



November 22, 2024

Debbie Nagano, Chair
Dawson Regional Planning Commission
Suite 201, 307 Jarvis Street
Whitehorse, YT Y1A 2H3

Dear Debbie Nagano,

RE: Recommended Plan for the Dawson Planning Region

Thank you for the opportunity to comment on the Recommended Plan for the Dawson Regional Land Use Planning area (Recommended Plan). The work that the Dawson Regional Planning Commission (the Commission) and your staff, with support from the Yukon Land Use Planning Council, have done to get to this point is noteworthy.

After careful review, extensive consultation, and engagement on the Recommended Plan, the Government of Yukon has determined to modify the Recommended Plan in relation to Non-Settlement Land as per 11.6.2 of the Tr'ondëk Hwëch'in Final Agreement.

The Government of Yukon commends the Commission for developing a Recommended Plan which aims to balance the many values in the region. A few examples of elements of the Recommended Plan that we particularly appreciate include:

- most of the Landscape Management Unit designations and boundaries, especially the distribution of Special Management Areas across the planning area;
- acknowledging the importance of the Clear Creek Caribou herd;
- the consideration of heritage and cultural factors tied to the work of the Department of Tourism and Culture through Plan management practices;
- consideration of the importance of the issue of Missing and Murdered Indigenous Women, Girls and Two-Spirited People and the link to land use;
- the establishment of an agricultural corridor in the Tintina Trench Landscape Management Unit;
- the Dempster Highway Corridor and its consistent description to the corridor recommended in the Peel Watershed Regional Land Use Plan; and
- the inclusion of Wetlands of Special Importance in the planning area.

We would also like to thank you for considering our feedback on the Draft Plan and incorporating that into the Recommended Plan, including:

- the removal of Special Management Area IIs; and
- the expansion of LMU 16: Wëdzey Năhuzhi (Matson Uplands) to better protect the Fortymile Caribou summer range.

One overarching theme of the Government of Yukon's proposed modifications to the Recommended Plan, similar to that of the Draft Plan, is the need for clarity. Clarity and specificity will provide certainty to industry, for regulators, for conservation, for traditional uses, for residents of the Yukon and for visitors.

In our view there are also some key aspects of the Recommended Plan that require some attention by the Commission prior to the submission of the Final Recommended Plan. This letter details the key issues the Government of Yukon has proposed modification on and requests the Commission address when drafting the Final Recommended Plan (listed as numbers 1-9 below). We believe that the first six key issues are essential and that failing to address these may jeopardize the Government of Yukon's ability to support the Final Recommended Plan.

1. Implementation

The Government of Yukon proposes modifications to the Recommended Plan text to improve the clarity of the document for all users, including assessors, regulators and proponents, to ensure that it will be implementable within the existing assessment and regulatory system. Any management directions for proponents or recommendations to the Parties must be legally, technically, financially and administratively sound.

The process for revising the Plan, including variances, amendments and reviews, must also be carefully considered to ensure the Plan can adapt to changing circumstances and should be established prior to the completion of the Final Recommended Plan. The Government of Yukon looks forward to working with Tr'ondëk Hwëch'in and the Commission during the next phase of plan development to ensure that these elements are developed and incorporated into the Final Recommended Plan.

The Government of Yukon has prepared a tracked changes version of the Recommended Plan that forms a portion of this submission that highlights problem areas and proposes modifications to address concerns. Finally, the Government of Yukon proposes a phased implementation of some aspects of the Plan to ensure it can be practically implemented, more details of which are included in the memo in the submission. Please review the complete submission for specifics on this and other implementation issues.

2. Sustainable Economy and Socioeconomic Wellbeing

The Government of Yukon wishes to underline the commitment under the final agreement “to ensure Sustainable Development” (11.1.1.6) and the subsequent Recommended Plan value of a sustainable economy and socioeconomic goals. We deeply value that Sustainable Development means beneficial socio-economic change that does not undermine the ecological and social systems upon which communities and societies are dependent (Chapter 1, Tr’ondëk Hwëch’in Final Agreement). Our proposed modifications aim to integrate these values and goals more fulsomely throughout the Plan.

The Government of Yukon views a sustainable economy – the production and exchange of goods and services in a manner that provides for the present and future well-being of the people and planet – as essential. We further understand sustainable development in the context of United Nation’s Sustainable Development Goals, which include reducing poverty; promoting wellbeing; building inclusive and sustainable economic growth; advancing gender equality; protecting, restoring, and promoting sustainable use of terrestrial ecosystems; and taking action on climate change.

Further information on our proposed modifications to support a sustainable economy and socioeconomic wellbeing of Yukoners can be found in the sections below on removal of interim withdrawals, cumulative effects thresholds, special management area quantum, critical minerals, climate change, and wetlands as well as in the accompanying memorandum and tracked changes.

3. Interim Withdrawals

The Government of Yukon does not support the inclusion of interim prohibitions of entry (interim withdrawals) in the Recommended Plan and proposes removing interim withdrawals from Landscape Management Units 3, 7, 17 and 21. In the case of Landscape Management Unit 3, we support a permanent withdrawal in the northern portion and a designation of the southern portion as an Integrated Stewardship Area 1 and the removal of the interim withdrawal. For Landscape Management Unit 7, we are proposing a boundary modification and an SMA designation and therefore would support a permanent withdrawal for this modified area. The Government of Yukon understands sustainable development to be allowed in Integrated Stewardship Areas and the Plan should provide sufficient direction to allow for this sustainable development.

Interim withdrawals do not provide clarity to regulators, industry, or assessors on how to implement a regional land use plan. It is unknown how long the additional conditions outlined in the Plan, such as access management plans, sub-regional planning or the Upper Indian River Stewardship Plan will take to complete. The Plan dictates that these are required to lift interim withdrawals 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.

