

**Dawson Regional Land Use Planning Commission
Survey and Comment Form**

Before this public review and feedback period, were you aware of the Dawson regional planning process?

- Yes, I have attended other meetings/workshops.

How did you hear about this public review and feedback period for the plan alternatives?

- Email notification from commission staff.

Where do you reside?

- Yukon

Do the zones used in the proposed land designation system adequately explore a range of conservation options?

- Add a 'Stewart River Corridor' based on the Boreal Low bio climate zone.
- Add a 'Major River Corridor' zone as described in section 3.2.4.2 of Yukon Government's 2014 Peel Watershed Regional Land Use Plan. Apply this to the main stem of the Ladue River, White River, Stewart River, Forty Mile River, Sixty Mile River, Indian River, North Klondike, South Klondike, Chandindu River, Tatonduk River, Kandik River, Miner River, and Whitestone River in any LMU not zoned as Conservation or Protected Area.
- Split the Stewart River LMU along a line running between the approximate coordinates of -138 33.917 W 63 16.504 N and -138 36.938 W 63 27.548 N. The Northern portion of the current Stewart River LMU has higher conservation values related to the larger lobe of the BOL bio climate zone and the greater number of wetlands, along with a much lower development potential as expressed by the distribution of February 2014 mineral claims. This would allow the flexibility to zone the Stewart River North LMU as IMA2 and the Stewart River South LMU as IMA 3.
- Splitting the Upper White River LMU and the Lower White River LMU at the White River would allow greater flexibility in zonation in the south west corner of the DLUP region.
- Splitting the Forty Mile River LMU into a north and south LMU along the Forty Mile River would allow more flexibility in zonation. Recommend zoning Forty Mile River- North LMU as IMA 2 in recognition of a lower existing developmental footprint and community resource use associated with the Yukon River. Recommend zoning Forty Mile River – South as IMA 3 recognizing the increased level of current placer activity in this area.
- Although the Commission is already aware of this, I would like to reiterate the importance of developing management prescriptions within IMA zones to address the many conservation values and concerns within an IMA area where the economic/conservation balance has not warranted zoning an LMU as Conservation or Protected Area.

Do the zones used in the proposed land designation system adequately explore a range of development options?

- Answer to the previous question would apply here as well.

Please describe any changes you would make to the proposed land designation system.

- I think that there are too many IMA zones (1 – 4); although I do recognize that there is value in maintaining a consistent approach to the LDS used in the North Yukon Plan and the Government of Yukon's Peel Watershed Plan. After some consideration, I do like the concept of the Traditional Economic Area (TEA). Assuming that the TEA is equivalent to IMA 1, I would recommend an additional 2 IMA zones (IMA 2 and IMA 3). IMA 3 would essentially be the status quo under the current environmental assessment and regulatory processes with the addition of a relationship to regional or sub regional cumulative effects thresholds, and other management prescriptions such as wetland and riparian buffer zones. IMA 2 would represent areas with a high than average level of concern for conservation and/or cultural attributes, and would have more stringent cumulative effects thresholds and management prescriptions.
- I would include a Major River Corridor zone as described in section 3.2.4.2 of the Government of Yukon's 2014 Peel Watershed Regional Land Use Plan.

When considering Alternative A, what elements do you like and why?

- I like that zones 2, 3,4,5,7, and 8 are zoned conservation. These areas provide connection between Yukon Charly and Fishing Branch. This area is Porcupine Caribou range. These areas represent first order intact watersheds. I would add however that these LMUs are also less likely at this point or in the near to medium term to see significant impact from industrial development. The primary economic potential drivers in this area are the Kandik and eagle plains hydrocarbon basins which do not overlap with the zones with the exception of zone 3. I would consider trading off the zoning of LMU 3 and 5 as conservation to IMA 2 for zoning LMU 9 as conservation in recognition of the potential for conserving the entire Tatonduk watershed and maintaining connectivity between Yukon Charly and the LMUs zoned Protected Area in the Yukon Government's Peel Watershed Regional Land Use Plan.
- I like that zones 23, 27, 28 are zoned Conservation. LMU 27 represents the upper portion of the Scottie Creek wetlands which is a territorially significant area of wetlands. I would potentially consider trading off the areas east of the White River in LMU 28 and the area south of the White River in LMU 23 for designating LMU 22 as conservation. LMU 22 represents an area with significant wetland and old lowland spruce forest with lower frequency and scale of fire. Although there is current and potential economic potential as placer mining in LMU 22 I believe that this is an area where trading off future economic development is justified in consideration of the strong conservation values.
- I like the use of the Boreal Low (BOL) bio climate zone to delineate the Yukon River Corridor. I would also like to see the BOL zone used to establish a Stewart River Corridor.

