

Environment and Climate Change Canada
Canadian Wildlife Service
91782 Alaska Highway, Whitehorse, Yukon



November 1, 2021

Debbie Nagano, Chair
Dawson Regional Planning Commission
Suite 201, 307 Jarvis St., Whitehorse, Yukon

Delivered By Email

RE: 2021 Draft Dawson Regional Land Use Plan

Dear Ms. Nagano,

Environment and Climate Change Canada's Canadian Wildlife Service (ECCC-CWS) would like to congratulate the Dawson Regional Planning Commission on the release of the 2021 draft Dawson Regional Land Use Plan (draft Plan). This is a significant step in the land use planning process and ECCC-CWS would like to acknowledge the Commission's hard work and collaboration efforts that have gone into developing the draft Plan.

As identified in previous submissions, ECCC-CWS is responsible for the conservation and protection of migratory birds as populations and individuals, and their nests in Canada under the *Migratory Birds Convention Act (MBCA)* and its regulations; for the protection of species at risk under the federal *Species at Risk Act (SARA)*; and for ensuring that Canada's commitments are met under the international Convention on Biological Diversity. Our comments and recommendations are provided within the context of these responsibilities.

ECCC-CWS provided input to the Dawson regional planning process on conservation values of importance and conservation priorities in its submission dated September 25, 2020. 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.

Our feedback on the draft Plan is broken into two sections: 1) the conservation priorities identified in our September 25, 2020 submission with discussion specific to the draft Plan; and 2) Recommendations, Suggestions and Questions by Section of the draft Plan. Appendices have been included to provide additional detail, context and background.

1) Conservation Priorities identified in ECCC-CWS September 2020 submission:

A. High elevation habitat (i.e. >1,000 m) utilized by migratory bird specialist species.

High elevation habitat has been considered among the Ecological Values for several of the conservation based LMUs, in particular those in the northern part of the planning region and designated as Special Management Areas. We have some suggested edits to the wording for these Values – discussed further in the Recommendations, Suggestions and Questions table in Appendix B.



B. Conservation of the Scottie Creek wetland complex to protect valuable waterfowl staging and nesting habitat.

As discussed in previous submissions, surveys of the Scottie Creek wetland complex area have shown that it is utilized by waterfowl for nesting and staging. Additionally it is identified as a Waterfowl Key Wildlife Area in Yukon Government's Key Wildlife Area spatial dataset. As discussed in the draft Plan, wetland complexes of this type are limited in the planning region. ECCC-CWS is supportive of the designation of this LMU as a Special Management Area II and the Commission's Recommendation to have the Parties create a Habitat Protection Area for LMU 22: Scottie Creek Wetlands.

C. Integrate management strategies/direction in the land use plan to provide advice or direction on project planning through the Tintina Trench to avoid or mitigate land use activities that disturb migratory birds during sensitive migratory periods (spring and fall).

Much of the Tintina Trench feature has been encompassed by LMUs with Special Management Area designations with the exception of LMU 11: Flat Creek Wetlands, designated as Integrated Stewardship Area I. LMU 11 is almost entirely within the Tintina Trench feature and includes Key Waterfowl Areas identified by the Commission (see table in Appendix B for a Question pertaining to the Key Waterfowl Area designation). However, while the designation for this LMU allows for development, it is the lowest development category and the objectives include work to identify and protect key wetland areas while allowing for continued growth of fuelwood activities. Other development activities, such as mineral development, appear to have limited prospects within this LMU.

ECCC-CWS acknowledges that the General Management Direction Section in the draft Plan includes Recommended Management Practices for Migratory Birds in key areas and during key periods with reference to the Tintina Trench and high elevation habitats.

D. Integrate management strategies/direction in the land use plan to ensure that land use activities avoid potentially destructive or disruptive activities at key locations and/or during key periods to avoid detrimental effects to migratory birds.

ECCC-CWS acknowledges that the General Management Direction in the draft Plan includes Recommended Management Practices for Migratory Birds in key areas and during key periods with reference to the Tintina Trench and high elevation habitats. We have some recommended edits to the wording of this section – discussed further in the Recommendations, Suggestions and Questions table in Appendix B.

