

Proposed Changes for Effective Document Design and Writing Style

Core issue with existing document structure: The Recommended Plan is difficult to navigate and repetitive

Relevant Stantec (for YLUPC) feedback:

The information provided with the LMU at first appears to be quite concise and provides guidance to users specifically about the LMU. However, it provides the caveat that the guidance is “in addition to all applicable general management directions [..]” The user then needs to go back to the Table of Contents to find the section that contains these general directions.

Why is this an issue?

1. Many directions point to multiple other sections of the Plan, where the user could then get lost in understanding what the intent of the directions are and where to find relevant information.

Example: Section 3.2. Land Use Designation System Table 3-1 Summary of Land Use Designation System for Dawson Region

Page 46 - Caribou Stewardship Area Overlay Description directs the reader to Section 6 – Landscape Management Units, page 160.

- Page 160 is the overview of the LMUs and also includes a reference back to Section 5 – General Management Directions (Page 70).
 - If the reader continues through Section 5 there is a subsection on caribou, but it does not speak to the caribou overlays.
 - If the reader continues through Section 6 to LMU 7 and 21 (those with caribou overlays) there is another signpost to return to Section 3.2.4.1 Caribou Stewardship Area.

The reader will have flipped through several sections of the Plan at this point and is likely to still be uncertain as to what they must do to be in conformity with the Plan if their project is in a caribou overlay area.

The Plan is similarly circular for Wetland Stewardship Areas pointing the reader from the overlay description to the applicable LMU and from there back to the overlay description.

2. Plan content is repeated in some sections but not all which may create confusion over where directions are meant to apply.

Example: General management directions say to avoid disturbing salmon habitat and to follow DFO’s timing windows. LMUs 6, 12 and 14 also include special management directions with similar wording. However, LMUs 1, 3, 4, 7, 8, 10, 11, and 19 all state in their respective values

tables that they also contain important salmon habitat but do not include a special management direction speaking to salmon. This duplication of directions in some sections but not others could create confusion for the reader as to when they are meant to apply.

3. Repetition of information unnecessarily bloats the Plan making it less accessible.

Example: Requirement for an access management plans are repeated in Moose, Caribou, and Access sections and in several LMUs.

- Page 78 - The Parties should prioritise the development of access management plans in LMUs where a high degree of overlap exists between caribou habitat and development activities.
- Page 80 - The Parties should prioritise the development of access management plans in LMUs where a high degree of overlap exists between moose habitat and development activities.
- Page 140 – [...] the Parties should develop overarching access management plans for the Planning Region, with the priority for development as follows: [...]
- Page 197 - An access management plan / agreement to be jointly created by the Parties which should consider the following: [...]
- Page 219 - This LMU is listed in Section 5.4.3 – Transportation and Access (page 129), as being a priority area for an access management plan [...]
- Page 239 - Access management planning as per Section 5.4.3.2.2 – Access Management Planning Recommendations (page 140).

