

Government of Yukon **Rationales for Major** **Proposed Modifications**

June 6, 2024



1. Implementation

Position

YG is in favour of:

- Improving clarity for assessors, regulators, industry and others;
- Approving the Parties' Technical Representative's (PTR) work on improving the clarity and implement-ability of the plan;
- Potential phased implementation of some aspects of the plan to ensure it can practicably be implemented.

Rationale

The Government of Yukon is recommending changes to the Plan text to improve the clarity of the document for all users and ensure that it will be implementable within the existing assessment and regulatory system. YG is preparing a tracked changes version of the Plan that will highlight problem areas and recommend changes to address concerns.

2. Caribou Overlays

- YG would like to work with TH and the Commission to update Caribou Overlays including boundaries and new conditions that would apply to development within the boundaries.
- We suggest the Technical Working Group may be a good venue to host these discussions.

Rationale

- The current Caribou Overlays within the Recommended Plan have major shortcomings. The overlays are confined to LMU boundaries, rather than to caribou herd ranges, and do not provide clear and easy-to-use direction for plan users.
- Adjusted boundaries:
- Create overlay boundaries that are tailored geographically to individual caribou herds (Clear Creek, Hart River, Klaza and Fortymile), rather than LMU boundaries.
- The proposed caribou overlays are necessary to maintain protection for caribou in critical habitat areas that are also identified for industrial activity.

3. Climate Change

- YG is in favour of the proposed modifications related to climate change that have been created by the TH-YG technical working group.

Rationale

- Climate change is stated as a priority in the Recommended Plan, but specific actions and direction to achieve the broader objectives are missing.
- The technical experts' work connects high-level policy to actions; adds and corrects clarity and consistency of terms; and adds some specific direction that was absent.
- Updating climate change data and projections in the Plan leads to more informed and regionally specific policy and management.
- Most actions in the Plan are relevant to building the knowledge base of climate change impacts and supporting climate risk reduction. This will contribute to climate resilience, a key target of Our Clean Future.

Background/Support

YG's previous response

- Consensus finalization of this work was on PTR's agenda for November 7th, and on SLC's agenda for approval in November (at meeting or via email).
- YG's Draft Plan response: Climate change is in the plan but not explicit (Draft Plan response and May 9, 2022 letter).

FN and Public Consultation:

- The Parties heard from the public and First Nations that climate change needs to be more meaningfully considered and addressed in the plan.

Proposed changes summary:

Updated climate projections

- YG has provided up to date climate projections and related maps for the planning area, as well as for each Land Management Unit. Having these downscaled projections provides a basis for region-specific policy and management.
- Summarized key projected changes in relevant sections of existing text.

Government of Yukon Rationales for Major Proposed Modifications

- Added new information to the descriptions of each Land Management Unit that describes projected climate change and implications to relevant values.

Revised management directions and recommendations

- Suggested minor edits throughout the document to clarify climate change relevance to management directions and policy or research recommendations.
Clarifying climate
- change relevance helps tie together broader objectives with specific policy and management directions.
- Recommended removal of several casual mentions of “mitigation” (referring to emission reduction). The plan lacks specificity regarding how it would support or achieve this and mitigation can be considered as part of the sustainable development goal. Some uses of mitigation refer to what would more correctly be categorized as adaptation.

Adaptive management

- Recommended language to acknowledge that timing windows for allowable activities and thresholds for cumulative effects may need to be adjusted to reflect changing climate impacts. By focusing on adaptive management strategies, future consideration of climate change in policy and management practices is promoted.
- As proposed, parties will conduct a major review of the Plan once every 10 years. This would be an acceptable interval to reflect changes in knowledge from climate science provided that other suggestions for adaptive management are followed.

4. Landscape Management Unit 1 Access

- YG supports TH, and the plan's recommendation for an access management plan, but would like to ensure that in the absence of an access management plan, an access route to the existing cobalt deposits can be developed within LMU 1 if the cobalt deposit is shown to be viable.
- YG recommends that the Commission considers stating within the plan, that in the absence of an access management plan, the details of where and how access is provided to these claims within LMU 1 shall be dealt with at the project level and in accordance with existing regulatory processes.
- YG will provide feedback to the Commission as part of modifications to the recommended plan, which includes recommendations that outline the key considerations for a proponent to consider as part of an application for access.