E. Integrate management strategies/direction in the land use plan to avoid activity that may cause disturbance or destruction of Bank Swallow nesting during the general nesting period (early May to late August in Yukon).

ECCC-CWS acknowledges that the General Management Direction in the draft Plan includes Recommended Management Practices for ‘Species at Risk and Rare Endemic Species’ including one for Bank Swallow residences. We have some recommended edits to the wording of this section – discussed further in the following Section 2 and in the Recommendations, Suggestions and Questions table in Appendix B.

F. Consider protection for stream reaches that host Spiked Saxifrage (listed as Special Concern on Schedule 1 of SARA).

Known locations of Spiked Saxifrage populations in the planning region fall within LMU 3: Yukon River-Chu kon dëk, which is designated as a Special Management Area II – Future Planning Area. Some populations are within existing active mineral claims. Special Management Direction for LMU 3 proposes that sub-regional planning occur within a stated timeline to be provided in the Recommended Plan; and that there be an interim withdrawal of lands from staking and industrial use until the completion and approval of a sub-regional plan while allowing for continued activity on existing mineral tenure. If the Parties agree to these directions, conservation of known populations of Spiked Saxifrage that are not within existing mineral claims can be further considered during the sub-regional planning processes.

G. Consider protection for areas where Yukon Podistera occurs (listed as Special Concern on Schedule 1 of SARA).

Some of the known locations of Yukon Podistera in the planning region fall within LMUs that have been designated for conservation purposes. In particular LMU 1: North-Tthetäwndëk, designated as a SMA II, encompasses several high elevation areas north of the Yukon River and LMU 3: Yukon River-Chu kon dëk, designated as SMA II – Future Planning Area includes areas where Yukon Podistera is known to occur. The SMA II designation allows for limited activity on existing active mineral tenure and recommends withdrawal of all other lands from staking and industrial use. If the Parties agree to these directions, conservation of known populations of Yukon Podistera that are not within existing mineral claims can occur. Conservation of known populations of Yukon Podistera in LMUs designated as Integrated Stewardship Areas will rely on the Environmental Assessment and Regulatory process.

H. Yukon South Beringia Priority Place (YSBPP) initiative:

As discussed in previous submissions, CWS is leading a core team of partners through a collaborative conservation action planning process for the Yukon South Beringia Priority Place. Guided by a distinct vision, “*Respect and uphold our sacred relationship with the natural world that maintains Yukon South Beringia’s unique bio-cultural diversity*”, the YSB partners are designing strategies (and projects) that are likely to result in benefits to several Species at Risk and species of interest.

Embarking on a hybrid conservation action planning process, in 2021 the partners advanced their work by identifying eleven bio-cultural values (conservation targets) and assessing the health of those values. The partners prioritised and rated pressures (threats), and are currently designing strategies to reduce pressures to achieve 12 goals for 3 priority values. Please refer to Appendix A for a detailed breakdown and background information.

Although the work is not yet complete, ECCC-CWS recommends that the Commission make space in its future deliberations to consider the outcomes from this multi-partnership initiative. ECCC-CWS is available to provide more information to the Commission on the status and potential contribution to the Dawson Land Use Plan process over the next several months as you consider the Recommended Plan.

I. Consider how conservation-type zones developed for the land use plan could count towards Canada's Conservation Targets of 25% of Canada's terrestrial areas and inland waters by 2025, either as protected areas or other effective area-based conservation measures (OECM).

As proposed the draft Plan provides for almost 40% of the planning region area with LMUs that have a conservation focus – Special Management Areas I and II. If the Parties agree to the proposed Special Management Directions for the SMA I and II areas, there is potential for counting areas of these LMUs, outside of existing (mineral) tenure, towards Canada's conservation targets with or without them having legal designation as a protected area. ECCC-CWS relies on Yukon Government to report additional hectares towards the conservation targets, and other land owners are able to nominate areas to be included in accounting. Yukon Government should be contacted for further information on the process of reporting hectares for the Yukon. ECCC-CWS is available to provide information on the general criteria and accounting of areas towards Canada's conservation targets.