- I like the adoption of the Traditional Economic Area as the IMA 1 zone. Zone 15 is zoned 15; would this continue to allow forestry activities as established under the Dawson Forest Management Plan to proceed?
- I agree with the Community Area being zoned out; with the provision that it should still include general management prescriptions. In particular there are significant wetlands in this area that should have recommended buffers zones established.
- This Alternative relies on Conservation Areas with no Protected Areas identified. Although Conservation areas do allow more flexibility for allowed activities and do not require the removal of subsurface rights; messaging from industry has indicated that it would be difficult to attract investment for projects within a conservation area, and therefore in reality has a similar effect on the usefulness on retaining subsurface rights. I would recommend including a blend of Protected Areas, and Conservation Areas.
- I agree with LMUs 17, 21 and 13 being zoned IMA 2 with the recognition that there are significant wetland and riparian conservation values in 17 and 21 that need to be addressed through management prescriptions.

When considering Alternative A, what elements don't you like and why?

- See discussion points in question above
- I don't like that there is no recognition of the value of Major River riparian areas with the exception of Yukon River. Riparian areas of major rivers contain high value conservation elements such as wetlands, lowland riparian forests, reduced fire frequency and intensity, and species diversity. Major rivers that need to be addressed are: Whitestone, Miner, Kandik, Tatonduk, Chandindu, North and South Klondike, Forty Mile, Sixty Mile, Indian, Stewart, White, and Ladue.

When considering Alternative B, what elements do you like and why?

- I like the establishment of Conservation Areas in the north part of the region in zones 2,3,4,5 and 7; however with the exception of LMU 3 having potential for future oil and gas development it is unlikely that these LMUs will experience significant levels of development pressure over the life of the Land Use Plan. Establishing Conservation areas where development impact is very low, can make it appear conservation is being achieved within the DLUP region but may be not very substantial.
- I like LMU 11 being zoned TEA
- I like LMU 21 being zoned IMA2 with the recognition that there are significant wetland and riparian conservation values in 21 that need to be addressed through management prescriptions.
- I agree with the Community Area being zoned out; with the provision that it should still include general management prescriptions. In particular there are significant wetlands in this area that should have recommended buffers zones established.

When considering Alternative B, what elements don't you like and why?

- I don't like that there is no recognition of the value of Major River riparian areas with the exception of Yukon River. Riparian areas of major rivers contain high value conservation elements such as wetlands, lowland riparian forests, reduced fire frequency and intensity, and species diversity. Major rivers that need to be addressed are: Whitestone, Miner, Kandik, Tatonduk, Chandindu, North and South Klondike, Forty Mile, Sixty Mile, Indian, Stewart, White, and Ladue.
- I don't like that almost all conservation zonation is focused on the northern portion of the region in an area where significant future development is unlikely, and would in reality exist as an unofficial conservation area anyways. It is important that conservation areas be identified in areas where there is potential for activities that these areas need to be 'protected' or 'conserved' from. Zoning areas with low development pressure is not in itself a bad thing, but can be viewed as being a disingenuous attempt to achieve a conservation percentage threshold, without actually resulting in a significant conservation achievement.
- I don't like that the Stewart River LMU is too large considering that there is quite a difference between the economic potential and conservation values in the western and eastern halves of the LMU. Split the Stewart River LMU along a line running between the approximate coordinates of -138 33.917 W 63 16.504 N and -138 36.938 W 63 27.548 N. The Northern portion of the current Stewart River LMU has higher conservation values related to the larger lobe of the BOL bio climate zone and the greater number of wetlands, along with a much lower development potential as expressed by the distribution of February 2014 mineral claims. This would allow the flexibility to zone the Stewart River North LMU as IMA2 and the Stewart River South LMU as IMA 3.
- I don't like that LMU 9 is zoned IMA 3; this LMU provides important connectivity between Yukon Charly and the Protected Areas identified in the Peel Watershed Regional Land Use Plan (2014). If LMU 9 is to be zoned IMA, I would recommend zoning it IMA 2 as was LMU 8. Additionally I would recommend a substantial buffer be established around the north and south branches of the Tatonduk River to contribute to connectivity between Yukon Charly and the Miner River conservation areas, and the Protected areas in the Peel Watershed.

When considering Alternative C, what elements do you like and why?

- I like the establishment of Conservation and Protected Areas in the north part of the region in zones 2, 3,4,5,7 and 8. However I would recommend making the Protected Areas contiguous, even with the provision for allowing access through to LMU 1, versus splitting them with a conservation zone in the middle. In this alternative I would recommend making LMUs 2,4,7 Protected Areas, trading off LMU 5 as conservation and LMU 3 as IMA 2
- I like the Yukon River Corridor being based on the Boreal Low bio climate zone.
- I like the establishment of Conservation and Protected areas in the south west corner of the region. I think that this is an appropriate area to establish conservation areas based on the economic/conservation tradeoffs.
- I like that LMUs 9,13,15,17 and 21 are zoned IMA 2 these LMUs have a strong mix of economic and conservation values and zoning as IMA 2 opens the opportunity to create a mechanism to

balance 'competing interests and values' through the development of management tools and prescriptions.