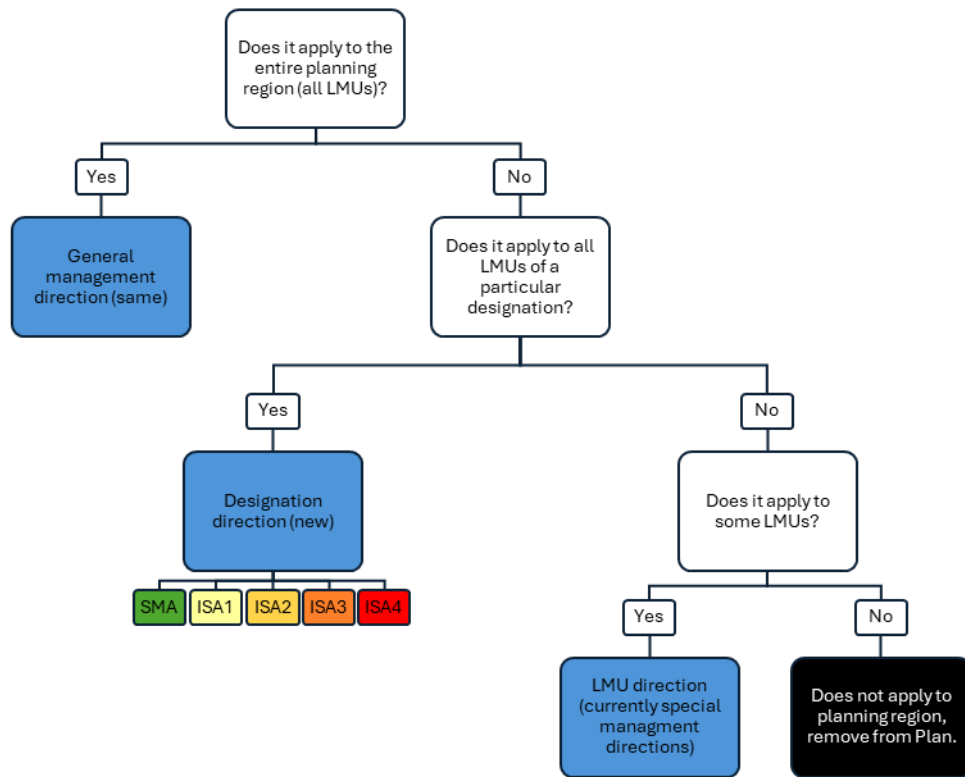
How can this issue be resolved?

Simplify location of management directions within the Plan as follows:

- General management directions – Apply to all LMUs across the planning region.
- Designation directions - Apply to LMUs of a specified designation type (SMA/ISA 1-4)
- LMU directions (currently special management directions) – Apply to one or more but not all LMUs.

Any of these management directions could apply to a sub-area tied to values but broadly speaking should apply to any such occurrence across the planning region or an LMU depending on type (e.g. the entire region is not a wetland, a highway may cross a portion of an LMU etc.). In this way, overlays would not need their own management direction type but should still be clearly identified on a map if they do not follow LMU boundaries. The following flowchart helps illustrate how to decide where to locate management directions.

Proposed decision tree for rearranging management directions and plan content hierarchy



Make the Plan simple, direct, and intuitive to navigate. Proponents will need to be able to determine what is required of them by the Plan to ensure that their projects conform. Categorizing the plan geographically and thematically also allows issue-specific parties to find the information they are looking for, whether it be about a particular area, value or topic of interest.

The following structure is proposed to simplify the Plan sections. See Specific Changes for Effective Document Design section below and tracked changes document for further proposed modifications related to this issue.

Proposed Plan Structure

1. Introduction - Vision, values, goals and guiding principles for planning region and legal scope of the Plan				
2. Description of Planning Region - Background information on region and values				
3. Plan Concepts – Generally define what planning tools are and how they were determined without including directions related to the tools. Planning tools include: <ul style="list-style-type: none"> • Landscape Management Units • Land Designations • Management Directions • Results-Based Management Framework • Cumulative Effects Framework 				
4. General Management Directions – Group by value, directions should apply to all LMUs in the entire planning region.				
5. Land Designations – Group by designation then by individual LMUs <ul style="list-style-type: none"> • Describe intent and any directions that apply to designation (including cumulative effects thresholds) • Describe intent, values and any directions that apply to LMU 				
5.1 SMA	5.2 ISA 1	5.3 ISA 2	5.4 ISA 3	5.5 ISA 4
5.1.1 LMU #	5.2.1 LMU #	5.3.1 LMU #	5.4.1 LMU #	5.5.1 LMU #
6. Implementation – Describe roles and responsibilities during implementation (including conformity and monitoring) and methods to revise the Plan.				
7. References				
8. Glossary				
9. Appendix				

Specific Changes for Effective Document Design

Section-by section changes are proposed below, based mainly on the major core issues described in detail above. Changes are suggested because the document should be structured in a way that is intuitive to readers or users of the plan without requiring significant ‘redirects’ that require the reader to jump around the plan in attempt to understand the content.