2) Recommendations, Suggestions and Questions for the draft Plan

ECCC-CWS has conducted a review of the draft Plan and Appendix B contains a table outlining recommendations, suggested edits and questions, along with discussion and reasoning, by Section of the draft Plan. A summary of our recommendations follows (additional suggestions and questions can be found in the table in Appendix B):

A. Section 4 – General Management Direction, 4.2 Ecological Integrity and Conservation, 4.2.1 Key Species Habitat (pg 77, paragraph 2) – ECCC-CWS recommends amending the wording to read:

In the Yukon wildlife is regulated under Territorial and Federal legislation including the Yukon *Wildlife Act*, the *Migratory Birds Convention Act* and the federal *Species at Risk Act*.

Note: other Federal legislation may be applicable here but direction and wording on inclusion should come from the responsible federal government department e.g. Fisheries Act, Fisheries and Oceans Canada.

- B. Section 4 – General Management Direction, 4.2 Ecological Integrity and Conservation, 4.2.2 Other Fish and Wildlife Habitat, Species at Risk and Rare Endemic Species, Recommended Management Practices (pg 90, Practice a) – ECCC-CWS recommends the wording of Recommended Management Practice (a) be amended to read:

Avoid activity that may cause disturbance or destruction of Bank Swallow residences whenever the burrow is occupied, which is typically during the nesting period that may extend from early May to late August in the Yukon, where found along clay/silt banks in river corridors, sandy banks along roads, and stockpiles and mining pits.

As per information in our September 2020 submission, we would like to emphasize that we do not just recommend avoiding activity. The [residence of a Bank Swallow](#)¹ is defined under the *Species at Risk Act* as any occupied burrow. It is illegal to destroy the residence (occupied burrow) under Section 33 of *SARA*. Because this species is protected under the *Migratory Birds Convention Act*, residences are protected wherever they are found (on any land tenure, not just federal land). For clarity, the nests of Bank Swallows have always been protected under the *MBCA*, however the protections extending to the entire occupied burrow are additional under the above noted clause of *SARA*.

- C. ECCC-CWS recommends that the Commission make space in its future deliberations to consider the outcomes from the multi-partnership Yukon South Beringia Priority Place initiative.

Appendix A provides information on the work of the Yukon South Beringia Priority Place initiative.

ECCC-CWS appreciates the opportunity to provide input on the draft Dawson Land Use Plan and looks forward to continued involvement. If you have any questions on the submission please let me know. I can be reached by email at nathalie.lowry@ec.gc.ca (new email address) or by phone at (867) 335-6471.

Sincerely,

Nathalie Lowry
Canadian Wildlife Service

¹ [Bank Swallow \(*Riparia riparia*\) \(canada.ca\)](#)

Appendix A – Yukon South Beringia Priority Place

Embarking on a hybrid conservation action planning process, in 2021 the partners advanced their work by identifying eleven bio-cultural values (conservation targets) and assessing the health of those values. The partners prioritised and rated pressures (threats), and are currently designing strategies to reduce pressures to achieve 12 goals for 3 priority values.

11 Bio-cultural Values: Riparian Systems, Alpine (wet and dry), Wide-Ranging Mammals, Tintina Trench, Forests, Beringian Steppe: Bluffs and Dry Meadows, Dunes and Wetlands, Ancestral Stewardship Responsibility, Sustainable Economy and Cultural Sites

3 priority Values selected to focus work: Riparian Systems; Beringian Steppe: Bluffs and Dry Meadows; and Ancestral Stewardship Responsibility

Draft SMART Goals for 3 priority values

Riparian Systems Goals:

RG1: By 2040, the majority of riparian habitats in YSB have no substantive anthropogenic disturbances and riparian landscapes are connected and intact.

RG2: By 2040, Yukoners are able to rapidly and effectively identify and respond to anthropogenic/climate changed-induced threats to riparian systems in YSB.