The Government of Yukon would like to see the Dawson Regional Land Use Plan avoid “planning to plan”. Management directions should be developed as part of the Final Recommended Plan, negating the need for interim withdrawals and creating further clarity and certainty moving forward.

4. Cumulative Effects Thresholds

A key position of the Government of Yukon is that the surface disturbance critical thresholds are 2.5% for ISA 3 and 5% for ISA 4 (i.e., return to Draft Plan thresholds). The Government of Yukon supports the linear disturbance thresholds outlined in the Recommended Plan.

Returning ISA 3 and ISA 4 thresholds to the Draft Plan levels aligns with the Chapter 11 commitment to sustainable development (11.1.1.6) and supports said development occurring in appropriate areas. ISAs 3 and 4 are intended to allow for higher levels of development than elsewhere in the Plan and the Government of Yukon wishes to support responsible development in these areas. In addition, the tracking system for surface disturbance includes disturbances from all human activities on the landscape: agriculture, forestry, mining, housing, trapping, recreation, outfitting, aggregate, etc. As the tracking system cannot distinguish between uses, the thresholds must allow sufficient room for these activities to occur while still providing a reasonable level of conservation. We view this as supporting the value for sustainable economy.

The Government of Yukon wishes to highlight that the ISA 2 Cumulative Effects Threshold for Landscape Management Unit 17 – Upper Indian River, has likely been exceeded by recently permitted or completed activities in the unit. Further information on this is available in the accompanying Memorandum section on LMU 17 and the track changes document.

The Government of Yukon recommends that the Plan provides a mechanism to incorporate cumulative effects indicators developed during implementation into the Plan (e.g. water and socio-economic indicators). This should be embedded in the adaptive management framework and implementation sections of the Plan.

5. Reclamation and Restoration and return of lands to the quantum of allowable disturbance

Another area, further highlighted in the memo and track changes document, that will need to be clear by the release of the Final Recommended Plan is definitions of reclamation and restoration, and detailing the process that returns land to the quantum. This is a key consideration for how the cumulative effects thresholds will be implemented and accounted for and, in the Government of Yukon’s view, essential for the functioning of the plan and supporting a sustainable economy and socioeconomic wellbeing.

6. Special Management Area Quantum

The Government of Yukon is comfortable with 39.9% of public lands in the planning region designated as special management area (including Tombstone Territorial Park and excluding Settlement Lands). This quantum of non-settlement lands contributes to an overall quantum (including both settlement and non-settlement lands) equivalent to Draft Plan levels of approximately 45%. We believe that the resulting Special Management Area quantum, in combination with critical thresholds used to limit the amount of activity in ISAs to a sustainable level, achieves a balance between multiple values within the planning region.

Information on Land Management Unit boundaries and designations supported by the Government of Yukon is in the memo, map and tracked changes.

7. Critical Minerals

The Government of Yukon proposes adding a section to the Final Recommended Plan speaking to critical minerals, including information on the access to known critical mineral deposits within the region. Critical minerals provide essential resources for the societal shift to a renewable energy economy and support a local and global sustainable economy. Overall, we seek to ensure that these minerals can assist in a viable clean energy industry. We view this as supporting the value for sustainable economy.

8. Climate Change

As highlighted in Government of Yukon's Draft Plan submission, specific actions and direction to achieve the climate change priority objectives in the Recommended Plan are missing. To address this, the Final Recommended Plan should integrate the updated climate change data and projections we are providing for more informed and regionally specific policy and management.

The proposed modifications in Government of Yukon's tracked changes document connect high-level policy on climate change to actions, provide clarity and consistency of terms, and add specificity to directions. Proposed changes focus on three main areas: updated climate projections, revised management directions, and recommendations and adaptive management specifics. Please review the complete submission for specifics.

9. Wetlands

The Government of Yukon recommends the Final Recommended Plan more fulsomely address wetlands in alignment with *A Policy for the Stewardship of Yukon's Wetlands* (January 2023). The Government of Yukon has proposed modifications to align the plan with the Wetlands Policy and correct inaccuracies related to wetlands.

The Government of Yukon is supportive of the three Wetlands of Special Importance proposed by the Commission in the Recommended Plan (Ladue, Flat Creek and Scottie Creek). We have proposed new geographic boundaries for these Wetlands of Special Importance based on wetland mapping and watershed boundaries to ensure that these designations can be properly implemented upon Plan completion.

For a full list of proposed modifications related to wetlands, please see the tracked changes document.

10. White River First Nation

White River First Nation has asserted rights in the southern portion of the Dawson Region. The Government of Yukon has signed a consultation protocol with White River First Nation and have met with their technical staff regarding the Recommended Plan. We encourage the Commission to engage with White River First Nation to hear their views directly on the Recommended Plan and we support White River First Nation's request to the Commission to mention White River First Nation by name in the Final Recommended Plan text in areas of the Plan overlapping with their assertion.