Modifications are proposed to:

1. Restructure how management directions were presented.
2. Improve structural consistency (hierarchy) to avoid confusion (missing links, scattered information, etc.) – See also Plan Headings section below.
3. Reduce the overlap/repetition
 - a. All relevant information should be presented in the same section.
 - b. Avoid repeating the same information or using the same heading more than once in one section.
 - c. Separate concept and actual management directions (plan policies/directions).
4. Reduce extra information in the management direction sections.
 - a. Separate what *informed* the development of the Plan (approaches, TH teachings, etc.) and the Plan (policies, etc.) itself.
 - b. Make the Plan’s focus on the land, water and resource management in the region.

Specific content changes to these sections are also included in the tracked changes document. Only sections where structural modifications are proposed are included below.

1. Introduction

1.1 Walking Together

- This section is written with the Commission’s voice and should be in the “Message from the Commission” section.

1.2, 1.3, 1.8 & 1.9 Vision, Planning Values and Goals, Indigenous Planning and Reconciliation, & Guiding Principles

- These sections all speak to concepts that guided the Commission’s work when drafting the Plan (beyond the Commission’s legal requirements as set out in 1.6 and 1.7). However, the distinctions and connections between them is not well explained and therefore is not carried through the rest of the Plan very well either. These sections should be consolidated and parred down so the reader can clearly understand what was driving the Commission’s decision-making and how this was applied in the Plan.
- The sections should be organized as a hierarchy that links vision to guiding principles to values and goals to land use designations and management directions.
- Further structural considerations for each subsection are provided below.

1.2 Vision

- There are multiple concepts/philosophy/approaches listed here. Seems each one has (or had) a different role and that should be clarified – ones that guides the Plan directions and the ones that provided guidance to the planning process.

- “Nän Käk ndä tr’ädäl (On the land we walk together)” – reflects the Commission’s Vision for the region”. It is also described in detail in 1.1 (see suggestion above).
- “(Vision) For the process” talks about implementation process.
- “(Vision) For the Plan” is a repeat/paraphrase of UFA.
- “Tr’ëhudè” – This provides context – and being “central” suggest this is the most important.
- It appears that the Commission’s Vision for the Region (Nän Käk ndä tr’ädäl) is the central/primary vision that applies to the Plan.

1.3 Planning Values, Issues and Goals

- See Plan Headings subsection below.

1.9 Guiding principles

- This section is important but connection to the Plan is weak, focus on introducing these four concepts and how they guided the drafting of the Plan generally. If any of the guiding principles only apply to certain sections of the Plan rather than the Plan as a whole, they may be better suited to be reframed as goals or objectives to meet certain Plan priorities.

1.9.1 Sustainable Development

- Parts of this section may be better suited to be incorporated into the goals section of the Plan, see tracked changes document for specifics.

1.9.2 Stewardship

- 1.9.2.2. There is a shaded box (“It is the Commission’s hope that...”). This is better suited to the Message to the Commission rather than in the middle of a Plan subsection.
- Remove subsection 1.9.2.3 Stewardship and Management as this section mostly repeats information found elsewhere in the Plan.

1.4, 1.6 & 1.7 Scope of the Plan, Terms of Reference & Mandate of the Commission

- These sections should be consolidated to fulsomely address the legal obligations the Commission had to meet in drafting the Plan and any other restrictions that applied to avoid repetition.
- Some parts of these sections are not needed for the average reader and could be moved to an appendix rather than kept in the main Plan document, see tracked changes document for specifics.

1.5 History of the Plan

- Move to appendix, this is background information that helps show why certain planning decisions were made but is not necessary for the average reader.

2. Description of the Planning Region

- See Plan Headings subsection above.
- Incorporate important background information from Section 5 subsections into this section. If background is too detailed, it should move to an appendix.

3. Plan Concepts

This section should generally define what planning tools are and how they were determined. Management directions related to the tools are better suited to later sections of the Plan so that they aren't missed by the reader or unnecessarily repeated.

3.2 Land Use Designation System

3.2.1 & 3.2.2 ISA; SMA

- Section 3.2 should describe general ideas behind designations including intent of these areas, and subtypes.
- Any management directions that apply to all ISAs (or one of the four subtypes) or SMAs should be presented in a similar manner to other directions in the Plan (i.e. clearly labelled as a direction and numbered for ease of use) rather than included in a paragraph where it may be missed, see Proposed Plan Structure diagram above.