When considering Alternative C, what elements don't you like and why?

- I don't like that the Stewart River LMU is too large considering that there is quite a difference between the economic potential and conservation values in the western and eastern halves of the LMU. Split the Stewart River LMU along a line running between the approximate coordinates of -138 33.917 W 63 16.504 N and -138 36.938 W 63 27.548 N. The Northern portion of the current Stewart River LMU has higher conservation values related to the larger lobe of the BOL bio climate zone and the greater number of wetlands, along with a much lower development potential as expressed by the distribution of February 2014 mineral claims. This would allow the flexibility to zone the Stewart River North LMU as IMA2 and the Stewart River South LMU as IMA 3.
- I don't like that there is no recognition of the value of Major River riparian areas with the exception of Yukon River. Riparian areas of major rivers contain high value conservation elements such as wetlands, lowland riparian forests, reduced fire frequency and intensity, and species diversity. Major rivers that need to be addressed are: Whitestone, Miner, Kandik, Tatonduk, Chandindu, North and South Klondike, Forty Mile, Sixty Mile, Indian, Stewart, White, and Ladue.
- If LMU 9 is to be zoned IMA, I would recommend zoning it IMA 2 as was LMU 8. Additionally I would recommend a substantial buffer be established around the north and south branches of the Tatonduk River to contribute to connectivity between Yukon Charly and the Miner River conservation areas, and the Protected areas in the Peel Watershed.

When considering Alternative D, what elements do you like and why?

- I like the establishment of Conservation and Protected Areas in the north part of the region in zones 2,4,5,7 and 8. However I would recommend making the Protected Areas contiguous, even with the provision for allowing access through to LMU 1, versus splitting them with a conservation zone in the middle. In this alternative I would recommend making LMUs 2, 4, 7 Protected Areas, trading off LMU 5 as conservation.
- I like the Yukon River Corridor being based on the Boreal Low bio climate zone.
- I like the establishment of Conservation and Protected areas in the south west corner of the region. I think that this is an appropriate area to establish conservation areas based on the economic/conservation tradeoffs. However LMU 22 should be zoned as Conservation or Protected as there are significant conservation values in the Ladue River watershed. If a trade off is required I would recommend splitting LMUs 28 and 23 at the White River and make the east portion of LMU IMA 2/3 and the southern portion of LMU 23 IMA 2/3. The northern portion of LMU 23 has significant conservation values.

When considering Alternative D, what elements don't you like and why?

- I don't like that the Stewart River LMU is too large considering that there is quite a difference between the economic potential and conservation values in the western and eastern halves of the LMU. Split the Stewart River LMU along a line running between the approximate coordinates of -138 33.917 W 63 16.504 N and -138 36.938 W 63 27.548 N. The Northern portion of the current Stewart River LMU has higher conservation values related to the larger lobe of the BOL bio climate zone and the greater number of wetlands, along with a much lower development potential as expressed by the distribution of February 2014 mineral claims. This would allow the flexibility to zone the Stewart River North LMU as IMA2 and the Stewart River South LMU as IMA 3.
- I don't like that there is no recognition of the value of Major River riparian areas with the exception of Yukon River. Riparian areas of major rivers contain high value conservation elements such as wetlands, lowland riparian forests, reduced fire frequency and intensity, and species diversity. Major rivers that need to be addressed are: Whitestone, Miner, Kandik, Tatonduk, Chandindu, North and South Klondike, Forty Mile, Sixty Mile, Indian, Stewart, White, and Ladue.
- If LMU 9 is to be zoned IMA, I would recommend zoning it IMA 2 as was LMU 8. Additionally I would recommend a substantial buffer be established around the north and south branches of the Tatonduk River to contribute to connectivity between Yukon Charly and the Miner River conservation areas, and the Protected areas in the Peel Watershed.
- I don't like that LMU 22 is zoned IMA; there are significant conservation values in the Ladue River watershed. The economic values in LMU 22 are not high compared to other areas more central to the region. LMU zoned as Conservation could include 'grandfathering in' established placer operations.
- LMU 21 has significant wetland values, in consideration of this I would zone it IMA2

When considering Alternative E, what elements do you like and why?

- I like that this alternative has a large protected area in the north: LMUs 2,3,4,7 and 8. I think that this is an appropriate area for Conservation/Protection. However I would recommend trading off protection of LMU 3 for Protection or Conservation of LMU 9. LMU 3 includes a lobe of the Kandik oil and gas basin. LMU 9 provides connectivity along the southern branch of the Tatonduk River with the Protected Areas identified in the Peel Watershed Planning Region.
- I like that LMU 1 is zoned IMA 2 as this area is within the range of the Porcupine Caribou herd.
- I like that LMU 22 is zoned Protected.
- I like the Yukon River Corridor being based on the Boreal Low bio climate zone.

When considering Alternative E, what elements don't you like and why?

- I don't like that the Stewart River LMU is too large considering that there is quite a difference between the economic potential and conservation values in the western and eastern halves of the LMU. Split the Stewart River LMU along a line running between the approximate coordinates of -138 33.917 W 63 16.504 N and -138 36.938 W 63 27.548 N. The Northern portion of the

current Stewart River LMU has higher conservation values related to the larger lobe of the BOL bio climate zone and the greater number of wetlands, along with a much lower development potential as expressed by the distribution of February 2014 mineral claims. This would allow the flexibility to zone the Stewart River North LMU as IMA2 and the Stewart River South LMU as IMA 3.

- I don't like that there is no recognition of the value of Major River riparian areas with the exception of Yukon River. Riparian areas of major rivers contain high value conservation elements such as wetlands, lowland riparian forests, reduced fire frequency and intensity, and species diversity. Major rivers that need to be addressed are: Whitestone, Miner, Kandik, Tatonduk, Chandindu, North and South Klondike, Forty Mile, Sixty Mile, Indian, Stewart, White, and Ladue.
- If LMU 9 is to be zoned IMA 2, I would recommend a substantial buffer be established around the north and south branches of the Tatonduk River to contribute to connectivity between Yukon Charly and the Miner River conservation areas, and the Protected areas in the Peel Watershed.
- I don't like that LMU 21 is zoned IMA 3; in recognition of the significant wetland and lake values in this LMU I would zone it as IMA 2 and ensure that management tools and prescriptions are in place to ensure the conservation of these values and to mitigate potential impacts from development projects.
- LMUs 27, 28, and 23 should be zoned Conservation or Protected. If a tradeoff is required I would recommend splitting LMUs 28 and 23 at the White River and make the east portion of LMU IMA 2/3 and the southern portion of LMU 23 IMA 2/3. The northern portion of LMU 23 has significant conservation values.

Is there other information you feel should have been considered in the development of the plan alternatives?

From my direct and indirect experience in land use and resource management planning, as well as comments from experienced planners and modelers in other jurisdictions; it is my belief that a common mistake in planning is spending too much time and effort at the front end of the process to collect information and data and too little time at the back end of the process discussing tradeoffs, and establishing management approaches. I would recommend the 30/70 rule: spend 30% of your time at the front gathering information and analyzing data and information and save the majority (70%) for allowing the Commission to fulfill their primary role of representing community values in making decisions about tradeoffs. I believe this was compounded by a lack of clarity regarding the roles and responsibilities of the Commission members and planning staff.

It is my opinion as well that when used properly by experienced practitioners and facilitators modeling programs such as Marxan, and decision making tools such as Strategic Decision Tools can be effective approaches for help guide Commission members through the decision making/tradeoff process. However, if too much reliance is put on the output of these tools they can disengage the decision makers from the information used to populate the models, or focus too much on achieving a predefined

acceptable ratio of conservation and development. Which in the end can negate the large effort made at the front end of the process to collect and compile data and information.

In summary, it is my opinion that the process of determining the LMUs to be used and the LDS could/should have been completed much earlier in the process (by end of year 1). Especially in light of the end result being adoption of the LMUs and LDS used in the neighbouring planning regions. By the beginning of year 2 a first draft of LMUs being designated as either conservation/protection or IMA could have been achieved. This would have left two years to identify what information/advice was needed to make the harder decisions of how to manage competing values within the IMA zones and establish clear management guidance and prescriptions.

What other information would have been helpful to have in this package?

Not having an understanding of what the actual differences will be between IMA zones 2 and 4 made it very difficult to recommend appropriate zones for the LMUs. As an organization we ended up having to make our own set of assumptions about what the differences, management tools, and prescriptions would be for the different zones. If our assumptions were correct, our analysis is useful and accountable. If our assumptions were not correct it throws into question our assessment and recommendations. I believe that this is a serious issue with the timing and approach to seeking input on a set of alternatives.

Do you have any additional comments or suggestions for us?

Canadian Wildlife Service will be providing recommendations and comments to the Commission regarding management goals and prescriptions for IMA 2-4, for the Yukon River Corridor, Stewart River Corridor, Major River Corridors, wetlands, lowland spruce forest, transboundary wildlife, and areas with significant probability for providing habitat to species of conservation concern.