Submission Overview

The ten issues mentioned above are the key issues the Government of Yukon has identified with the Recommended Plan at this stage in the planning process. In addition to these ten key issues, the Government of Yukon is providing additional comments and observations from our thorough whole-of-government review. The Government of Yukon is pleased to provide this feedback as part of our submission. The documents are intended to be read collectively. The contents of our full submission include:

- This letter introducing the Government of Yukon's major proposed modifications;
- A cover letter for the entire package;
- A memorandum delving deeper into proposed modifications that we felt warranted additional detail or explanation;
- A map detailing the Government of Yukon's proposed boundary and Landscape Management Unit designations changes;
- Rationales for major proposed modifications that were previously provided to Tr'ondëk Hwëch'in;
- A tracked changes version of the Recommended Plan that details various technical, minor and editorial comments and errors which were identified;
- A design and writing style document that makes suggestions of how to improve the structure of the Recommended Plan to increase its usability and ability to be implemented for Plan users and Parties;
- A table of all recommended management practices, recommendations to the Parties and special management directions from the Recommended Plan with proposed modifications;

- Tracking table that summarizes all of the above and will hopefully serve to help the Commission in navigating the Government of Yukon's submission; and
- Scenarios report, which reflects Government of Yukon's learnings from a scenarios exercise hosted by Government of Yukon and Tr'ondëk Hwëch'in designed to identify gaps in the Recommended Plan related to the implementation of projects in the Dawson planning area. We are sharing a report to acknowledge the important contributions of the scenario exercise participants, and to meet our obligations to them.

The Government of Yukon looks forward to continuing to work with Tr'ondëk Hwëch'in, the Commission, White River First Nation, other Yukon First Nations, stakeholders, as well as the public in the planning process outlined in Chapter 11 of Tr'ondëk Hwëch'in Final Agreement. These continuing conversations may result in changes to the Government of Yukon's views regarding aspects in the Final Recommended Plans as they are developed.

The Government of Yukon would be happy to make a presentation on this package to the Commission. Please contact the Government of Yukon Land Planning Branch to arrange for a meeting date.

Sincerely,



John Streicker
Minister of Energy, Mines and Resources



Nils Clarke
Minister of Environment

cc: Hähkè Taylor, Tr'ondëk Hwëch'in
Chief Chasse, White River First Nation
Kirsten Reid, Senior Planner, Dawson Regional Planning Commission
Neil Salvin, Yukon Land Use Planning Council
Dennis Berry, Deputy Minister Environment
Paul Moore, Deputy Minister Energy, Mines and Resources

encl: Cover letter
Memo
Map
Rationale document previously provided to Tr'ondëk Hwëch'in
Tracked changes Recommended Plan
Design and writing style document
Recommendations table
Summary table
Scenarios report

Overview of the Government of Yukon's Response to the Recommended Dawson Regional Land Use Plan

In addition to the high-level breakdown of the issues mentioned in the preceding letter, the Government of Yukon has also collated the observations and comments of our planning practitioners, scientific and technical staff who reviewed the Recommended Plan. We are pleased to provide these for your consideration, specifically:

- **Memo**
 - Additional detail or explanation of proposed modifications that we felt could not be adequately addressed in one of the other submission documents.
- **Map**
 - Proposed boundary and designation changes for Landscape Management Units.
- **Rationales for major proposed changes that were previously provided to Tr'ondëk Hwëch'in.**
 - Expanded rationales for high priority concerns with Recommended Plan and suggested changes that were previously provided to Tr'ondëk Hwëch'in.
- **Tracked changes version of the Recommended Plan**
 - Edits and commentary on entire Recommended Plan, including specific changes recommended in other documents in this submission.
 - Includes two files: tracked change versions of the Recommended Plan text and the Plan map package.
- **Proposed changes for effective document design and writing style**
 - Proposed modifications to the Recommended Plan's structure and writing style to improve effectiveness of the planning document, reduce risk of misinterpretation, and increase the feasibility of the Plan's implementation.
- **Recommendations Table**
 - All management directions, recommendations to the Parties and special management directions from the Recommended Plan with suggested modifications including recommendations on whether directions should remain in the main text of the Plan or move to an Appendix.
- **Summary Table**
 - High-level synopsis of all changes proposed and the location of each change
- **Scenarios Report**
 - Reflects the Government of Yukon's learnings from a scenarios exercise hosted by Government of Yukon and Tr'ondëk Hwëch'in designed to identify gaps in the Recommended Plan related to the implementation of projects in the Dawson planning area. We are sharing a report to acknowledge the important contributions of the scenario exercise participants, and to meet our obligations to them.

Memorandum of Government of Yukon's Proposed Modifications to the Recommended Dawson Regional Land Use Plan

Introduction

The objective of this document is to expand on proposed modifications outlined in the Ministers' letter and to identify additional areas of proposed modification to the Recommended Plan. Modifications are also proposed in the Effective Document Design and Writing Style document, the tracked changes version of the Recommended Plan, and the Recommendations Review table; the Government of Yukon's submission should be read as a whole to ensure all proposed modifications are considered.

Modifications are proposed in accordance with s.11.6.2 of the Tr'ondëk Hwëch'in Final Agreement which authorizes the Government of Yukon, after Consultation, to approve, reject or propose modifications to the Recommended Plan as it applies to Non-Settlement Land.

1. Proposed Modifications to Specific Landscape Management Units

1.1. Landscape Management Unit 1 Access

The Government of Yukon appreciates that the Commission recognizes the importance of critical minerals and included language in the Recommended Plan that addresses access to the cobalt claims in Landscape Management Unit 1.

The Government of Yukon supports the Recommended Plan's recommendation for an access management plan for Landscape Management Unit 1. That said, in the event an access management plan has not been established at the time the cobalt deposit is shown to be viable, then an access route to the existing cobalt deposits should be determined in accordance with existing processes.

Thus, the Government of Yukon proposes that the Commission state within the Final Recommended Plan that in the absence of an access management plan, access details related to claims in Landscape Management Unit 1 shall be dealt with at the project level, in accordance with existing regulatory processes.

The Recommended Plan currently states:

If existing mineral claims are proven viable by a proponent, the parties shall jointly consider permitting new surface access and access route.