3.2.3 Sub-regional Planning Areas

- Section refers to three other sections of the Plan to find direction on these areas, this should be reduced for the reader's ease of use.

3.2.4 Overlay

- Overlays make sense as a tool to use when additional direction is needed at a scale between the size of the planning region (where general management directions apply) and an individual LMU (where special management directions apply). Where this is not the case, overlays add an unnecessary additional layer of complexity and could be removed.
- Wetland Stewardship Area is not needed as a separate designation as it only applies to one LMU, directions for this area should be incorporated into special management directions for LMU 17 Indian River Wetlands.
- See tracked changes document for suggested inclusion of Wetland of Special Importance subsection.

3.2.5 Corridors

- Corridors could be removed and do not need a separate designation as there does not appear to be any specific directions that apply within these areas that could not be covered by a general or special management direction. If there are directions that do not fit within general or special management directions and therefore do require a separate designation, the areas should be included within the general overlay section rather than add a "corridor area" designation.
- Agricultural Corridor should be incorporated into special management directions for LMU 10 – Tintina Trench.
- Highway Corridors should be incorporated into general management directions within 5.4.3.1 Existing Highway Access or as special management directions for applicable LMUs.

3.2.6 Other areas

- Remove this section as the information is more comprehensively captured in section 1.4.

Table 3-1

- Both the characteristics of the area and the management directions are listed in the “Description” column. Need to make them separate and list the designation specific management directions as per suggested structure, between General and Special management directions (see Proposed Plan Structure diagram above).

3.5 Results Based Management Framework

- While the concept itself is useful to describe a planning process (start big, go in detail, check and update), and how the Plan is structured, Plan doesn’t really follow it (e.g. in Section 5 many objectives don’t match with the goals).
- This can be removed, or plan should be strengthened to follow this framework.

3.6 Cumulative Effects Management & 4. Cumulative Effects Framework

Due to the repetition across sections, suggest amalgamating these two sections and providing subsections within section 3 with information on:

- What are cumulative effects and what is cumulative effects management?
- How the Plan incorporates cumulative effects?
- How future work on cumulative effects should proceed – link this to Adaptive Management Implementation sections as needed to clarify how the Plan will change overtime.

Portions of s.3.6 and 4.5.1 describing thresholds and recommendations should be presented with other directions in the Plan (in section 5 or 6 as appropriate), see Proposed decision tree above to determine where they best fit.

5. General Management Directions

- This section should primarily include management directions that apply to the entire planning region (some of the policy recommendations should be relabelled as management directions - see tracked changes document and the table of Recommendations). Where no management directions are included, the value should be removed from this section but could be included elsewhere in the Plan.
- Directions tied to LMU should be Special Management Directions for those LMUs rather than General Management Directions.
- Recommendations to the Parties (policy, research and action) should be moved to an Appendix.
- Topic Overview – should be short and not repeat information better suited to the Objectives or Key Planning Issues subsections. Other relevant background information on the value can be moved to Section 2 Description of the Planning Region or to an Appendix.
- Headings for 5.2, 5.3, and 5.4 should use the same categories as elsewhere in the Plan (see Plan Headings below for further discussion on this topic).
- Subsections should follow the structure outlined in 5.1.1 (Topic Overview-Objectives-Key Planning Issues- Planning Strategies).
- Limit the number of sub-sub-sections to avoid burying information.

5.2.1 & 5.2.2 Key Species Habitat; Other Fish and Wildlife Habitat

- These sections could be combined under a single “Key Species” heading as no explanation is provided in the Plan for separating them.
- Subsections could be partially combined; issues may vary more across values and could be kept separate while combining objectives and management directions which are often similarly worded across wildlife values to limit repetition.
- 5.2.1.4 Sheep – remove this section, there are no sheep specific general management direction.

