



Box 1709  
Dawson City, Yukon Territory  
Y0B 1G0  
[friendsofdempster@gmail.com](mailto:friendsofdempster@gmail.com)

To: Dawson Regional Planning Commission  
By email: [dawson@planyukon.ca](mailto:dawson@planyukon.ca)  
Re: June 2021 Draft Regional Plan

November 1, 2021

Friends of the Dempster Country (FoDC) would like to thank the Dawson Regional Planning Commission (DRPC) for the many hours the members have given to this very important work. As in the past we will limit our comments on The Draft Dawson Plan to the portion of the region that is north of the Tintina Trench - 'Dempster Country'.

We have heard and appreciate the Commission's reasons for dividing this northern portion of the planning region into several different 'land units' with varying levels of protection. However we wish to point out that the result is just that - a land divided.

FoDC remains committed to the request made in our previous comments of January 5, 2020, ie. that the portion of the planning region north of the Tintina Trench be designated as a Conservation Area, and that it be recommended for permanent withdrawal from any new industrial land use and surface access. In terms of the Draft Plan that would be as an SMA Level I.

FoDC suggests that changing the three LMUs, (#1,#4,#7), designated as SMA II to SMA I would give them permanent protection from new industrial development while allowing what development is ongoing to remain. An SMA I designation does not create a 'park' but rather a Conservation Area as in the Peel Watershed Land use Plan.

FoDC suggests that the Primary Objective for LMU #6: to "ensure a viable land base is available for forestry and fuel wood harvesting" could be included as allowable under a SMA I designation as trees are a renewable resource, (like blueberries and moose).

FoDC suggests that the purpose for LMU #8 seems to be for the possible expansion of the 'Brewery Creek' heap-leach mine site. Considering the results of the Site Audit Report done by the Yukon Water Resources Branch, September 2020, we believe that enlarging that operation should not be a 'given'. If at some future date Tr'ondek Hwech'in and Yukon Government do agree to consider expanding the heap leach operation at Brewery Creek the Draft Dawson Region Plan includes direction for making revisions and amendments.

FoDC suggests protecting the key habitat for the Clear Creek Caribou Herd should be the Primary Objective in LMU #9. No new industrial development or access roads should be allowed as per a SMA I designation. Caribou habitat (summer and winter) in this small land unit is already fragmented and disturbed by active mineral (gold) development including a secondary road and associated site access roads. Disturbance impacts also include the effects of wildfires. We do not know how much key caribou



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habitat was lost during the 2021 Clear Creek Fire. We do know that forest fires are increasing due to climate change.

FoDC also suggests that activity in the Dempster Highway Corridor be included in disturbance thresholds for cumulative effects management in the adjacent land units. By itself the highway is a linear disturbance. The 'mining', crushing and storage of aggregate in 'borrow pits' for road maintenance creates areas of surface disturbance. Both types of disturbance have impacts on vegetation and wildlife. Add the noise and dust of traffic on the road and the amount of impact increases - with the size and the speed of the vehicle. On dry windy summer days the dust from traffic can cover ponds and streams and vegetation into the highway corridor far beyond the 'right-of-way'.

Natural and cultural values in the portion of the region north of the Tintina Trench are impacted by the highway, by active gold mining claims, by mineral projects and by a park with hiking trails and a campground. All of these preclude the use of the word 'pristine' to define the wilderness character of the area.

Yet 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

- in fulfilling its obligation under the Umbrella Final Agreement to ".....not undermine the ecological and social systems upon which communities and societies are dependent",
- in honouring the wishes of Tr'ondek Hwech'in for their Traditional Territory and legally protect 60% of the planning region,
- in providing a refuge - a large connected wilderness area - that climate scientists around the world are calling for.

Thank you for considering these comments as you set to work on the Recommended Dawson Plan for Tr'ondek Hwech'in and Yukon. We appreciate the complexity of planning for an area with so many voices and variables. FoDC is encouraged by this comprehensive draft and the efforts the Commission has made to study the region and to address the issues and concerns it heard. Our final suggestion is that the Recommended Plan be called 'The Dawson Land Stewardship Plan'

Thank you,  
Julie Frisch,  
for Friends of the Dempster Country Society