Rationale

- In early 2017, the Yukon Minister of Energy, Mines and Resources, the Grand Chief of the Council of Yukon First Nations and the Chiefs of Yukon's eleven Self-Governing First Nations signed the Mining Memorandum of Understanding. This MOU commits the Yukon Government and Yukon's Self-Governing First Nations to the long-term responsible management of Yukon's mineral resources and to supporting a healthy mining industry that adheres to high environmental standards.
- The Yukon Mineral Development Strategy and Recommendations (2021) includes a strategic priority to "create substantive and sustained Yukon socio-economic returns from resource development that benefit Yukon First Nations, local communities and all Yukoners today and in the future.
- Critical minerals are becoming an increasingly important part of international conversations about clean energy, and in the last decade many countries have been actively defining lists of critical minerals, including Canada. The Government of Yukon's 'Our Clean Future' strategy identifies four goals, three of which call for investments in clean energy:
 - reduce Yukon's greenhouse gas emissions;
 - ensure Yukoners have access to reliable, affordable and renewable energy; and
 - build a green economy.

Government of Yukon Rationales for Major Proposed Modifications

- Government of Yukon considers critical minerals to underpin the transition to “green” energy and essential for the economy.
- LMU 1 contains one of the few known cobalt deposits in Yukon. Cobalt is a critical mineral and is among five others identified for their necessity as inputs to priority supply chains, particularly for production of batteries for electric vehicles.
- It is a priority to ensure there could be access to these claims if the resource is demonstrated to be viable. It is equally important to preserve the cultural, environmental and wildlife values, which is why stringent conditions have been developed through the planning process.
- If an access management plan is not in place by the time an application is received, the existing regulatory process can check that the application is in conformity with the plan.
- The approach will contribute toward meeting the objectives of the 2017 Mining Memorandum of Understanding to support a healthy mining industry that adheres to environmental standards, the 2021 Mineral Development Strategy and Recommendations and Our Clean Future strategy (2020) to provide opportunities for access to critical minerals that help to achieve the goals of transitioning toward a clean energy and objectives for sustained socio-economic returns for affected communities.

Background/Support

YG's previous response

- Draft Plan response: Cobalt mineral deposit in LMU 1 would need access.
- June 1, 2022 letter: “clarity and certainty are needed for access to cobalt deposits”.
- Support for an access management plan, however, in the absence of one, regulatory processes apply as per each jurisdiction.

FN and Public Consultation:

- The area covered by LMU 1 contains some of the most undisturbed and wilderness landscapes of the planning region and is rich in Tr’ondëk Hwëch’in history.
- The area is critical for cultural continuity and maintaining ties to the land for Tr’ondëk Hwëch’in citizens.
- Importance of LMU 1 for Sheep habitat.

Government of Yukon Rationales for Major Proposed Modifications

- Importance of access to support mineral economy

Technical Reason:

- Access is needed if the cobalt deposit is shown to be viable.
- An access management plan would provide specific direction and conditions if an access were to be developed. Detailing specific conditions provides certainty for proponents and confidence to governments that access would be responsibly developed and reclaimed.
- The exact route of the road should not be determined at this stage, as this level of detail is too fine for a regional land use plan.

5. SMA Quantum

Position

- YG supports a conservation area quantum that is equivalent to Draft Plan levels for public lands. This equates to 35.6% of the planning region (including Tombstone Territorial Park and excluding Settlement Lands).
- YG's preference for how this quantum would be distributed is:
 - SMAs designated in the recommended Plan remain as SMAs.
 - The northern portion of LMU 3 becomes an SMA
 - LMU 7 becomes an SMA after the boundary is adjusted as per YG's proposed boundary change for LMUs 7/8 (see attached map).
 - Interim withdrawals are removed from the Plan

Rationale

- Helps reach Canada's conservation targets. Allows for Yukon's total protected area quantum to exceed our stated 25% by 2025 goal detailed in the Bilateral Nature Agreement.
- Achieves a balance between the multiple values on the landscape.
- Ensures that the areas that Yukon has identified as those with highest conservation priority are located within areas designated as SMAs in the Plan.

6. Interim Withdrawals

Position

The Government of Yukon wants interim prohibition of entry (interim withdrawals) removed from the Plan.