RG3: By 2040, all riparian priority and endemic species, in YSB, found throughout their historical range, and abundance is stable to increasing.

RG4: By 2040, many First Nation citizens, (with overlapping territory) in YSB are using riparian systems for traditional practices and active hunters and harvesters are meeting their needs.

Beringian Steppe: Bluffs and Dry Meadows Goals:

BG1: By 2040, in YSB, Beringian Steppe meadow patches are intact and only have minor shrub/tree encroachment, and endemic species are sometimes seen among patches and occasionally abundant.

BG2: By 2040, in YSB, Beringian Steppe meadow patches found throughout their historical range, and their abundance and size is stable to increasing.

BG3: By 2040, many First Nation citizens, (with overlapping territory) in YSB are using Beringian Steppe Meadows for traditional practices and active hunters and harvesters are meeting their needs.

BG4: By 2040, the majority of the cultural sites in YSB will be documented and accessible and stories (related to these cultural sites) are shared.

Ancestral Stewardship Responsibility Goals:

ASRG1: By 2040, many First Nation citizens, (with overlapping territory) in YSB are thriving by practicing their ancestral ways (traditional/cultural practices) and active hunters and harvesters are meeting their needs.

ASRG2: By 2040, YSB is managed holistically with biocultural conservation in partnership with First Nations (with overlapping territory in YSB).

ASRG3: By 2040, many First Nations (with overlapping territory) in YSB are implementing their land stewardship plans and Species At Risk plans.

ASRG4: By 2040, many First Nation citizens, in YSB are land/ cultural stewards and many on the land training opportunities exist for all First Nations citizens.

CONTEXT

- Priority places seek to conserve Canada’s biodiversity by advancing conservation action (protection, recovery and prevention) through multi-species and ecosystem-based approaches that:
 - Enable collaboration and shared responsibility with partners and stakeholders for conserving nature
 - Target resources and funding to on-the-ground action for species and their habitat
 - Utilize a ‘stewardship first’ approach
 - Apply adaptive management to effectively plan, implement and monitor action
- Priority places were identified by federal, provincial, and territorial (FPT) governments using defined criteria, including species, critical threats and partnership opportunities
- Priority place initiatives began through FPT governments and rapidly expanded to include collaboration with Indigenous peoples and stakeholders
- Priority places use participatory planning tools such as the Open Standards for the Practice of Conservation and other decision support tools as the basis of partnerships for conservation action (Healthy Country Planning)
- Action in priority places will be enabled by contributions under the Canada Nature Fund and match funding from partners

Funding

To date, ECCC-CWS allocated approximately \$1.3 M to support YSBPPI related projects under the Canada Nature Fund and will be able to support the implementation of conservation action identified in the integrated conservation action plan through Enhanced Nature Legacy funding (approximately \$3 M, for the next 5 years).

Projects

The focus of funding proposals for 2020/21 are enabling the development of the integrated conservation action plan. A second grouping of projects are meant to fill data gaps, improve our understanding of Endemic and Beringian Species (Species at Risk) and contribute information to the land use planning processes. Conducting inventories and modeling potential impacts are also positive steps towards the creation of an informed integrated conservation action plan, while decision-support processes may be useful for understanding habitat shifts for Species at Risk.

