet after this date it was accommodated.

- Posters and Draft Plan facts and information were posted around the room for anyone to review.
- Events were held in Dawson, Mayo, and Whitehorse to reach a broad audience.

Inclusivity was a priority for the Commission, especially to ensure that Dawson residents and Tr'ondëk Hwëch'in citizens had ample opportunity to voice their thoughts and concerns. In particular, two events were held with Tr'ondëk Hwëch'in citizens in mind:

**Tea Circles:** Held one afternoon in Dawson and primarily advertised to citizens as the Commission were advised smaller events would feel more comfortable. During this session, staff facilitated discussions that allowed citizens to engage with both the Commission and plan partners.

**Citizen and Commission Gathering:** Organised by Tr'ondëk Hwëch'in Government, several Commission members and a staff member attended to listen to citizens and explain more about their reaction to the Draft Plan and answer questions; it was an open forum. Some citizens came to express opinions, others came to learn more about the plan; all came to listen and learn.



*DRPC Commission Member Dan Reynolds and Planner Nicole Percival host a Tea Circle*



*DRPC Senior Planner Tim Sellars talking to Community Conversation attendees*

**Dawson Regional Planning Commission**  
On The Land We Walk Together • Nān kāk ndā tr'ādāl

**COMMUNITY CONVERSATIONS & OPEN HOUSE!**  
**14TH OCTOBER | 3-7:30PM**  
**MAYO VILLAGE COMMUNITY HALL**

Community Conversations: 3:30pm | 6:00pm

The Dawson Regional Planning Commission needs your help. This Draft Plan is the Commission's best attempt at balancing cultural, economic and environmental values with an eye to our vision: on the land we walk together.

Please come share your thoughts with Commission and staff, ask us questions and share your values and concerns. Staff will be available all day and there will be 2 facilitated discussions.

*Thinking of community needs today and for future generations, are we on the right path?*

**\* Free Hot Drinks & Food by Big Red! \* Door Prizes\***  
**\* All Are Welcome \***

Call us: (867) 993-4400 Send us an email: [dawson@planyukon.ca](mailto:dawson@planyukon.ca)

*Community Conversations advertising in Mayo*



*Whitehorse Community Conversations*

**PUBLIC WORKSHOPS**

Event	Location	Attendees	Date
<b>Wetlands</b>	Online	20+	August 4, 2021
<b>Wetlands</b>	City of Dawson	20+	August 4, 2021
<b>Conservation Zones</b>	Online	20+	August 5, 2021
<b>Conservation Zones</b>	City of Dawson	20+	August 4, 2021
<b>Future Planning Areas</b>	City of Dawson	20+	August 5, 2021

In August 2021, to kick off in-person engagement, the Commission held five public workshops in Dawson in addition to an online engagement platform to gather initial feedback on the Draft Plan and start discussions. Commission members attended all sessions.

- The workshops were not technical and were open to everyone.
- Designed so that participants could discuss issues with each other and learn about the different perspectives that exist for certain issues.
- The topics covered included: Wetlands, Conservation Zones, and Future Planning Areas.

**Wetlands** and **Conservation Areas** used the following format:

- Online sessions were facilitated by an external contractor, John Glynn-Morris, and in-person by Commission staff.
- Staff provided an overview of the Draft Plan and then participants were split into breakout groups to discuss their initial impressions. Each group then was invited to feedback to everyone else.
- The workshop topic was introduced, and breakout groups had a discussion before providing a summary to the main group.

For **Future Planning areas**, a charette style approach was utilised.

- Participants were invited to discuss whether this was the right approach for each future planning area (Klondike Valley, Dempster Highway Corridor and Yukon River).
- The session was supported with large maps that allowed individuals to interact directly, marking key areas, values, and issues.



*August Summer Workshop – Large Group Discussion*



*August Summer Workshop – Breakout Group*

### TECHNICAL WORKSHOPS

Event	Location	Attendees	Date
<b>Cumulative Effects</b>	Whitehorse	30+	September 28-29, 2021
<b>Wetlands</b>	City of Dawson	30+	October 27, 2021

Two technical workshops were held in Fall 2021 to tackle topics that the Commission needed direct input on. The topics, cumulative effects and wetlands, had many conflicting values and issues associated with them, and the Commission wanted to invite plan partners to participate, listen to each other and help formulate ideas and solutions that could be utilised in the Recommended Plan.

Technical workshops were not open to the public but summaries of each were made available immediately after on the DRPC website.



*DRPC Planner Nicole Percival and YLUPC Senior Planner Sam Skinner leading the Cumulative Effects Technical Workshop in Whitehorse*

## FORMAL WRITTEN SUBMISSIONS AND PRESENTATIONS

The bulk of feedback was received following Draft Plan public engagement in the form of written submissions, including formal documents, emails, and surveys. The Commission also received several presentations in 2022 from Industry Plan Partners as new information became available.

The Commission received:

- Over 250 letters and emails from the public<sup>3</sup>, including 62 submissions from Tr'ondëk Hwëch'in citizens
- Over 20 submissions from Plan Partners

The volume of responses received was welcomed by the Commission as it showed how engaged people were with the Regional Planning process and the Draft Plan.

## SURVEY

A survey was developed in collaboration with Tr'ondëk Hwëch'in and Government of Yukon to ensure that it was accessible and easy to understand. The survey acknowledged that not everyone would have read the Draft Plan and each section

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<sup>3</sup> Not including Plan Partners

of the survey provided a plain language summary. The survey was available both online and in paper format – see [Appendix 3](#) (page 57) for a copy of the survey.

### MEETINGS

Commission staff spent most of the summer engaging with a range of stakeholders including Plan Partners and Affected First Nations to ensure that the Draft Plan was well publicised, and that anyone with questions or concerns were able to have direct input. Over 40 meetings were held, and summaries can be found on the DRPC website (except for when attendees opted not to share information).

### WEBSITE

The DRPC website was used extensively to share public engagement summaries. Meetings and events were summarised and posted on the website, except for meetings that occurred in presentation format, or when attendees opted not to share information.

### MAILERS

All households in the City of Dawson, Whitehorse, and surrounding communities received a mailer from the Commission outlining the process, and what to expect. These were sent in advance of the Draft Plan’s release to increase awareness of the process. Later in the summer, Commission staff mailed a copy of the Draft Plan Highlights to all residents in Dawson. This included information about upcoming Community Conversations.



*Household mailer sent to households in multiple Yukon communities  
Artwork by Yukon Graphic Recording*

## SOCIAL MEDIA AND LOCAL ADVERTISING

The Commission and staff used social media in a limited but targeted way. Updates and events were posted to Facebook and local advertising was used to boost event coverage and attract people who may not have been aware of planning activities or the Commission. This helped reach a broader audience and increased awareness of the regional planning process.

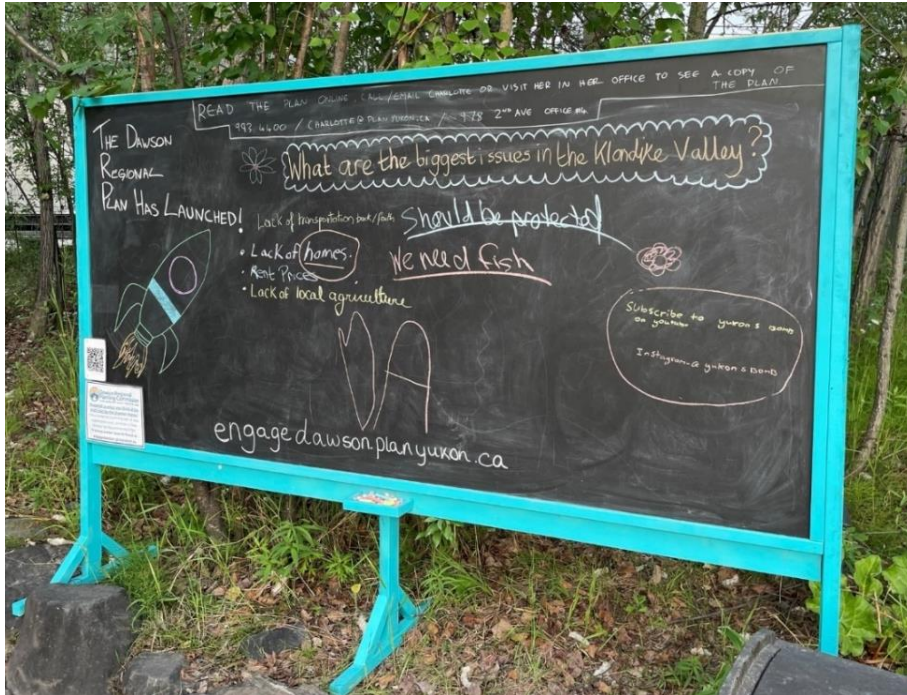
## POP-UPS & BLACKBOARD ENGAGEMENT

During Draft Plan engagement, Commission staff hosted ‘pop-up’ events in the garden adjacent to the office. Anyone passing by could stop to learn about the Draft Plan, ask questions and take Highlights or Summary documents with them. Additionally, three events for Tr’ondëk Hwëch’in citizens were held. These were held at C4 (a subdivision on Tr’ondëk Hwëch’in Settlement Land), outside the DRPC office and in the Tr’ondëk Hwëch’in administration building.

Finally, the Commission employed a community-based method of engagement via a blackboard. Each week a new question was posed to Dawson residents to get them thinking about the issues in the region and promote the Commission’s work.



*DRPC Planner Charlotte Luscombe hosting a Pop Up*



*Blackboard Engagement*

## GOLDFIELDS TOUR

The importance of mineral exploration and development in the Dawson Region was highlighted during the first rounds of engagement. The KPMA, a plan partner, invited the Commission and staff to visit some placer mining sites in LMU 12 – East. It was an opportunity to talk to those working in the industry, learn more about placer mining and strengthen relationships.



*KPMA Placer Mining Tour with Commission members Debbie Nagano and Alice McCulley*

## ENGAGEMENT MATERIALS

### Draft Plan

The main item used for engagement was the Draft Plan itself. This document was the culmination of two years of planning work, including multiple public meetings, technical working group sessions and field trips. Key topics and concepts in the Draft Plan were highlighted during meetings with Plan Partners, and they informed community events. For example, during Community Conversations, the topic of Wetlands was an option attendees could select for table discussion. The Draft Plan itself also had multiple 'call-out' boxes where the Commission actively sought input as they needed help and direction for certain issues.