The Yukon government proposes modifying the language to:

An access management plan for this Landscape Management Unit should be jointly created by the Parties. If existing mineral claims are proven viable prior to completion of the access management plan, details of where and how access is provided to these claims will be dealt with at the project level, and in accordance with existing processes.

These changes are proposed to provide certainty that the project can proceed to assessment without undue delays if the Parties are unable to expeditiously complete the access management plan. Any access route proposed would still be subject to regular assessment and consultation requirements that would take into consideration the values identified in the Plan.

1.2. Landscape Management Unit 3

The Government of Yukon does not support a sub-regional planning process for Landscape Management Unit 3. Instead, the Government of Yukon proposes designating the northern portion of Landscape Management Unit 3 as a Special Management Area, with a permanent prohibition of entry order, and designating the southern portion of Landscape Management Unit 3 as an Integrated Stewardship Area 1. With these changes, the interim prohibition of entry orders should be removed for the entire Landscape Management Unit.

Yukon government does not support the continued use of withdrawals for areas outside of Special Management Areas once the Plan is approved. The Plan should provide sufficient direction now to allow for sustainable development without the use of interim withdrawals.

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.

These changes would protect environmental values in 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, including industry and tourism. The northern portion of Landscape Management Unit 3 could either be a standalone Special Management Area or merged into Landscape Management Units 1 and 4. Please see the Draft Options for LMU Modification Map included with this submission for more details.

The Government of Yukon proposes that the Final Recommended Plan recommend the Parties pursue a Canadian Heritage Rivers designation for the portion of the Yukon River in this Landscape Management Unit. This would seek to apply this designation that is currently in place for four other rivers in the Yukon, including the Thirty Mile portion of the Yukon River. This could assist in collaborative efforts between Yukon Parks and Tr'ondëk Hwëch'in to undertake mitigative strategies, such as the establishment and maintenance of backcountry campsites and undertaking backcountry recreational impact monitoring surveys to inform potential future management decisions. Heritage River status does not constitute any management or enforcement authority; however, other existing legislative and regulatory tools can be used to regulate industrial and recreational activity.

The proposal to have a sub-regional plan that would span the entire length of the Yukon River is out of the scope of the Dawson Regional Land Use Plan. 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 provides certainty and predictability within the plan and avoids a situation of planning to plan.

1.3. Landscape Management Units 7 and 8

The Government of Yukon proposes modifying the boundary between Landscape Management Units 7 and 8. We further propose designating the modified Landscape Management Unit 7 as a Special Management Area, thus permanently withdrawing it from mineral staking, and designating the modified Landscape Management Unit 8 as an Integrated Stewardship Area 4. This boundary change would add 1,336 km² to Special Management Areas. This recommendation is based on our consultation with Tr'ondëk Hwëch'in and is proposed to balance protecting important habitat for the Northern Mountain Caribou herds (Clear Creek and Hart River) while allowing economic interests and values in the area including critical minerals to be developed.

Please see the Draft Options for LMU Modification Map included with this submission for more details.

The Government of Yukon is in favour of updating the Caribou Stewardship Area in the Recommended Plan to provide clear management direction and to be tailored geographically to the context of individual caribou herds. Updated Caribou Stewardship Area boundaries that align with the herd ranges of the Clear Creek and Hart River herds would apply across Landscape Management Unit 7 and the majority of Landscape Management Unit 8. Please see Caribou Stewardship Areas (Caribou Overlays) below for further details. Caribou data shows that the Special Management Area proposed for Landscape Management Unit 7 (with modified boundaries) protects a significant amount of caribou habitat.

The proposed approach increases the area of Landscape Management Unit 8 and re-designates it to an Integrated Stewardship Area 4 to ensure that the mineral resources in the area, including critical minerals, can be developed effectively. Additionally, the Government of Yukon is proposing that the Final Recommended Plan recommend a new Off-Road Vehicle Management Area that aligns with the Clear Creek and Hart River caribou herd ranges in Landscape Management Unit 8 to restrict off-trail use for recreational users. The current Off-Road Vehicle Management Area would continue to apply for alpine areas 1,400 metres or higher; if implemented, this new Off-Road Vehicle Management Area would apply to the full geographic extent of the herds' range boundaries and require recreational users to keep to designated trails and roads.

The Government of Yukon believes this approach can achieve both environmental and economic objectives in the area, including protecting important habitat for the Hart River and Clear Creek Caribou herds.

1.4. Landscape Management Unit 17

The Government of Yukon wishes to highlight that the ISA 2 Cumulative Effects Threshold for Landscape Management Unit 17 – Upper Indian River, is not reflective of permitted or completed

activities in the unit. Specifically, the surface disturbance threshold is 1.0% or 4.9km² of the total area (485km²) and as of mapping completed in 2020, 1.2km² has been disturbed. The linear feature density threshold is 0.5km/km² or 243km and as of mapping completed in 2020, there are 234km of linear features. This leaves only 3.6km² of surface disturbance and 8km of linear features before exceeding thresholds, based on imaging from 2020. Based on permits issued since 2020, these thresholds could have been exceeded already or be exceeded soon. This is concerning given the significant placer and some quartz development in the LMU, including existing operators seeking to renew their current permits and claim holders seeking new permits.

The Government of Yukon supports the Recommended Plan's recommendation for development of an Upper Indian River Stewardship Plan, provided it is decoupled from continued interim withdrawals in this area. The development of an Upper Indian River Stewardship Plan during Plan implementation will provide additional guidance for the management of wetland and other environmental and cultural values in this Landscape Management Unit. The Government of Yukon does not support interim withdrawals in Landscape Management Unit 17.

