



Box 1223, Dawson City, Y.T., Y0B 1G0
admin@katts.ca

dawson@planyukon.ca
and delivered by hand

October 19, 2021

Dawson RLUP Commission
978 2nd Avenue (upstairs)
Dawson, Yukon

Dear Dawson Planning Commission,

Thank-you for your good work in developing the Draft Dawson Regional Land Use Plan (the Draft Plan) released this past June. We appreciate the opportunity to provide input. In our view 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. We are hoping that you will feature trails more prominently and afford them more protection in the coming Recommended Plan.

As stated by Virginia Smarch:

“A well-worn trail is not merely a footpath where someone once walked, but a manifestation of the ancestor’s life on the land, of the lengthy journeys taken, of goods exchanged with neighboring peoples in trade, of the hard times, and the good times, and of our responsibilities to each other.”

Trails provide numerous important benefits to society:

- a. Cultural - humans are walking creatures. Trails are some of our oldest artifacts, etched on our landscapes as the reach of humanity expanded to cover much of the planet. Some say that the history of our species on this planet is written in our trails.

- b. Health – Trails keep us fit. Across Canada and Yukon, trails are in ever greater demand as part of a healthy lifestyle. Trails reduce medical costs by encouraging exercise and other healthy outdoor activities.
- c. Social – The use of Trails fosters social relationships and shared responsibility. Trails encourage wholesome pursuits and reduce crime rates.
- d. Economic – Trails can be a significant economic draw, as shown in places like Tombstone Park.
- e. Education - Trails provide excellent opportunities to experience nature, history, and culture in an “outdoor” classroom.
- f. Community identity and pride – In many places trails have become sources of community identity and pride.
- g. Environmental Sustainability – Trails provide the ideal way to experience the natural environment with minimal environment effect. With proper trail construction and proper use (for example, Leave No Trace principles), trails are entirely sustainable.
- h. Connection to the land – Trails foster the value of stewardship by connecting people to the land and their environment.
- i. Inspiration and joy – For many people, hiking trails, or just knowing there are trails available to be hiked, is a source of huge contentment.
- j. Legacy for Future Generations – Trails through the incomparable Dawson Planning Region are one of the greatest gifts we can leave for generations to come – the ability to use your own power - without artifice or enhancement – to see the world as God created it.

We hope that the Recommended Plan recognizes and protects these values.

Comments on Specific Sections of the Draft Plan

The Draft Plan explicitly acknowledges “*Trails and travel routes*” among Heritage Resources and Sites in section 1.6. But trails and travel routes are more than just Heritage Resources and Sites. Trails and travel routes are living and evolving present day manifestations of our connectivity with the environment. Trails look into the future as much as they look back at the past. Non-motorized trails are an elemental connection between human beings and planet earth.

We would like to see Trails and Travel Routes explicitly mentioned under Section 2 Description of the Planning Region. Trails are an important part of the Environment. Trails make significant contributions to the Economy and are an important Renewable Resource. In our view, trails are at least as important to the Dawson planning region as Mining, Timber or Agriculture. Man does not live by bread alone. The soul needs nourishment just as the body needs food.

Stewardship is explicitly identified as a guiding principle in 1.6.2.2 and expanded upon in the section on Heritage and Culture, 4.3.2. Identifying, mapping, restoring and protecting trails are all ways to support the fostering of a Stewardship ethos in the planning region.

Similarly, when people use trails, whether for access, commuting or recreation, people are necessarily placed into the landscape where stewardship can blossom.

Transportation and Access are listed as major focus of the Plan in the Highlights section (Page 8). Trails, Access and Access management are considered in management directions in some LMUs (LMUs 1, 3, 4, 6, 7, 8, 9, 11, 12, 13, 15, 16, 17, 20 and 23) and in the General Management Direction under Sustainable Economy (4.1.2) Altogether Access is mentioned 275 times in the Draft Plan. Clearly access and access management, including trails is recognized as a major theme in the Draft Plan.