### Maps

Maps are a powerful visual aid that the Commission and its staff used extensively throughout Draft Plan engagement. Printed maps of the Land Designation System were made available at every public event and the whole map package (including GIS data files) were available to view and download on the DRPC website.

### Highlights Version

At only six pages, the Draft Plan Highlights introduced the planning region, highlighted the main issues the Commission wanted feedback on and introduced people to the Land Management Designation system. The Highlights were mailed to every resident in Dawson.

### Summary Version

A summary of the Draft Plan was developed to provide an easy-to-read version for non-technical experts. This used plain language and was provided at community events and workshops.

### Cumulative Effects Illustrations

The Commission contracted the services of Yukon Graphic Recording to provide an artistic interpretation of the different development threshold levels outlined in the Draft Plan for a non-technical audience. These illustrations are provided in [Appendix 2](#) (page 56).

### Video Presentation

A PowerPoint presentation of the Draft Plan was recorded and posted online. This provided an oral and visual option for individuals to interact with the Draft Plan.

## **ENGAGEMENT ANALYSIS**

It was important to the Commission and to staff that every single submission received be read and carefully analyzed. Using specialist qualitative research analysis software, staff reviewed each submission line-by-line and coded responses against topics. Coding allowed staff to 'label' quotations and helped them identify themes and relationships. This feedback was then presented to the Commission during working sessions and was a fundamental part of the decision-making process.

As part of analysis, the Commission received five form letters that were sent by multiple respondents. Each of these letters were reviewed once, taking care to make note of additional individual comments. The Commission carefully considered the content of the letters, not the number of copies received. These letters were from the following groups:

- Tr'ondëk Hwëch'in Citizens
  - General Recommendations
  - Climate Change
  - Water Preservation and Protection
  - Wetlands Protection
- CPAWS letter 'All My Vision'
- Industry letter 'Commission Draft Plan'

Copies of each can be found in [Appendix 5](#) (page 98).

A full description of the coding methodology will be provided in the upcoming Methods Report.

## **ENGAGEMENT LIMITATIONS**

### **POTENTIAL FOR DUPLICATION OF INPUT**

Throughout this process, individuals and organisations were able to contribute multiple times through different methods e.g., they could submit a survey, attend a meeting, and send an email. The Commission also did not restrict how many online surveys could be submitted from a single IP address.

### **COVID RESTRICTIONS**

Throughout the engagement process there were ongoing concerns with regards to COVID-19 which added additional challenges to the planning and format of public engagement events.

## GAPS IN RESPONDENT DEMOGRAPHICS

Although the Commission tried to create an inclusive and accommodating process, we recognise that some sectors of the Dawson community were not able to fully participate:

- **Youth:** Attracting youth participants was difficult and represents a significant gap despite staff and Commission members attending Tr'ondëk Hwëch'in Youth Council as well as giving a presentation at Robert Service School.
- **Seasonal workers:** The intention of a five-month engagement period was to ensure as best as possible that seasonal workers would have opportunities to participate either in person or online. The Commission recognises that summer is the busiest period for those working in mining, agriculture, tourism, etc. The Commission sought to meet with industry representatives as well as attending specific events where they might engage directly with people such as the KPMA Annual General Meeting (2021).

## ENGAGEMENT RESULTS

This section of the report reviews feedback and provides a summary as well as direct quotes from all the different inputs we received.

- The Parties
  - Tr'ondëk Hwëch'in
  - Government of Yukon
- Affected First Nations
  - First Nation of Na-cho Nyäk Dun
  - Vuntut Gwitchin First Nation
- Other First Nations
  - White River First Nation
- Plan Partners
- General Feedback: Questions from the Commission
  - Overall impressions of the Draft Plan
  - Special Management Area 2 land designation
  - Cumulative effects indicators and framework
  - Access
  - Wetlands
  - Land Stewardship Trust
- General Feedback: Additional topics
  - Stewardship

- Key Species
- Sustainable Economy

## THE PARTIES

### Tr'ondëk Hwëch'in

*“Tr'ondëk Hwëch'in would like to thank the Dawson Regional Planning Commission (the Commission) for their hard work reaching this important milestone. We are encouraged by the efforts made by the Commission to strike a balance between competing and conflicting land uses and perspectives in this complex planning region. Additionally, we are happy to see many of the recommendations of the Draft Plan reflect a collective vision that is based on a sustainable approach to development within the Dawson planning region. The Draft Regional Plan (Draft Plan) is a good start towards meeting the objectives of Chapter 11 of the Tr'ondëk Hwëch'in Final Agreement (THFA or Final Agreement).”*

Tr'ondëk Hwëch'in recognised the Commission's work in producing the Draft Plan, acknowledging their efforts to strike a balance between competing and conflicting land uses. Their feedback was grounded in the voices of Tr'ondëk Hwëch'in citizens and specific guiding documents, including the THFA, Dënezhu Dätr'inch'e and the draft Tr'ondëk Hwëch'in Land Vision. Feedback was centred around six themes:

1. **Alignment with the Tr'ondëk Hwëch'in Final Agreement:** Tr'ondëk Hwëch'in emphasized that the Recommended Plan should more explicitly consider the distinct values of Tr'ondëk Hwëch'in and how their culture is reflected in the region. Further, they emphasized the importance of the traditional economy, and of recognising and promoting Tr'ëhudè in the Recommended Plan. They advised settlement land requires more focused consideration, and the importance of land-based learning and Dënezhu ways and knowledge should be emphasized.
2. **Protection of High Conservation Areas:** Tr'ondëk Hwëch'in did not support SMA 2 areas and wanted to see all of them legally designated as per Chapter 10 of the Tr'ondëk Hwëch'in Final Agreement. Additionally, they recommended greater protection for waterways, advised that fen development thresholds in wetlands should be limited to 25% and wetland buffers be established, and that to truly protect permafrost, new roads and trails should avoid such areas. Finally, the protection of caribou habitat was emphasized, particularly for the Fortymile, Clear Creek and Hart River herds.

3. **Sustainable Development on the Working Landscape:** Tr'ondëk Hwëch'in advised that the language in the Recommended Plan should be strengthened to better reflect the definition as per the THFA. They wanted to see the CE framework recommend indicators that are appropriate and reflect the social and cultural values of Tr'ondëk Hwëch'in. Moreover, CE thresholds need to be set so that key values are not undermined. They would like greater clarity around how adaptive management will be applied during implementation and advised that monitoring of all Plan components will be required. Finally, they would like to see greater protection for high value agricultural land.
4. **Climate Change and Tr'ondëk Hwëch'in Rights and Interests:** Would like to see more robust recommendations to address climate change, including how different values could be affected. The Recommended Plan needing to acknowledge how climate change will affect Tr'ondëk Hwëch'in way of life was emphasized, and they advised climate change could be a reason to review and adapt the Plan.
5. **Joint Management and the Concept of Stewardship:** Tr'ondëk Hwëch'in were pleased to see Stewardship emphasized in the Draft Plan as it is an important concept that is central to Tr'ondëk Hwëch'in worldview. However, they want to see the Recommended Plan better align with how they understand Stewardship, noting that "Stewardship is about responsibility and obligation – take care of the land and it will take care of you; take from the land only what you need and leave the rest for future generations." They also would like to see more around how Stewardship as a guiding principle directed the Plan's recommendations. Distinguishing between Stewardship and specific values was also highlighted.
6. **Future Planning Areas and Adequate Interim Protection:** Tr'ondëk Hwëch'in advised that they have management and stewardship responsibilities for the lands and resources within their Traditional Territory, suggesting that the Recommended Plan "should bring clarity to the importance of shared management and implementation by consistently reflecting this as a goal of the Plan." They want to ensure Tr'ondëk Hwëch'in Citizens can meaningfully participate in the management and care of public resources, on both Crown and Settlement Land. Further, they advised Chapter 6 - Implementation of the Recommended Plan should ensure joint management responsibilities are emphasized.

## Government of Yukon

*“The work that the Dawson Regional Planning Commission (the Commission) and your staff, with support from the Yukon Land Use Planning Council, have done to get to this point is noteworthy. The Government of Yukon commends the Commission for developing a Draft Plan which aims to balance the many values in the region... One overarching theme of the Government of Yukon’s comments on the Draft Plan is the need for clarity. Clarity will provide certainty to industry, for conservation, for regulators during implementation, for traditional uses, for residents of the Yukon and for visitors.”*

Government of Yukon commended the Commission for developing a Draft Plan that aimed to balance the many interests in the region. Government of Yukon staff across all departments reviewed the Draft Plan, and their feedback was detailed and comprehensive.

Feedback was centred around six themes:

### 1. Designations and Land Management Unit Boundaries

- a. **SMA 2:** Concerned about designation as the intent remains unclear and current legislation will not allow for protection as envisioned. Also, these areas would not count towards Federal protection targets.
- b. **Existing claims:** Unclear how claims in protected areas could be developed or accessed. Suggested moving some claim blocks into adjacent LMUs.
- c. **Critical minerals:** A major concern as the Yukon is part of national strategies and critical minerals are essential for development of clean energy solutions.
- d. **Yukon River Corridor:** Access to other LMUs off the Yukon River is important, for mineral development and for tourism. Suggested designating it as an ISA 1 so that development can proceed while still protecting other values.
- e. **Caribou:** Fortymile summer range is not adequately captured in LMU 18, and the Clear Creek herd should be protected with a boundary extension of LMU 7.
- f. **Land Management Unit Adjacency:** The adjacency of LMUs should be better considered in the Recommended Plan. A and p ‘tiered approach’ to designation was proposed

- g. **Tombstone – Ddäl ch’ël:** Appreciated the Draft Plan’s reference to the existing management plan, and that it counts towards the overall protected area of the region.
- 2. **Cumulative Effects:** Appreciated the Commission’s work but would like to see greater clarity in the Recommended Plan. They identified several issues they felt needed addressing including linking linear density and surface disturbance with ecological values, development of socio-economic indicators and the development of values-based reclamation guidance.
- 3. **Wetlands:** Encouraged the Commission to use draft wetlands policy when developing the Recommended Plan and were encouraged to see reference to the mitigation hierarchy. They do not support the Draft Plan’s direction for LMU 19 or region-wide thresholds for wetlands. They also advised that previously permitted and licenced activities need to be grandfathered.
- 4. **Culture and Heritage:** Advised that the Draft Plan’s assumption that management practices for heritage and cultural resources are adequate is not accurate. They advised that more proactive surveys would better align with Chapter 13, and that the significance of culture and heritage with respect to Chapter 13 needs to be better reflected in the Recommended Plan.
- 5. **MMIWG2S+:** Government of Yukon were pleased to see this issue highlighted and further, would like to see proponents partner with the signatories of the ‘*Changing the Story to Upholding Dignity and Justice: Yukon’s Missing and Murdered Indigenous Women, Girls and Two-spirit People Strategy*’.
- 6. **Implementation:** Government of Yukon would like to see greater clarity for implementation as well as a single implementation committee identified. They also do not support the establishment of new bodies.