The Government of Yukon supports withdrawals only in Special Management Areas; there should not be interim withdrawals in the Final Recommended Plan. Integrated Stewardship Areas support sustainable development; interim withdrawals would impede this as they do 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. In Integrated Stewardship Areas, the Plan should provide sufficient direction to allow for sustainable development without interim withdrawals.

1.5. Landscape Management Unit 18

The Government of Yukon proposes that the designation of Landscape Management Unit 18 be an Integrated Stewardship Area 4, not Integrated Stewardship Area 3. This will allow for the Coffee Gold Mine to be fully constructed and for other projects to continue to explore and develop within the proposed critical surface disturbance threshold for ISA 4.

Further exploration through mining activities at Coffee Gold Mine may lead to extension of the mine, which should be accounted for in the Plan. Additionally, there are other quartz and placer activities currently underway in Landscape Management Unit 18, reducing the area available for development.

1 Special Management Areas

1.6. Definition

The definition for Special Management Areas identified in the Recommended Plan does not match the Chapter 10 definition within the Tr'ondëk Hwëch'in Final Agreement and so should not cite

Chapter 10 as the source. For reference, the definition we are discussing is from the Recommended Plan Glossary:

A conservation area identified and established within a Traditional Territory of a Yukon First Nation under a Final Agreement. SMAs can be Yukon Parks, Habitat Protection Areas, National Parks or Wildlife Areas or other types. The level of protection is defined in a management plan developed for each area, with management shared among the Yukon government, First Nation governments, and Renewable Resource Councils, depending on the jurisdiction (Chapter 10, FNFA).

Chapter 10 Special Management Areas are designated and developed through a prescribed process which differs from that of regional land use planning under Chapter 11. Due to this difference, the Government of Yukon would like to change the definition in the Plan and remove the reference to Chapter 10. Our proposed definition is:

Plan designation used to identify areas intended to be jointly managed by Government of Yukon and Tr'ondëk Hwëch'in, in the spirit of Chapter 10 of the THFA, for conservation. During Plan implementation SMAs will require permanent prohibition of entry orders for placer and quartz, withdrawal from disposition for oil and gas, development of a management plan and legal designation. Land use activity in SMAs is allowed in accordance with the management intent and directions of the individual LMU.

Tr'ondëk Hwëch'in and Government of Yukon may decide to establish Special Management Areas identified in the Plan through Chapter 10, s. 10.2.0 (g) and 10.5.0 and manage them in accordance with Chapter 10. Government of Yukon is open to this discussion with Tr'ondëk Hwëch'in, however it is a separate process than regional land use planning.

1.7. Cumulative Effects Thresholds

The Government of Yukon cannot support the Recommended Plan's assertion that only industrial development counts towards the cumulative effects thresholds in Special Management Areas. The tracking and calculation of surface disturbance and linear disturbance thresholds include all human caused disturbances, including those associated with recreation, trapping, outfitting, tourism, etc. We do not have a methodology which would only account for disturbance associated with industrial development.

While technology may ultimately allow for new methodologies, the inclusion of all human activities in cumulative effects thresholds is consistent with the definition and intent of Special Management Areas for conservation. Given the nature of these areas, the surface disturbances impacting these regions are just as likely to be from recreation, tourism, outfitting and trapping activities, and therefore it would be inappropriate to exclude these activities for surface disturbance thresholds for these areas.

The Government of Yukon supports the cumulative effects threshold values currently recommended for each Special Management Area but proposes modifying the language of the Final Recommended Plan to define these thresholds in the text of the Landscape Management

Unit descriptions, rather than referring to Integrated Stewardship Areas (and their cumulative effects thresholds). Specifically, the thresholds in Special Management Areas should be defined as either a percentage for surface disturbance and km/km² for linear disturbance or should be calculated to show the actual values. As an example, in the Recommended Plan LMU 1 is a SMA with an ISA 1 threshold, this should instead be modified to a surface disturbance threshold of 0.25% of LMU area (19.9 km²) and a linear feature density of 0.25 km/km² (1,990 km). This recommendation applies to all Special Management Areas in the Plan to increase clarity in the Plan for users by removing the linkage between Special Management Areas and Integrated Stewardship Areas.

1.8. Land uses allowed within Special Management Areas

In addition to being clear about the cumulative effects thresholds established for Special Management Areas, the Government of Yukon proposes being clearer about the land uses allowed or restricted within these areas, as pointed out in the tracked changes document.

Section 3.2.2 of the Recommended Plan states that:

“An SMA is an area managed for conservation. Industrial land use is generally not allowed in these areas. However, exceptions may be made whereby industrial activity may be allowed in existing land dispositions and surface access may be established to access those dispositions, if specified in the special management directions.”

The direction for some of the individual Special Management Areas is contradictory with the statement in Section 3.2.2, therefore, we have recommended deleting the above statement. Most of the Special Management Areas state that industrial land uses are allowed up to a threshold level and do not specify that this would need to be within existing tenure. Additionally, forestry and agriculture (industrial land uses as per the glossary definition) are allowed in some Special Management Areas and the allowable future activity may not yet have an existing disposition. The Government of Yukon is supportive of the management intent and direction for land uses being provided for each individual Special Management Area rather than in the overall direction in Section 3.2.2, so long as the direction is stated clearly, covering all industrial activities.

Clarity on the allowable land uses within a Special Management Area is important as this affects the Parties' future consideration of appropriate legal designations. Some legal designation tools are incompatible with land uses that may be permitted within a Special Management Area. For example, some territorial park types under the *Parks and Land Certainty Act*, require that industrial development be prohibited. Under this legislation, “industrial development” includes (a) development of mines and minerals, oil and gas, hydro-electric and other energy resources, and agricultural lands; (b) harvesting of timber resources, (c) development of townsites, and any land use, activity or infrastructure associated with the above. Therefore, any part of a Special Management Area that allows agriculture or timber harvest, for example, could not be designated as some of the territorial park types.