Rationale

Interim withdrawals are included in the Recommended Plan in LMU 3: Chu Kon Dëk (Yukon River Corridor), LMU 7: Wehtr'e (Antimony), LMU 17: Nän Dhòhdäl (Upper Indian River Wetlands) and LMU 21: Wëdzey Tąy (Fortymile Caribou Corridor). These withdrawals are recommended until such time as additional management plans are completed by the Parties or until the Parties agree to remove them. The LMUs with interim withdrawals are sub-regional planning areas (LMU 3) or Integrated Stewardship Areas where some level of industrial development is generally allowed (LMUs 7, 17, 21). Permanent withdrawals are recommended for Special Management Areas.

YG does not support keeping LMU 3 as a sub-regional planning area. See YG proposal 10, response to TH proposal 13 and TH question 7 for further information on YG's recommended approach for this area.

YG does not support the continued use of withdrawals for areas outside of Special Management Areas once the Plan is approved. Withdrawals for Special Management Areas will be made permanent to protect the values identified for these areas. In all other areas (Integrated Stewardship Areas), the Plan should provide sufficient direction to allow for sustainable development without the use of interim withdrawals. YG is in favour of allowing sustainable development in Integrated Stewardship Areas; interim withdrawals would not allow new operators in these areas and limits existing users to their current claims.

Interim withdrawals do not provide clarity to industry or regulators on how to implement a regional land use plan. It is unknown how long the additional conditions required to lift interim withdrawals would take to complete and therefore this introduces uncertainty into plan implementation counter to one of the purposes of land use planning which is to allow for clarity of management practices on a landscape scale.

7. Landscape Management Unit 18

Position

YG would like to propose that the designation of LMU 18 be modified from an ISA 3 to an ISA 4 to accommodate the Coffee Gold Mine within the critical surface disturbance threshold.

Rationale

- By itself, the current and anticipated authorizations for the Coffee Gold Mine will likely push past ISA 3 surface disturbance thresholds.
- Further exploration through mining activities at Coffee may lead to extension of the mine life and deposit extent, which should be accounted for in the plan.
- There is other quartz and placer activity currently underway in LMU 18 which reduces the area available for development. If the thresholds were to remain, Coffee cannot be developed as proposed.

Public Input

- The current surface disturbance critical threshold in LMU 18 is too restrictive for the Coffee Gold project.
- The plan should be clear about how Coffee Gold mine will be consistent with plan directions, including cumulative effects thresholds.

8. Wetlands

Position

Proposing changes to the wetland sections of the Plan – see tracked changes document for exact modifications.

Rationale

The Government of Yukon is recommending changes to the Plan text to more fully address wetlands. The Recommended Plan was released in June 2022, but the territorial wetland stewardship policy was published in January 2023. The Recommended Plan does not reflect the fact that the wetland policy has been completed and the Government of Yukon is proposing changes to correct this. There are inaccuracies and omissions related to wetlands in the Plan that the Government of Yukon is proposing the Commission correct. For example, the Plan proposes designating certain wetlands as wetlands of special importance but does not provide boundaries for these areas. YG's recommended changes include delineating these boundaries and clarifying what the designation means under the policy.

YG is also recommending changes to better align the Plan with existing territorial guidance, in particular the disturbance buffers adapted from the Forest Resources Regulations Wetlands Riparian Management Standards and Guidelines.

The Government of Yukon is willing to discuss additional changes related to wetlands, while being consistent with our other proposed modifications at this point.

9. Biodiversity

Position

Proposing changes to the Plan to address biodiversity and species at risk – see attached tracked changes document for exact modifications.

Rationale

The Government of Yukon is recommending changes to the Plan text to more fulsomely address biodiversity and species at risk. Preservation of biodiversity and improved knowledge of rare species were raised as key concerns through consultation and public engagement. The planning region houses many healthy populations of species at risk that are faring poorer elsewhere in the country increasing the importance of maintaining the area for current and future use to protect these species.

There were inaccuracies and omissions related to biodiversity and species at risk in the Plan that the recommended text changes fix. For example, the Plan listed species at risk found within each Land Management Unit but this information was often incomplete and has now been corrected. Modifications are also recommended to more closely align the Plan with requirements of federal recovery strategies and management plans for listed species at risk. Additionally, the Government of Yukon wishes to ensure that policy recommendations relating to biodiversity monitoring and research can inform management decisions on a continual basis and has suggested changes to reflect this.