### AFFECTED FIRST NATIONS

Two Yukon First Nations have overlapping Traditional Territory within the Dawson Region and so as per Chapter 11, the input of Affected First Nations was essential to the planning process.

#### First Nation of Na-cho Nyäk Dun

*“FNND would like to applaud the Commission for its hard work and for releasing the Draft Plan. This is a critical milestone towards fulfilling the critical promise of land use planning in Chapter 11 of the Final Agreement.”*

As an “Affected First Nation”, FNNND expressed interest in participating in the Senior Liaison Committee and Technical Working Group, and outlined several topics of concern for the Commission to consider moving forward:

- Alignment of the Plan with FNNND’s aboriginal and treaty rights and incorporation of FNNND knowledge into the Plan.
- Climate change: more proactive and concrete measures.
- Protection of important areas: all SMAs should require maximum conservation, and water/waterways and wetlands, caribou and salmon and their habitats should receive more attention.
- Stronger integration of stewardship and sustainable development concepts into the Plan, and more explicit measures to bolster a cumulative effects framework.
- Specific concerns for several LMUs (7, 8, 9, 10, 11, 12, and 19) and management of the Dempster and Klondike Highway corridors.
- Land use conformity, even while the Plan is still in draft form.
- Plan implementation and review of the Plan as a “living document”.
- A moratorium on development until Chapter 11 regional land use planning has been completed in FNNND’s entire Traditional Territory.

### **Vuntut Gwitchin First Nation**

*“As a plan that is contiguous with the two previous regional plans that addressed Vuntut Gwitchin First Nation...Traditional Territory, we have several interests in the Dawson Plan relating to the holistic connections between our planning regions...”*

The Vuntut Gwitchin Government outlined nine major concerns with the Dawson Plan based on its close connections with both the Dawson and North Yukon Regional Land Use Plans:

- Porcupine Caribou Herd protection, management, and research.
- Watersheds, their interconnectivity, and the potential impacts of industrial development.
- Climate change resilience: VGG has declared a state of climate emergency.
- Sustainable development, especially oil and gas development in the Eagle Plains and Kandik Basins.
- Cumulative effects management: consistent thresholds across different regional land use plans.
- Inclusion of VGFN knowledge and concerns in Dempster subregional planning.

- Potential incompatibility of different management intents and thresholds between adjacent LMUs in the DRLUP and NYRLUP.
- Incorporation of Vuntut Gwitchin place names and traditional knowledge.
- Plan Implementation, Evaluation and Review.

## OTHER FIRST NATIONS

### White River First Nation

*“We feel that the plan fails to recognize the importance of the planning region to WRFN’s past, current, and ongoing ties to the landscape”.*

In their submission, they included examples of where the Commission could include White River First Nation in their recommendations and highlighted their history and current use of certain areas.

White River First Nation provided recommendations regarding:

- LMUs 3, 20, 21, and 22.
- Suggestions for reorganization of LMU specific summaries.
- Feedback regarding cumulative effects indicators and framework.
- Development of a fen threshold.
- Comments regarding sub-regional plans.

They also re-submitted their Conservation Priorities Assessment that was received by the Commission on February 3, 2021:

*“We are pleased to see some of our conservation priorities being address [sic] in this version of the draft”.*

## PLAN PARTNERS

The Draft Plan would not have been possible without the participation of the DRPC’s Plan Partners. During every stage of the planning process, the Commission have communicated with Plan Partners, keeping them informed of meetings and opportunities for engagement. The range of different knowledge and experience that Planning Partners have added to the planning process is immense, and the Commission welcomed their input and perspectives.

The Commission received over 20 responses from Plan Partners, and the following section of Engagement Results summarises what we heard from the formal written submissions received from Plan Partners in response to the Draft Plan. Written submissions are all available on the DRPC website.

### **BEACONS Project – University of Alberta/Yukon University**

*“The success of the Dawson Plan to maintain healthy lands and waters within Integrated Stewardship Areas...will likely rely on adaptive management.”*

The BEACONS Project suggested that the Plan contain a description of how adaptive management works, and key elements required for implementation, as well as identification of ecological benchmarks classified as Special Management Area 1.

Given the uncertainty of climate change they proposed that refugia and corridors be explicitly identified/monitored and classified as Special Management Area 1, and that the Dawson region’s contribution to climate change resilience in the north be considered.

### **Canadian Parks and Wilderness Society – CPAWS**

*“While we think the draft plan is a good start towards securing a healthy future for the Dawson Region, we also see parts that must be changed for the plan to align with sustainable development.”*

CPAWS’ major recommendations for consideration include:

- Ground the plan in sustainable development, not ‘balance’.
- Provide enduring protections for the Fortymile caribou herd by protecting the entirety of the herd’s core range in the Yukon.
- Remove Special Management Area 2 as a designation option.
- Ensure the Cumulative Effects Framework will work to sustain ecological and cultural values.
- Establish meaningful protection for wetlands.
- Better protect the Klondike Plateau ecoregion.

### **Canadian Wildlife Service - CWS**

*“ECCC-CWS is pleased to see that, overall, the conservation priorities we identified are reflected in the draft Plan and Land Management Unit (LMUs) designations in the draft Plan.”*

CWS’s conservation priorities for the region include high elevation habitat, the Scottie Creek wetland complex, and the Tintina Trench. They also proposed:

- Integrated management strategies that ensure land use activities avoid detrimental effects on Bank Swallows and other migratory birds.
- Protection of areas where plant species of Special Concern occur.

- Consideration for the Yukon South Beringia Priority Place initiative and Canada's Conservation Targets.

### **Conservation Klondike Society - CKS**

*"The Commission should use traditional knowledge and conservation science to set limits that ecosystems can tolerate... All aspects of the plan need to prioritize the health of lands, waters and wildlife."*

CKS highlighted that "Tr'ondëk Hwëch'in conservation priorities call for 60% protection of the Dawson region, 3.5% is not enough!" They recommended:

- Upgrading conservation areas with weak protection to Type 1 special management areas.
- Protection of critical habitats.
- Consideration of the importance of traditional foods and sustainable agriculture.
- Limits on development in sensitive areas.

### **Dawson District Renewable Resources Council - DDRRC**

*"In general, we think the plan is a good start towards identifying and accommodating the needs of all land users within the Planning Region. We support the concept of stewardship even in areas where industrial development is permitted. We understand the challenging task of balancing ecological, socio-cultural, and economic interests and appreciate the immense efforts made by the Commission to accommodate and engage with all members of the public affected by this initiative."*

The DDRRC raised concerns regarding the development of new access and the resulting cumulative effects on key species, and gaps in the Plan's implementation process. They brought forward specific recommendations for key species including caribou and salmon, traditional economy, and wetland conservation areas.

### **Ducks Unlimited Canada - DUC**

*"We are not opposed to development and understand that resource extraction industries are important to both the local and global economies. However, we believe it is possible for these industries to be undertaken in a manner that maintains the ecological values that wetlands and other ecosystems currently provide."*

DUC provided recommendations specific to:

- Management objectives and how they relate to policy.
- Development in bogs marshes and fens in LMUs.
- Carbon stored in fens and how that relates to climate change goals.
- Buffers around wetlands to ensure protection from development.
- Clarification of the intent of Wetlands of Special Importance.
- Adoption of no-loss of wetland values for areas designated as Wetlands of Special Importance.
- Designations and management intent for specific Special Management Areas and LMUs.
- Cumulative effects thresholds for ISA units.
- Guidance around offsetting activities.

### **Fish and Fish Habitat Protection Program – FFHPP**

*“FFHPP seeks to conserve existing fish and fish habitat resources, protect these resources against future impacts and restore fish habitat. Overall, our review found that the draft Plan aligns well with these goals”.*

FFHPP provided specific comments relating to fish and fish habitat, and the Fish Habitat Management System for Yukon Placer Mining. Recommendations were provided on sections of the plan pertaining to:

- Surface disturbance.
- Water indicators.
- Cumulative effects framework discussion.
- All-season surface and water access.
- Forestry.
- Aggregate resource extraction.
- Salmon.
- The Fortymile River.
- Regional indicators for sustainable development.

### **Friends of Dempster Country - FoDC**

*“...FoDC believes that with adaptive management designed to mitigate the disturbance of what is already happening on the land and by employing the ‘precautionary principle’ the Recommended Dawson Regional Plan could go a long way...”*

FoDC advocated for:

- The region north of the Tintina Trench to be designated as a Conservation Area.
- Change Special Management Area 2 designations to Special Management Area 1 in LMUs 1, 4, and 7.
- Allowance for forestry and fuel wood harvesting in LMU 6 under a Special Management Area 1 designation.
- Direction for making future Plan revisions if the Brewery Creek heap-leach operation expands.
- Protection of key habitat for the Clear Creek Caribou Herd in LMU 9.
- Inclusion of activity in the Dempster Highway Corridor in disturbance thresholds for cumulative effects management in adjacent land units.

### **Klondike Active Transport and Trails Society – KATTS**

*“...the Draft Plan makes a good start at recognizing the importance of non-motorized trails but can be improved to better ensure that our trails and travel routes are respected and protected for future generations.”*

KATTS outlined the numerous important benefits to society that trails provide:

- Cultural, health; social; economic; education; community identity and pride; environmental sustainability; connection to the land; inspiration and joy; and legacy for future generations.
- Recommendations were made on how to better build these value sets into specific sections of the Draft Plan.