The above example is provided to illustrate the importance of being clear which land uses are allowed within a Special Management Area, not to suggest that the Plan provide direction for

future designation. The Parties are responsible for the implementation of Special Management Areas, including decisions about designations and management planning.

1.9. Tombstone Territorial Park

As per the Terms of Reference, the Plan should not apply to Tombstone Territorial Park.

Section 1.4 (Scope of the Plan) accurately captured this, but section 3.2.6 (Other Areas) missed it. Section 6 (Landscape Management Units) should describe Tombstone similar to how it treats the City of Dawson. The Government of Yukon proposes adding Tombstone Territorial Park to the list of excluded areas in section 3.2.6, removing the Intent Statement and Special Management Directions and adding a disclaimer that the Plan does not apply to this area in section 6 LMU 5: Ddhäl Ch'ël (Tombstone).

The portion of the Dempster Highway corridor that runs through Landscape Management Unit 5 should be made its own Landscape Management Unit as it is not part of Tombstone Park but should be included in the Plan. Government of Yukon proposes creating an additional Landscape Management Unit designating this and the remainder of the Dempster Highway Corridor as a sub-regional planning area to align with Recommended Action #87 and the designation of the Dempster Highway in the Peel Watershed Regional Land Use Plan.

2. Administrative Revision, Variance and Plan Amendment

The Recommended Plan is proposing three types of changes outside of Plan review and revision – administrative revisions, variances, and amendments. The Government of Yukon supports the ability to make changes to the Plan to ensure that it is adaptable to changing circumstances. The Government of Yukon agrees with the idea of administrative revisions for minor technical changes that do not change the substance of the Plan and that amendments should be used to change management strategies (policies, designations or directions) within the Plan.

The Government of Yukon believes that variances are not changes to the Plan, as they should allow the Parties to decide that an otherwise non-conforming use should be allowed on a one-off basis without changing the Plan itself. By using a variance, an otherwise non-conforming use is allowed for a single user but not for other users going forward. If a change should apply more broadly, it should be treated as a Plan amendment and follow that approval process. The variance process should be described in the Plan but should follow Chapter 12 of Tr'ondëk Hwëch'in Final Agreement and the *Yukon Environmental and Socio-economic Assessment Act* in allowing Decision Bodies to determine if an otherwise non-conforming project can proceed.

The Government of Yukon would like to work with the Commission and Tr'ondëk Hwëch'in to determine the process to request and assess administrative revisions, and amendments prior to the release of the Final Recommended Plan. At a minimum, the process should set out who may make a request, what consultation and/or engagement is needed, how the request will be reviewed and by whom, who can approve or reject the request, and how disputes will be resolved.

3. Staged Approach to Implementation

The Government of Yukon proposes a phased implementation of some aspects of the Recommended Plan to ensure it can be practically implemented. The Government of Yukon also recommends removing recommendations outside of the planning process' scope as detailed in Chapter 11 of the Umbrella Final Agreement and the Terms of Reference for the Dawson planning process.

The Final Plan will need to be implementable to meet its objectives, protect rights, and serve the public. Several recommendations and directions in the Recommended Plan are not currently implementable. To achieve full implementation of the Recommended Plan, it would be necessary to increase the capacity of both governments and complete substantial up-front and ongoing work that is not currently feasible. There are necessary regulatory structures and information systems that must be created, changed and/or augmented before the plan can be implemented. Substantial time will be required to gather data and create systems regardless of the financial and human resource requirements. Regulators and the Commission would require multiple inputs to determine conformity and permit projects, including;

- The collection of data and creation of indexed databases and associated user interfaces;
- Research and mapping;
- Definition, clarification and delegation of responsibilities related to inputs to applications; and
- Increased monitoring and enforcement

Un-implementable recommendations should be moved to the Implementation section of the plan, and an interim approach should be used until the full recommendation can be implemented. This will accomplish the intent of the Plan to the greatest degree possible, while still allowing the Plan to be approved and implemented.

The recommendation and directions that must consider implementability and be rewritten or removed to the Implementation section of the Final Recommended Plan:

3.1. Surface disturbance and Linear feature density tracking frequency

Recommended action number 12 states that the Government of Yukon should produce an annual summary of surface disturbance and linear feature density for each Land Management Unit as a short-term action. The infrastructure, resources, and capacity required to complete annual disturbance tracking do not exist, so it cannot be implemented now.

In addition to implementation concerns, it would not be effective to require annual summaries for each Land Management Unit. Surface disturbance tracking should be prioritized based on level of activity in a Landscape Management Unit, and new information needs to be gathered on an ongoing basis to inform conformity checks as tracking of the proposed and permitted disturbance would be required to ensure that cumulative disturbance does not exceed Plan thresholds. For this to be achieved it will require a commitment of additional resources beyond current allocations, and a spatial database and public-facing portal will need to be developed which will take significant time and resources to develop.

The Government of Yukon is proposing an approach to track surface disturbance every five years with a focus on areas with greater intensity of development. The Government of Yukon supports the medium- and long-term commitments in Recommended action number 12 to develop a publicly accessible indicator tracking system for use in conformity checks and to develop an online platform to allow proponents to have information supporting program design.

Monitoring of surface disturbance is not a management tool. If a Land Management Unit is approaching thresholds, conformity checks and regulatory decisions are the tools to limit additional surface disturbance. Restoration of existing disturbance will also add land back to the quantum in the long-term.