Background

Tracked changes document created with input from Department of Environment subject matter experts. Document reviewed by PTR working group and provided to SLC in November 2023; SLC has not yet approved changes. In their November 2023 submission, TH acknowledged the work done to date and the need for further discussion to reach consensus on the proposed changes.

10. Landscape Management Unit 3

Position

YG is not in favour of a sub-regional planning process for LMU 3.

YG is in favour of designating the northern portion of LMU 3 as an SMA. This could either be a standalone SMA or merged into LMUs 1 and 4. YG is also in favour of designating the southern portion of LMU 3 as an ISA 1 and removing the interim withdrawal.

YG proposes that the plan recommend that the Parties request a Canadian Heritage Rivers designation from Parks Canada for the Yukon River in this LMU (extending the designation currently in place for the Thirty Mile portion of the Yukon River). This can enable Yukon Parks to conduct management actions related to recreational activity, such as the establishment and maintenance of backcountry campsites and undertaking Backcountry Recreational Impact Surveys to inform potential future management decisions. Other tools will be used to regulate industrial activity.

Rationale

- Designating the northern portion of LMU 3 as an SMA (given the environmental values in the area as well as limited development) and the southern portion as an ISA 1 and removing the interim withdrawal protects the northern portion of the river and allows a small amount of sustainable development to continue in the southern portion, securing future use of the corridor for all users.
- This approach also enables sustainable development activity south of Dawson and aims to protect values in the entire corridor such as access for industry, and tourism.
- A Canadian Heritage Rivers designation helps to address recreational and tourism concerns in the river corridor by enabling Yukon Parks to conduct management actions related to recreational activity.
- Heritage river designation can help manage tourism by enabling Yukon Parks to conduct management actions related to recreational activity such as developing backcountry campsites in partnership with TH. It further provides an opportunity for the contracts for maintenance and monitoring work in this corridor to be put in place with TH (following the model with TKC in the Thirty Mile section) which could enable Guardian programs.

Government of Yukon Rationales for Major Proposed Modifications

- There is a need to manage barge landings in the southern portion of LMU 3 and there are a variety of existing tools to help manage these activities in implementation.

Public Input

- The importance of salmon, drinking water, and other values within the Yukon River corridor
- The plan should promote effective management of barge landings and recreation sites
- Waterways are important for industry and tourism and TH traditional use.

11. Landscape Management Unit 7/8 changes to boundary and ISA category

Proposal

- YG is in favour of a boundary shift between LMUs 7 and 8 (see map for details).
- YG would be in favour of designating the modified boundary (see map for details) of LMU 7 as an SMA, which would make it permanently withdrawn from mineral staking.
- YG is in favour of the updating the Caribou Stewardship Area in the Recommended Plan to provide clear management direction and to match the herd range for Northern Mountain Caribou. This updated Caribou Stewardship Area boundary (see map for details) would apply across LMU 7 and the majority of LMU 8.
- Limit access into LMU 8 (if required to be developed) to one route from the Brewery Creek direction to better protect caribou values in the area. Access from the Dempster highway should not be allowed.
- Manage off-road vehicles through application of an ORV management area that aligns with the proposed Northern Mountain Caribou Stewardship Area.
- Takes into consideration consultation by making a portion of LMU 7 into an SMA for caribou while the southern portion gets moved into LMU 8 and designated an ISA 4 with cumulative effects thresholds in line with economic interests and values in the area.

Rationale

- To achieve a balance of economic and environmental values in the area, and in consideration of TH's desire to see the protection of the Hart River and Clear Creek Caribou herds, YG has compromised and believes this is a balanced approach that can achieve both environmental and economic objectives.
- Caribou data shows that the SMA proposed for LMU 7 (with modified boundaries) protects a significant amount of caribou habitat. An additional 1,336 km² will be recommended to be designated as an SMA.
 - The proposed SMA would provide continuous habitat used by the Hart River herd with adjacent SMAs including Tsey Dëk, Ddhäl Ch'ël (Tombstone), and Tthetäwndëk SMAs in the Dawson region and Kit Range/North Cache Creek and Ogilvie River Headwaters in the Peel region.

Government of Yukon Rationales for Major Proposed Modifications

Additionally, the West Hart River Wilderness Area from the Peel region directly to the north of the proposed SMA will be managed to provide 'unfettered movement and habitat use' by the Hart River herd.