### **Klondike Placer Miners’ Association - KPMA**

*The KPMA has proven our ability to evolve, learn and grow; we have practical on-the-land experience; we understand the important stewardship role we plan on the land we work; and most importantly, we want to do a good job. But we cannot be expected to work to a standard that hasn’t been set yet (there is no approved wetland reclamation plan, there is no final Wetland Policy, there is no modern Placer Act), and we do not believe a Precautionary Approach is a fair or reasonable response to all issues in front of the Commission. We also appreciate you must respond with a balanced recommendation to these contestable issues, and we’ve made some recommendations of our own for you to consider adopting.*

The KPMA's "key take-home messages", in addition to comments on specific LMUs include:

- The addition of reclamation into all aspects of the Plan, including the cumulative effects framework.
- Recognition of placer miners as taking a stewardship role in their work.
- Designating Special Management Area II areas as either Special Management Area Is or ISAs.
- Offsetting disturbance values with reclamation.
- Avoid recommendations that create unnecessary reporting/additional bureaucracy.
- Use the Fish Habitat Management System as a guide.
- Use the offsetting principle for wetlands and be clear in determining simple wetland thresholds.
- Ensure access to mineral claims that are 'allowed' in the Plan is maintained.
- Change management directions related to timing windows so they are more adaptable to the actual presence of species and not a date on a calendar.

### **Porcupine Caribou Management Board – PCMB**

*"The Board appreciates the...Commission's work on...[the Plan] to date and we note the inclusion of important concepts such as zones of influence, cumulative effects, key migration routes, critical pinch points and caribou habitat requirements."*

The Board suggested that the Plan reference the Porcupine Caribou Management Agreement as the source of guiding principles regarding the Porcupine Caribou herd and provided comments specific to LMUs that overlap with the herd's range.

They also highlighted concerns regarding Special Management Area designations, development density, winter roads, cumulative effects, sub-regional planning for the Dempster Highway, and expressed interest in providing direction and identifying gaps to support the Recommended Plan's implementation.

### **U.S. Fish and Wildlife Service - Alaska**

*"We are very impressed with your planning approach to proposed zones of use intensity and criteria for linear density and surface disturbance. We applaud the consideration given to the environmental and social effects of climate change and ways to thoughtfully adapt and mitigate the effects."*

The service administers several national wildlife refuges in Alaska that are connected to the Yukon River downstream of the planning area. They appreciate the recognition of the importance of the Scottie Creek Watershed and support its conservation, as well as point out that Yukon River chinook are a species of conservation concern and are important for achieving purposes for national wildlife refuges. They encourage measures to protect water quality and quantity as well as identification and protection of cold-water refugia.

### **Wildlife Conservation Society – WCS**

*“We commend the Commission on their take of adding “Stewardship” into this plan as a theme and for their attempt at striking a balance between development and ecological and socio-cultural preservation.”*

WCS provided comprehensive recommendations for the Plan with respect to:

- Guiding principles of sustainable development and stewardship
- Precautionary principle and adaptive management
- Priority criteria for protected areas
- Climate change and cumulative effects management
- Special Management Areas, Integrated Stewardship Areas and Corridor Areas
- General management direction and special management direction
- Sustainable economy; transportation and access; forestry
- Key species – caribou, salmon, sheep, grizzly bears
- Wetlands
- Management direction within specific LMUs
- Plan implementation

### **Yellowstone to Yukon – Y2Y**

*“[the Commission should] re-examine what balance and sustainability mean given climate change, biodiversity loss and the sacred cultural connections to the land held by the Tr’ondëk Hwëch’in.”*

Y2Y provided comments that reflect suggestions to support:

- Increasing the amount of large interconnected protected areas
- Conservation of cultural heritage including lands and wildlife for Indigenous Peoples that have overlapping traditional territories in the planning region
- Cumulative effects management in the draft plan should to be reviewed

- Protection of the Fortymile caribou herd is a critical goal

### **Yukon Environmental and Socio-economic Assessment Board – YESAB**

*“YESAB applauds the work of the DRLUPC and the effort taken to inform environmental and socio-economic assessment in the Dawson regional land use planning area”.*

YESAB’s comments focused on ensuring references to YESAB and the environmental and socio-economic assessment process in the Recommended Plan are portrayed accurately.

### **Yukon Conservation Society - YCS**

*YCS’s comments reflect their mission to “pursue ecosystem well-being throughout the Yukon and beyond, recognizing that human well-being is ultimately dependent upon fully functioning healthy ecosystems.”*

YCS provided extensive conservation-focused feedback section-by-section, as well as by LMU. They highlight the importance of Tr’ondëk Hwëch’in rights and responsibilities and the fact that none of the caribou herds in the planning region have a recovery plan or critical habitat identified.

### **Yukon Conservation Society and Canadian Parks and Wilderness Society - YCS & CPAWS**

*“Imagine it is 2050, about 30 years from now. You are looking back on the Dawson Land Use Plan. What is your hopeful or fearful future for the Dawson Region?”*

They compiled attendees’ responses which covered concerns around: ecosystem health, intact fish and wildlife populations, accommodation of First Nation interests, climate change adaptations, reclamation practices, conservation, youth engagement and healthy communities.

### **Yukon Chamber of Mines - YCM**

*“YCM supports the draft plan’s priority to value heritage and habitat areas for conservation, however, industry currently working in the region would like to also see the plan preserve the ability for industry to continue to work in areas that are economically important today and in the future. [They] believe that establishing relevant and reasonable habitat disturbance thresholds and concurrent reclamation practices for the 3 proposed ISA classes will be critical. “*

The Chamber would like to see more of a focus on environmental stewardship rather than outright land withdrawals: “When exploration and mining is done responsibly and in stewardship and partnership, the economic benefits for the community are substantial”.

They provided feedback relating to implications to existing claims and projects in LMUs where there was industry activity: 1, 3, 4, 6-13, 15-23, and commented that managing and implementing the plan will be difficult.

### **Yukon Fish and Wildlife Management Board – YFWMB**

*“In keeping with our mandate to conserve fish, wildlife and their habitats in Yukon, we acknowledge that the planning process was challenged by the extensive developments within the planning area already in place, but wish to express that our primary interest is to preserve Conservation as is laid out in the First Nation Final Agreement. This includes the harvesting rights of First Nations within the Traditional Territory and as such, the Board supports Tr’ondëk Hwëch’in’s conservation priorities for the Dawson Region, and commend the First Nation for putting the health of the lands, waters, wildlife and people foremost within the Dawson Region Plan.”*

They provide specific recommendations regarding:

- Land use designations
- Disturbance thresholds
- Management of the Fortymile caribou herd
- ORV use
- River travel restrictions
- Stewardship.

### **Yukon Prospectors Association - YPA**

*“It is important that the Commission consider and analyze the serious implications on the exploration and mining industry if some of the proposed conditions, restrictions and thresholds in the [Draft Plan] are implemented. “ An independent review of the adverse effects of the Plan on the exploration and mining industry was recommended.*

YPA identified concerns with cumulative effects thresholds; recommended the allowance of low impact exploration; incorporation of flexibility and adaptive management into the plan; and proposed models for successful and responsible quartz/hard rock and placer exploration. Recommendations for mining in wetlands and critical level of development thresholds were also provided.

### **Yukon Salmon Sub-Committee – YSSC**

*“We support your vision of stewardship, which puts ‘the health of the land at the forefront of decision making’, even in areas where industrial development is allowed. But there are sections of the Draft Plan that can be improved”.*

YSSC’s submission focuses on salmon populations and habitat in the Dawson planning region – they note that *“protection of salmon stocks and salmon habitat in the Dawson region affects all Yukon River salmon in the Yukon territory.”*

### **Yukon Wood Products Association - YWPA**

*“In the context of land use planning the plan should be focused on how the wood products industry can contribute to the wellbeing and sustainability of the planning region.”*

YWPA Provided substantive input and most notably would like to see more value placed on the socio-economic benefits of local commercial business interests; stronger linkages to pre-existing plans (Forest Resource Management Plan pursuant to the Forest Resources Act and chapter 17 of the Settlement Agreements); allowance for the utilization of timber for biomass production in support of mining operations in LMUs that do not have potential for timber harvesting; and suggest that a number of subregional plans, advisory boards and committees recommended throughout the plan may not be necessary.

## **GENERAL FEEDBACK: QUESTIONS FROM THE COMMISSION**

### **Impressions of the Draft Plan**

During the engagement process the Commission wanted to know what people generally thought of the Draft Plan. What did people like? What did they feel was missing or what would they change? They also had some specific questions for the Parties and public. These specific questions were identified as call-out boxes in the Draft Plan and highlighted in the survey and the topic of workshops and gatherings.

The following section gives a brief overview of what we heard and provides a selection of quotes that expressed some of the thoughts and ideas that were shared during the engagement on the Draft Plan.

#### *What did people generally like about the Draft Plan?*

Overall, the Draft Plan was received well. Many responses recognized the hard work that the Commission had done to develop the Draft Plan and noted that it was clear

that the Commission were trying to achieve some balance between the environmental, socio-cultural, and socio-economic values in the Region.

*"I recognize the challenges in making a plan to suit everyone and I appreciate the effort and open mindedness of the commission in listening to everyone." (Survey Response (661))*

*"I think you are heading in the right direction with all of this (a difficult task indeed) and I'd like to pass along my thanks to the people involved for sticking with it and hearing all sides of the debates." (Survey Response) (663)*

The support for the concept of Stewardship and 'On the land we walk together' / Nän kāk ndä tr'ädäl as underlying concepts in the Plan was overwhelmingly positive.

*"The Plan is to be applauded for its approach to and enthusiasm for a strong Stewardship element in the Plan. It explicitly calls for options to instill a sense of stewardship in all users." (Plan Partner Response) (YCS)*

*"I like the want/drive for everyone to work together...I like the understanding that we need to be thinking of future generations, our children." (Survey Response) (718)*

*"It is encouraging that the guiding principle of the plan is about stewardship and respect." (Survey Response) (644)*

The Precautionary Principle was one of the concepts that was met with mixed reviews. Generally, the more conservation focused responses were supportive of the use of the principle in the Draft Plan, whereas others felt that it was unnecessarily restrictive.