5.2.3 & 5.2.4 Water & Rivers and Watercourses

- 5.2.3 does not follow the same structure as the rest of Section 5, there are no Objectives or management directions.
- In the values tables in Section 6, the focus for “Water” seems to be on rivers.
- The subsection for Rivers and Watercourses within 5.2.3 Water is almost identical to the opening sentence for 5.2.4 suggest combining these into a single section.
- Move background information and information on water’s interdisciplinary nature in these sections to section 2 Description of the Planning Region.

5.2.5 Wetlands

- The Management Practices currently do not but should follow the standard format to improve clarity as to who is expected to do what. Some of the information currently in this section regarding changes to understanding overtime should be incorporated into the adaptive management section.
- Climate Change and Wetlands – Should incorporate information from 5.2.6.1.
- Wetlands of Special Importance – management directions should follow standard format.

5.2.6 Climate Change

- The Recommendations to the Parties does not follow the standard structure.
- Contents in 5.2.6.1 Special Management Areas should be incorporated into 3.2.2 Special Management Areas (3. Plan Concept) as there is no associated recommendations (i.e. what has to happen in SMA). Remove or incorporate into relevant section.
- 5.2.6.2 [Climate Change and] Wetlands information should be combined with 5.2.5 Wetlands subsection.

5.3.2 Stewardship

- This section does not follow the standard structure for a planning strategy. This is not an identified value or resource for the region, section repeats much of what was included in section 1.9.2 and can be removed. See tracked changes document.

5.3.4 Hän Language

- This section does not follow the standard structure, and it is not an identified value or resource for the region. The Plan itself incorporates the language, some of this information could be incorporated into Section 1 as a guiding principle for the process.

5.3.5.1 *Community Water*

- This subsection seems to divide Community Growth into a new subtopic, but objectives, issues and management practices return to the broader topic. The paragraph under this heading (up to planning strategy) should be incorporated into the planning issues without a separate subsection to avoid confusion for the reader.

5.4.2 *Resource Development and Impacts to MMIWG2SS+*

- While this is an important topic, this is not an identified value or resource for the region.
- This section does not follow the standard structure for a planning strategy, either. This could be part of the 5.4.1 Mineral Exploration and Development to maintain the consistent structure.

5.4.3 *Transportation and Access*

- Detailed background/context information should be in Section 2.
- It is a very important issue, but current structure of multiple sub-sub sections is confusing suggest re-grouping to Major highway corridors, Resource roads, New surface access, ORV access, Air access, and Water access.

5.4.3.1 *Existing Highway Access*

- Many of the management directions are about new access off existing highways and not about the highways themselves, such directions could move to the new surface access section to avoid repetition.
- Rather than have separate similar directions for each highway, combine into single direction for all highways.
- Directions tied to LMU should be Special Management Directions for those LMUs.

5.4.3.2 *New All-Season Surface Access and Winter Roads*

- Simplify section heading to all new surface access.
- Incorporate directions about new access from 5.4.3.1 into this section.
- Northern Access Route subsection should move to after other recommendations for new access.

5.4.3.3 *ORV Access*

- This subsection does not follow the structure and has no associated recommendations. Background information can be incorporated in the background or general overview of the access section. Currently, management directions related to ORV use are incorporated into other sections of the Plan. If there are no other directions that applies to ORV use in general, this subsection can be removed.

6. *Landscape Management Unit*

- See Proposed Plan structure diagram above for suggested reorganization to group by designation (ISA 1, 2, etc.), LMU numbers should follow sequentially.
- Suggestion for the Tables (“How to read the tables” and throughout)
 - Add applicable thresholds information from Table 3-2 for each Land Designation (instead of saying “same as ISA #” for each LMU). For SMA’s the Surface Disturbance

threshold differs for each LMU, so should be within the Special Management Directions for each LMU.

- Remove Rationale for Designation as it should be evident from the Intent Statement and other parts of this table. If a more thorough explanation is required, this could be captured in a methodology report provided with the Plan rather than as part of the Plan itself.
- Priority Objectives –There is overlap with the Intent Statement but gaps between Special Management Directions, Values and the Objectives.
- Values table categories and values used should be the same as those used elsewhere in the plan, see Plan Heading section below.