KATTS recommends that Access Management Plans be included as Special Management Directions in the above listed LMUs, with a specific view to encourage active transportation to support the principle of Stewardship. In addition, KATTS recommends that the development of Access Management Plans become a condition of any industrial development in the Dawson Planning region, with a requirement to consider trails and recreation as part of all reclamation plans.

As described in our November 25, 2019 submission to the Commission, the most serious challenge to the maintenance and protection of trails in the Dawson planning region comes from the antiquated Placer Mining Act, which is totally out of sync with modern values and inconsistent with UFA Chapter 11 Objectives.

The Commission appears to recognize this in section 4 of the Draft Plan. One of the Planning Strategies related to mineral development and development is:

“Added clarity and certainty on what lands are accessible for mineral exploration and development within the Dawson planning region, and what conditions are necessary to achieve sustainable development within those areas”.

In the same section, the Draft Plan states that:

“The Yukon Mineral Development Strategy has put forth a series of recommendations which will not be duplicated in this section but should be supported in efforts to continuously improve the process by which mineral exploration and development projects are realized.

and recommends that:

“The Parties should support implementation of the recommendations of the Yukon Mineral Development Strategy related to Strategic Priority # 3 to establish effective, efficient and transparent environmental and regulatory processes.”

Immediately afterwards the Draft Plan states that *“efforts to educate and support the mining industry in land reclamation and compliance should be encouraged”.*

All of this is good as far as it goes. But, in our view these recommendations do not go far enough to achieve “sustainable development”.

The Yukon Mineral Development Strategy Panel recommended a “*bold and transformative overhaul*” of current Yukon mining legislation. We would like to see the Commission go farther in that direction. In our view the Commission should endorse more than just Strategic Priority # 3 of the Yukon Mineral Development Strategy, which deals primarily with the environmental assessment process. We would like the Commission to endorse the other Strategic Priorities as well, which include:

“1. Establish a modern mineral resource management regime aligned with the modern treaties with Yukon First Nations” (etc.); and

“5. Demonstrate environmental responsibility and preparedness to adopt practises to address climate change” (etc.)

All of these Strategies have to be implemented in order to ensure that:

“human activities happen in a respectful way with the health of the land at the forefront of decision making”

as envisioned in section 1.6.2.2 of the Commission’s Draft Plan. KATTS encourages the Commission to elaborate upon what is required to provide “stewardship” in the Dawson planning region. This truly does require a *bold and transformative overhaul* of the present mining regime. Status quo environmental and cultural standards are not adequate to meet Chapter 11 Objectives to:

“minimize actual or potential land use conflicts” and

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

In section 4.1.6 of the Draft Plan, there is one Objective

“Maintain existing trail networks and support establishment of new trails and/or the revival of historic trails”

and two Recommended Management Practises that pertain to trails:

“1: Avoid, or minimize potential impacts of industrial land use activities (e.g. mineral exploration, forestry) within and adjacent to existing trails, including but not limited to the Discovery Trail and the Klondike Trail.”

“2: Maintain access to existing recreational trails by delineating their location, identifying any potential land use conflicts and recommending appropriate

mitigation measures (e.g. buffers) as part of the application and review process for new land use tenure.”

KATTS thanks and salutes the Commission for clearly articulating an Objective in section 4.1.6 Community Growth and Recreation related to trails. This is a significant step in the right direction. We understand this Objective to apply to the entire Dawson planning region and accordingly recommend that the Commission clarify this in the Objective, so that it reads, “Maintain existing trail networks **in the Dawson planning region** (emphasis added) and support establishment of new trails and the revival of historic trails”.