*"The application of the precautionary principle invites humility into decision-making by registering with decision-makers the magnitude of getting it wrong." (Plan Partner Response) (Y2Y)*

*"The YWPA would prefer that the underlying philosophy of the plan be focused on how to use the land within the Dawson planning region for the benefit of the community. This will require a shift in approach to assessing the acceptability of the resource sector...The precautionary principle starts from the premise that the resource sector is going to do harm so make them prove that they will not harm the land before they can proceed. This needs to change." (Plan Partner Response) (YWPA)*

*What were some of the areas of improvement or gaps that people would like to see addressed in the Draft Plan?*

Echoing the responses that were received during the 2019/2020 public engagement sessions, the main issue for the region was by far the amount of land that was protected and the amount of land available for exploration and industrial development.

*"Protect more than 3.8% of the area; with Canada's commitment 30% by 2030 we should do better." (Survey Response) (632)*

*"It should be noted that by exploring and mapping most all of the land it would result in possibly 5%-10% of the land requiring more advanced exploration, and then less than 1% of the ground being mined. Maybe 90% or more of the land does not require advanced exploration and thereby is automatically 'protected' from advanced exploration and mining. The low-impact prospecting should be allowed on most all of the land as it does minimal or no damage to the land, flora and fauna, as all other low-impact activities on the land are allowed." (Plan Partner Submission) (YPA)*

*"Industry needs clearly defined areas where we can and cannot work – the current Draft Plan does not provide the necessary certainty." (Public Submission) (008)*

Other areas of improvement will be considered in more detail in following sections.

### **Special Management Area 2 land designation**

The Draft Plan introduced the concept of Special Management 2 Areas. This was a new type of designation where the intent was for high conservation and long-term maintenance of wilderness character. The important difference between these areas and the Special Management Area 1 areas was that there would be no legal designation for them as protected areas.

The Commission, as part of engagement, asked the public and plan partners directly what they thought about this land designation, by asking: 'How do you feel we should approach these areas in the Recommended Plan?'

Several responses acknowledged the Commission's attempt to balance and meet the many different regional interests with the SMA 2 designation:

*"Although SMA 2 don't offer full protection, I applaud the commission in trying to conserve. I appreciate that the northern part of the planning region has more SMA 2s, that offer somewhat protection, and are all connected." (Survey Response) (689)*

*"I strongly support your vision for the North SMA II "The future of the area will look similar to how it is today" and in particular, your rationale for establishing it: "...enable landscape connectivity between Yukon-Charley National Preserve in Alaska..." This would allow wildlife habitat connectivity from the Peel River on the east through the Dawson planning area, all the way to the extensive protected areas in eastern and northeastern Alaska." (Public Submission) (014)*

Many were concerned that the SMA 2 designation would not offer enough protection, and many wanted these areas to become SMA 1 areas:

*"Not enough protection. My first impression makes me question the efficacy and commitment of protection in SMA 2s." (Survey Response) (636)*

*"I wish the SMA 1 area was large like the SMA 2 area. I also wish the SMA 2 was fully protected like SMA 1 if SMA2 became fully protected I wouldn't feel a need for SMA 1 to be larger." (Survey Response) (718)*

*"SMA-2 is a gutless way to make it look like public lands are protected but still allow the industry to spoil them. ='flexibility'" (Survey Response) (668)*

We also heard concern about how much of the region had this designation and that too much was now off-limits:

*"I have one question. On the areas marked as SMA II - Dawson city to the Alaska border. There's a great chunk that's on the right hand side or the left of the Yukon River that is recommended to permanently take it out of staking. I just like to let the Commission know that I truly believe the vast amount of minerals in this vast area of square miles of 1000s of 1000s of square miles of resources, I'd like to know if the Commission would take into consideration the value of those resources that you 're going to try to take off the map here. ... Because we seriously have to look at this. As much as I love this land for what it is, I still truly feel it works for everybody's interests." (Public Response) (080)*

Finally, a lot of submissions felt the designation would not work in practice as the Commission intended. Implementation of this designation was a concern we heard from many perspectives:

*"SMA 2 is giving a false hope that development can occur, when in a placer context it will essentially shut the operator down. ... There should only be areas that are deemed for protection or areas that are deemed to allow varying levels of development." (Survey Response) (698)*

*“Because SMA 2s would not receive legal protection or management plans, most of the proposed management directions associated with them are unlikely to occur because there will be no government body legally responsible for implementation of the management direction.” (Plan Partner) (CPAWS)*

*“SMA 2's allow industrial development within existing mining claims and winter roads, and don't seem to have any future management planning. These combined leave these areas up for unmanaged development and leave Tr'ondëk Hwëch'in without decision-making input, which to me is problematic and goes against the whole intent of Chapter 11.” (Survey Response) (635)*

*“Clarify the management intent of SMA II to articulate the vision more clearly for these regions including what activities are permitted and why certain legal designations are not adequate.” (Plan Partner) (Ducks Unlimited)*

### **Cumulative effects indicators and framework**

The Draft Plan recommended cumulative effects thresholds for surface disturbance and linear density. The Commission recognized that there were unanswered questions regarding the cumulative effects framework. During the engagement process the Commission held CE focused workshops and meetings, survey questions, and sought feedback through the call-out boxes in the Draft Plan.

The Parties suggested that the Commission should establish a broad cumulative effects framework that can be worked out more specifically by the Parties during implementation.

### **Recommendations from the Cumulative Effects Workshop included:**

- Recognition that surface disturbance and linear feature density are reasonable indicators.
- Indicator thresholds should be linked to values and their management objectives.
- Management objectives need to be broader and more holistic (e.g., harvest levels maintained, healthy population, restore historic population levels, expanded range, habitat availability and connectivity).

### **Party feedback specific to Cumulative Effects**

- The disturbance and linear feature density thresholds should be linked to values (i.e., caribou).
- Socio-economic values, and socio-cultural values are very important and should be further developed in the Recommended Plan.

- Government of Yukon will provide new linear feature density and surface disturbance data in the Spring of 2022.
- Reclamation: develop values-based reclamation guidance in an adaptive management context.
- Additional indicators: establish appropriate and additional indicators for the Dawson planning region, including those that better reflect TH social and cultural values (harvesting and hunting, and measurable indicators of climate change, like permafrost and wildfires).
- Threshold levels: set levels that do not undermine the key values of the region, such as moose, caribou, salmon, water, and to accept that these values might not be the same throughout the planning region.
- Clarity: provide clarity around the overall cumulative effects framework.

### **Plan Partner and public feedback specific to Cumulative Effects**

There was a need for more transparency and clarity as to how the thresholds were established for the Plan and questions about the current surface disturbance data that was used to determine thresholds.

*"It is unclear if the Cumulative Disturbance Thresholds are based off ecological derived habitat needs or are more arbitrary management thresholds." (Survey Response) (713)*

*"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." (Public Submission) (018)*

*"The plan is unclear in how it arrived at the currently proposed LUDs [land use designations] and associated cumulative thresholds." (Public Submission) (062)*

There were also some questions about the effectiveness of linear feature density and surface disturbance as CE indicators in the Plan. Also highlighted was the gap of how reclaimed land is dealt with in the framework.

*"The amount of human caused linear disturbance is not a good surrogate for impact of resource development activities on the environment especially if measures are undertaken to minimize impacts and good reclamation is undertaken." (Public Submission) (020)*

*"To consider cumulative effects of the placer industry on the Land Use Plan, it is vital that reclamation be included as an indicator to effectively consider and manage the past, present and future impacts of placer mining on the landscape." (Plan Partner Submission) (509)*

There were many questions about how the CE framework would be implemented and who would do the work. Additional bureaucracy and barriers to the permitting and licensing process were of concern.

*"Who is responsible for keeping track, for doing the measuring and what happens when a threshold is passed?" (Public Submission) (053)*

### **Access**

Access is a broad and complicated topic in the planning region. Access is needed for economic development, recreation and to participate in traditional economic activities. However, access can also be a detriment to the things that are valued on the land including wilderness and ecological connectivity. The effects of access on animals (particularly grizzly bears and caribou) were of particular concern. The Draft Plan made many recommendations surrounding access, especially in the Special Management Directions and recommendations for Management Plans for some LMUs.

*"...additional roads and trails mean I am able to access farther on the land for harvesting, however more roads and trails also undermines the things I am going out to harvest...So, it is a balancing act that must be carefully managed." (Survey Response) (603)*

### **Party feedback specific to Access**

The Government of Yukon provided the following for the Commission's consideration.

- In SMA 2s there is uncertainty how mineral claims will be accessed
- Access off the dempster to the claims in LMU 7 should be permitted. Acknowledging the impact that roads would have on the viewscape for tourism.
- Need reliable access to critical mineral deposits (for example in LMU 1 & 7)
- Water access via or across the Yukon River is needed in order to ensure that sustainable development can occur in the adjacent LMUs. Controlled access points should be established along the Yukon River Corridor

Tr'ondëk Hwëch'in provided the following for the Commission's consideration:

- Eliminate the distinction of SMA1s and SMA2s and *"To recommend that all SMAs are to be permanently withdrawn from any new industrial land use and surface access, and that they are intended to become legally designated as protected areas with subsequent management plans"*

- They also emphasized that it is "*...important for the Recommended Plan to reflect the various rights and obligations Tr'ondëk Hwëch'in has with respect to Settlement Lands, such as those related to water and access...*"
- Additional feedback included suggestions to
  - Prevent loop roads that increase predation and hunting
  - Additional monitoring in areas of increased access
  - Carefully consider the impacts that the NAR will have on the southern portion of the region.
  - Be aware that poor planning of access on the Yukon River may negatively impact the tourism/wilderness values.

### **Plan Partner and public feedback specific to Access**

There was concern about new roads and trails opening new areas to use and development and what the implications of this may be.

*"Once you 'open it up' [provide access into an area] you open up everything else."  
(Community Conversation Mayo)*

*"An important issue is the heavy use of the goldfield roads for hunting by people from outside the region. Are TH families getting enough wild meat?" (Public Submission) (056)*

It was asserted that past and current cultural ties to the Yukon River for Yukon First Nations cannot be understated. The Dawson Region is important for harvesting, traveling, traditional activities, and across the territory, the land is deeply rooted in First Nations' history.