7. Implementation

- Add section on how adaptive management will work after Plan approval or incorporate this into 7.7 Plan Revision.

Appendix

- Remove Appendix 3 Cumulative Effects Framework Thresholds as it unnecessarily repeats tables found in the Plan without providing additional information.
- Remove Appendix 4 Land Stewardship Trust.

Plan Highlights & Summary Documents

- 8-pg Highlights is not useful on its own, compared to the summary document.
- Map 1 is shown twice.
- Pg. 7 Key Recommendations mixes plan concepts/tools, approaches, etc.
- Pg. 11 Planning Issues – see suggestion for the Plan itself. These are not issues. The theme/category headings should match with other sections
- Pg. 13 History and Scope can be after “why is the land use plan important?” on page 5.
- Pg. 26 – 29. These are highly abbreviated summary, compared to the earlier part of the document. It would be more valuable to give overview (at least show all the topics in the Plan) here on multiple pages than go into details of the planning process or other context of the plan in a summary document.
- Pg. 24 Threshold table should be presented with the table on pg. 21 and overall designation on pg. 31 to provide context.

Writing Style: Consistent, Clear and Effective Writing

The following are writing style considerations to improve clarity of the Plan.

Overall Plan: This is the Plan (The Plan should speak for itself)

The Plan provides guidance on how the region's land, water, and other resources are managed. However, the writing style and tone of the Recommended Plan create uncertainty about how this plan will guide land use decisions once approved by the Tr'ondëk Hwëch'in Government and the Government of Yukon. It should be clear how following the Plan's management directions will help achieve its objectives and goals for the region, ultimately realizing its Vision.

The Plan should be written as if it is already in effect. The Commission is recommending the plan to the parties, the content of the plan should provide clear direction, not read as though it is being recommended. The plan should be written as though its audience is proponents, assessors, regulators, and other plan users rather than being targeted towards the Parties. Currently, many directions are presented as recommendations or are explicitly labeled as such. While this may be suitable for certain parts of the Plan, such as recommendations to the Parties regarding research, it is not suitable for content such as the "recommended management practices". These so called "recommended management practices" are management directions and should be written accordingly.

Similarly, policy and research recommendations for the Parties should be removed to an appendix (see Recommendations Table for full list of suggested changes). Where appropriate, if a particular recommendation is necessary to implement other management directions, it should be written as a management direction.

Plan Headings

Use the same categories for headings to thematically carry the reader through the Plan. Similarly, the values associated with these headings should also be the same throughout the Plan. Values can be grouped where appropriate to minimize repetition, but the reader should still be able to clearly follow how each is addressed throughout the Plan. This method should also reduce repetition in the Plan as information can be presented within the appropriate section and the reader still has easy access to it (e.g. background information on the current state of a value can be included in section 2 if applicable to the whole region or within the values table in section 6 if only applicable to certain LMUs and does not need to be repeated in section 5).

The following table shows how the heading and value differ across Plan sections.