- Adding an ORV management area that aligns with the proposed Northern Mountain Caribou Stewardship Area would extend the management of off-road vehicles management to areas lower than 1,400 metres, require users to keep to designated trails and roads, and to prevent new alpine access points from being developed.

Economic:

- The DRLUP is intended to identify areas for conservation and protection, as well as areas that are suitable for sustainable development:
 - An objective of land use planning is to ensure that social, cultural, economic and environmental policies are applied to the management, protection and use of land, water and resources in an integrated and coordinated manner so as to ensure Sustainable Development (11.1.1.6).
 - The plan defines sustainable development as “beneficial socio-economic change that does not undermine the ecological and social systems upon which communities and societies are dependent”.
- In developing the plan, Chapter 11 of the Umbrella Final Agreement states that the Commission shall promote Sustainable Development (11.4.5.9).
- In addition to creating opportunities for Sustainable Development, it is equally important to preserve the cultural, environmental and wildlife values, which is why management directions have been developed through the planning process.
- In early 2017, the Yukon Minister of Energy, Mines and Resources, the Grand Chief of the Council of Yukon First Nations and the Chiefs of Yukon's eleven Self-Governing First Nations signed the Mining Memorandum of Understanding. This MOU commits the Yukon Government and Yukon's Self-Governing First Nations to the long-term responsible management of Yukon's mineral resources and to supporting a healthy mining industry that adheres to high environmental standards.
- The Yukon Mineral Development Strategy and Recommendations (2021) includes a strategic priority to “create substantive and sustained Yukon socio-economic returns from resource development that benefit Yukon First Nations, local communities and all Yukoners today and in the future.

Government of Yukon Rationales for Major Proposed Modifications

- Critical minerals are becoming an increasingly important part of international conversations about clean energy, and in the last decade many countries have been actively defining lists of critical minerals, including Canada. The Government of Yukon's 'Our Clean Future' strategy identifies four goals, three of which call for investments in clean energy:
 - reduce Yukon's greenhouse gas emissions;
 - ensure Yukoners have access to reliable, affordable and renewable energy; and
 - build a green economy.
- Government of Yukon considers critical minerals to underpin the transition to "green" energy and essential for the economy.
- There are significant copper and other critical minerals within the existing claims within the existing (Recommended Plan) boundaries of LMU 7 and 8.
- The proposed approach increases the area of LMU 8 and redesignates it to ISA 4 to ensure that the mineral resources in the area, including critical minerals, can be developed effectively, while subsequently:
 - creating a new protected area in caribou habitat,
 - revising the concept of the Caribou Stewardship Areas in the draft plan to match the range boundaries for Northern Mountain caribou, which covers the majority of LMU 8, and;
 - creating new ORV management area(s) that align with the proposed Northern Mountain Caribou Stewardship Area.
- The approach will contribute toward meeting the objectives of: the 2017 Mining Memorandum of Understanding to support a healthy mining industry that adheres to environmental standards; the 2021 Mineral Development Strategy and Recommendations; and Our Clean Future strategy (2020) to provide opportunities for access to critical minerals that help to achieve the goals of transitioning toward clean energy and objectives for sustained socio-economic returns for affected communities.