*"The Yukon River Corridor was a lifeline for travel for Yukon First Nations people. It connected people across the territory and allowed for people to travel great distances easily. Our members talk about rafting the Yukon River Corridor all the way to Dawson...The Yukon River also allowed nations to come together to celebrate and gather each year." (White River First Nation Submission)*

Access by river (particularly the Yukon River) was cited as essential access route for tourism, cultural used, recreation and industry).

Co-ordination of access into areas relayed to the Commission many times. Opportunities for strategic access would reduce the overall need to create more trails and roads.

*"As other industries develop access into this land use zone there may be opportunity for the utilization of timber resources. The high cost of road construction for small volumes*

*of timber limits the wood products industry's ability to economically operate. New access may create an opportunity to gain better utilization of forest resources and restrictions placed on this land use designation should be kept to a minimum.” (Plan Partner Submission) (YWPA)*

The implications of climate change and access infrastructure was also a topic of concern by many. The expense of infrastructure repairs with melting permafrost and increased rainfall, but also the possibility of a bridge across the river at Dawson.

*“With the increasing likelihood of the rivers not freezing in future (or at least ice conditions and crossing being unstable or unreliable) the requirement for a bridge to West Dawson or Sunnydale becomes more of a necessity” (Public Submission) (Taggart).*

## **Wetlands**

During Draft Plan Engagement, the Commission held a technical workshop and community meetings on Wetlands in addition to targeted questions in the Draft Plan and on the survey. There was a lot of feedback for the Commission to consider. One of the main areas of focus for the Commission was the question of development thresholds in different wetland types in the region and identifying wetlands of ‘special importance’ for protection.

### **Party feedback specific to Wetlands**

The Government of Yukon provided the following for the Commission’s consideration. There was support for:

- The wetland mitigation hierarchy concept.
- Scottie Creek as a wetland of special importance (WSI).

However, Government of Yukon also:

- Questioned identification of Upper Indian River wetland as a WSI.
- Did not support a region-wide wetland avoidance threshold. Avoidance thresholds could apply in some LMUs (11,12, 19 & 21). Suggested thresholds of no development in bogs and 50% in fens. Other wetland types can be reclaimed and thus no thresholds are necessary.
- Suggested that baseline data should be as of 2022, and all wetlands to be avoided in SMAs

Tr’ondëk Hwëch’in provided the following for the Commission’s consideration:

- Identified Clear Creek, Indian River, Scottie Creek, and Flat Creek as wetlands to protect.
- Wetlands should be kept intact; they are critical areas for traditional use and economy.
- No more than 25% of fens should be disturbed. They are important for climate change mitigation, and they are irreplaceable.

### **Plan Partner and public feedback specific to Wetlands**

The following are some points that reflect the main concerns of the public and stakeholder feedback:

Protecting wetlands does not necessarily have to mean that development activities cannot occur, but it must be mitigated and, in some cases, restricted.

*“We believe that maintaining wetland values can be done in a manner that still allows for responsible and ethical development activities to occur through implementing the mitigation hierarchy with a goal of no-net-loss of wetland values.” (Plan Partner Submission) (DUC)*

There were many who shared and promoted the work that is currently being undertaken by the mining industry in wetland restoration, and that water is also being adequately protected through other existing regulations such as the waterboard, DFO and YESAA. It was suggested that the real problem for industry is that there are inconsistent policies and expectations for wetland reclamation. There is a desire for clear guidance.

*“We believe the conversation on wetlands is actually: ‘is placer mining allowed to disturb wetlands or not?’” (Plan Partner Submission) (KPMA)*

*“Creation of wetland restoration policies outlining acceptable industry practices 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 for the restoration of wetland function and habitat.” (Survey Response) (716)*

In the letters received by Tr’ondëk Hwëch’in citizens it was expressed that water (and wetlands are life and should have increased protection. Disrupting wetlands releases CO<sup>2</sup> which will have implications for climate change. The coordinated letters stated that no more than 25% of fens should be disturbed and supported

protection of the Upper Indian River, and Scottie Creek wetlands. They are culturally and ecologically important places.

*“All wetland is important and we need to protect as much of it as possible in its intact state.” (Tr’ondëk Hwëch’in citizen form letter)*

The input was divided with regards to implementing a threshold for development in wetlands. Many felt that restricting industry in this way would have devastating effects on the placer mining industry, and not allowing mining in the Upper Indian River LMU would create conflict.

*“I dislike the approach to wetlands. It values conservation over industry (when it is only in areas that placer mining occurs that this approach would be used) is too complex and is too strict to see industry succeed in the future. The current approach will seriously harm industry and will create massive negative cumulative effects on the community as a result: businesses shut down, less workers, less infrastructure into existing businesses as people and money leave the area.” (Survey Response) (699)*

On the other hand, there was a lot of support for some restriction of development in wetlands, albeit recognizing that it is socio-culturally and ecologically complicated.

*“Retain the commitment to no development in bogs and marshes in all LMUs and fens in select LMUs”. (Plan Partner Submission) (DUC)*

*“I recognize we need to balance our hopes but the value of carbon sink like a fen cannot be overstated in the midst of our current climate crisis.” (Survey Response) (701)*

As was demonstrated at the community meetings and workshops there were generally two predominant responses to the wetland issue that were *values-based*:

1. The ecological and socio-cultural value of an intact wetland:
  - a. To mitigate climate change (CO2 release and habitat resilience).
  - b. Unknown impacts to ecosystems and permafrost that sustain damage.
  - c. Intrinsic value of wetlands and traditional use and economy.
2. The socio-economic value of the gold found in wetlands.
  - a. Industry supports the community and the Yukon (employment, family).
  - b. Cultural elements and history of industry.

Where these two opposing views often came together was on the topic of reclamation. There is a strong desire from industry to do good reclamation and there were many examples shared from other jurisdictions that have effective

systems in place (for example Alaska). There was a general acknowledgement that the wetland may not be able to be restored to its original form and function, but what replaces it still has value for human use and ecological function. Although there is a strong desire to see wetlands protected, in cases where this is not possible, everyone wants to see good, values-based reclamation take place.

### **Land Stewardship Trust**

Overall, there was broad support for the Land Stewardship Trust concept. We heard from a lot from people who already consider themselves stewards, and how much they appreciate and value the Dawson region.

*“I think the Trust sounds great, I like the idea of outing for children/youth and providing educational/research opportunities. Funds helping encourage/support industry stewardship is great because taking care of the land and the earth is most important of all. If you're going to use the land to make 'money' reclamation is important, without the earth there would be no need to make money because we wouldn't exist.” (Survey Response) (718)*

*“Great idea, it would be great to be able to have a stewardship fund that allows more people to get out onto the land. As well as it would be great to clean up some of the legacy sites with this fund, that being said I believe that if the placer miners are given time to continue mining more and more of these sites will be cleaned up by them, even if we were not the ones to create them.” (Survey Response) (698)*

## **GENERAL FEEDBACK: ADDITIONAL TOPICS**

### **Stewardship**

The Commission introduced the concept of stewardship to show the importance of everyone's responsibility to the land. The intention in the Draft Plan was to create a sense of community stewardship where all users of the land have shared responsibility to the land. It was an effort to change the conversation to acknowledge that land planning is about our 'relationship' with the land, and that the relationship is reciprocal.

The feedback we received suggested that many in the region consider themselves stewards of the land and they support the Commission's approach. Something we frequently heard is stewardship approaches can vary depending on experience and perspective.

Importantly, the feedback that was received by Tr'ondëk Hwëch'in highlighted that a clear distinction was needed to differentiate between stewardship as it is lived and

practiced as an ancestral responsibility by Tr'ondëk Hwëch'in and the concept of community stewardship that applies to everyone more broadly.

Here is some of what we heard about Stewardship in the Draft Plan:

*"The land insures our survival. You have to look after the land, you have to look after the animals. The land is our heritage: because we use it, because it is everything, everything comes from the land. Keep your land clean, keep your animals, they are your friends. You look after them, they look after you. You look after your water, land, trees, you look after the land, you respect it. That's our spirituality." (NND Response)*

*"...I connect to the land with the idea of a land use plan in the sense that the land gives myself and family the ability to make a living. Year after year which is sustainable. Having a vibrant community requires people to make a decent living so they can support the community. I take care of the land by not polluting and respecting the wildlife also using the land. Responsible placer mining is simply a land use that allows for one to make a honest living in order to support his family and community." (147:69 – Survey)*

*"Placer miners, by and large, believe we are already stewards of the land. ...We are eager to work at stronger demonstrations of placer mining stewardship, but concrete language around what that means for our industry (i.e. what reclamation standards are acceptable) is necessary for widespread adoption." (Plan Partner Submission) (KPMA)*

*"As co stewards of this land, we must respect and allow Tr'ondëk Hwëch'in leaders and elders to take us on a necessary path of truth, reconciliation, land reclamation, environmental restoration, and healing together. We are late to this, and the time to make things right is now." (Public Submission) (036)*

### **Water and waterways**

There was a sense from the public and Parties that there was not enough emphasis on the importance of water and rivers in the Draft Plan.

*"I do not think that the Draft Plan ensures effective protection of our waterways. (Letter Submission) (049).*

*"The river is busier than ever and unsustainable tourism is as much an issue as mining" (Survey Response) (603)*

*"River corridors don't appear to have any particular protection." (Survey Response) (605)*

### **Sustainable Development and Balance**

Sustainable development as defined in Chapter 1 of the Tr'ondëk Hwëch'in Final Agreement is defined as 'Beneficial socio-economic change that does not

undermine the ecological and social systems upon which communities and societies are dependent’.

*“Typically, ‘balance’ is achieved at the expense of ecological conservation and socio-cultural preservation. This idea is at the heart of the now discredited ‘three -legged stool’ of planning, where the three legs are environment, society and economy.” (Plan Partner Submission) (YCS)*

*“We suggest removing references to ‘balance’ in the plan, and instead ensuring the plan reflects sustainable development or, if that is not the case, being clear where economic development has been prioritized at the risk of undermining ecological and social systems.” (Plan Partner Submission) (CPAWS)*

### **Climate Change**

Overall, the Parties, and many members of the public felt that the Draft Plan needed to integrate the concept of climate change into the Plan more.