The Parties and Commission should work together to explore additional approaches.

3.2. Directions requiring specific wetland type identification and mapping.

To ensure compliance with requirements such as disturbance limits and buffers, proponents need access to wetland mapping to incorporate the information into their project proposals. Without this information, it is not possible to determine project conformity.

Existing, broad-scale mapping is not specific enough to determine project overlaps with wetlands. Without fine-scale wetland mapping, delineation and classification, proponents cannot determine mitigations of adverse effects at the project level or produce wetland management, access management, and reclamation plans. Percent thresholds for wetland disturbance cannot be implemented without project-scale mapping and wetland type identification.

4. Interim Withdrawals

The Government of Yukon proposes the removal of withdrawals for areas outside of Special Management Areas once the Plan is approved. The Final Recommended Plan should provide sufficient direction now to allow for sustainable development without the use of interim withdrawals.

Interim withdrawals create uncertainty for industry and regulators on how to implement a regional land use plan. The time and level of effort required to satisfy additional requirements is unknown. One of the purposes of land use planning is to provide clarity. Interim withdrawals are contrary to this goal and should not be used beyond plan approval.

Further, the Government of Yukon proposes that planning be completed now rather than deferred to future processes. 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 Tày (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). Part of this regional planning process includes creating management directions for these areas now, not deferring this to implementation. The

Government of Yukon proposes the Commission include the necessary direction for these areas in the Final Recommended Plan now so that interim withdrawals can be removed and the Plan can be implemented once it is approved.

5. Critical Minerals

The Government of Yukon proposes adding a sub-section into Plan Section 5.4 (Sustainable Economy) speaking to critical minerals in the planning region. The section should speak to:

- The use of critical minerals as raw inputs for clean technologies which will hasten the transition to a greener economy and help reach global CO₂ emission goals.
- Support for securing critical mineral supply chains. (Canada/U.S. Joint Action Plan on Critical Minerals Collaboration and Canada's Critical Minerals Strategy)
- How nickel, cobalt, copper and manganese are utilized across clean energy technologies.

6. Adaptive Management

Given that adaptive management was included as a guiding principle for the Recommended Plan, it is clear that the Plan is intended to be able to respond to changing circumstances throughout its lifetime. Government of Yukon recommends that the Final Recommended Plan further address how adaptive management will work during implementation to clarify how these changes will be incorporated. This is particularly relevant to the cumulative effects framework section of the Plan that is intended to expand as additional information becomes available through monitoring. Effective adaptive management is also key to properly consider how climate change alters landscapes and affects wildlife behaviours and distribution. How adaptive management fits into variances, amendments and Plan reviews processes must be considered. The Government of Yukon would like to work with the Commission and Tr'ondëk Hwëch'in to determine this process prior to the release of the Final Recommended Plan.

7. Cumulative Effects Framework

As stated in our letter to the Commission in response to the Draft Plan, the Government of Yukon views cumulative effects management as a foundational framework for this plan, providing the opportunity to guide the management of the working landscape in the Dawson Region in a more sophisticated manner. The Government of Yukon supports cumulative effects monitoring as it provides a more holistic approach to assessing impacts at a landscape-scale rather than on a project-by-project basis. The development of an effective framework is important to fully understand what is happening in the region and to appropriately adapt to concerns throughout implementation of the Plan.

The work completed by the Commission on the cumulative effects framework in the Recommended Plan is commendable and advances the topic significantly from the Draft Plan.

However, the Recommended Plan did not incorporate our suggested changes to the Draft Plan to address the following specific concerns:

- Link linear feature density and surface disturbance thresholds to priority ecological values, specifically moose, caribou and water/aquatic systems using best available information.
- Further develop the socio-economic indicators in the Draft Plan to inform cumulative effects management. This will help to balance industry interests and social needs.
- Develop values-based reclamation guidance in an adaptive management context.

Currently, the Recommended Plan has guidance to track surface disturbance and linear feature density, which are indicators of human activity on the landscape, not of cumulative effects. Cumulative effects are best measured by value-based indicators. Work to identify some value-based indicators has been completed by the Cumulative Effects Working Group and are summarized in the disturbance report (<https://dawson.planyukon.ca/publications/recommended-plan/exploring-the-cumulative-effects-of-future-land-use-in-the-dawson-planning-region/>).

Recognizing the capacity constraints of the Commission, Cumulative Effects Working Group and Parties' technical staff, the Government of Yukon now recommends that some of this work occur during implementation rather than before Final Recommended Plan release. However, the Plan should provide a mechanism to incorporate cumulative effects indicators developed during implementation into the Plan. This should be embedded in the adaptive management framework and implementation sections of the Plan. For clarity, Government of Yukon supports the inclusion of these pieces in the Final Recommended Plan if available. However, regulatory processes and decision making should be able to continue without waiting for these pieces, as they are created and incorporated into the Plan they should apply going forward.

The Government of Yukon suggests adding wildfire (e.g., per cent of landscape burned), lichen cover, and caribou demographic rates (e.g., herd size, cow-calf ratios and cow-bull ratios) as value-based indicators, given that we have historic and ongoing data collection to monitor these indicators. This addition will help to provide a more holistic view of values with respect to cumulative effects at this time. These indicators, alongside the surface disturbance and linear feature density indicators, can better reflect cumulative effects in the framework and support sustainable development and conservation as defined in the Trondëk Hwëch'in Final Agreement. The Final Recommended Plan can continue to recommend further development of the cumulative effects framework, including indicators identified in Section 4.2.2 of the Recommended Plan (e.g. water and socio-economic indicators). The Government of Yukon supports the work of the Cumulative Effects Working Group in further developing values-based indicators.