Heading	Section 1.3.1 Key Planning Issues	Section 2 Subsections	Section 5 Subsections	Section 6 Values Table
1.3.1 – Ecological Integrity, Conservation and Stewardship 2.3 – Environment/ 2.7 – Climate Change 5.2 – Ecological Integrity and Conservation 6 – Ecological Integrity and Conservation Value	<ul style="list-style-type: none"> • Climate Change • Fish and Wildlife and Habitat • Protected and Conserved Areas 		<ul style="list-style-type: none"> • Key Species <ul style="list-style-type: none"> ○ Caribou ○ Moose ○ Salmon ○ Sheep ○ Grizzly and Black Bears • Other Fish and Wildlife Habitat <ul style="list-style-type: none"> ○ Resident Fish Species ○ Migratory Birds and Raptors ○ Species at Risk and Rare Endemic Species • Water • Wetlands • Climate Change 	<ul style="list-style-type: none"> • Birds • Caribou • Ecosystem Representation • Furbearers • Grizzly Bear • Landscape Connectivity • Moose • Salmon and other Fish • Sheep • Species at Risk • Vegetation and Unique Features • Water • Wetlands
1.3.1 – Culture and Heritage 2.4 – People and Communities / 2.5 – Economy 5.3 – Culture, Heritage Resources and Community 6 – Culture, Heritage Resources and Community Values	<ul style="list-style-type: none"> • Harvesting Rights and Activities • Heritage Resources and Sites • Traditional Economy 	<ul style="list-style-type: none"> • Traditional Economy 	<ul style="list-style-type: none"> • Heritage Resources and Sites • Stewardship • Harvesting Rights and Activities • Hän Language • Community Growth <ul style="list-style-type: none"> ○ Community Water • Recreation 	<ul style="list-style-type: none"> • Community Value • Heritage Resources and Sites • Traditional Economy/ Traditional Use
1.3.1 – Sustainable Development 2.5 – Economy 5.4 – Sustainable Economy 6 – Socio-economic Values	<ul style="list-style-type: none"> • Access and Infrastructure • Agriculture • Community Growth and Recreation • Forestry • Mineral Exploration and Development and Mining Operations • Renewable energy • Tourism 	<ul style="list-style-type: none"> • Transportation • Non-renewable resources • Hard Rock Mining • Placer Mining • Renewable resources • Forestry and Timber • Agriculture • Traditional Economy • Tourism 	<ul style="list-style-type: none"> • Mineral Exploration and Development • Resource Development and Impacts to MMIWG2S+ • Transportation and Access <ul style="list-style-type: none"> ○ Existing Access ○ New All-Season Surface Access and Winter Roads ○ Air Access ○ Water Access • Agriculture • Tourism • Outfitting • Forestry • Aggregate Resources • Traditional Economy 	<ul style="list-style-type: none"> • Agriculture • Energy • Forestry • Mineral Resources • Outfitting and Trapping • Tourism • Transportation and Access

Style: Voice, Clarity and Tone

The written content throughout the document should be consistent to one writing style. The writing style should be active, clear, and positive. The plan should avoid repetition and ambiguity to minimize the risk of misinterpretation.

Active Voice

The Plan should strive for an active voice to be clearer and more direct.

An example of passive voice:

Land Designation System Through management directions and thresholds, the focus will be on minimizing negative environmental and cultural impacts, restoring areas of imbalance, and protecting ecological and cultural values while allowing economic development activities to continue respectfully. Through an integrated stewardship approach, the aim is to not simply manage or control the industrial use of the land, but rather to respect the integrity of the land and to instill that all land users have a duty to care for the land.

The following rewording makes the above more active:

The *Land Designation System's* management directions and thresholds minimize negative environmental and cultural impacts, restore areas of imbalance, and protect ecological and cultural values while allowing economic development activities to continue. An integrated stewardship approach respects the integrity of the land and instills that all land users have a duty to care for the land rather than simply managing or controlling industrial use of the land.

Clear Writing Style

Management directions must be clear on when they apply and to who, where, what (e.g., At what stage in a process should this access management plan be submitted? Who is responsible for determining if the submitted access management plan is satisfactory? What is the threshold/trigger for the requirement of the access management plan when it comes to 'limited access'? How are areas of high ecological or socio-cultural value defined?). An example that leaves room for misinterpretation as to when it applies is management practice 'F' within the Northern Access Route subsection.

5.4.3.2.1 f - Proponents should prepare detailed access management plans for projects that involve the construction of new all-season access in LMUs with areas of high ecological or socio-cultural value and/or where existing access into the area is limited.

Access management plans should include:

- Road construction details and rationale for construction.
- Applicable traffic management protocols (i.e., access control, signage, etc.).
- How impacts to key values in the area will be mitigated; and,
- Detailed decommissioning and reclamation plans.

Positive Writing Style

The Plan should always describe what things are rather than what they are not for clarity and brevity. What something is not is an infinitely long list. However, the Plan should use negatives when describing the exceptions to directions if there is a clear, finite number of exemptions.

Examples of negative tone:

- These areas have not been identified as having the highest conservation value (page 42).
- This subsection is not meant to reiterate all related resource information (page 70).
- The intent is not to inhibit industrial development by restricting access (page 130).