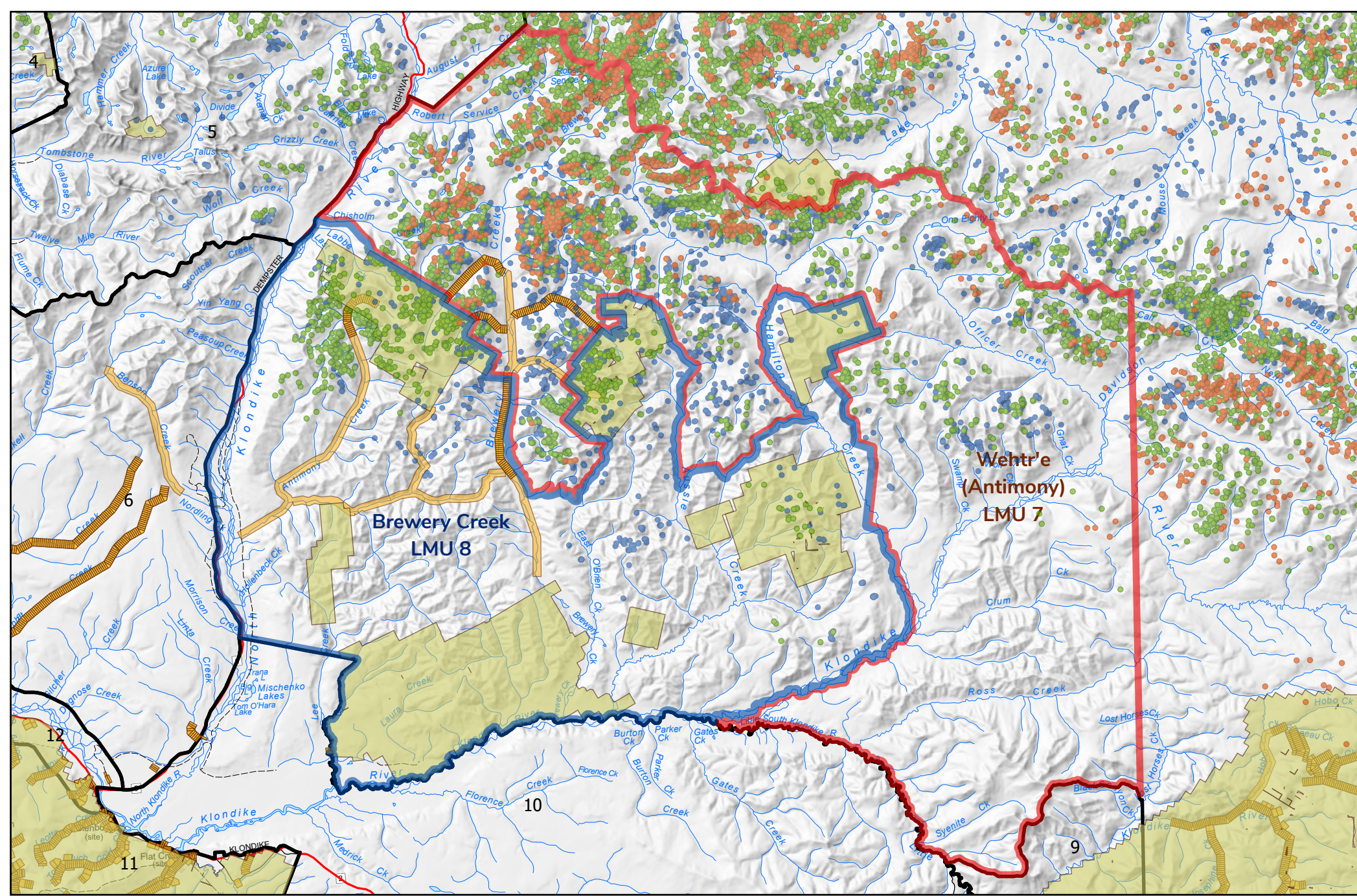
Background/Support:

YG's previous response:








- Draft Plan response:
 - Should not be an SMA II.
 - Eastern portion of LMU 7 should be extended south for Clear Creek Caribou and be an SMA.

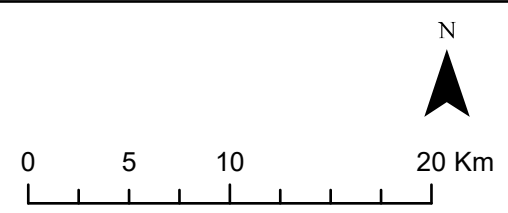
Government of Yukon Rationales for Major Proposed Modifications

- Existing claims in LMU 7 should move to LMU 8.
- May 9 & June 1, 2022 letters:
 - Critical minerals in LMU 7 need to be able to be developed
 - Support of access management plan, yet in its absence projects still are considered via regulatory processes, and FN and public consultation.



LMU 7/8 Boundaries

- | | | |
|---|--|--|
|  LMU 7 |  HRCH Calving 2015-2023 |  Placer Claims - 1M |
|  LMU 8 |  HRCH Rut 2015-2023 |  Quartz Claims - 1M |
| |  HRCH Summer 2015-2023 | |



12. Landscape Management Unit 21 Fortymile Caribou Corridor (Wëdzey Tay)

Proposal

YG is not in favour of the interim quartz withdrawal.

- YG is in favour of removing the following text from the Special Management Directions for LMU 21,
 - “Under the current regulatory system quartz exploration and development is not supported in this LMU”
- YG is in favour of updating Caribou Overlays for this LMU.

Rationale

- The Government of Yukon does not support the continued use of interim prohibition of entry order for areas outside of Special Management Areas once the Plan is approved. The Plan should provide sufficient direction to allow for sustainable development and management of Plan values; interim prohibition of entry orders should not be necessary.
- Quartz exploration and development is an important value in this LMU and the Plan should allow for this work within its cumulative effects thresholds and management directions.
- In early 2017, the Yukon Minister of Energy, Mines and Resources, the Grand Chief of the Council of Yukon First Nations and the Chiefs of Yukon’s eleven Self-Governing First Nations signed the Mining Memorandum of Understanding. This MOU commits the Yukon Government and Yukon’s Self-Governing First Nations to the long-term responsible management of Yukon’s mineral resources and to supporting a healthy mining industry that adheres to high environmental standards.
- The Yukon Mineral Development Strategy and Recommendations (2021) includes a strategic priority to “create substantive and sustained Yukon socio-economic returns from resource development that benefit Yukon First Nations, local communities and all Yukoners today and in the future.
- Critical minerals are becoming an increasingly important part of international conversations about clean energy, and in the last decade many countries have been actively defining lists of critical minerals, including Canada. The

Government of Yukon Rationales for Major Proposed Modifications

Government of Yukon's 'Our Clean Future' strategy identifies four goals, three of which call for investments in clean energy:

- reduce Yukon's greenhouse gas emissions;
- ensure Yukoners have access to reliable, affordable and renewable energy;
and
- build a green economy.
- Government of Yukon considers critical minerals to underpin the transition to "green" energy and essential for the economy.
- There are significant copper and other critical minerals within the existing claims within this LMU.

13. Landscape Management Unit 17

Position

YG is not in favour of an interim withdrawal on LMU 17 and is in favour of keeping the requirement for the development of an Upper Indian River Stewardship Plan.

Rationale

- Placer mining is an important value in this LMU
- The development of an Upper Indian River Stewardship Plan will allow for wetland, other environmental and cultural values to be better managed in this LMU.
- YG does not support the continued use of withdrawals for areas outside of Special Management Areas once the Plan is approved. Withdrawals for Special Management Areas will be made permanent to protect the values identified for these areas. In all other areas (Integrated Stewardship Areas), the Plan should provide sufficient direction to allow for sustainable development without the use of interim withdrawals. YG is in favour of allowing sustainable development in Integrated Stewardship Areas; interim withdrawals would not allow new operators in these areas and limits existing users to their current claims.
- The Government of Yukon views the current interim guidance for the Indian River, plus the guidance outlined in the recommended Plan, to provide an appropriate balance between development opportunities and wetland protections.

Public Input

- Should have lower ISA value or SMA
- Should have higher ISA value to allow more development
- Culturally significant area

14. Cumulative Effects Thresholds

Position

- YG proposes that the surface disturbance critical thresholds return to the Draft Plan levels. This would increase the surface disturbance critical thresholds for ISA 3 and 4 by 0.5% and 1%, respectively.
- YG is not proposing changes to the linear disturbance thresholds in the Recommended Plan.
- Thresholds in areas of high and very high cultural and ecological value would remain unchanged.
- Increased thresholds would only apply to areas that have been identified for moderate or highest development.
- These changes intend to preserve high value areas while allowing for sustainable resource development in other areas.

Rationale

- Considering the varied responses during the public consultation, Draft Plan critical thresholds for surface disturbance are considered a compromise that balance competing interests on the landscape.
- The total area of the 11 LMUs designated for some development under the recommended Plan is 22,643.41 km². This means a total of 425.99 km² of land in the planning region can be disturbed before all critical thresholds are reached. After taking into account current disturbance, this leaves 229.63 km² available for development across the entire region.
- Returning to Draft Plan levels would increase the total area available for development from 229.63 km² to 319.94 km². YG considers this to be a more measured balancing of interests.

Public Input

- Public and First Nations engagement on recommended plan:
- Thresholds are too high
- Thresholds are too low
- We heard during the Draft Plan consultation that the surface disturbance thresholds were too low for mineral values in the region (including to allow exploration, mineral deposit development and industry investment). We heard

Government of Yukon Rationales for Major Proposed Modifications

these concerns amplified during the Recommended Plan consultation with the more restrictive surface disturbance thresholds.