Project Title/ Description	Proposed project outcomes
Priority Places endemic meadow mapping	Creating more accurate maps to understand the distribution of this important habitat known as Beringian meadows - for South Beringian specialist, endemic species to inform conservation planning and mitigate threats
Trondek Hwech'in Participation and Engagement in PPI	Increasing understanding of TH world view, stewardship values, traditional land management concepts, guiding principles, citizen engagement, increased public awareness and understanding of TK, planning approach and research designs
Nacho Nyak Dun Participation and Engagement in PPI	Sharing and incorporating TK into the project, engaging NND citizens and increasing awareness of SAR
Addressing cumulative effects of development and climate change in the Yukon to inform effective land use planning	Baseline bird monitoring and inventory data; understanding of at-risk bird populations; recommendations for habitat conservation and/or special management areas
A decision-support process for projecting climate change and its impacts on habitat supply for species at risk	Understanding of how climate change is going to impact ecosystems and focal species; A climate adaptation plan that can be implemented through regional land use plans; a web based portal for users to use as a decision-support tool
Yukon Bioblitz	Improving our understanding of species diversity through collecting data on SAR and endemics, mobilizing citizen science, informing COSEWIC and management plans
Species at Risk Conservation in the Yukon	using data gathered from camera traps to inform understanding of SAR, informing EA process and guidance for LUP
Restoration Playbook	Habitat restoration monitoring and tools for pilot conservation credit facility
Characterizing and mapping of climate-change refugia and enduring features, and co-development of a monitoring framework, to enhance habitat protection and stewardship for priority	<p>Assessment of current potential areas</p> <p>Maps of refugia and enduring landscape features overlay with SAR and species of interest</p> <p>Future opportunities for protection and stewardship</p>

species and ecosystems in YSB	
Amendment - Addressing cumulative effects of development and climate change in the Yukon to inform effective land use planning	Publication and dissemination of results Sharing results with working group partners
Carnivore species conservation in the Klondike Plateau ecoregion	Population Density for Grizzly Bears and Black Bears Pilot to determine Wolverine Density Data could contribute to conservation planning for these species (future mgmt. decisions - regulation, and mitigation)
The intersection of Indigenous Knowledge and Western Science for Species at Risk and Endemics	Co-development of communications protocols Interviewing elders and youth Producing maps and biocultural indicators to contribute to conservation planning exercises with Indigenous knowledge at the forefront
Design and Implementation of a Communication Strategy	Collaborative effort of the YSB working group partners to create awareness of SAR and YSB PPI through education and outreach

Scope and Map: Yukon South Beringia Priority Place

Yukon South Beringia was selected as a Priority Place for species at risk conservation due to its geologic and glacial history that resulted in the region being a home to a variety of unique and endemic species, some of which are rare or at risk.

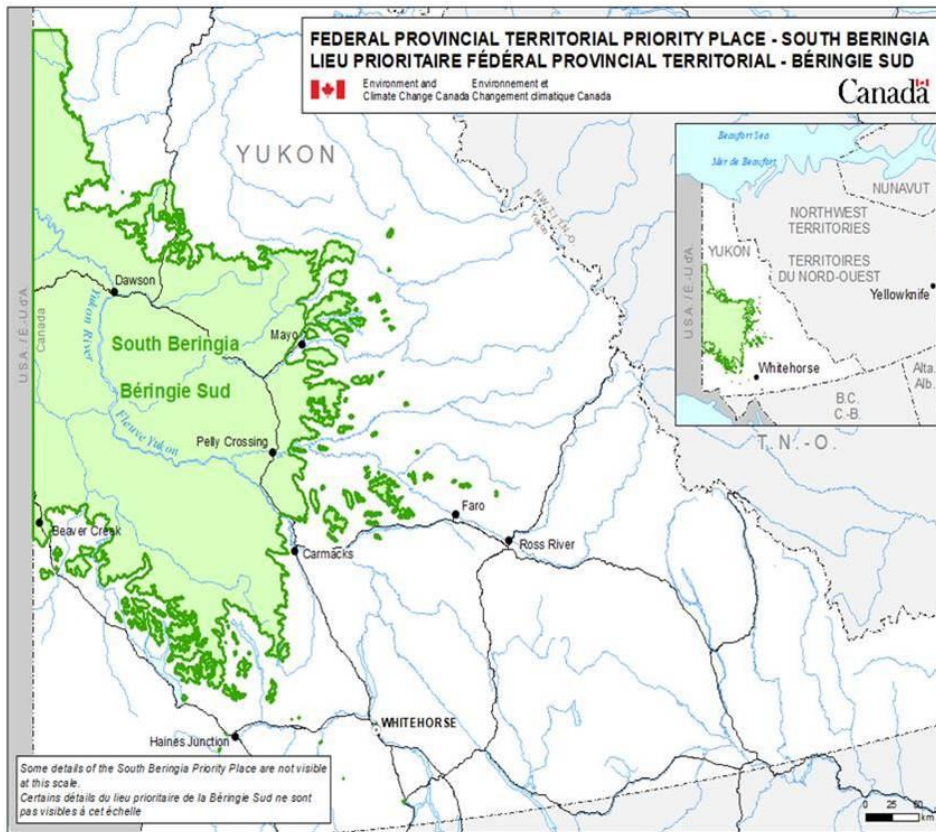
“Yukon South Beringia” is defined as the southern portion of Beringia in Yukon—an area that remained ice-free during past glacial (cold) periods—and south of the North Yukon land use planning region. Yukon South Beringia also encompasses small isolated lowland grasslands, salt flats, and dune ecosystems found south of the glacial limit, which now contain remnant populations of endemic Beringian species. In all, Yukon South Beringia is approximately 89,000 km², stretching from the Ogilvie Mountains in the north, south to Dezadeash Lake and Carcross (see map).