8. Cumulative Effects Thresholds

8.1. Critical Thresholds

As stated in the letter, the Government of Yukon recommends that critical thresholds for surface disturbance be changed to the Draft Plan levels, i.e. critical thresholds for surface disturbance for ISA 3 should be changed from 2% in the Recommended Plan to 2.5%, and critical thresholds for surface disturbance for ISA 4 should be changed from 4% in the Recommended Plan to 5%.

The Government of Yukon's proposed modification considers varied responses during the public consultation and responds by adjusting the balance of competing interests on the landscape. The total area of the 11 LMUs designated for some development under the Recommended Plan is 22,643.41km². This means a total of 425.99km² of land in the planning region can be disturbed before all critical thresholds are reached. After considering current disturbance, this leaves 229.63km² available for development across the entire region. Returning to Draft Plan levels would increase the total area available for development from 229.63km² to 319.94km². The Government of Yukon sees this as a more measured balancing of interests.

8.2. Reclamation/Restoration Definitions

Policy Recommendation 4 states:

The Parties must define what is meant by reclamation and restoration and how these concepts relate to the Dawson Regional Plan's cumulative effects framework.

The Parties are, and would like to continue, working together through the Cumulative Effects Working Group on this topic.

The Government of Yukon re-iterates that these definitions and concepts need to be agreed to and finalized before the Final Recommended Plan is completed, as it is a key consideration for how the cumulative effects thresholds will be implemented. These definitions must provide certainty around how and when disturbed land can be returned to the "land quantum" (i.e. not counting towards the surface disturbance or linear feature density thresholds) within a reasonable timeframe and that the process to determine this, including actions and roles of those involved, must be clearly presented.

As "reclamation" is commonly understood by industry to describe activities completed by proponents during the period when a permit is active, Government of Yukon would like to suggest that a third term, "recovered", may be needed to describe the stage at which disturbed land can be returned to the "land quantum" but may not be fully "restored" and therefore should remain as a separate concept.

When land is "recovered" and can be returned to the "land quantum" should be determined by a process proposed by the Cumulative Effects Working Group and agreed to by the Parties or failing that in accordance with 11.6.2 and 11.6.4 clauses of the Final Agreement. As stated above, Government of Yukon would like to continue, working together through the Cumulative Effects Working Group on this topic.

8.3. Precautionary Level of Disturbance Thresholds

At the Draft Plan stage, the Government of Yukon recommended that the precautionary level of the cumulative effects disturbance thresholds should be removed. The information recommended to be collected at this level was associated with surface disturbance mapping, which was completed following the Draft Plan. As this information is now available and new information will be gathered on an ongoing basis to inform conformity checks, it is not necessary to have a separate

stage for gathering information. It is unclear what information would be gathered at this stage that would not already have been needed to determine that this stage was reached. Therefore, the Government of Yukon continues to suggest that this level of threshold not be used in the Final Recommended Plan.

Given the amount of work associated with this Recommended Plan, the Government of Yukon is cautious to recommend any more information be collected at the Precautionary Level. Tying values to disturbance thresholds (and cumulative effects) would be challenging at this level of development but should be captured at later levels (Cautionary and Critical), as recommended in 7, above.

9. Access

The Government of Yukon proposes including an Access Management chapter in the Final Recommended Plan, given the large number of activities on the landscape in the Dawson region. A subsection on this topic would outline standard access provisions as general management directions and provide clarity for implementation, rather than scattering access considerations throughout the Plan.

The Access Management chapter should deal with access in general, its impact on other values in the Plan, and which Landscape Management Units require access management plans, including the rationale. Much of the Plan's section 5.4.3 would thus be restructured as a new subsection under section 5. This approach should provide general management direction that mitigates access concerns, thereby reducing the number of subsequent access management plans. Issues on a specific Landscape Management Unit can be included in the appropriate subsection in section 6 of the Final Recommended Plan.

The Government of Yukon does not support the Commission's recommended list of Landscape Management Units requiring access management plans. The Government of Yukon agrees that access management plans should be developed for Landscape Management Units 1 and 7. The Government of Yukon does not believe access management plans are necessary elsewhere, primarily because access already exists in much of the region, and the proposed access management chapter should otherwise address access considerations generally. The Government of Yukon proposes that the Commission include the following language within the plan:

We are supportive of the Parties working to reach consensus on joint access management plans for Landscape Management Units 1 and 7, however, in the absence of an approved access management plan, each government reserves the right to develop and approve a plan for its area of jurisdiction, as per the existing regulatory review process.

The Government of Yukon does not believe it is necessary to put in place interim withdrawals or limits on permits until access management plans are complete. Access management plans are important tools that should be developed, where appropriate, but we have concerns that their development may take significant time due to financial and human capacity constraints and we see this as a risk to economic development in the region if withdrawals or the limiting of permits were tied to their completion.

10. Wetland Buffers

The Government of Yukon is proposing modifications to better align the Plan with existing territorial guidance by strengthening the wetland disturbance buffers by adapting them to align with the buffer sizes developed for the Forest Resources Regulations Wetlands Riparian Management Standards and Guidelines and applied to all wetlands. This would strengthen wetland buffers in the Final Recommended Plan and increase Plan implementability by mimicking existing regulations. Please see the tracked changes document for details.

11. Caribou

11.1. Fortymile Caribou

The Recommended Plan did not incorporate our suggested change to the Draft Plan to include the caribou summer range area west of Sixty Mile Road into Landscape Management Unit 21 – Fortymile Caribou corridor (formerly LMU 23). This leaves sensitive caribou migration corridors at risk in Landscape Management Unit 15 – Sixty Mile. