

**TH GENERALLY SUPPORTS THE RECOMMENDED PLAN. THANK YOU TO THE COMMISSION.**

\*Dec 2020 = Ninānkāk hqzq wēkātrenōhcha. Submitted to the Commission on Dec 1, 2020

\*Nov 2021 = TH Review of the Dawson Regional Draft Plan, including appendices. Submitted to the Commission on Nov 1, 2021

\*Dec 2023 = Speaking note from Hähkè Taylor and Tr’ondëk Hwëch’in Council at the DRLUP Meeting of the Principals December 12, 2023. Notes attached to the letter sent from Hähkè Taylor to Premier Pillai and Ministers Streicker and Clarke sent to YG on Jan 11, 2024. Copy of the letter and notes provided to YLUPC and Commission staff on the same day.

**PROPOSED MODIFICATIONS**

Theme	Recommended Plan Says	Discussion	TH Proposed Modifications	What has TH said in the past?*	Rationale
<b>Vision and Objectives</b>	<ul style="list-style-type: none"> <li>Plan vision and goals are stated on p. 8 and 11, respectively</li> </ul>	<ul style="list-style-type: none"> <li>TH supports the Vision and Objectives of the Recommended Plan. These would have us adopt a substantially higher level of care for lands and waters in the planning region than the status quo.</li> <li>TH believes that in order to achieve the vision and objectives, there needs to be a willingness and commitment to utilize all existing regulatory tools (e.g., Special Operating Areas) and to develop new tools as needed/required.</li> <li>In order to achieve these goals, TH believes our recommendations help achieve the visions and objectives of the</li> </ul>	<ul style="list-style-type: none"> <li>In the Implementation Chapter, TH would like to see high-level language that encourages the use of all existing policy and legislative tools and encourages the development of new tools, as needed or required, to implement the plan</li> </ul>	<p><b>Dec 2023</b></p> <ul style="list-style-type: none"> <li>TH recommended YG should use all the tools in YGs current toolbox to protect culturally or environmentally sensitive areas in the planning region, such as:               <ol style="list-style-type: none"> <li>Special Operating Area provisions of the Placer and Quartz Mining Acts:</li> <li>Land Management Zones under the Territorial Lands (Yukon) Act:</li> <li>Withdrawals, where necessary alongside other tools, to achieve the objectives of the Plan for an LMU, even if the LMU is an ISA.</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>There are several existing policy and legislation tools that TH believes should be used to implement the Plan, including some that exist but have never been used.</li> <li>TH believes that the vision and goals of the Plan cannot be fully realized without the use of all relevant existing tools to their fullest extent and the development of new tools where existing ones are limited or not appropriate</li> <li>In order to achieve these goals, TH believes our recommendations help achieve the visions and goals of the Plan</li> </ul>
<b>Traditional Land Management Practices (11.4.5.5 &amp; 11.4.5.6 THFA)</b>		<ul style="list-style-type: none"> <li>TH wants to include cultural pillars to inform Sustainable Development in the Region</li> </ul>	<ul style="list-style-type: none"> <li>We ask the Commission to incorporate the following Tr’ondëk Hwëch’in cultural pillars to inform Sustainable Development in the Dawson Planning Region: Reciprocity, Respect, and Humility</li> </ul>		<ul style="list-style-type: none"> <li>11.4.5.5 and 11.4.5.6 of the THFA require the Commission to use the knowledge and traditional experience of Yukon Indian People, and take into account traditional land management practices of Yukon Indian People.</li> <li>It is therefore important and necessary to incorporate TH traditional land management practices and worldview into the Plan</li> </ul>

**Sustainable  
Development**

• The definition of sustainable development (SD) in the Plan is taken from Chapter 11 of the THFA: Development that is resilient, versatile, responsible, for current and future generations. SD maintains the integrity of land, water, wildlife as well as the cultural and heritage values of TH. SD must allow for the continuation and integrity of ecosystems and societies. Overall, activities that do not undermine the ecological and social system upon which communities and societies are dependent.

• TH believes the Plan could go further in specifying permitted activities in the working landscape. For example, outlining which LMUs allow quartz vs placer mining

• Include language that directs the separation of mining activity to prevent the overlap of Placer and Quartz mining within the same LMU

**Dec 2020**

• TH mentions a desire to minimize the potential for land use conflicts.

- The overlapping of quartz and placer mining activities in an LMU has a greater impact on the environment and makes it harder to monitor the effects of specific mining projects
- Placer mining may undermine the ability of a quartz mine to preserve water quality targets (e.g., Brewery Creek is a real-life example where proposed placer activity would have undermined Brewery Creek Mine water treatment system)
- The overlapping of quartz and placer mining activities may undermine the vision, management directions and/or objectives set out in certain LMUs (e.g., LMU 18: Vision: "It is important that this area remain open for current and future mineral interests without undermining its important environmental and cultural attributes" and Special Management Direction 3: "Efforts to enhance the use of this area for traditional economic activities and cultural/educational pursuits should be explored" -- TH Believes the vision and management direction will be undermined if there are multiple placer mines and a large hard rock mine in the LMU.
- Certain development activities may not be compatible with others

**Cumulative Effects**

• The Plan outlines a CE Framework that sets thresholds for acceptable level of development (including disturbance and access) envisioned for different LMUs in the region. There are four tiers of Integrated Stewardship Areas (ISA 1 to 4) that are differentiated by their cumulative effects thresholds. Linear features and surface disturbance are the current indicators proposed to monitor cumulative effects. The Plan recommends that the Parties continue to co-develop indicators for the Framework.

• TH supports the Plan's linear and surface disturbance thresholds  
• TH supports the continuation of collaborative work to further develop the Cumulative Effects Framework

• **TH supports developing** CE indicators for water quality, salmon, caribou, and socio-economic factors, and impacts to TH culture and subsistence harvesting  
• Add a recommendation to the Parties to commit to a workplan and timeline for further CE Framework research, including indicators and evaluating the efficacy of the Framework

**Nov 2021**

• TH Recommendations on the Draft Plan: To ensure that the CE framework establishes appropriate indicators for the Dawson planning region; To explicitly incorporate indicators that better reflect Tr'ondëk Hwëch'in social and cultural values (e.g., harvesting and hunting, and/or spending time out on the land), and measurable indicators of climate change, including permafrost and wildfires; To identify effective and acceptable levels of disturbance that do not undermine the key values of the region, such as moose, caribou, salmon, water, and to recognize that these values might not be the same throughout the planning region; and To provide clarity around the overall cumulative effects framework and how to assess and monitor indicators, how often disturbance mapping will occur, the process to occur when changes or exceedances are identified

**Dec 2023**

• We want to embrace high environmentally and culturally sound Cumulative Effects Thresholds for linear and surficial disturbance. When there is question, we want to err on the side of caution.  
• We want to make solid commitments to add additional Cumulative Effects indicators to the Plan, such as water quality, abundance of species like caribou and moose, and potentially others.  
• Cumulative Effects thresholds must be set at levels that protect the environment and maintain its ability to

• Conservative Cumulative Effects thresholds will help protect the environmental and cultural values of the land.  
• Canadian courts have made clear that the cumulative effects of industrial development authorized by the Crown can significantly diminish the ability of First Nation citizens to exercise their rights to hunt, fish and trap in their territory as part of their way of life and therefore constitute an infringement of their Treaty rights (see *Yahey v British Columbia*, 2021 BCSC 1287).  
• It is essential that the cumulative effects thresholds in the Plan are adequate to protect the TH way of life and TH's constitutionally protected rights under the TH Final Agreement.  
• TH has growing concerns about the impacts of placer mining and climate change on salmonid-bearing watersheds and other fish habitat. A water quality CE indicator would require some extensive thought on how to frame it for consideration as the research is still on-going.

**Cumulative Effects**

• The Plan makes recommendations to the Parties to undertake further research on incorporating fire disturbances into the framework

• Fire scars can have an equally devastating effect of wildlife and development activities, especially Caribou

• Include fire scar monitoring alongside cumulative effects monitoring in areas of old growth habitat that overlap with caribou herds to build a fire history into quantitative assessments of available habitat in the event of a large fire or other climatic event.

**Nov 2021**

• Fire scars listed as a recommended CE framework indicator

• TH supports having wildfire scar data tracked separately in a way that can be easily layered on top of linear/surface disturbance threshold data to help with analysis and decision-making.  
• The protection of critical values may require that wildfire data to be included in total disturbance calculations  
• TH recognizes the variability post-fire Caribou winter range recovery (Kelsey Russell with Klaza herd showed as little as 40 years, but there are quite a few ranges where 60-75+ years has not been sufficient)

**Cumulative Effects**

• See cell above

• TH is concerned that a TH Citizen may not be able to develop SL for non-traditional pursuits purposes in an LMU where non-TH development activities have consumed the Cumulative Effects development quota

• TH would like to reserve rights to the CE thresholds relative to the proportional amount of SL within a given LMU

**Nov. 2021**

• TH supports proposed ISA designation on SL for the use on non-renewable resource extraction, under the conditions that the development does have irreversible impact and ensures economic benefits to TH citizens or TH as a whole.

• Citizens and the TH Government expect to be able to use Settlement Land for the purpose for which it was selected, or as decided otherwise by TH.  
• TH agrees to use Settlement Land in a way that is consistent with the LMU designations and related Cumulative Effects thresholds specified in the Plan (if consensus can be achieved on those elements of the Plan), provided that mining and other non-TH industrial uses leave reasonable space in those thresholds for TH

**Reclamation & Restoration**

Reclamation and restoration is mainly discussed in sections 3 and 4 under the plan concepts and the cumulative effects framework recommendations. These indicate that the specific meanings of reclamation and restoration should be agreed upon by the parties. Indicating that restoration should be value-based and focused on the return of disturbed

• See cell above

• Full reclamation is necessary so that the landscape can support the exercise of TH Final Agreement rights, such as rights to harvest Fish and Wildlife, to quality and quantity of Water, and to continue the TH way of life, including cultural activities and stewardship responsibilities.

• TH believes a "full" reclamation concept with an agreed upon threshold should be used in the Dawson Plan, similar to what was used in the Peel Plan, but specific to the Dawson Region's ecology and wildlife habitat.  
• TH believes that YGs reclamation definition does not go far enough and

• See cell above

• Include a robust definition of restoration and reclamation in the plan that incorporates a two-eyed seeing approach and is inclusive of TH's definitions. TH has provided a definition of restoration and reclamation in the appendices of our submission.

**Nov 2021**

• TH comments to the Commission highlighted concerns related to ambiguity in the definitions of reclamation and restoration, as well as concerns related to restoration activities that result in new wetland classes and not restored original wetland class  
• TH believes that access impedes provisions of THFA because of changes caused to lands

• Through a Tr'ëhudè lens, TH considers land reclaimed when all aspects of our relationship with the land are in balance and when we are "living in a good way".  
• TH views reclamation and restoration in a holistic way  
• This approach to reclamation is more in keeping with Tr'ëhudè, when any land use is undertaken, restoration is our ultimate goal.

**Reclamation & Restoration**

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• See cell above

• Provide interim measurable minimum standards for reclamation. An example of measurable standards based in western science comes from the Peel (note, any reclamation standards would need to be adapted to the Regional context and driven by the VSECs. E.g., sensitive caribou habitat, wetlands and cultural values in the Dawson Region may require different reclamation goals, objectives, and standards to ensure these values are protected over time)

• Provide language that set conditions prior to any development commencing (including exploration activities) that includes:

• See cell above

• TH believes the minimum standards for reclaimed or restored should come from the Peel Plan goal: "Ensure that any lands disturbed by human activities are reclaimed or restored to their natural state" i.e., full reclamation.  
• In the absence of full reclamation, the cumulative effects of development will significantly diminish the ability of TH citizens to exercise their rights to hunt, fish and trap in their territory as part of their way of life and therefore constitute an infringement of TH Final Agreement rights.

<p><b>Reclamation &amp; Restoration: Reclamation Bonding</b></p>	<ul style="list-style-type: none"> <li>• The Plan does not reference Reclamation Bonding</li> </ul>	<ul style="list-style-type: none"> <li>• There needs to be a mechanism to ensure sufficient funds are available for reclamation</li> <li>• The cost of reclamation should not be borne by the public</li> </ul>	<ul style="list-style-type: none"> <li>• The Plan should recommend that the Parties ensure that current and future mines in the Dawson Planning Region have closure plans backed up with realistic, adequate and accessible financial security bonds.</li> <li>• Proponents should be held accountable if reclamation standards are not met.</li> </ul>	<ul style="list-style-type: none"> <li>• See cell above</li> </ul>	<ul style="list-style-type: none"> <li>• To ensure adequate reclamation, current and future mines in the Planning Region need to have closure plans backed up with realistic, adequate and accessible financial security bonds.</li> <li>• Companies must be held accountable and be responsible for the costs associated with reclamation, remediation, and restoration.</li> <li>• Enforcement measures should not allow proponents to skip the territory and escape scot-free if reclamation requirements are not achieved.</li> <li>• Achieving balance through reciprocity is an inherent cultural cornerstone of TH and is the way TH views making amends with the land and water after any activity has been undertaken.</li> </ul>
<p><b>Reclamation &amp; Restoration: Reclaiming Legacy Sites</b></p>			<ul style="list-style-type: none"> <li>• Include language directing the Parties to identifying legacy mining sites and include language directing the Parties to ensure that reclamation is undertaken as soon as possible</li> </ul>	<ul style="list-style-type: none"> <li>• See cell above</li> </ul>	
<p><b>Access Management</b></p>	<ul style="list-style-type: none"> <li>• The effects of access infrastructure for industrial land use have high impact on fish and wildlife population, thus they should be carefully managed.</li> <li>• The goal of the plan is that infrastructure is established, maintained, and remediate, minimizing conflicts and cumulative effects, while also allowing people to access such recourses and supports the goals of</li> </ul>	<ul style="list-style-type: none"> <li>• TH supports the Recommended Plan goal that access infrastructure to renewable and non-renewable resources be established, maintained and remediated in a way that minimizes conflicts and cumulative effects.</li> <li>• To achieve the abovementioned goal, the Vision and Goals of the Plan generally, and to effectively implement Special Management Directions and Priority Objectives for specific LMUs, access must be managed effectively.</li> <li>• Access has significant impacts on wildlife and the ecological integrity of lands and water.</li> </ul>	<ul style="list-style-type: none"> <li>• Add joint planning and approval of LMU-level general access management plans to the satisfaction of YG and TH.</li> <li>• Re-position the existing Transportation and Access Management section to Chapter 3, Plan Concepts.</li> <li>• Expand the section to provide high-level guidance on Access Management principles for the entire Region</li> <li>• Provide language regarding how Access Management Plans relate to Wetland Stewardship Areas (WSA) and Caribou Overlays (CO), including a specific recommendation for higher standards of access planning and development in WSA and COs that are connected to protecting the intended values</li> </ul>	<p><b>Dec 2020</b></p> <ul style="list-style-type: none"> <li>• Uncontrolled access routes result in disturbance to furbearers' movement corridors and/ or adversely impact trapping infrastructure.</li> <li>• TH recommended that general management directions should protect habitat for wildlife, movement corridors and wetlands; protective thresholds for cumulative effects, development footprint, access, water withdrawal and disturbance.</li> </ul> <p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>• TH recommended that all SMAs are to be permanently withdrawn from any new industrial land use and surface access</li> </ul>	<ul style="list-style-type: none"> <li>• Access and transportation have influence and impact far beyond the economy. They influence almost all Plan values and all LMUs, and modes of access are the key mechanisms through which virtually all human activities and land uses are realized.</li> <li>• Controlling access is critical to ensuring Sustainable Development and protecting TH's constitutionally protected harvesting rights and way of life, as well as the environmental and cultural integrity of the land.</li> <li>• To preserve the wilderness character of the Yukon, and to protect the special relationship between Yukon Indian People and the Yukon wilderness environment, access must be carefully managed.</li> <li>• The Yukon environment is extremely sensitive to human imprints.</li> </ul>

**Access  
Management**

• See cell above

• See cell above

• Provide language that describe principles and approaches to access, including:

1. Lands and waters that are disturbed by human activities, including lands and waters disturbed by and for access should be restored to their natural state.
2. Full reclamation bonding should be required for all industrial activities, including access, to ensure government can restore lands and waters to their natural state if the proponent is unable or unwilling to do so.
3. Industrial Access, including access for mining exploration, should be managed to minimize ecological and cultural impacts.
4. No access should be allowed in important subsistence harvesting areas, other areas of community use, and areas with cultural and/or historic resources.
5. Access throughout the planning region should be planned and approved jointly, to the satisfaction of YG and TH.
6. Wherever possible, including in the Yukon River Corridor, access nodes should be developed with the potential to serve multiple mining operations to minimize disturbance.
7. Access for mining exploration should be as

• See cell above

• See cell above

**Access  
Management**

• See cell above

• See cell above

• Provide language directing the Parties to agree on appropriate access requirements, including:

- Location and construction of Barge Landings
- Location and construction of Roads
- Identification of access nodes to serve multiple mining operations so as to minimize disturbance, especially for Yukon River Corridor (LMU 3)
- Entities (people, companies) with permission to use the access
- Prescribed purposes for which access may be used

• See cell above

• See cell above

**Access  
Management**

• See cell above

• See cell above

- Include language that direct the Parties to prevent the use of mining claims solely for the purpose of access until such time that new legislation provide for this
- Provide language for joint planning and approval of all trunk roads/road networks throughout region.
- Include a requirement for “Full reclamation” of access disturbance and secure adequate bonding to cover the full cost of reclamation, including requiring proof of available and sufficient security, adjusted for inflation, for full reclamation at all times during exploration and mining.
- Provide language for tools to minimize the ecological and cultural impacts from industrial access, including access for mining exploration, such as prescribed access, baseline data requirements, effective CE thresholds and caribou overlays
- Include a recommendation for no new access routes in areas important for subsistence harvesting and with cultural and historic resources, or other areas of community use, including all LMUs TH is proposing as SMAs. In all other areas, access must be carefully considered and planned, and require approval by both Parties

• See cell above

• See cell above

**Caribou/Caribou  
Overlay**

• Plan objectives are:  
Objectives: 1. Healthy and resilient caribou herd populations that grow towards historic levels; 2. Habitat and migration pathways are sufficient to support historic population levels; 3. A society that respects and is connected to caribou.

• The intent of Caribou Overlays is to provide protection of the caribou population and habitat, which have high ecological and cultural values. Industrial development and access could have a potential negative impact on caribou values

• TH supports the Caribou Overlays but believes more work is needed to ensure their efficacy.

• Overlays are not yet an effective tool for the protection of the Caribou.

• The different elements of the Caribou overlay not identified in the Plan.

• Expand the Caribou Overlays section in Plan Concepts to provide greater detail about the different elements of the Overlay.

• Decouple Caribou Overlays from LMU boundaries and align Caribou overlay to critical caribou habitat and migration corridors

• Provide clarifying language that outlines relationship between Caribou Overlays and the Access Management Planning

• Provide language directing the parties to co-develop regulations for overlays

• Provide further details on the minimum standards for Caribou Overlays. TH believes that caribou overlays should include, at minimum:

- Monitoring for seasonal range loss to zones of influence from disturbances
- Monitoring for the influence of wildfires, including return of lichen in burned areas
- Evaluation of herd viability risks resulting from new access development
- Access planning and management, including mitigation measures tested with ongoing monitoring

• Add Language that require the Parties to commit to a workplan and timeline for caribou-related CE Framework research and indicators

**Dec 2020**

• Caribou has high cultural and ecological importance within the region

• Protection for caribou habitat and movement corridors as crucially important for TH.

**Nov 2021**

• Protecting habitat for wildlife is essential to meeting the objectives of Chapter 16 of the THFA, including to “ensure Conservation in the management of all Fish and Wildlife and their habitats” and to “provide for the Yukon Indian People’s ongoing needs for Fish and Wildlife.” In addition, Tr’ondëk Hwëch'in has the cultural obligation to protect these animals.

**Dec 2023**

• We want healthy aquatic and terrestrial eco-systems. This means maintaining and where necessary restoring abundant populations of caribou, moose, bear, and salmon - so that our people can eat the food that has nourished us for millennia

• Caribou are an appropriate indicator for monitoring the accumulating effects of access to the land by various users.

• Caribou are also a good indicator for the effect of wildfire on ecosystem processes: they rely on lichen-rich older forests and subalpine shrublands that are periodically lost to wildfire.

• There is not enough scientific evidence from northern ecosystems with which to define or prescribe thresholds of cumulative effects (human and fire) below which a herd’s viability is at limited risk.

**Salmon**

• Plan objectives for Salmon are: 1. Stewardship of rivers enhance salmon habitat and support salmon recovery; 2. Salmon migration routes allow for salmon recovery.  
• Salmon recognized as a key species in the region for ecological and socio-cultural reasons  
• Several research recommendations are made to further understand Salmon in the region

• It is TH's view that considerably more must be done to protect salmon habitat in the Dawson planning region.  
• Yukon River Chinook and Chum salmon have always been central pillars of our culture and well-being.  
• Until recently, Chinook and Chum salmon were mainstays of our subsistence.  
• Yukon River salmon are at an historic low.  
• Chinook Salmon are on the verge of function extinction  
• The US and Canada have agreed to suspend all fishing for a full cycle and are embarking on a rebuilding plan

• Include a requirement for adequate baseline data prior to any disturbance in streams where salmon may spawn, emerge, rear, and/or overwinter.  
• In sections of the Plan related to salmon and fish, remove words “known” and/or “identified” when referring to habitat.  
• To ensure damage to salmon habitat is not inflicted due to lack of information, TH proposes the Plan include requirements for adequate baseline data prior to any development activities

**Dec 2020**

• Salmon is extremely significant to TH. For generations, TH people have relied heavily on the salmon runs in the Yukon River and continue to utilize fish camps along its shores. Salmon are an important component of the traditional diet and essential to good health.  
• The importance of salmon to the broader ecosystem and economy is reflected in international agreements, national and territorial salmon research, management and stock restoration efforts and protection initiatives that have been spearheaded by Tr’ondëk Hwëch’in, amongst others.  
• Maintaining quantity and quality of water is important for sustaining populations of salmon.

**Dec 2023**

• We want healthy aquatic and terrestrial eco-systems. This means maintaining and where necessary restoring abundant populations of caribou, moose, bear, and  
• See cell above

• Salmon is extremely significant to TH. For generations, TH people have relied heavily on the salmon runs in the Yukon River and continue to utilize fish camps along its shores. Salmon are an important component of the traditional diet and essential to good health.  
• Salmon migration routes must also be identified prior to considering blocking any potential routes.  
• Chinook Salmon are on the verge of function extinction

**Salmon**

• See cell above

• TH believes it is imperative to support the work of the Salmon Subcommittee

• Include a planning objective for Salmon: Actively support the development and implementation of Yukon River Chinook Salmon Rebuilding Plans

• This work is already happening at the salmon subcommittee and should be incorporated into the plan  
• The Department of Fisheries and Oceans is presently in the process of listing Yukon River Chinook as a 'major species'. Because Yukon River Chinook are presently not meeting escapement objectives, this carries with it a requirement to develop a Yukon River Chinook Rebuilding Plan.  
• It is imperative that the Dawson Regional Land Use plan contain strong provisions to protect both Chinook and Chum salmon  
• DFO is responsible to identify the migration routes. YG shares responsibility to ensure migration routes are not disturbed. Important to recognize that salmon migration routes include routes both upstream and downstream, and include rearing and overwintering areas for Chinook.  
• TH has acted as a guardian of the Salmon in the face of declining numbers -- in recent years TH citizens have voluntarily ended the salmon harvest. This constitutes a major shift in TH cultural practice. TH wants to play an active role with other government partners to ensure a thriving salmon population for the Yukon and to restore important cultural and subsistence practices.

**Salmon**

• See cell above

• Uncertainty over responsibility for salmon an salmon habitat

• Include a recommendation that YG, DFO and TH work together to clarify and codify responsibility for salmon and salmon habitat in the Dawson Planning Region, with the objective of protecting and restoring salmon and salmon habitat so that: Sufficient numbers of Canadian origin Yukon River Salmon return to Canada to meet Yukon River Panel spawning escapement goals and a fulsome TH subsistence harvest of salmon is once more supported.

• See cell above

<b>Salmon</b>	<ul style="list-style-type: none"> <li>• See cell above</li> </ul>	<ul style="list-style-type: none"> <li>• See cell above</li> </ul>	<ul style="list-style-type: none"> <li>• Provide language directing ongoing, rigorous, and consistent water quality and salmon rearing and overwintering habitat suitability research and monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• See cell above</li> </ul>	<ul style="list-style-type: none"> <li>• The THFA protects our rights to harvest Fish for subsistence, as well as our rights to participate in the management of Fish and salmon specifically. Ongoing data collection and monitoring is an integral part of the recovery of Salmon</li> </ul>
<b>Moose</b>	<ul style="list-style-type: none"> <li>• Plan objective: A resilient and growing moose population sufficient to support herd health, as well as current and future harvest levels.</li> <li>• Mitigations relating to moose are closely tied to access in the Region</li> </ul>	<ul style="list-style-type: none"> <li>• TH supports the recommendation that the Parties "Undertake and evaluate values-based indicator research, with a priority placed on the impacts of human-caused disturbance on caribou, moose, salmon, and wetlands." (p.76)</li> <li>• Increasing surface disturbances and linear features are negatively affecting moose habitat</li> </ul>	<ul style="list-style-type: none"> <li>• Provide access management direction within moose key wildlife areas (e.g., calving grounds and winter ranges) with the aim to reduce the number and density of roads, constrain new access, and restore access disturbances.</li> <li>• Add Language that require the Parties to commit to a workplan and timeline for moose-related CE Framework research and indicators</li> </ul>	<p><b>Dec 2020</b></p> <ul style="list-style-type: none"> <li>• Moose identified as a species of particular interest to TH</li> <li>• Several key habitats identified, including calving grounds</li> </ul> <p><b>Dec 2023</b></p> <ul style="list-style-type: none"> <li>• We want healthy aquatic and terrestrial eco-systems. This means maintaining and where necessary restoring abundant populations of caribou, moose, bear, and</li> </ul>	<ul style="list-style-type: none"> <li>• Moose are an important part of TH traditional harvest and diet</li> </ul>
<b>Additional Areas for Conservation</b>	<ul style="list-style-type: none"> <li>• SMA status recommended for LMUs 1, 4, 10, 16, 20</li> </ul>	<ul style="list-style-type: none"> <li>• TH is happy to see several LMUs recommended to be SMAs</li> <li>• TH believes additional conservation areas are needed to protect key ecological and cultural values, including major rivers, portions of LMUs along the Dempster, key caribou habitat, wetlands and moose.</li> <li>• The Recommended Plan identifies approximately 30% of the planning region as Special Management Areas, a significant portion of which is SL.</li> </ul>	<ul style="list-style-type: none"> <li>• Add SMA status for LMUs 3, 6, 7, 17, the Ladue wetlands in LMU 19 and a new LMU with a SMA status (Stewart River Corridor)</li> <li>• TH recommends an expanded boundary for LMU 16 (see appendices for our map)</li> </ul>	<ul style="list-style-type: none"> <li>• TH has consistently outlined the importance of protecting the land and water through conservation and care land management practice done to the highest standards of stewardship.</li> <li>• TH has also submitted various maps that highlight our conservation priorities, including our Dec 2020 submission to the Commission re conservation priorities and the Nov 2021 submission to the Commission re the draft Plan.</li> </ul> <p><b>Dec 2021</b></p> <ul style="list-style-type: none"> <li>• TH recommended 60% of the Region be protected in our Conservation Priority</li> </ul>	<ul style="list-style-type: none"> <li>• TH believes it is necessary to add more conservation areas to the Plan.</li> <li>• We believe this is necessary to achieve a balance between industrial development and our Final Agreement rights/relationship with the land</li> <li>• For Tr'ondëk Hwëch'in, protection and conservation means preserving the wilderness character of the land and its ability to support the subsistence and cultural needs of TH Citizens, and supports TH Citizens' relationship with the land, now and in the future</li> <li>• Appropriate conservation measures are required to support the ongoing meaningful exercise of TH's constitutionally protected rights.</li> <li>• Conservation areas are essential to protect wildlife and habitats, to maintain a high quality of water, to maintain ecosystem intactness, sustain rich biodiversity, and assist with species survival in the face of climate change</li> </ul>
<b>Indigenous Protected and Conserved Areas (IPCAs)</b>	<ul style="list-style-type: none"> <li>• The Plan directs the Parties to support the implementation of an IPCA in LMU4</li> </ul>	<ul style="list-style-type: none"> <li>• TH supports the Commission's recommendation that LMU 4 be an IPCA with TH having primary management responsibility.</li> <li>• TH wants to pursue IPCAs on the understanding that IPCAs are: (1) Indigenous led, (2) represent a long-term commitment to conservation and (3) elevate Indigenous Rights and</li> </ul>	<ul style="list-style-type: none"> <li>• Include additional recommendations promoting potential IPCAs for other LMUs that are of critical interest to TH, including LMU 1, 3, 5, and 10.</li> <li>• Add language that emphasizes that TH is the sole authority over conservation management of SL and co-manager with YG of SMAs that are non-SL</li> </ul>	<p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>• TH request that the Commission provide more information regarding the consideration/implementation (the what/where/and how) of establishing an Indigenous Protected and Conserved Area (IPCA) for LMU 4</li> </ul>	<ul style="list-style-type: none"> <li>• To strength TH capacities to protect and conserve the land in a manner that is consistent with traditional approaches and the Plan</li> <li>• to protect culturally important areas and support the federal government's conservation strategy,</li> </ul>

## Wetlands

- The recommended Plan notes the socio-cultural and ecological importance of wetlands as important ecological areas, including a mention of the importance of wetlands for traditional activities and that development of these areas can result in a permanent alteration of the ecosystem.
- The Plan proposes special wetlands conservation stewardship areas; however, this designation does not protect wetlands legally nor does it withdraw them from activity
- Interim withdrawal and additional management directions are recommended for the LMU 17.
- In addition to their critical role in ecosystem health, wetlands hold immense cultural significance for TH
- We need more research to help inform effective buffer sizes, and how these buffer sizes might vary in relation to the size and type of wetlands
- TH proposes that all bogs, marshes and fens within the Region be protected, which means: additional wetland mapping and investigation, as required; and permanent withdrawal from placer and quartz staking.
- TH wants LMU 17 designated a SMA with an ISA level 2, which means: Permanent withdrawal of placer and quartz staking; No development in undisturbed bogs, marshes and fens within existing tenure, except for existing permits; for existing permitted activities, TH proposes 50% permanent protection of undisturbed fens within the permitted area. If this is deemed impossible, we support the Commission's recommendation for an Upper Indian River Stewardship Plan
- TH proposes that the Ladue wetlands within LMU 19 be designated as SMA, which means: Permanent withdrawal of placer and quartz staking; no access; no development in undisturbed bogs, marshes and fens within existing tenure, except for existing permits; for existing permitted activities, TH proposes 50% permanent protection of undisturbed fens within the permitted area. If this is deemed impossible, TH proposes a Ladue River Stewardship Plan be jointly created by the
- Dec 2020**
  - TH discussed the key roles of wetlands and ecological function, including their role: as habitat for fish and wildlife, in carbon sequestration, and as an important part of TH Citizen's traditional activities.
  - TH recommended keeping wetlands intact as they are ecological hotspots, suggesting protecting them as well as adjacent land and upstream water bodies.
- Nov 2021**
  - TH emphasized the immeasurable value of wetlands and other waterways, suggesting for these areas to have the highest value of conservation.
  - TH pointed out that it is essential to ensure the protection of such water bodies as to uphold TH rights as specified in chapters 5 and 14 of the THFA.
  - TH expressed the need to expand the wetlands of special importance considered in the plan to include areas such as the Flat Creek Wetland, as well as extending the boundaries of the already identified wetlands.
  - TH recommended that no activity should occur in wetlands and that they should have a 200m buffer zone, and that protecting permafrost is essential as well.
- Dec 2023**
  - TH requested a guarantee of the protection of all wetlands, and wanted clarification on the use of
- Wetlands have important cultural and environmental value to TH.
- Wetlands protect water quality and rate of flow (Chapter 14 THFA), are the home of traditional medicines and host a diversity of animals
- Wetlands support biodiversity in the Planning Region, as well as the exercise of harvesting rights under the THFA and other cultural practices.
- They are prime moose habitat and accordingly prime hunting and harvesting grounds for our people.
- Peat wetlands are also critical for sequestering carbon and abating Climate Change.

## Rivers

- The many rivers of the Dawson Planning Region hold high ecological, economic, heritage, and cultural importance.
- Besides LMU 3: Chu Kon Dèk (Yukon River Corridor), the Plan has not identified major river corridors that require specific management direction.
- The main objective for rivers is to maintain and enhance their multi-use character by maintaining their ecological and cultural integrity and balancing their economic uses (i.e., transportation, tourism, etc.).
- Plan objectives include:
  1. Clean and pristine water. Healthy aquatic ecosystems and watersheds;
  2. Stewardship of rivers enhance salmon habitat and support salmon
- TH supports the Plan recommendation to explore personhood for the Yukon River
- TH believes the Plan can go further to protect important rivers in the Region
- TH wants to protect the Stewart River corridor
- Designate LMU 3 (Yukon River Corridor) as an SMA with restrictions on grandfather claims to be developed using hand-mining techniques, and joint access management planning.
- Modify LMU 11 (Goldfields) to create a NEW LMU (22) with an SMA designation along the Stewart River corridor with the same boundary guidelines as LMU 3 (Yukon River) as recommended by TH (i.e., between 1-2kms from the high water mark; see appendices for our map)
- TH recommends personhood for the Yukon and Stewart Rivers
- TH proposes the Commission create a new LMU along the Stewart River within the Region with the same corridor limits and management directions as described in the TH proposed language for the Yukon River Corridor (LMU 3)
- Dec 2020**
  - TH Goal for key river corridors: Conservation measures should preserve the values and characteristics that make major river corridors ecologically and socio-culturally important, including critical habitats, intact landscapes, and opportunities for appropriate cultural and non-industrial access and use.
  - Managing views capes along these river corridors by preventing visual anthropogenic activities is essential in maintaining TH's spiritual connection and continued use of the ancestral routes along these waterways.
  - Several rivers were identified as a conservation priority for TH including but not limited to the Yukon River, Stewart River, and the Indian River
- Nov 2021**
  - TH identified four key areas for conservation that included Key River Corridors (Yukon, Stewart, and Klondike Rivers)
  - TH recommended establishing a Major River Corridor designation and made recommendation for Corridors for rivers not covered under the Draft Plan, including the Klondike and Stewart River Corridors; and
  - TH recommended developing specific General Management Directions for water, that include, at a minimum: The protection of water quality, quantity, and rate of flow through and adjacent to Settlement Land as per Chapter 14 of the THFA; The need for adequate water with drawal monitoring and treating
- Rivers in the Region are home to diverse aquatic ecosystems. Protecting these waterways ensures the health and stability of ecosystems, which are essential for maintaining biodiversity and protecting TH's harvesting rights.
- Residents of the Region rely on rivers as a source of drinking water. Contaminated water sources can pose serious health risks to both humans and wildlife.
- Protecting river water quality ensures that communities have access to safe and clean drinking water and honours the THFA.
- Water holds significant cultural and spiritual importance for TH.
- Protecting water quality and preserving natural habitats are essential for sustaining economic activities in the Region, including tourism and agriculture activities
- Healthy rivers and waterways play a crucial role in mitigating the impacts of climate change. They help regulate local climates and maintain water supplies. Protecting water resources is essential for building resilience to climate change in the Region

## Rivers

- Re salmon: Minimize surface and vegetation disturbance in riparian areas by maintaining riparian buffers/setbacks from development activities where possible.
- Re forestry practices: Maintaining riparian buffer zones around on-land activity is important for protection and function of aquatic ecosystems.

- TH believes the Plan should provide greater direction regarding the protection of riparian zones

- Include a 200m riparian buffer on important rivers in the Region where the river is not within a SMA and/or in LMU recommended for sub-regional planning (Note: TH is proposing SMA status for all of LMU 3 and LMU 22)
- Rivers recommended for this buffer include: Klondike River (including North and South branches, outside of LMUs 12 & 13), Forty Mile River, Sixty Mile River, White River, and Ladue River

### Dec 2020

- Riparian areas adjacent to rivers and creeks offer distinct ecosystem services that protect water quality, play an important role in flood mitigation and provide valuable wildlife habitat (beaver, waterfowl, otter etc.).

### Nov 2021

- TH recommended that the Commission revisit the need for conservation of important waterways as well as riparian areas for the Recommended Plan

- Riparian buffers are essential as they act as natural filters, trapping pollutants, sediment, and nutrients before they reach water bodies. Additionally, they help stabilize stream banks, reduce erosion, and provide shade that regulates water temperature, creating healthier aquatic ecosystems and benefiting both wildlife and human communities.
- Functioning river ecosystems and intact riparian areas support TH cultural use along river ecosystems, such as hunting, fishing, and harvesting, because they provide necessary habitat for animals, fish and culturally important plants and berries. Protecting these rivers and their riparian ecosystems also honours the cultural significance of water and rivers to TH
- Up to 200 m riparian buffers are required in other Jurisdictions, such as Alberta (Alberta Timber Harvest Planning and Operating Ground Rules Framework for Renewal)

<p><b>Baseline Data</b></p>	<ul style="list-style-type: none"> <li>• The plan mentions that indicators are limited by the data availability and the potential of measurement of such data.</li> <li>• The definition of baseline data include the physical, chemical, biological, socioeconomic, and cultural aspects of an area.</li> <li>• There are multiple mentions of the need of further monitoring and collection of additional data on things such as extent of wetlands, water quality, linear disturbance, and on several key species such as grizzly and black bears.</li> <li>• The plan mentions that indicators are currently focused on ecological components, these are surface disturbance and</li> </ul>	<ul style="list-style-type: none"> <li>• TH supports the Plans recommendation for ongoing data collection, including baseline data, to allow for more effective project assessment and monitoring</li> <li>• TH wants to see language that requires solid adequate baseline data prior to any development, including exploration, to better understand potential adverse effects of a project on TH values and VSECs. Exploration is part of development. Wherever "development" or "development activities" are referenced, exploration is included.</li> </ul>	<ul style="list-style-type: none"> <li>• Add a definition for "Adequate baseline data". TH's recommended definition is as follows: "Adequate baseline data" describes the current conditions of a valued component, including the range and variability of conditions, and evaluates potential project effects.</li> <li>• Include language to state that baseline data is typically considered adequate if it: <ul style="list-style-type: none"> <li>-- Characterizes aquatic, terrestrial, atmospheric, and heritage and historic resources that may be adversely affected;</li> <li>-- Relies on scientifically defensible and repeatable methodologies that will be used throughout all project phases to evaluate project effects;</li> <li>-- Determines potential pathways of effects, impact mechanisms and relevant indicators;</li> <li>-- Identifies terrain and environmental hazards (potential effects of the environment on the project);</li> <li>-- Allows the prediction of the significance of a project's impacts and the effectiveness of proposed mitigation activities throughout all project phases;</li> <li>-- Supports the design of water quality (including groundwater, where required) and environmental effects monitoring programs, that will allow for the evaluation of the actual</li> </ul> </li> </ul>	<p><b>Dec 2020</b></p> <ul style="list-style-type: none"> <li>• Attention was drawn to several difficulties that arise from the lack of data, such as an accurate assessment of mining industry impacts, mentioning that it is difficult to know the real impact of such activities as externalities regarding ecological and socio-cultural impacts can not be fully quantified.</li> <li>• TH suggested conducting comprehensive analyses that extend to the full range of costs and benefits of such activities beyond the value of the extracted minerals, considering ecological and sociocultural externalities as well as the costs that local communities incur by allowing such activities.</li> </ul> <p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>• TH noted that indicators used to inform cumulative effects management should reflect TH social and cultural values, as well as indicators of climate change and natural hazards.</li> <li>• TH noted concerns about out-of-date data, especially regarding the impact of current and future mining development (claims and authorizations) on key ecological areas.</li> </ul> <p><b>Dec 2023</b></p> <ul style="list-style-type: none"> <li>• TH proposed adding additional Cumulative Effects indicators to the plan, including water quality, abundance of wildlife, and others.</li> </ul>	<ul style="list-style-type: none"> <li>• When we live Tr'èhudè, we sustain what is most valuable to us.</li> <li>• Collecting adequate baseline data to inform what values may be impacted and how we can return the land in a respectful way is true to living in a good way.</li> <li>• In the context of the Dawson Planning Region, baseline data collection and analysis should contribute to achieving the goals of the DRLUP, including: <ol style="list-style-type: none"> <li>1. Manage development at a sustainable pace.</li> <li>2. Maintain the wilderness character of much of the planning region.</li> <li>3. Maintain ecological integrity by ensuring terrestrial and aquatic habitats remain in a suitable condition to sustain healthy native fish populations and wildlife and communities within their natural ranges.</li> <li>4. Maintain the quantity, quality, and rate of flow of water within its natural range.</li> <li>5. Ensure that any lands disturbed by human activities are reclaimed or restored to their natural state.</li> <li>6. Recognize, conserve, and promote the heritage and cultural resources and values, and traditional land use practices, of affected First Nations and the Yukon.</li> </ol> </li> </ul>
<p><b>Baseline Data</b></p>	<ul style="list-style-type: none"> <li>• See cell above</li> </ul>	<ul style="list-style-type: none"> <li>• See cell above</li> </ul>	<ul style="list-style-type: none"> <li>• Add Language that indicates, before any development activities can begin (including exploration activities), adequate baseline data be collected on: <ul style="list-style-type: none"> <li>-- Wildlife and terrestrial habitats</li> <li>-- Fish, water bird, aquatic habitat and water quality</li> <li>-- Heritage and historic resources</li> <li>-- Existing surface disturbances</li> <li>    Spawning, Roosting and Overwintering</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• See cell above</li> </ul>	<ul style="list-style-type: none"> <li>• See cell above</li> </ul>

### Critical Minerals

- It is noted in the Plan that Critical Minerals are a major concern for YG, some LMUs may contain critical minerals.
- TH supports the careful development of Critical Minerals
- TH believes gold is not a critical mineral
- Provide language in the Plan that supports mining for critical minerals only as part of an integrated and comprehensive strategy to address climate change and protect TH rights. The strategy must address: reconciliation; UNDRIP (as the federal Critical Mineral Strategy does); paced mineral development, in accordance with agreed upon CE thresholds and in a manner that does not adversely affect TH Final Agreement rights, cultural and subsistence needs, including salmon and caribou.
- TH wants to see language in the Plan
- Dec 2023:**
  - TH supports much of the Critical Mineral Strategy, but not at the cost of salmon and caribou ecosystems. TH wants to moderate the pace of mining, in part, through stringent regulation.
  - The development of critical mineral must respect UNDRIP and work towards Reconciliation.
- TH supports the careful and sustainable mining for critical mineral as a part of the fight against climate change.
- Gold mining in the Region does not assist in the fight against climate change, it contributes to it

### Climate Change

- The plan recognizes that Climate Change is a threat to the Dawson Region and that little is known about how ecosystem function and species' behaviour will be affected
- TH believes that Plan does not go far enough to address climate change
- TH proposes the Plan have stronger and more comprehensive provisions to address climate change. Please refer to the Appendix X for an analysis of the Plan through a Climate Change lens
- Nov 2021**
  - TH Recommended:
    - To consider adding more robust and tangible recommendations that address climate change throughout the entirety of the Plan. For example, the General Management Direction sections could emphasize the impacts different industries have on climate change (i.e. transportation and the construction of roads) and the impacts from climate change on different values (the traditional economy and agriculture);
    - To review and adapt the listed objectives of the climate change section to include: Recognising the way climate change is affecting Tr'ondëk Hwëch'in rights, regional governance, and capacity; Support the development of self-sufficiency initiatives, food security, and sustainable renewable energy development;
  - In addition to mitigating the effects to permafrost
- TH stands behind the Yukon First Nations Climate Change Emergency Declaration, which states there is no greater threat today to First Nations culture, way of life, and the wellness of First Nation Citizens and communities than the impacts of climate change.

**Special Management Areas and Settlement Land**

- Several SL blocks are within LMUs designated as SMAs
- The Plan mentions that on SL decision-making and legal powers are held by their respective FN.
- Each SMA and its management provisions will be defined in its own individual management plan developed by YG and TH, and with input from the Renewable Resource Council and Fish and Wildlife Management Board.

- See cell above

- TH agrees with the goal of conservation and protection for the SMA LMUs of which TH Settlement Land is a part, but does not agree to include Settlement Land in SMA designations. SMA status would dilute TH management authority over Settlement Land.

- TH would like to strengthen language regarding the co-management of non-SL SMAs

- **To avoid confusion, the term “SMA” should not be applied to TH Settlement Land.**

- Management Directions should be inserted that specify that Non-SL in SMAs should be co-managed by TH and YG, whereas conserved areas on TH Settlement Land should be designated under TH laws and managed exclusively by TH within the spirit and intent of the management directions and thresholds for the LMU.

- Provide language in management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations for TH SL

- Clarify management directions regarding joint approval of access so that it is limited to non-SL access and that TH manages access on SL

- Include language clarifying that TH & YG will co-manage all SMAs on non-SL ("otherwise agree" as per THFA 10.5.1)

- TH has diligently and consistently defended the THFA and TH SGA and the rights and authority described in these agreements in all major submissions to the Commission, including the Nov 2021 submission on the Draft Plan.

**Dec 2020**

TH states that TH retains direct control of all Settlement Land, including the right to manage and plan for SL, and the powers to enact laws on SL.

**Dec 2020**

- Dënezhu dătr'inche'e states that "it is our responsibility to protect our Traditional Territory as a whole."

- TH noted the THFA citation on the meaningful participation in the management of land and resources.

- TH expressed intention to independently manage SL.

- TH discussed collaborative management between TH and YG for protected and conserved areas on non-settlement land in THTT.

**Nov 2021**

- Introduction states that the Region represents 75% of TH Traditional Territory (THTT) and that the THTT is their responsibility, indicating that the TH are integral not only as decision-making authority but as part of the land itself.

- TH approaches to land management and the co-management of the land are essential to the goals of reconciliation.

- TH explicitly states that there must be joint TH participation on all areas of the Region.

**Dec 2023:**

- TH makes an explicit call for the YG to uphold its consultation commitments with TH as well as a

- TH gave up rights and title to 96% of its Traditional Territory in exchange for meaningful participation in the management of public resources, including Chapter 11 Land Use Planning. For TH, the planning process does not stop with the drafting of the document but also extends to the implementation and management of lands and water throughout the Planning Region, especially areas of cultural and ecological significance.

- In light of TH's Final Agreement and Self-Government Agreement, TH is best positioned to manage, conserve and protect its Settlement Land

- TH intends to retain full management authority over its own Settlement Land and does not want that diluted in any way

- TH has an ancestral obligation to steward the land and the THFA allows for the co-management of SMAs.

- TH wants to continue to meaningfully participate in the planning and management of lands within its Traditional Territory

- In the Peel case the Supreme Court of Canada confirmed that "a clear objective" of Regional Land Use Plans is "to ensure First Nations meaningfully participate in land use management in their traditional territories", on both Settlement Land and Non-Settlement Land.

**Special Management Areas and Settlement Land**

**ISAs and Settlement Land**

- Several SL parcels are located within ISA LMUs.
- There are several SL parcels, including many smaller SL parcels, located within the working landscape. TH is concerned that industrial activity will interfere with the peaceful use and enjoyment of SL.
- Add a 200m buffer, where no industrial activity should occur, around SL parcels that are not surrounded by bordered by SMAs. Within the buffer, all mining activity should be restricted to hand-mining, only.

**Dec 2020**

- TH states that TH retains direct control of all SL, including the right to manage, and plan the region, as well as the powers to enact laws in it.

**Nov. 2021**

- To avoid land use conflicts and to provide a base for traditional activities for TH citizens.

**Nov. 2020**

- TH supports proposed ISA designation on SL for the use of non-renewable resource extraction, under the conditions that the development does not have irreversible impact and ensures economic benefits to TH citizens or TH as a whole. Note, this reserved right would represent a minimum.

- Many of the smaller SL blocks were selected by specific TH individuals or families. They often have a special significance to the people who identified these areas for Settlement Land.

- Buffers around these SL parcels are necessary to protect the peaceful use and enjoyment of SL by our Citizens and their pursuit of traditional economic activities and land

- Citizens and the TH Government expect to be able to use Settlement Land for the purpose for which it was selected, or as decided otherwise by TH.

- TH agrees to use Settlement Land in a way that is consistent with the LMU designations and related Cumulative Effects thresholds specified in the Plan (if consensus can be achieved on those elements of the Plan), provided that mining and other non-TH industrial uses leave reasonable space in those thresholds for TH

**ISAs and Settlement Land**

- See cell above
- TH Settlement Land was selected for specific purposes, including traditional uses, cabins, fish camps, homesteads, agriculture activities, and general economic development
- TH is concerned that a TH Citizen or the TH Government may not be able to develop SL for non-traditional pursuits purposes in a LMU where development
- TH would like to reserve rights to the CE threshold relative to the proportional amount of SL within a given LMU

**Implementation**

- The parties have the responsibility for implementing the plan, according to the legislation, policies and decision-making processes of both YG and TH, in addition to the customs and traditions of TH. The parties should work together in order to implement the Plan.
- TH would like to see additional triggers for Plan review and modification
- Provide an additional trigger for plan review and modification that is linked to extreme weather events and geologic events (e.g., fire, flood, landslides)

**Nov 2021**

- TH suggested that the commission to be more comprehensive on its inclusion of climate change measures and effects on several topics, as it is the greatest threat to the wellness of first nations.
- TH asked for explicit clarification on how climate change will be considered in an adaptive management implementation.
- TH recommended the commission to propose proactive measures of climate change adaptation and mitigation, and asserts that climate change and its effects should be triggers for a plan review.

- Enhances adaptive management by providing a mechanism to adapt and respond to evolving risks, ensuring the Plan remains relevant, resilient, and responsive to changing conditions.

**Implementation**

- See cell above

• TH would like to see further clarifying language regarding Plan implementation

• Include consistent language throughout the Plan stating that TH and YG must jointly implement the Plan and must mutually agree to any changes to the Plan in the future, including the further development of the cumulative effects framework, and for scheduled reviews  
• There must be certainty in the Plan that co-management applies to the Parties to the Plan and, where agreed by the Parties, Affected First Nations. Consultation may be required for other First Nations, such as White River First Nation, according to the Crown’s constitutional obligations; however, these First Nations should not be included in the co-management process.

**Nov 2021:**

- Section 5 is entirely focused on the co-management and on the co-implementation of the plan by the parties, pointing out the need to explicitly stating that joint management and joint implementation are critical to the plan.
- TH requested clarification on the implementation of adaptive management and on the definition and process of defining cumulative effects framework.

- The Supreme Court of Canada noted: “under the Yukon treaties, the Yukon First Nations surrendered their Aboriginal rights in almost 484,000 square kilometres, roughly the size of Spain, in exchange for defined treaty rights in respect of land tenure and a quantum of settlement land (41,595 square kilometres), access to Crown lands, fish and wildlife harvesting, heritage resources, financial compensation, and participation in the management of public resources “ ( Beckman v. Little Salmon/Carmacks First Nation, 2010 SCC 53, at para. 9)
- The Supreme Court of Canada has further stated that it is a clear objective of Chapter 11 to ensure First Nations meaningfully participate in land use management in their traditional territories and to foster a positive, mutually respectful, and long-term relationship between the parties to the Final Agreements (see First Nation of Nacho Nyak Dun v. Yukon, 2017 SCC 58, at para. 47).
- TH sees joint-implementation of Chapter 11 land use plans as essential to uphold these central promises of the TH Final Agreement.
- See cell above

**Implementation**

- See cell above

• TH would like to see further clarifying language regarding co-management of SMAs

• The Plan should be modified to clarify and strengthen TH’s role in the governance and management of the Planning Region through the following changes, include the following language as adapted from the Peel Plan regarding Future Special Management Areas: For the purposes of Section 10.5 of the Umbrella Final Agreement, Management of Future Special Management Areas, this means that the Government of Yukon “otherwise agrees” such that:

1. The Parties to the Plan will have joint management authority for all of the Special Management Areas in the [Dawson Region];
2. The Parties shall jointly prepare, or have

- See cell above

**Implementation**

- See cell above

• The Plan does not provide adequate guidance about how and when withdrawals will be lifted, TH’s role in lifting withdrawals, or what baseline of protection will be provided at the time

- Include language indicating that lifting any interim withdrawals in the Region must be jointly agreed to by TH & YG.
- Include language to allow for additional withdrawals if needed as per to principles of

**Nov 2021:**

- Mention on the need for withdrawals to protect areas in LMUs and that any decision to lift mineral withdrawal should be a joint decision made by TH and YG.

- As stewards of the land, TH must have certainty over when and how withdrawals can be lifted.
- This is the approach used in the Peel for Wilderness Areas.

**Co-Management**

• Recommendations co-management or joint managements and decision making, however, there is little guidance on process.

• Co-management and joint decision making are not adequately addressed in the Recommended Plan. The Recommended Plan does not include strong enough language regarding the role that TH will play in future decision making associated with plan implementation.

• The Plan should be modified to clarify and strengthen TH’s role in the governance and management of the Planning Region through the following changes, include the following language as adapted from the Peel Plan regarding Future Special Management Areas: For the purposes of Section 10.5 of the Umbrella Final Agreement, Management of Future Special Management Areas, this means that the Government of Yukon “otherwise agrees” such that:  
1. The Parties to the Plan will have joint management authority for all of the Special Management Areas in the [Dawson Region];  
2. The Parties shall jointly prepare, or have prepared a management plan for each Special Management Area;  
3. The Parties shall jointly make best efforts to complete the management plans within five years of the establishment of the Special Management Areas; and  
4. The Parties shall jointly review each management plan at least once every 10 years.

**Dec 2020**

• TH noted that "it is our responsibility to protect our Traditional Territory as a whole."  
• THFA citation on the meaningful participation in the management of land and resources.  
• TH expressed intention to independently manage SL.  
• All areas identified in the submission contributed to the upholding of TH rights under the THFA, moreover there is an explicit mention of collaborative management between TH and YG for protected and conserved areas on non-settlement land in TH Traditional Territory.

**Nov 2021**

• Introduction states that the Region represents 75% of TH Traditional Territory and that TH has an ancestral responsibility to care for and steward the land, indicating that TH are integral not only as decision-making authority but as part of the land itself.  
• Upholding TH approaches to land management and the co-management of the land are essential to reconciliation.

**Dec 2023**

• There is an explicit call for the YG to uphold its consultation commitments with TH as well as a statement on TH's meaningful participation in the management of SL and non-SL as well.

• As noted by the Supreme Court of Canada, “under the Yukon treaties, the Yukon First Nations surrendered their Aboriginal rights in almost 484,000 square kilometres, roughly the size of Spain, in exchange for defined treaty rights in respect of land tenure and a quantum of settlement land (41,595 square kilometres), access to Crown lands, fish and wildlife harvesting, heritage resources, financial compensation, and participation in the management of public resources “ ( Beckman v. Little Salmon/Carmacks First Nation, 2010 SCC 53, at para. 9).  
• The Supreme Court of Canada has further stated that it is a clear objective of Chapter 11 to ensure First Nations meaningfully participate in land use management in their traditional territories and to foster a positive, mutually respectful, and long-term relationship between the parties to the Final Agreements (see First Nation of Nacho Nyak Dun v. Yukon, 2017 SCC 58, at para. 47).  
• TH sees co-management in the implementation of Chapter 11 land use plans as essential to uphold these central promises of the TH Final Agreement.

**Co-Management**

• See cell above

• See cell above

• TH proposes that Access Management for Industrial Activities on Non-Settlement Land, including mining exploration, should be agreed

• See cell above

• See cell above

**Co-Management**

• The Plan uses both terms, co-management or joint management, interchangeably.

Use of both co-management and joint management in the plan

• Select a single term (e.g., “co-management” or “joint”) to use consistently throughout the Plan -- preference for co-management as this is more commonly used in the literature  
• Include a definition in glossary for the selected term

• See cell above

• For clarity and consistency

**Co-Management**

- See cell above
- TH would like to strengthen language regarding the co-management of non-SL SMAs
- Include language clarifying that TH & YG will co-manage all SMAs on non-SL ("otherwise agree" as per THFA 10.5.1)

**Dec 2020**

- Dënezhu dät'r'inche'e states that "it is our responsibility to protect our Traditional Territory as a whole."
- TH noted the THFA citation on the meaningful participation in the management of land and resources.
- TH expressed intention to independently manage SL.
- TH discussed collaborative management between TH and YG for protected and conserved areas on non-settlement land in THTT.

**Nov 2021**

- Introduction states that the Region represents 75% of TH Traditional Territory (THTT) and that the THTT is their responsibility, indicating that the TH are integral not only as decision-making authority but as part of the land itself.
- TH approaches to land management and the co-management of the land are essential to the goals of reconciliation.
- TH explicitly states that there must be joint TH participation on all areas of the Region.

**Dec 2023:**

- TH makes an explicit call for the YG to uphold its consultation commitments with TH as well as a

- TH has an ancestral obligation to steward the land and the THFA allows for the co-management of SMAs.
- TH wants to continue to meaningfully participate in the planning and management of lands within its Traditional Territory
- In the Peel case the Supreme Court of Canada confirmed that "a clear objective" of Regional Land Use Plans is "to ensure First Nations meaningfully participate in land use management in their traditional territories", on both Settlement Land and Non-Settlement Land.

**Management Directions**

- Management directions (MDs) appear throughout the Plan. There are general management directions that apply to the entire Region and Special Management Directions that apply to specific LMUs and/or values
- Some MDs direct for co-management and/or co-approval or development projects in SMA designated LMUs
- Edit any language that directs co-management of co-approval of development projects to specify that this is in relation to non-SL, only

**Nov 2021**

- TH asked for clarification on the extent of adaptive management as well as on the role of co-management, as it is imperative for TH to make clear the objectives of the THFA Chapter 11 will be met. TH marks the relevance of ensuring their participation on the management of public resources throughout the region in crown land and settlement land.
- TH specified that co-management should be explicitly reflected on several sections: Guiding principles, Plan goals, General Management Direction, and Plan recommendations. Ensuring that TH meaningfully participates in the management through the region. Both in crown land and settlement land.

**Dec 2023**

- TH ceded, released and surrendered aboriginal rights and title to more than 96% of TH Traditional Territory, retaining exclusive management authority and many Self-Government powers only on TH Settlement Land.
- TH does not want its authority over SL to be diluted in any way

**Interim Measures**

- The Plan recommends several activities that must be undertaken to inform how certain LMUs will be managed.
- The Plan needs to clarify what happens to the land and water between the time the Plan is approved and fully implemented
- TH endorses the continued development of the CE Framework throughout implementation to assist in defining reclamation standards.

- Until the recommended activities can be completed, the Plan should mandate appropriate interim measures to maintain the current state of the land and water.
- TH proposes that interim reclamation standards that are specific, measurable and tailored to the Dawson Region (for example the Peel standards, which are measurable) are put in place until the Parties have completed their collaborative work on developing reclamation standards.
- The Plan should direct the Parties to prevent the use of mining claims solely for the purpose of access. Until mining legislation is amended

**Nov 2021**

- Recommendation: To explicitly state what interim measures should be considered prior to the completion of the sub-regional plans in these important areas. (2024 NOTE: While TH references interim measures for sub-regional planning areas in 2021, we are now raising this issue as it relates to the entire region and the successful implementation of the Plan)

- To ensure the vision and objectives of the Plan are achieved, interim measures must be in place
- Until such time as all recommended activities are completed, the status quo is not acceptable.
- The protection of the land and orderly, paced development in areas where it is permitted in critical to Plan implementation, ensuring the continuance of TH's way of life, and reconciliation

**Tools to Realize Plan Vision & Objectives**

- The Plan puts forth many recommendations that will require the use of existing policy and legislative tools and some that will require new tools be developed
- In drafting the Final Recommended Plan, Commissioners should be open to including language that encourages, or where appropriate requires, YG to use existing tools or develop new tools, whether that be under current or future legislation and policies.

- Add language that encourages the Parties to commit to using existing and new tools as necessary to ensure the Recommended Plan's Vision and Objectives are upheld, and that the Plan is fully implemented.
- Provide clearer direction regarding Plan implementation e.g. what activities are permitted in different LMUs, particularly between different classes of ISAs (see section on Integrated Stewardship Areas above). This will help the Parties determine what tools will be required to implement the Plan.