The region overlaps the traditional territories of 11 Yukon First Nations: Vuntut Gwitchin First Nation, Tr’ondëk Hwëch’in, the First Nation of Na-Cho Nyäk Dun, Selkirk First Nation, Little Salmon/Carmacks First Nation, White River First Nation, Kluane First Nation, Champagne and Aishihik First Nations, , Kwanlin Dün

First Nation, the Ta'an Kwächa'an Council, and Carcross/Tagish First Nation. All but one have modern land claim agreements, and many have Settlement Lands identified in the region.

Yukon South Beringia also overlaps the majority of the Dawson Land Use Planning region, as well as portions of the Northern Tutchone, North Yukon, White River, Kluane and Whitehorse planning regions. Land use planning for North Yukon is complete, and land use planning for Dawson is currently underway.

The principal land uses occurring within Yukon South Beringia include mining (hard rock and placer), hunting and fishing, tourism, and agricultural. The region also overlaps with the communities of Dawson City, Stewart Crossing, Pelly Crossing, and to a lesser extent Whitehorse and Carcross.



Appendix B – Recommendations, Suggestions, Comments, Questions

Category	Draft Plan Section and Page #	Issue	Comments	Recommendation / Suggestion / Comment / Question
Recommendation	Section 4 – General Management Direction, 4.2 Ecological Integrity and Conservation, 4.2.1 Key Species Habitat pg 77	Wildlife is regulated under the <i>Yukon Wildlife Act</i> , or, depending on status, the federal <i>Species at Risk Act</i> .	Wildlife in the Yukon is regulated under different Territorial and Federal legislation. Migratory Birds are regulated under the <i>Migratory Birds Convention Act</i> and its regulations.	ECCC-CWS recommends amending the wording of this sentence to read: In the Yukon wildlife is regulated under Territorial and Federal legislation including the <i>Yukon Wildlife Act</i> , the <i>Migratory Birds Convention Act</i> and the federal <i>Species at Risk Act</i> . <i>Note: other Federal legislation may be applicable here but direction and wording on inclusion should come from the responsible federal government department e.g. Fisheries Act, Fisheries and Oceans Canada.</i>
Comment	Section 4 – General Management Direction, 4.2 Ecological Integrity and Conservation, 4.2.2 Other Fish and Wildlife Habitat,	Research Recommendation: The Parties should undertake research initiatives with the CWS...to build knowledge of the location of key staging and nesting areas...	ECCC-CWS works closely with YG-Environment on migratory birds, species at risk and of concern, and identification of their key habitat areas throughout the Yukon. The Yukon South Beringia Priority Place initiative work on development of the integrated conservation action plan, and the	ECCC-CWS is supportive of this Research Recommendation and the opportunity to continue working with YG, THFN and other partners to build knowledge for key species of concern/interest and their habitat in the planning region, and throughout the Yukon.