*“Addressing climate change is an opportunity to help readdress some of the societal and governance issues we face in the north. The Plan doesn’t emphasize enough the disproportionate impacts of climate change in the north; nor adequately records that the effects on governments and residents are multiplied by the inherent vulnerabilities, and logistics of isolation, of living in the north.” (Public Submission) (057)*

### **Mineral Development**

Mineral development, understandably, attracted a lot of feedback in the Draft Plan. There was a lot of concern that the Draft Plan would not only impact the mineral industry economically, but culturally as well. Mining has been part of the Dawson region’s history for over 100 years, and the way of life and culture that has developed is important to many residents and families in the Dawson Region.

Tr’ondëk Hwëch’in emphasized the need to truly assess the limits of what the land can sustain:

*“In order to determine where acceptable limits of Sustainable Development lie, an analysis is required on the economic benefits, costs, and impacts on broader values such as government finances, the environment, social and community values, and Indigenous Values ... The Commission must consider not just the value of materials produced by mining, but the full range of costs and benefits, including ecological, social, and community costs, as well as who benefits and who shoulders the costs.”*

Government of Yukon highlighted the importance of critical minerals and access:

*“Critical Minerals are a major concern for the Government of Yukon as they provide much needed resources as we shift to a renewable energy economy, supported in the Government of Yukon’s ‘Our Clean Future’. Government of Yukon has supported national strategies and agreements in order to insure that these minerals that can assist in the clean energy industry are viable. These known mineral deposits would need access in order to be successful.”*

We heard a lot about how important mineral development is to the region’s economy, and to the territory. There was concern that the Draft Plan could reduce certainty and make it more difficult for Industry to continue.

*“It is important that the Commission consider and analyze the serious implications on the exploration and mining industry if some of the proposed conditions, restrictions and thresholds in the Dawson Regional Draft Plan are implemented...If the incentive and ability to prospect and open mines down the road becomes uncertain then the effect on the personal lives of families and the economy would be great.” (Plan Partner) (YPA)*

*“Ninety percent (90%) of placer mines are family owned and operated. The amount of documentation that is already provided from one family business is immense. License and permit applications and reports are only the start, and even with these submissions – what happens with the information? ...Nothing seems to be done with endless information gathering.” (Plan Partner) (KPMA)*

*“Sustaining a healthy mineral industry is key for the economic security of the Planning Region as its 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.” (Survey Response) (716)*

*“The mineral industry is the largest single non-government economic driver in the region, a complete freeze during Plan approval and implementation would have serious economic consequences. Responsible continued economic development should be able to continue during this time.” (Plan Partner) (TruePoint Exploration)*

*“I care about mining and want it to be effective. Placer mining a creekbed over tens of square kilometers and for the sake of removing a few hundred thousand ounces is incredibly ineffective. In comparison the Victoria gold mine is set to produce 200,000*

*ounces of gold per year of a much smaller footprint. Focus on what is an effective use of land resources in mining and metals." (Survey Response) (649)*

We also heard a lot about how the Draft Plan does not do enough to protect land from future development, and whether mining can be considered a sustainable activity:

*"Can a mine that permanently alters the landscape by changing wetlands into uplands and ponds really not be undermining ecological systems? There are economic activities from which the land cannot recover, at least not in any meaningful timescale. This concern might result from the omission of the term 'sustainable' from the bullet on economic activities. A more complete sentence would go on to acknowledge that not all economic activities are sustainable." (Plan Partner) (YCS)*

*"Accessing the gold most often requires removal of vegetation, re-routing of drainages, and exposure of large amounts of over-burden. When the vegetative cover is complex wetlands (such as fens) or old forest stands, the original ecosystem cannot recover (with or without human action) within a period of time allowing for cultural continuity. Similarly, changes to water flow regime and quality are irrecoverable because they spread downstream and are progressive through time as different placer operations take place." (Plan Partner) (WCS)*

*"It's problematic that mining claims get to pre-empt land use planning decisions (e.g. if you've staked a claim you are allowed to disturb a land that otherwise would be protected). Most of this problem falls at the feet of YG, but the Commission should do what it feels is best for the land, and not let fears over mining claims water down stewardship and sustainability." (Survey Response) (677)*

*"Be bold and make hard decisions honoring the UFA and TH's Final agreements, but also to choose protection over mining. Industry will adapt with whatever circumstances are thrown at them as that is what people and the economy does - they adapt. But wildlife and the environment are too sacred and fragile when asked to share with widespread disturbances." (Survey Response) (687)*

## **Key Species**

### *Caribou*

Caribou are a culturally and ecologically important species in the region, and many respondents felt the Recommended Plan should do more to protect caribou.

*"I Fear that we will look back and wonder why we chose the short-term benefits of a mine over a caribou herd." (Public Submission)*

*“There needs to be a large amount of land protected for these animals to have a good fighting chance at survival. I do not think placer mining is all negative, I do agree that it is important to our economy. That said, we do not need to be disturbing and destroying any more wetlands, river corridors, caribou habitat and important ecosystems than we already have.” (Public Submission)*

Here is some of feedback received about caribou:

- Linear density in the Draft Plan is too high to sustain caribou populations.
- The Clear Creek herd needs to be better protected.
- The problem with the caribou does not stem from mining activity but hunting.

### *Moose*

*“The harvesting of moose in our traditional areas allows for members to connect to their families and traditional ways.” (WRFN Submission)*

Here is some of feedback received about moose:

- Suggested more use of traditional land management practices, such as trapping wolves to help moose populations.
- Seasonal road closures are a problem for industry.
- Limiting industry or halting activity during rutting periods is a serious limitation for mining operators.
- Increased industrial activities is causing moose to become contaminated and not suitable for harvest.
- Moose like reclaimed areas – placer mines make moose habitat.
- Industry trails and roads provide access for harvest.

## *Salmon*

*"We miss the king salmon"*

Here is some of the feedback we received about salmon:

- Salmon are culturally and ecologically a very important species in the region
- The waterways need to be protected to promote healthy salmon habitat to encourage the return of healthy salmon populations to the region.
- Generally, the public were supportive of the Draft Plan's proposals for salmon but some did not believe that the Draft Plan goes far enough to protect them.

## *Grizzly and Black Bears*

*"Road density is an important metric to consider in the conservation and management of grizzly bears...road densities greater than 0.6km/km<sup>2</sup> are associated with decreased grizzly bear densities." (Plan Partner Submission) (CPAWS)*

Largescale connectivity is extremely important for bears, and large areas must be protected for them.

## **Sustainable Economy**

### *Agriculture*

*"We need to consider food security moving forward into the future...We need to focus on a new system of agriculture that works with the land and not against it." (Plan Partner) (Conservation Klondike)*

*"The KPMA supports mineral and agricultural industries being encouraged to collaborate on projects, and that directions have been given through the Draft Plan to support this dual land use." (Plan Partner) (KPMA)*

*"I fully support the encouragement of a sustainable local agriculture industry and the objectives the commission has drafted. I would add that sustainable agriculture has the potential to be an active agent in reclaiming previously impacted areas, therefore the lands identified as potentially useful for agriculture can be greatly expanded (without impacting wilderness areas)." (Public Submission) (043)*

Here is some of the feedback received about agriculture:

- Food security is very important, particularly in relation to climate change and access to new agricultural land.

- The potential impact agriculture could have on other values (such as salmon habitat and ecological integrity) should be considered before new dispositions are allocated.
- Lots of support for more land multi-use, such as with placer mining.
- Some concern about how agricultural activity will be monitored to ensure environmental standards are upheld.

### *Tourism*

*“Who in their right mind is going to travel here to look at a wasteland? People, for the most part travel up here, mining is part of it, but it's not all of it. People come here to enjoy the nature, the culture, our clean water, and the environment that we have intact. And there's a value to that.” (Public Submission) (240)*

*“The river is busier than ever and unsustainable tourism is as much an issue as mining.” (Survey Response) (701)*

*“I am happy that some areas should remain open to developments like mining and tourism, but the health of the ecosystems needs to be prioritized where these activities take place too.” (Public Submission) (052)*

*“Trail systems help people, local and visitors, experience and learn about the land who might not otherwise.” (Survey Response) (663)*

Here is some of the feedback received about tourism:

- Economic importance of tourism was emphasized and should be promoted. New infrastructure will also be needed as part of this.
- Tourism will be an important part of achieving the Plan's sustainable development goals. Tourism needs to be promoted in a sustainable way.
- Concerns about the region's wilderness character and ensuring the environment is looked after and tourists are respectful.

### **LAND DESIGNATION SYSTEM**

The Draft Plan had two types of designation, SMA and ISA, which were then subdivided according to an LMU's specific values, priorities and permitted level of development. Each LMU received a significant amount of feedback, and a detailed summary of what we heard can be found in [Appendix 4](#) (page 57). The Commission and staff anticipated that the land designation system would receive a lot of attention, and it is where we found perspectives most polarised.

The feedback for each LMU was used throughout the development of the Recommended Plan. Staff provided summaries in options papers that the

Commission were able to review and consider as they made decisions through consensus about designations, special management directions and key values to highlight in their intent statements.

## IMPLEMENTATION

How the Plan will be used and implemented was something we heard concern about frequently during public engagement. A lot of feedback indicated a need for more clarity and direction, including processes for monitoring, adaptive management and measuring plan success. The use of traditional knowledge to inform implementation was shared and will be very important for adaptive management and climate change. We also heard that people wanted to continue being involved and how important it is to have collaboration with the Parties and with each other.

