



*"The primary instrument for Renewable Resource Management in the Tr'ondëk Hwëch'in Traditional Territory."*

Submitted via email  
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DRLUP Commission  
978 2nd Avenue  
Dawson City, Yukon

Dear Dawson Planning Commission,

Thank you for your dedication and commitment to developing the Draft Dawson Regional Land Use Plan (the Draft Plan). Since the release of the Draft Plan on June 15, 2021, our Councilors have been busy attending the various public consultation sessions offered by the Commission. We have listened to the many sentiments voiced by the public and stakeholder organizations and have met numerous times as a Council to prepare our response.

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.

Finding a middle ground for sustainable development requires significant effort and compromise from all involved. In the spirit of accommodation, we acknowledge and support the Commission's very important role in promoting collaboration within our region for all.

The DDRRC (the Council) has specific interests we would like to bring to the attention of the Commission as follows:

### **Access / Implementation**

A significant concern of the Council is the development of new access and the resulting cumulative effects on key species. The Draft Plan adequately identifies policy and research gaps required to mitigate the negative effects of access. However, we are concerned that without the resources required to implement the plan, policy and research alone cannot ensure access is regulated at sustainable levels. The Council would like to see more focus in the Draft Plan on identifying implementation gaps related to regulating access, this could be accomplished by



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identifying recommended research to determine what tools and resources may be required to successfully implement the Plan once finalized.

The Council would also like to see a mechanism developed to monitor and assess the implementation process. We certainly do not want to see many years pass between the finalization of the plan and implementation, this would cause a significant increase in conflict between land users and would likely also increase the negative impacts we have observed on key species within the Planning Region.

## Key Species

### Caribou

The Council appreciate an ISA1 classification for ridgetops within LMU #23 (Fortymile Caribou Corridor). We are currently in the process of drafting a document to provide clear, accessible guidance for project proponents, assessors, land use planners, and governments in their consideration of decisions related to industrial activities impacting the Fortymile Caribou Herd (FMCH) range. The document is currently being developed by a technical team assembled of representatives from the DDRRC, YG Environment and Tr'ondëk Hwëch'in. We hope to provide the Commission an opportunity to apply and incorporate aspects of the guidance document once completed.

### Salmon

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. The Council recognizes that the recommended Sub Regional Plans for the Yukon River Corridor (LMU 3: Yukon River – Chu kon dëk) and the Klondike Highway Corridor (LMU 13: Klondike Valley) may go a long way towards protecting Salmon habitat within the planning region. We would like to see development of these Sub-Regional Land Use Plans expedited. The Council has grave concerns about the impact of human activity on Salmon spawning areas within the two yet to be developed Sub Regional Plans.

The Draft Plan states that "salmon-specific indicators may not be needed at this time". The Council recommends that salmon specific indicators be identified as a research recommendation instead of as described.

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Additionally, within Section 4.1.2.5 (Water Access) the Draft Plan states that impacts to key values in LMU #21 (White – Tädzan dëk) and LMU #15 (Fortymile River - Chëdähdëk) from jet boats are not well understood and recommends research into the potential for this activity to be affecting water quality and salmon habitat should be conducted in these areas. The DDRRC agrees and would like to see LMU #6, #10 and #13 (Klondike Highway Corridor, Upper Klondike and Klondike Tr'ondëk) and LMU #17 (60 Mile) added to the list as well.

### **Traditional Economy**

Not only does the traditional economy provide a lifestyle and economic benefit to those who are involved, the activity is rooted in stewardship which is a key concept of the Draft Plan. The traditional economy also provides a necessary tool to facilitate the teaching and passing on of traditional knowledge to the younger generations of all Yukoner's. We are concerned that specific details regarding allowable trapping and hunting activities, including surface development associated with the building of trapping and hunting infrastructure, is not well defined within the Draft Plan especially for those that conduct traditional economy activities within Land Management Unit's 1 & 2.

### **Specific DDRRC References**

The Council did not have any issues with any instance where we were named as a recommended organization that could contribute to the implementation of the Draft Plan. We did however observe an instance where our organization's acronym (DDRRRC) was misspelled in Section 4.2.1.1 – top of page 80.

### **Wetlands**

For the Council the issue of accommodating economic interests within identified wetland conservation areas has become the most contentious issue discussed throughout this planning initiative. We are very concerned that this issue alone has caused a significant amount of conflict between user groups and has negatively impacted the Commission's ability to focus on all aspects of the plan with equal attention.



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The Council recommends that the Commission consider delaying the delineation and classification of wetland LMU's until sufficient mapping has been developed and extensive identification of wetland landscape representation throughout the entire region can be verified. If this requires the development of Sub-Regional Land Use Plans for Wetlands, the Council will support this.

Furthermore, the Council believes a significant wetland area within LMU #21 (White – Tädzan dëk) along the Ladue River has not been considered as a key wetland area within the region, further research to delineate and identify the landscape representation of all wetlands in the region could help confirm this.

### **Conclusion**

The Dawson District Renewable Resources Council (DDRRC) is honoured to provide this response to the Commission, we hope our input will assist positively in finalizing the Draft Plan and we look forward to the next steps of this endeavor.

Regards,

Mark Wierda (DDRRC Co-chair) on behalf of the DDRRC.