Category	Draft Plan Section and Page #	Issue	Comments	Recommendation / Suggestion / Comment / Question
	Migratory Birds and Raptors pg 89		projects identified to support it, are looking at ways to fill some of these knowledge gaps.	
Recommendation	Section 4 – General Management Direction, 4.2 Ecological Integrity and Conservation 4.2.2 Other Fish and Wildlife Habitat, Species at Risk and Rare Endemic Species pg 90	Recommended Management Practices: Avoid activity that may cause disturbance or destruction of Bank Swallow residences (occupied burrows) during the general nesting period (early May to late August) along clay/silt banks in river corridors	Further to information provided in our September 2020 submission, in addition to clay/silt banks in river corridors, Bank Swallows have been observed by biologists and miners, nesting in stockpiles and mining pits in the planning region. Management Practices should include a description of these areas as they are more likely to be subject to disruption from activity.	ECCC-CWS recommends the wording of the Recommended Management Practice pertaining to Bank Swallow be amended: <i>Avoid activity that may cause disturbance or destruction of Bank Swallow residences whenever the burrow is occupied, which is typically during the nesting period that may extend from early May to late August in the Yukon, where found along clay/silt banks in river corridors, sandy banks along roads, and stockpiles and mining pits.</i>
Suggestion	Section 5 – Land Management Units Starts pg 109	The layout of the Land Management Units includes a section on Ecological Values. Categories used to identify ecological values include Birds, Species at Risk, and Vegetation	1- The ECCC-CWS September 2020 submission suggested that the DPC “consider inclusion of areas with higher elevation (i.e. > 1,000 m) habitat for areas zoned as conservation in the planning	1- ECCC-CWS suggests that consistent wording be used in the Ecological Values pertaining to Birds where the Commission wishes to emphasize the

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		<p>and Unique Features, among others.</p> <p>1- Some of the wording used in these categories appears to be based on information provided in the September 2020 CWS submission (e.g. Birds – areas of high elevation) but has been altered slightly. The altered wording was not provided in the CWS submission and is used inconsistently between LMUs (e.g. habitat inconsistently described as “crucial” or “important” for migratory bird specialist species”; inconsistently describing the high elevation habitat for “specialist species” or “some migratory bird species”).</p> <p>2- Inclusion of the Species at Risk category and which species are identified in the Species at Risk category among the LMUs is inconsistent. In addition, wording in some LMU Species at Risk categories includes “...habitat for</p>	<p>region in order to protect migratory bird specialist species utilizing high elevation habitats.” ECCC-CWS did not distinguish between those high elevation areas throughout the planning region to those that were ‘crucial’, specific to ‘specialist species’ vs. ‘some’ migratory bird species. Until, and if, such information is available to allow for this differentiation ECCC-CWS suggests using consistent wording among the LMUs.</p> <p>2- Species at Risk are, by nature, not common and the wording “common species at risk” is misleading. Range and occurrence information is available for Species at Risk within the planning region from the Species at Risk Public Registry and the Yukon Conservation Data Centre. A more comprehensive and consistent description could be provided in this category. Alternatively, if the intent is to highlight certain Species at Risk,</p>	<p>inclusion of high elevation habitat:</p> <p><i>The LMU consists of/contains high elevation (>1,000 m) habitat types found in alpine and subalpine zones that may be utilized by migratory bird specialist species that would not necessarily be utilized at lower elevations.</i></p> <p>2- a) In order to increase awareness, ECCC-CWS suggests that the Species at Risk category capture all Species at Risk that may be found in an LMU based on range and occurrence information. This information is available on the Species at Risk Public Registry and from the Yukon Conservation Data Center. ECCC-CWS can also provide this information.</p> <p>ECCC-CWS supports the inclusion of Species at Risk as/in separate categories (e.g. Caribou, Yukon Podistera in the Vegetation and</p>