**Dev 2023**

- TH asked YG if it is willing to use all the tools in the current toolbox to protect culturally or environmentally sensitive areas in the planning region, tools such as: a. Special Operating Area provisions of the Placer and Quartz Mining Acts; b. Land Management Zones under the Territorial Lands (Yukon) Act; c. Withdrawals, where necessary alongside other tools, to achieve the objectives of the Plan for an LMU, even if the LMU is an ISA.
- TH asked YG if it is willing to make commitments to develop new tools, if necessary, to achieve

- In order to achieve the Plan Vision and Objectives, and to effectively implement the Plan, existing and possibly new tools must be used to manage land use.
- YG has existing tools they can utilize and can create new tools where existing tools may not exist.
- Without commitment to utilize the full range of tools available under existing legislation or policy and a willingness to develop new tools, where needed, to implement the Plan, it will be operationally impossible to achieve the Plan Vision and Objectives for the planning region as a whole or the Priority Objectives set out for specific LMUs

**Integrated Stewardship Areas**

- ISAs are defined as areas with multiple activities happening on the land and of not having high conservation value.
- The plan divides them into 4 categories number 1 having the most strict disturbance threshold and the 4 the least strict.
- Most LMUs, including all ISAs, are assigned a specific land designation (ISA 1-4) to indicate the relative level of conservation or development focus.
- Cumulative effects indicators are tracked, monitored, and compared to their designation's ISA designation CE threshold to determine conformity with each LMU.
- The Plan provides very high-level guidance on development activities permitted in an LMU, e.g., industrial

- TH recommends that ISAs should be differentiated not just by management intent, cumulative disturbance and linear feature indicator thresholds, but also by the types of activities that may be permitted.
- TH would like to see a greater degree of detail regarding the types of activities allowed in an LMU. For example, whether all types of mining are permitted in an LMU or if only certain types of mining are allowed in certain LMUs (e.g., LMU 7)

**Dec 2023:**

- There are multiple requests for clarification by TH on YG's stance on mining and its specific provisions.

- Certain activities may be inconsistent with the values and priorities for an ISA, even if they do not exceed the cumulative disturbance and linear feature indicator thresholds.
- To provide additional direction for the implementation of the Plan and clarity as to what tools will need to be used to implement the Plan.

<p><b>Integrated Stewardship Areas</b></p>	<ul style="list-style-type: none"> <li>• The plan recommends a permanent withdrawal from all SMA, including the non-renewal of lapsed tenure.</li> <li>• An interim withdrawal from staking is recommended until a decision is reached on LMU 7, the same recommendations is made for LMU 21, including the mention</li> </ul>	<ul style="list-style-type: none"> <li>• Staking is allowed in some LMUs where the Plan also identifies very high ecological or heritage/cultural value</li> </ul>	<ul style="list-style-type: none"> <li>• Add a permanent withdrawal from staking in LMUs with ISA1 where the Recommended Plan identifies very high ecological or heritage/cultural value within a sensitive biophysical setting. Alternatively, additional overlays could be used to prescribe restrictions on activities in specific ISAs, for example to prevent staking but allow access, or to allow mining for critical minerals but not more generally.</li> </ul>	<p><b>Dec 2020</b></p> <ul style="list-style-type: none"> <li>• TH suggested the withdrawal of the conservation areas from staking which includes all wetlands</li> <li>• Proposed stewardship area 1 regions are mentioned to have a priority of reclamation and protection against disturbance.</li> </ul> <p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>• TH called for an interim withdrawal of several LMUs, to consider impact on culturally and ecologically significant areas.</li> <li>• Lifting any withdrawal should be a joint decision made by both TH and YG.</li> </ul> <p><b>Dec 2023</b></p>	<ul style="list-style-type: none"> <li>• It is imperative to TH that sensitive areas are afforded a degree of protection, even in the working landscape, to preserve ecological integrity and cultural heritage while balancing resource development demands</li> </ul>
<p><b>Sub-Regional Planning</b></p>	<ul style="list-style-type: none"> <li>• The Recommended Plan identifies three areas for sub-regional planning: the Dempster Corridor, the Klondike Valley, and the Yukon River Corridor.</li> </ul>	<ul style="list-style-type: none"> <li>• How Sub-regional planning occurs must be clear.</li> </ul>	<ul style="list-style-type: none"> <li>• TH would like to see additional language regarding sub-regional planning, including a recommendation for TH &amp; YG to jointly undertake sub-regional planning on non-SL with the participation of the Commission, as invited by the Parties</li> <li>• TH wants to be a Party to any sub-regional</li> </ul>	<p><b>Nov 2021:</b></p> <ul style="list-style-type: none"> <li>• TH mentions joint management and co-management, and joint implementation, of all LMU whether they are SL or non-SL. Section 6 has a specific recommendation on the joint management of sub-regional planning units.</li> </ul>	<ul style="list-style-type: none"> <li>• TH believes a strong mandate from the commission regarding sub-regional planning, including a degree of detail that reduces possible confusion of misinterpretation regarding how and when the process is to proceed, will help ensure that planning activities occur in a timely fashion</li> </ul>
<p><b>Ongoing Development of the CE Framework</b></p>	<ul style="list-style-type: none"> <li>• The Plan recommends that further development of the CE Framework continue</li> </ul>	<ul style="list-style-type: none"> <li>• Continuing the development of the CE Framework</li> </ul>	<ul style="list-style-type: none"> <li>• Given the ongoing importance of the development of the CE Framework, TH supports this collaborative work as part of implementation, including the joint development of reclamation and restoration standards.</li> </ul>	<p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>• Recommendation: To ensure that the cumulative effects management framework establishes appropriate and additional indicators for the Dawson planning region;</li> </ul> <p><b>Dec 2023</b></p> <ul style="list-style-type: none"> <li>• We want to make solid commitments to add additional Cumulative Effects indicators to the Plan, such as water quality, abundance of species like caribou and moose, and potentially others.</li> <li>• Over time, TH wants to add Cumulative Effects</li> </ul>	<ul style="list-style-type: none"> <li>• Collaborative development of the CE framework, including identifying appropriate indicators and developing definitions, is critical to the success of the Plan and effective implementation</li> </ul>

<b>Ongoing Role of the Commission</b>	<ul style="list-style-type: none"> <li>The Plan recommends that Parties and YLUPC should continue to fund the DRPC. This work will include: <ul style="list-style-type: none"> <li>Plan monitoring as per S 11.4.5.10.</li> <li>Sub-regional planning.</li> <li>Conformity checks and representations to YESAB.</li> <li>The 5-year Status Report and 10-year Plan</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The role of the Commission as it relates to implementing the plan needs to be clarified by the Parties</li> </ul>	<ul style="list-style-type: none"> <li>TH proposes that, through funding from Canada and YG as required, the Commission continue to exist to do the following: <ul style="list-style-type: none"> <li>Make conformity determinations and representations to YESAB as per 12.17.1, 12.17.2, and 12.17.3 of the THFA;</li> <li>Monitor the implementation of the Approved Plan in order to monitor compliance with the Plan and assess the need for amendment of the Plan;</li> <li>Participate in Sub-regional planning as invited by the Parties;</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>TH has consistently supported the work of the Commission</li> </ul>	<ul style="list-style-type: none"> <li>As per S 11.4.5.10 of the THFA, a Commission “may monitor the implementation of the approved regional land use plan, in order to monitor compliance with the plan and to assess the need for amendment of the plan.”</li> <li>An ongoing Commission would increase capacity for Plan Implementation, Conformity Checks, Variances and Amendments, Monitoring, and Revision.</li> <li>To allow for local knowledge to inform Implementation activities and reduce confusion as to how the Plan should be interpreted.</li> <li>A “Plan champion”, independent of the Parties, may aid in Plan implementation.</li> </ul>
<b>LMU-Specific Modification</b>	<p><b>Tthetäwndek (Tanduk) - SMA</b></p> <p>Area of high cultural and ecological relevance, recommended for conservation with limited use. Industrial land use permitted within ISA 1 CET. Includes non-SL and SL parcels: TH R-48A, TH R-4A, TH R-5A, TH R-76A,</p>	LMU 1	<ul style="list-style-type: none"> <li>Remove SMA status from SL</li> <li>Provide language to Special Management Directions that directs the parties to jointly approve an access management plan (not just jointly consider access management)</li> <li>Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations within TH SL</li> <li>Provide language that acknowledge that TH will manage and conserve SL in a way that</li> <li>Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations within TH SL</li> </ul>	<p><b>Dec 2020</b></p> <ul style="list-style-type: none"> <li>TH proposed the Northern Area as a conservation region due to its high wildlife value, role in migration pathways, and its extensive uses for traditional pursuits.</li> <li>It is a key preservation area for contribution to the region's climate change resilience, and essential to the Hän culture and traditional economy.</li> </ul> <p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>Support for SMA status with ISA 1</li> <li>TH suggested further archeological research, and</li> </ul> <p><b>Dec 2020</b></p> <ul style="list-style-type: none"> <li>LMU included in the Northern Area conservation region, but also proposed as a Stewardship Area 1, aiming for increased management to protect the interest of TH citizens and their traditional pursuits.</li> </ul> <p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>Support for ISA 2</li> <li>TH suggested consideration to linkages to the Dempster Corridor and other LMUs and highlighted the</li> </ul>	<ul style="list-style-type: none"> <li>TH ceded, released and surrendered aboriginal rights and title to more than 96% of TH Traditional Territory, retaining exclusive management authority and many Self-Government powers only on TH Settlement Land.</li> <li>TH does not want its authority over SL to be diluted in any way</li> <li>TH wants to ensure co-manage access</li> </ul> <ul style="list-style-type: none"> <li>TH ceded, released and surrendered aboriginal rights and title to more than 96% of TH Traditional Territory, retaining exclusive management authority and many Self-Government powers only on TH Settlement Land.</li> <li>TH does not want its authority over SL to be diluted in any way</li> </ul>
<b>LMU-Specific Modification</b>	<p><b>Horseshoe - ISA 2</b></p> <p>Intended to support subsistence hunting and harvesting, and to ensure the habitat requirements of the Porcupine caribou herd are met. SL parcel R-49A</p>	LMU 2			