The tracked changes document highlights other examples of these issues. The Commission should also consider this feedback more broadly going forward as they re-draft the Plan.

Capitalization of Words

The Plan is inconsistent and occasionally incorrect in its use of capitalization throughout the document. In particular, the term “Region” is capitalized throughout the document regardless of if it is referring to the Dawson region, other regions in the Yukon or regional planning generally. Capitalization also does not seem to be linked to terms defined in the glossary as some are capitalized and others are not. If the intention is to emphasize defined terms, Government of Yukon would be supportive of using capitalization, bolding or other means of emphasis to indicate use is consistent with definition in the Glossary. Modifications are suggested in the tracked changes document, there may be some that have not been caught that should still be corrected by the Commission.

Sources of Information

Throughout the Plan, there is information presented as fact that does not reference the source of the information. For example (underline added for emphasis):

2.5.3.4 Tourism

Tourism is the largest employment sector in the Dawson Region, with 27 percent of the employment.

Citations are needed to allow readers to confirm what information was considered during the planning process and that this information is accurate and up to date. The tracked changes document highlights other examples of this issue, but the Commission should also consider this feedback more broadly going forward as they re-draft the Plan.

Interchangeable Use of Terms

The Plan should be consistent in its use of terms, it should define key terms and avoid using synonyms as this may introduce inconsistencies and cause confusion. Additional terms may be needed to provide greater specificity or nuance than a general term but should be used only for this narrower scope. The following are examples of this issue:

Linear Features vs Access

When referring to access, the Plan typically speaks of access by humans (e.g., hunters). Not all linear features provide access as they may be discontinuous, in remote locations with no connection to other roads or trails or be otherwise impassable. Linear features may provide access, but this is not always true. The Plan should not use these terms synonymously.

Hunting vs. Harvesting

Government of Yukon Department of Environment uses the term ‘hunting’ to represent the action of hunting, which may or may not result in the death of an animal, and ‘harvest’ to refer to when an animal has been killed. We recognise that this is not the only way to define the terms but suggest providing clear definitions and using the terms as defined. The Plan differentiates between the terms in the Glossary as being by First Nation (harvesting) or non-First Nation (hunting) people, it is unclear if the Plan means to distinguish this way. Within the moose section (5.2.1.2) both terms are used with an objective speaking to future moose harvest and a recommendation to the Parties mentioning hunting pressure. Both instances should apply to actions by any person.

Activities vs Development vs. Industrial Land Use vs. Project

These terms are all used frequently throughout the Plan to describe what can or cannot occur and where. These terms all have slightly different meanings and are defined as follows within the Glossary:

Activities: Anthropogenic actions that alter the human or biophysical environment (where those alterations are observable / measurable / detectable). May or not be subject to assessment under YESAA. See: Project.

Development: As per the Parks and Land Certainty Act, the act of constructing, erecting, altering, placing or making any change in the use of or the intensity of use of any facility, structure, building, excavation, improvement or other installation on, over or under land, or altering the use of any land within the Region.

Industrial land use: May refer to

- a) Exploration and development of mines and minerals, oil and gas, hydroelectric and other energy resources; or
- b) Development agricultural lands; or
- c) Commercial harvesting of timber resources; or
- d) Development of townsites.

and any land use, activity or infrastructure associated with the above.

Project: An activity that is subject to assessment under S47 or S48 and is not exempt from assessment under S49 of the Yukon Environmental and Socioeconomic Assessment Act (YESAA).

The Plan should ensure that the correct term is used in the appropriate spot to not otherwise limit directions (e.g., if project is used then direction only applies to YESAB assessed projects, if industrial land use is used then the direction only applies to some uses and not all activities).

Permitted Uses

Throughout the Plan, including in several LMUs, directions specify which uses are permitted. As written, the Plan presupposes the outcome of assessment and regulatory processes. The Plan should indicate if the use is appropriate given the LMU designation, objectives, and values but the use would still only be permitted at the discretion of the decision body. Change “permitted” to “allowable” or “allowed” to address this concern. Restrict use of “permit” to discussions of issuance of permits.