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		<p>common species at risk found in the region...”.</p> <p>3- Wording in some of the categories referring to how much of a particular habitat type is within the LMU can be awkward e.g. LMU 19 – Wetlands “Upper Indian River drainage majorly consists of swamp, fen and bog...”, LMU 7 – “Extensive inclusion of high elevation habitat...”.</p> <p>4- The Climate Change Mitigation category does not seem to be used consistently among LMUs.</p>	<p>which should be based on some type of criterial that is used consistently between LMUs, this could be included in the description, or by highlighting them in separate categories as appears to have been done with some of the LMUs.</p> <p>3- Spatial data is available for most of the habitat types being discussed. This information could be used to provide a more quantitative description (e.g. % or area) of how much is contained within an LMU. This description could be used to give a relative comparison to other LMUs in the planning region if the amount of a habitat type in a particular LMU is to be highlighted. Alternatively consistent descriptors could be used (e.g. low, moderate, high) to highlight the amount of a habitat type within/between LMUs.</p> <p>4- The Climate Change Mitigation category in regards to LMUs with wetland habitats as one of the</p>	<p>Unique Features category) in order to highlight its presence within a particular LMU.</p> <p>b) ECCC-CWS suggests that migratory bird Species at Risk, Bank Swallow and Common Nighthawk, be identified in the ISA LMUs to aid in heightening awareness for proponents of the presence of Species at Risk and where mitigation measures may need to be identified. For example occurrences of Common Nighthawk and Bank Swallow have been observed in LMU 12 and for Bank Swallow in LMU 14. ECCC-CWS can assist in identifying these for migratory bird species at risk.</p> <p>3- ECCC-CWS suggests utilizing spatial data information to provide a more quantitative description of habitat type being highlighted within LMUs.</p> <p>4- ECCC-CWS suggests consistent use of the Climate Change</p>

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			<p>highlighted features is not used consistently between LMUs (e.g. included in LMU 19 but not in LMU 22 where both have wetlands as a highlighted feature). Given the relatively low amount of wetland habitat in the planning region, including this category in those LMUs that contain higher proportions of wetlands/wetland complexes is useful to highlight.</p>	<p>Mitigation category among the LMUs.</p>
<p>Comment</p>	<p>Section 5 – Land Management Units, 5.22 – LMU 22: Scottie Creek Wetlands, Special Management Directions pg 169</p>	<p>Special Management Direction (4) – Parties should explore the option of establishing this area as a Habitat Protection Area (HPA).</p>	<p>As discussed in previous submissions, surveys of the Scottie Creek wetland complex area have shown that it is utilized by waterfowl for nesting and staging. The wetland complex is identified as a Waterfowl Key Wildlife Area in Yukon Governments Key Wildlife Area spatial dataset. As discussed in the draft Plan, wetland complexes of this type are limited in the planning region. The majority of the Scottie Creek wetland complex extends beyond</p>	<p>ECCC-CWS is supportive of the designation of this LMU as a Special Management Area II and of the Commissions recommendation to have the Parties create a Habitat Protection Area for LMU 22: Scottie Creek Wetlands.</p>

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			<p>the boundary of the Dawson Planning Region. Formal protection of this LMU would promote similar conservation consideration in further land use planning process in the adjacent planning region.</p>	
Question	Appendix A, Map 3, Selected Ecologically Important Areas	Waterfowl key area	<p>ECCC-CWS notes that “Key Waterfowl Area(s)” have been mapped/identified in LMU 11: Flat Creek and LMU 10: Upper Klondike; LMU 12: East; LMU 3: Yukon River Corridor, LMU 21: White. Many of these are not identified in the Yukon Wildlife Key Areas spatial dataset, nor have they been identified as key areas for waterfowl (e.g. Important Bird and Biodiversity Areas).</p> <p>ECCC-CWS is currently working on identifying Key Habitat Sites for Migratory Birds in the Yukon. The main criteria we are using, consistent with our identification of Marine and Terrestrial</p>	<p>Who designated these areas and what was the criteria used for the designation as a Key Waterfowl Area?</p> <p>ECCC-CWS is very interested in this information to support our identification of Key Habitat Sites for migratory birds in the Yukon.</p>

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			<p>Migratory Bird Key Habitat Sites in the NWT and Nunavut, is that the sites are believed to support at least 1% of a Canadian population and, where this is not met, the sites are of exceptional species diversity, both avian and other, typically surrounded by relatively barren areas.</p>	