<b>LMU-Specific Modification</b>	<b>Chu Kon Dëk (Yukon River Corridor) - Sub-Regional Planning Area</b>	LMU 3	<ul style="list-style-type: none"> <li>• Designate non-SL in LMU as SMA</li> <li>• Modify boundaries of the LMU to be a minimum of 1Km from the high water level, accept in areas where the full valley bottom exceeds 1Km, in which case, the LMU boundary should extend to 2Km from the high water level. If sub-regional planning is deemed to be the best option, add language that outlines a joint planning process among TH and Government</li> </ul>	<b>Dec 2020</b>	<ul style="list-style-type: none"> <li>• The Yukon River is of vital importance to TH, other First Nations, and the Yukon Territory as a whole.</li> </ul>
	Intended for future planning, prioritizing protection and enhancement of water quality. Intended to preserve its role as a key habitat and to allow for sustainable transportation, tourism,		<ul style="list-style-type: none"> <li>• Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and</li> <li>• Remove SMA status from SL</li> </ul>	<ul style="list-style-type: none"> <li>• TH proposed the Yukon, Klondike and Stewart rivers as conservation areas, as they play a critical role in many aspects such as natural habitat, the salmon ecosystem, water source for the population, cultural significance to TH, and other aspects such as connectivity and ecotourism values, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• TH ceded, released and surrendered aboriginal rights and title to more than 96% of TH Traditional Territory, retaining exclusive management authority and many Self-Government powers only on TH Settlement Land and does not want to dilute that authority in any way.</li> </ul>
<b>LMU-Specific Modification</b>	<b>Tsey Dëk (Fifteenmile) - SMA</b>	LMU 4	<ul style="list-style-type: none"> <li>• Change language to direct the parties to jointly approve (not just jointly consider) access management</li> <li>• Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations within TH SL</li> </ul>	<b>Dec 2020</b>	<ul style="list-style-type: none"> <li>• TH ceded, released and surrendered aboriginal rights and title to more than 96% of TH Traditional Territory, retaining exclusive management authority and many Self-Government powers only on TH Settlement Land.</li> </ul>
	Intended for conservation with limited use. Industrial land use permitted within ISA 1 CET. Includes non-SL and SL parcels: TH R-1A, TH R-3A, TH R-64B, TH R-		<ul style="list-style-type: none"> <li>• Provide language that acknowledged that TH</li> <li>• Remove SMA status from SL</li> <li>• Provide language to Special Management Directions that directs the parties to jointly approve an access management plan (not just jointly consider access management)</li> </ul>	<ul style="list-style-type: none"> <li>• TH proposed the Northern Area as a conservation region due to its high wildlife value, role in migration pathways, and its extensive uses for traditional pursuits.</li> <li>• It is a key preservation area for contribution to the region's climate change resilience, and essential to the Hän culture and traditional economy.</li> </ul>	<ul style="list-style-type: none"> <li>• TH does not want its authority over SL to be diluted in any way</li> </ul>
<b>LMU-Specific Modification</b>	<b>Ddhäl Ch'ël (Tombstone) - SMA</b>	LMU 5	<ul style="list-style-type: none"> <li>• Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations within TH SL</li> <li>• Designate non-SL in LMU as SMA</li> </ul>	<b>Nov 2021</b>	<ul style="list-style-type: none"> <li>• See cell above</li> </ul>
	A protected area designated as Natural Environment Park. Includes non-SL and SL Parcels: TH R-19B, TH R-34B, TH S-138B1, TH S-145B1, TH S-28B1, TH S-29B1, TH S-26B1/D, TH S-		<ul style="list-style-type: none"> <li>• Provide language that acknowledged that TH</li> <li>• Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations within TH SL</li> <li>• Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations within TH SL</li> <li>• If SMA status is deemed appropriate, provide language that acknowledge that TH will manage and conserve SL in a way that supports a way of</li> </ul>	<ul style="list-style-type: none"> <li>• Support for SMA status with ISA 1</li> <li>• TH proposed the Northern Area as a conservation region due to its high wildlife value, role in migration pathways, and its extensive uses for traditional pursuits.</li> <li>• It is a key preservation area for contribution to the region's climate change resilience, and essential to the Hän culture and traditional economy.</li> </ul>	<ul style="list-style-type: none"> <li>• This LMU falls within TH's Cultural Integrity Area. The Cultural Integrity Area includes key wildlife habitat for many species of wildlife and is consequently a highly used area within TH Traditional Territory. It is an area of very high value to TH, and to the environmental integrity of TH Traditional Territory.</li> <li>• TH ceded, released and surrendered aboriginal rights and title to more than 96% of TH Traditional Territory, retaining exclusive management authority and many Self-Government powers only on TH Settlement Land.</li> <li>• TH does not want its authority over SL to be diluted in any way</li> </ul>
<b>LMU-Specific Modification</b>	<b>Tr'ondëk (Klondike) - ISA 2</b>	LMU 6		<b>Dec 2020</b>	
	Area designed for sustainable development, with a special consideration to water purity as it provides for the City of Dawson and surrounding area. Includes non-SL and SL parcels: TH R-38A, TH S-112B1, TH S-142B1, TH S-			<ul style="list-style-type: none"> <li>• TH proposed the Northern Area as a conservation region due to its high wildlife value, role in migration pathways, and its extensive uses for traditional pursuits.</li> <li>• It is a key preservation area for contribution to the region's climate change resilience, and essential to the Hän culture and traditional economy.</li> </ul>	
				<b>Nov 2021</b>	
				<ul style="list-style-type: none"> <li>• Recommended SMA status</li> <li>• TH suggested to ensure that impact to lynx must be avoided, as well as listing special protection to water</li> </ul>	

**LMU-Specific  
Modification**

**Wehtr'e (Antimony) - ISA 1** LMU 7

Key Caribou habitat, envisioned for conservation focus with limited development of existing mineral tenure and carefully managed surface access. Interim withdrawal in place. Includes non-SL and SL parcels: TH R-41B, TH S-123B1, TH S-143B1, TH S-

- Designate non-SL in LMU as SMA
- Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations within TH SL
- Provide language that acknowledge that TH will manage and conserve SL in a way that supports a way of life that is based upon a spiritual and economic relationship with the land and complements adjacent DRLUP SMAs on Non-SL.

**Dec 2020**

- TH proposed the Northern Area as a conservation region due to its high wildlife value, role in migration pathways, and its extensive uses for traditional pursuits.
- It is a key preservation area for contribution to the region's climate change resilience, and essential to the Hän culture and traditional economy.

**Nov 2021**

- Recommended SMA status
- TH reaffirmed its goals of protecting waterways, wetlands, and the caribou habitat.
- TH also recommends to emphasize the ecological

- See cell above

**LMU-Specific  
Modification**

**Brewery Creek - ISA 3** LMU 8

Area set for sustainable development and preservation of key values. Includes non-SL and SL parcels: TH R-63A, TH S-159B1, TH S-203B, TH S-204B1, TH S-80B1

- Add a Special Management Direction that provides a 200m buffer around SL parcels where no industrial activity should occur. Within the buffer, grandfathered claims and any new claims permitted should be restricted to hand-mining, only.
- Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations within TH SL
- Provide language to restrict future mineral development to Critical Minerals, only

**Dec 2020**

- TH proposed the Northern Area as a conservation region due to its high wildlife value, role in migration pathways, and its extensive uses for traditional pursuits.
- It is a key preservation area for contribution to the region's climate change resilience, and essential to the Hän culture and traditional economy.

**Nov 2021**

- Support for ISA designation
- Recommended a modified boundary

• This LMU falls within TH's Cultural Integrity Area. The Cultural Integrity Area includes key wildlife habitat for many species of wildlife and is consequently a highly used area within TH Traditional Territory. It is an area of very high value to TH, and to the environmental integrity of TH Traditional Territory.

• Buffers around these SL parcels are necessary to protect the peaceful use and enjoyment of SL by our Citizens and their pursuit of traditional economic activities and land uses

• Given the strong cultural connection to this area and ecologically sensitive values, mineral extraction should be limited to critical minerals, as they are critical for society. Gold is not a critical mineral.

• TH ceded, released and surrendered aboriginal rights and title to more than 96% of TH Traditional Territory, retaining exclusive management authority and many Self-Government powers only on TH Settlement Land.

• TH does not want its authority over SL to be diluted in any way

• Buffers around these SL parcels are necessary to protect the peaceful use and enjoyment of SL by our Citizens and their pursuit of traditional economic activities and land uses

• TH ceded, released and surrendered aboriginal rights and title to more than 96% of TH Traditional Territory, retaining exclusive management authority and many Self-Government powers only on TH Settlement Land.

• TH does not want its authority over SL to be diluted in any way

**LMU-Specific  
Modification**

**Clear Creek - ISA 4** LMU 9

Area set for sustainable development and preservation of key habitat areas for woodland caribou. Includes non-SL and SL parcels: TH R-2A and TH R-79B

- Add a Special Management Direction that provides a 200m buffer around SL parcels where no industrial activity should occur. Within the buffer, grandfathered claims and any new claims permitted should be restricted to hand-mining, only
- Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations within TH SL

**Dec 2020**

- TH proposed the Northern Area as a conservation region due to its high wildlife value, role in migration pathways, and its extensive uses for traditional pursuits.
- It is a key preservation area for contribution to the region's climate change resilience, and essential to the Hän culture and traditional economy.

**Nov 2021**

- Support for ISA designation

**LMU-Specific  
Modification**

**Tintina Trench - SMA w/  
ISA 2** LMU 10

Area designated for conservation purposes and traditional pursuits. It is also a source for water for Dawson City and holds significance to the Nacho Nyäk Dun First Nation as well. Some industrial, timber and agricultural uses are allowed. Includes non-SL and SL parcels: TH R-2A, R-7A, R-21B, R-22B, R-79B, R-80B, S-19 B1/D, S-

- Remove SMA status from TH SL
- Provide language that acknowledge that TH will manage and conserve SL in a manner that respects the spirit and intent of the LMU objective and management direction and TH approaches to conservation

- Strike the language in the square brackets from Special Management Direction 1.c. and modify it to state: "Any industrial activity must consider the strong conservation value of this area, take into consideration the objectives, values, and rationale listed in this Plan ~~and would require agreement of both Parties~~. Any proposed **industrial activity on non-SL requires the agreement of both Parties**."

- Provide language to management directions
- Add a Special Management Direction that provides a 200m buffer around SL parcels where no industrial activity should occur. Within the buffer, grandfathered claims and any new claims permitted should be restricted to hand-mining, only
- Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations within TH SL

Dec 2020

- TH proposed the Northern Area as a conservation region due to its high wildlife value, role in migration pathways, and its extensive uses for traditional pursuits.
- It is a key preservation area for contribution to the region's climate change resilience, and essential to the Hän culture and traditional economy.

Nov 2021

- Support for SMA status with ISA 2
- Recommended a modified boundary
- TH reaffirmed its goals of protecting waterways, wetlands, and the caribou habitat.
- TH recommended placing permanent and interim withdrawals in key areas, such withdrawals should not be removed without TH agreement.

**Dec 2020**

- Wetlands were identified as conservation areas due to their key ecological and cultural functions.
- TH emphasizes the role of the region as a once significant harvest area for citizens, containing important habitat for many species.
- TH stated its goal mitigating and limiting the impacts of mining, with a focus on wetland protection.

**Nov 2021**

- Support for ISA 4
- Recommended areas for SMA status
- TH suggested the inclusion of the Steward River as a special corridor and points out the need of further monitoring to collect baseline data, as well as

- TH ceded, released and surrendered aboriginal rights and title to more than 96% of TH Traditional Territory, retaining exclusive management authority and many Self-Government powers only on TH Settlement Land.
- TH does not want its authority over SL to be diluted in any way

**LMU-Specific  
Modification**

**Goldfields - ISA 4** LMU 11

Area designated for sustainable development with preservation of key areas. The area comprises bast portions of the Indian and Stewart Rivers, with prevalent wetlands along them. Includes non-SL land and SL parcels: TH R-12A, TH R-18A, TH R-20A, TH R-46A, TH R-47A, TH R-58B, TH R-61A, TH R-62A, TH R-

- Buffers around these SL parcels are necessary to protect the peaceful use and enjoyment of SL by our Citizens and their pursuit of traditional economic activities and land uses
- TH ceded, released and surrendered aboriginal rights and title to more than 96% of TH Traditional Territory, retaining exclusive management authority and many Self-Government powers only on TH Settlement Land.
- TH does not want its authority over SL to be diluted in any way