With the entire planning region in mind, we encourage the Commission to strengthen the recommended Management Practises in section 4.1.6:

- 1) In the first Recommended Management Practice we recommend that:
 - a) the words “*or minimize*” be removed, so as to read “Avoid potential impacts of industrial land use activities (e.g. mineral exploration, forestry) within and adjacent to existing trails;
 - b) the words “*and identified new*” be added between “*existing*” and “*trails*”; and
 - c) the following trails be added to “*the Discovery Trail and the Klondike Trail*”;
 - i) *the Klondike East Bench Trails, including the Moose Mountain Cross Country Ski Trail Network;*
 - ii) *The Percy De Wolfe mail trails from Dawson to Eagle;*
 - iii) *The trail from Wellesley Lake through Coffee Creek to Fort Selkirk;*
 - iv) *The Trans-Canada/Yukon Quest trail;*
 - v) *The All Gold trail from Flat Creek to Hunker;*
 - vi) *The Ridge trail from upper Hunker to Callison;*
 - vii) *the trail up the Yukon Ditch to Tombstone and beyond;*
 - viii) *the trail between Tr’ochëk and the Indian River;*
 - ix) *the trail from Swede Creek to California Creek;*
 - x) *the trail from Bonanza Creek to Flat Creek;*
 - xi) *the development of a multipurpose trail between the communities of Henderson’s Corner, Rock Creek, Bear Creek, the Dredge Pond subdivision and Dawson; and*
 - xii) *the Heritage Routes recognized in the TH Final Agreement.*

- 2) In the second Recommended Management Practice in section 4.1.6, we recommend that:
 - a) the words “*cultural and identified new and*” be added between “*existing*” and “*recreational*”, so that it reads “*Maintain access to cultural and new and existing recreational trails by delineating their location, ; and*
 - b) “100 metres” be identified as the appropriate buffer.

To support the Recommended Management Practises in this section, we recommend that a comprehensive trail map be included in the Recommended Plan.

KATTS recognizes that the recommended Sub Regional Plan for the Yukon River Corridor (LMU 3: Yukon River – Chu kon dëk) Future Planning Area may go a long way towards protecting the Percy De Wolfe mail trails. Accordingly, we would like to see the Commission add additional strength and clarity to your recommendations around LMU 3:

- We believe the Corridor should be an SMA 1 as opposed to SMA 2.
 - The Yukon River is the main artery of life in the Dawson Planning Region. It deserves the highest level of protection.
- The development of a Sub-Regional Land Use Plan for LMU 3: Yukon River – Chu kon dëk should be undertaken on an expedited basis either by the existing Dawson Planning Commission, or a Planning Commission constituted in the same way as the existing Dawson Planning Commission, with the same representation and same opportunity for public input.

KATTS also recognizes that the recommended Sub Regional Plan for the Klondike Valley (LMU 13) Future Planning Area may promote the development of a multipurpose trail between the communities of Henderson’s Corner, Rock Creek, Bear Creek, the Dredge Pond subdivision and Dawson. Accordingly, we would like to see a timely Sub-Regional Land Use Plan developed for this area – with good opportunities for public input.

In section 5.13 LMU 13 we recommend that:

- 2.g be reworded to read “Avoid potential impacts of industrial land use activities (e.g. mineral exploration, forestry) within and adjacent to existing trails, including but not limited to the Discovery Trail and the Klondike Trail”; and
- “Development of a multipurpose trail between the communities of Henderson’s Corner, Rock Creek, Bear Creek, the Dredge Pond subdivision and Dawson “ be added to the matters that should be considered in the development of a sub-regional plan.

KATTS supports the Commission’s Recommended Action in section 4.1.6 that a Trails Master Plan be developed for the Dawson region. Such a Plan would be an asset for both the local and broader community.

In closing, we want to thank you once again for the opportunity to provide input into this important land use plan. We appreciate the vision you have painted. In the main we believe it is taking us in the right direction. If you would appreciate greater clarity regarding our submission or would like to engage in any dialog regarding these matters, we will be happy to do whatever we can to help.

Godspeed,

Cathie Findlay-Brook
President, KATTS