*“...we encourage the Commission to make explicit the joint implementation of the Plan through collaborative decision-making processes and the shared management of public lands and resources.” (Tr’ondëk Hwëch’in Draft Plan Response)*

*“It is recommended that the Draft Plan identify a single committee comprised of Parties’ representatives, similar to the North Yukon and Peel Regional Land Use Plan implementation committees. This would provide coordination and common oversight for effective implementation. If the implementation committee determines additional committees or working groups are needed, they can be established as appropriate.” (Government of Yukon Draft Plan Response)*

*“It should be noted that revision of the Plan periodically and in light of new information is not synonymous with adaptive management. Adaptive management frameworks, including critical targets, metrics, and monitoring, must still be initiated through Plan recommendations. Periodic review of the Plan must evaluate the efficacy of adaptive management implementation in light of the most recent data and information.” (First Nation of Na-Cho Nyäk Dun Draft Plan Response)*

*“Without an ongoing planning commission, no one government department or management body has the role of “plan champion” during implementation. Maintaining momentum, engagement, and understanding of plan implementation can be challenging.” (Vuntut Gwitchin Government Draft Plan Response)*

*“We support the concept of adaptive management, however we caution the Commission that it can lead to endless feedback loops in the bureaucratic systems. Governments are already working at capacity, and should the Commission choose to recommend*

*significant adaptive management structures, we strongly advise these recommendations include clear ways for existing roles within the large government body to do this work. We do not need an additional department to govern the same few people trying to make a living.” (Plan Partner) (KPMA)*

*“Implementation needs to involve industry and community transparency to be successful. Industry has proven through the robust environmental review process (YESAB) that development can coexist with environmental and socio-economic values being respected. As clearly demonstrated by Yukon companies, pro-active partnerships and engagement with First Nations and communities, the use of innovative technologies to mitigate potential effects of exploration, mineral development and mine production show the mining industry’s preparedness to take on, with partners, positive environmental land stewardship.” (Plan Partner) (YCM)*

## **NEXT STEPS**

### **RECOMMENDED PLAN RELEASE**

The Recommended Plan will be released by the Parties later in 2022 once they have agreed how and when public consultation will be undertaken. Chapter 11 of the First Nation Final Agreements provides direction as to how the Parties shall proceed following the submission of a Recommended Plan by a Planning Commission.

## APPENDIX 1: TIMELINE

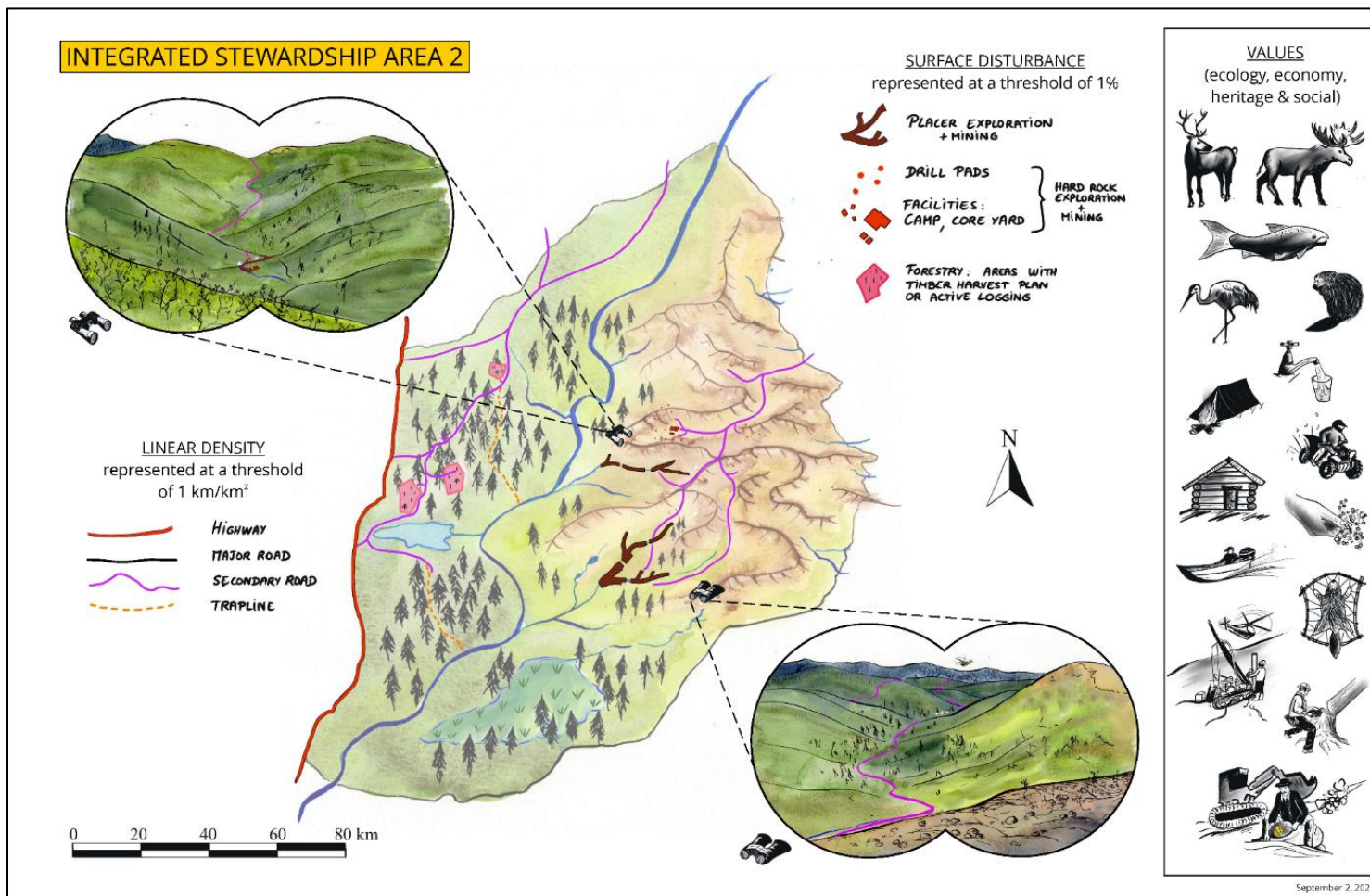
<b>Community Conversation</b>
<b>Tour</b>
<b>Meeting</b>
<b>Technical Workshop</b>
<b>Community Workshop</b>
<b>Online Workshop</b>

<b>Event</b>	<b>Date</b>
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

<b>Event</b>	<b>Date</b>
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

<b>Event</b>	<b>Date</b>
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](http://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](http://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.)

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#### 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...**

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

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

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**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...**

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**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**

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**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?**

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

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**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**

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**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.**

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## 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.**

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**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'*

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**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]

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**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?**

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

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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**

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**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?**

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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.**

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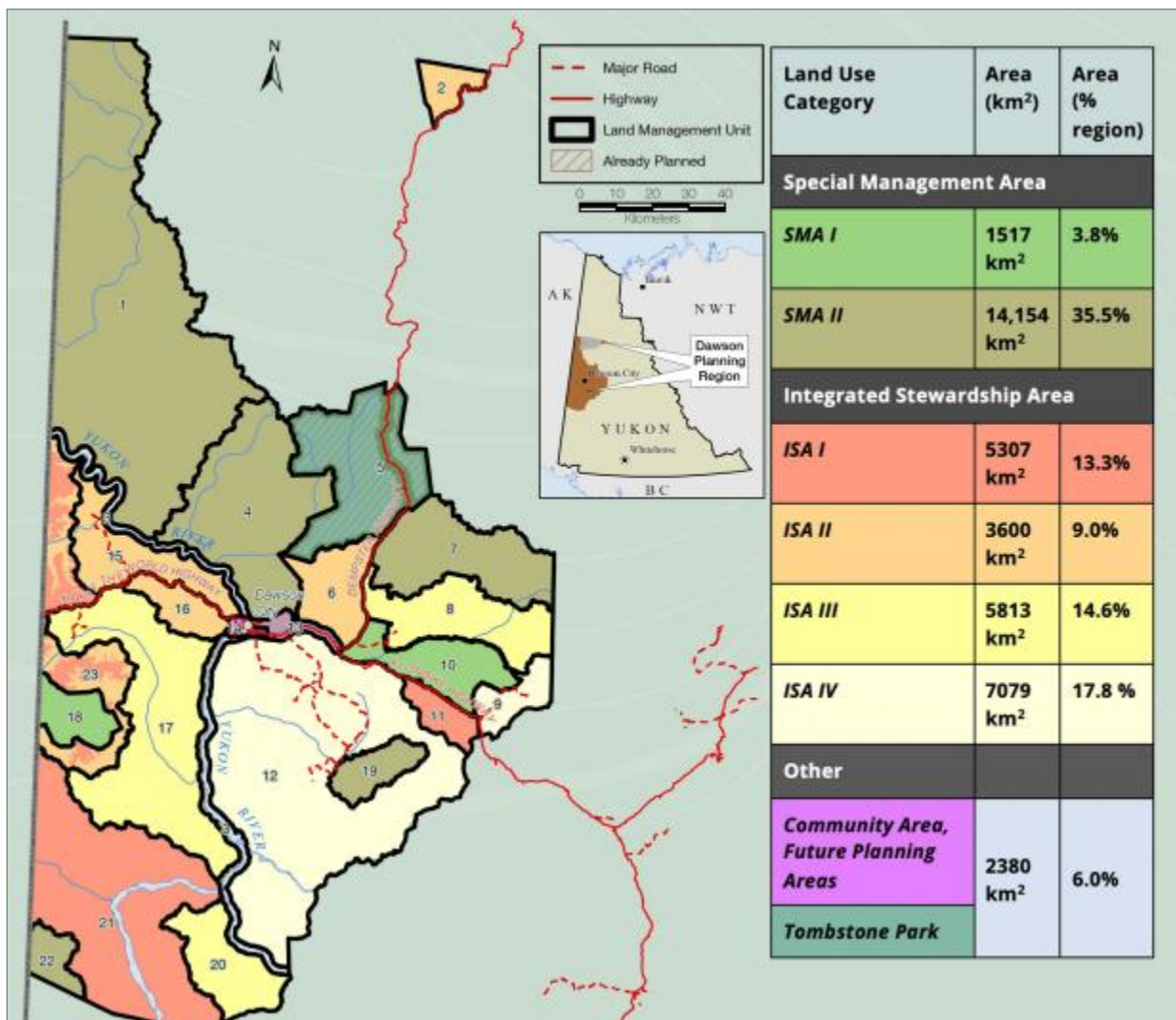
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### INTRO: LAND DESIGNATION SYSTEM

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

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**CONTACT INFORMATION:**

If you would like be on our e-mail list for upcoming workshops and other engagement opportunities, please email [dawson@planyukon.ca](mailto: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](http://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**

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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 CO<sub>2</sub> 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**

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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**

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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'ondĕk Hwĕch'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**

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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.