<p><b>LMU-Specific Modification</b></p>	<p><b>Tr'ondëk Tāk'it (Klondike Valley) - Sub-Regional Planning Area</b>          LMU 12          Contains non-SL and SL          Parcels: TH C-14B, TH C-16B, TH C-7B, TH R-14A, TH R-20A, TH R-38A, TH R-64B, TH S-106B1, TH S-113B1, TH S-122B1, TH S-126B1, TH S-153B1, TH S-165B, TH S-166B1, TH S-41B</p>	<ul style="list-style-type: none"> <li>• TH supports the Sub-regional Planning Area designation</li> </ul>	<p><b>Dec 2020</b></p> <ul style="list-style-type: none"> <li>• TH proposed the Yukon, Klondike and Stewart rivers as conservation areas, as they play a critical role in many aspects such as natural habitat, the salmon ecosystem, water source for the population, cultural significance to TH</li> </ul> <p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>• TH reaffirmed its goals of protecting waterways and wetlands,</li> <li>• TH recommended permanent and interim withdrawals in key areas, such withdrawals should not be removed without TH agreement.</li> <li>• TH supported sub-regional planning for this LMU and points out the need of further monitoring to collect baseline data, as well as managing for higher standards of water quality and flowrate through</li> </ul>	<ul style="list-style-type: none"> <li>• TH believes this is an appropriate designation</li> </ul>
<p><b>LMU-Specific Modification</b></p>	<p><b>Ch'ënyäng (City of Dawson) - CA</b>          LMU 13          Comprised of non-SL and 72 THSL parcels.</p>	<ul style="list-style-type: none"> <li>• TH support Community Area designation</li> <li>• TH does not support mining in the Community Area</li> </ul>	<p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>• TH supported LMU designation and pointed out the need of further monitoring to collect baseline data, as well as managing for higher standards of water quality and flowrate through adjacent settlement areas.</li> </ul>	<ul style="list-style-type: none"> <li>• see cell above</li> </ul>
<p><b>LMU-Specific Modification</b></p>	<p><b>Tay Dëkdhät's (Top of the World) - ISA 2</b>          LMU 14          The goal of this area is to enhance cultural and community values while allowing limited sustainable development. Chu To Dëk (Swede Creek) is a source of drinking water. It also contains the Clinton</p>	<ul style="list-style-type: none"> <li>• Add a Special Management Direction that provides a 200m buffer around SL parcels where no industrial activity should occur. Within the buffer, grandfathered claims and any new claims permitted should be restricted to hand-mining, only</li> <li>• Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations within TH SL</li> </ul>	<p><b>Dec 2020</b></p> <ul style="list-style-type: none"> <li>• TH stated it goals for highway corridors is to balance the multiple uses while minimising habitat disturbance.</li> </ul> <p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>• Recommended areas for SMA status</li> <li>• TH suggested buffers to all areas of cultural significance to TH Citizens.</li> <li>• TH mentioned the value of the area for chum and other species.</li> <li>• Reclamation of Clinton Creek site is needed</li> </ul>	<ul style="list-style-type: none"> <li>• Buffers around these SL parcels are necessary to protect the peaceful use and enjoyment of SL by our Citizens and their pursuit of traditional economic activities and land uses</li> <li>• TH does not want its authority over SL to be diluted in any way</li> </ul>
<p><b>LMU-Specific Modification</b></p>	<p><b>Khel Dëk (Sixty mile) - ISA 3</b>          LMU 15          Area envisioned to protect key caribou habitat areas and to allow for sustainable development. Includes non-SL and SL parcels: TH R-11A, TH R-43A, TH S-107B1, TH S-14B1, TH S-</p>	<ul style="list-style-type: none"> <li>• Add a Special Management Direction that provides a 200m buffer around SL parcels where no industrial activity should occur. Within the buffer, grandfathered claims and any new claims permitted should be restricted to hand-mining, only</li> <li>• Provide language to management directions clarifying that TH is the sole authority to prepare, approve, review, and modify plans and regulations within TH SL</li> </ul>	<p><b>Dec 2020</b></p> <p>TH suggested management focused on preserving the integrity of caribou ecosystem, especially the connection between Matson Uplands (LMU 16) and the Dawson Range in the south.</p> <ul style="list-style-type: none"> <li>• This goal conflicts with current mining uses.</li> </ul> <p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>• TH suggested at least a designation of the LMU as ISA 2 as the proposed designation contradicted the management statement.</li> </ul>	<ul style="list-style-type: none"> <li>• see cell above</li> </ul>

**LMU-Specific Modification**

**Wédzey Nāhuzi (Matson Uplands) - SMA**  
 Core summer habitat for the Fortymile Caribou Herd. Management direction outline no new surface access to the LMU. Non-SL.

- TH proposes modified boundaries for this LMU. Please refer to our map in this submission
- Add language that directs the parties to jointly approve (in addition to jointly consider) access management if any form of new access or access infrastructure is contemplated

- Dec 2020**
- Fortymile and the southern tip of the planning region are proposed as Stewardship Area 1, prioritizing the conservation of areas important for Caribou.
- Nov 2021**
- Support for SMA status
  - Recommended boundary modifications
  - The draft LMU boundary did not meet the needs of the caribou herd which should be prioritized above all else.

- To provide additional protection for the Forty Mile Caribou
- The protection and recovery of Caribou in the region is critical to ecosystem integrity and to ensure that TH's harvest rights and way of life are upheld

**LMU-Specific Modification**

**Nān Dhòhdāl (Upper Indian River Wetlands) - ISA 2**  
 The area comprises part of the Indian River Wetland, prioritizing the limitation of development, and high standards of reclamation. Non-SL.

LMU 17

- Designate LMU as an SMA, which means:
  - Permanent withdrawal of placer and quartz staking;
  - No development in undisturbed bogs, marshes and fens within existing tenure, except for existing permits;
  - For existing permitted activities, TH proposes 50% protection of undisturbed fens within the permitted area.

- Dec 2020**
- Wetlands are identified as conservation areas due to their key ecological and cultural functions.
  - Wetlands are ecological hotspots and considered under high level threat across Canada, moreover, they provide essential function to the water function and fish and wildlife depend on them.
  - Wetland disturbance represents a disproportional loss to regional biodiversity.
- Nov 2021**
- Recommended SMA status
  - Recommended boundary modifications
  - TH reaffirmed its goals of protecting waterways, wetlands, and the caribou habitat.
  - TH recommended a permanent and interim withdrawals in key areas, such withdrawals should not be removed without TH agreement.
  - Permafrost and wetlands should always be protected.

- TH has raised concern about the destruction of wetlands from placer mining in the Indian River valley for a decade or more.
- This area is of significant cultural importance to TH. Prior to intense mining, Citizens used to frequent the area for hunting and trapping. The current level of activity has displaced our people from this valley.
- The wetland ecosystem has been badly damaged. Much of the landscape has not been reclaimed.
- TH would like to see what is left of the wetlands in the Upper Indian River remain intact.
- This would contribute significantly to reconciliation, and to protection of TH rights relating to harvesting.

**LMU-Specific Modification**

**Therian Dēk (Coffee Creek) - ISA 3**  
 The area is envisioned as one focused on sustainable development. The area is a migration corridor for two caribou herds. Non-

LMU 18

- Designate LMU as ISA 4
- Add Language to general management directions that placer mining should not occur until such time that the Coffee Creek Quartz Heap Leach Mine has been reclaimed
- Add Language to allow for carefully considered CE exceedances for the proposed Coffee Creek Quartz Heap Leach Mine

- Dec 2020**
- The southern tip of the planning region was proposed as Stewardship Area 1, prioritizing the conservation of areas important for Caribou.
- Nov 2021**
- Support for ISA 3
  - TH stated that any placer development should not interfere with baseline data collection and monitoring,

- In order to better protect the land and to allow for more accurate monitoring of the effects of mining activities, TH does not want to see two types of mining occurring in this LMU
- Limiting the quartz and placer mining overlap will also aid in more effective CE monitoring and implementation

<b>LMU-Specific Modification</b>	<p><b>Tädzan Däk (White River) - ISA 1</b> LMU 19</p> <p>The area has many key ecological functions, includes the Ladue Wetlands and is within the range of two caribou herds. It is recommended to allow the lowest level of development. Comprises non-SL and SL parcels: TH R-44A, TH R-45B, TH R-50A, TH S-17B1</p>	<ul style="list-style-type: none"> <li>• Designate the Ladue Wetlands to be designated as an SMA, which means: <ul style="list-style-type: none"> <li>-- Permanent withdrawal of placer and quartz staking</li> <li>-- No unplanned or unagreed access;</li> <li>-- No development in undisturbed bogs, marshes and fens within existing tenure, except for existing permits; and</li> <li>-- For existing permitted activities, TH proposes 50% protection of undisturbed fens within the permitted area.</li> </ul> </li> <li>• Add a Special Management Direction that provides a 200m buffers around SL parcels where no industrial activity should occur.</li> <li>• Add additional language to the Special Management Direction that directs the parties to jointly consider and approve any future access</li> </ul>	<p><b>Dec 2020</b></p> <ul style="list-style-type: none"> <li>• Wetlands are identified as conservation areas due to their key ecological and cultural functions.</li> <li>• Wetlands are ecological hotspots and considered under high level threat across Canada, moreover, they provide essential function to the water function and fish and wildlife depend on them.</li> <li>• Disturbance to wetlands represents a disproportional loss to regional biodiversity.</li> </ul> <p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>• Support for ISA 1</li> <li>• TH reaffirmed its goals of protecting waterways, wetlands, and the caribou habitat.</li> <li>• TH recommended placing permanent and interim</li> </ul>	<ul style="list-style-type: none"> <li>• The Ladue Wetlands are important calving ground habitat for moose, an underrepresented value in the Plan.</li> <li>• This habitat needs to be protected because it is critical moose habitat and protecting it will help safeguard moose populations from hunting pressures.</li> <li>• The area is also of cultural significance to TH and Citizens have identified this area as an important place that requires more protection.</li> </ul>
<b>LMU-Specific Modification</b>	<p><b>Luk Tthe K'ät (Scottie Creek Wetlands) - SMA</b> LMU 20</p> <p>Designated mainly as a conservation wetland complex. Non-SL</p>	<ul style="list-style-type: none"> <li>• TH proposes modified boundaries for this LMU. Please refer to our map in this submission</li> <li>• Add language to Special Management Direction that indicates that any new access should be jointly considered and agreed to, if deemed acceptable</li> <li>• Add a Special Management Direction that provide a 200m buffer around SL parcels where no industrial activity should occur. Within the buffer, grandfathered claims and any new claims permitted should be restricted to hand-</li> </ul>	<p><b>Dec 2020</b></p> <ul style="list-style-type: none"> <li>• Wetlands are identified as conservation areas due to their key ecological and cultural functions.</li> <li>• Wetlands are ecological hotspots and considered under high level threat across Canada, moreover, they provide essential function to the water function and fish and wildlife depend on them.</li> <li>• Their disturbance represents a disproportional loss to regional biodiversity.</li> </ul> <p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>• Support for SMA status</li> <li>• TH reaffirmed its goals of protecting waterways, wetlands, and the caribou habitat.</li> <li>• TH recommended placing permanent withdrawals</li> </ul>	<ul style="list-style-type: none"> <li>• Access is the means through which any future development in the LMU will occur. As such, TH must be a co-manager of future access</li> </ul>
<b>LMU-Specific Modification</b>	<p><b>Wédzey Tąy (Fortymile Caribou Corridor) - ISA 2</b> LMU 21</p> <p>The designation permits some industrial activity. The plan mentions that the area will prioritize the preservation of the caribou corridor. Includes non-SL and SL parcel TH S-13B1.</p>	<ul style="list-style-type: none"> <li>• TH proposes modified boundaries for this LMU. Please refer to our map in this submission</li> <li>• Add language to Special Management Direction that indicates that any new access should be jointly considered and agreed to, if deemed acceptable</li> <li>• Add a Special Management Direction that provide a 200m buffer around SL parcels where no industrial activity should occur. Within the buffer, grandfathered claims and any new claims permitted should be restricted to hand-</li> </ul>	<p><b>Dec 2020</b></p> <ul style="list-style-type: none"> <li>• Fortymile was proposed as a conservation area due to its ecological importance a key summer role as a caribou herd habitat, as well as being used by Alaskan herds.</li> <li>• Fortymile and the southern tip of the planning region are proposed as Stewardship Area 1, prioritizing the conservation of areas important for Caribou.</li> </ul> <p><b>Nov 2021</b></p> <ul style="list-style-type: none"> <li>• Recommended SMA status</li> </ul>	<ul style="list-style-type: none"> <li>• To provide additional protection for the Forty Mile Caribou</li> <li>• The protection and recovery of Caribou in the region is critical to ecosystem integrity and to ensure that TH's harvest rights and way of life are upheld</li> <li>• TH does not want its authority over SL to be diluted in any way</li> </ul>

**LMU-Specific  
Modification**

The area of this proposed NEW LMU  
LMU is found mostly  
within recommended  
LMU 17 (I don't think it  
includes LMU 17) (ISA 2)  
LMU 11 (ISA 4).

- Create a new LMU along the Stewart River within the Region with the same corridor limits and management directions as described in the TH proposed language for the Yukon River Corridor (LMU 3)
- Only non-SL in the LMU should be designated as SMA
- Access management for the Corridor should consider and accommodate the proposed Northern Access Route.

**Dec 2020**

- TH proposes the Yukon, Klondike and Stewart rivers as conservation areas, as they play a critical role in many aspects such as natural habitat, the salmon ecosystem, water source for the population, cultural significance to TH, and other aspects such as connectivity, reclamation and ecotourism values, etc.

**Nov 2021**

- Recommended for SMA status
- TH suggested the inclusion of the Stewart River as a special corridor and points out the need of further monitoring to collect baseline data, as well as

- TH wants to protect the Stewart River Corridor
- Protective measures are needed to ensure the ecological and socio-cultural importance of the Stewart River Corridor for both TH and NND
- Managing viewscales along the river corridor by preventing visual anthropogenic activities is essential in maintaining TH's spiritual connection and continued use of the ancestral routes along these waterways.
- TH SL within the corridor should not be included in the SMA designation because TH does not want its authority over SL to be diluted in any way

































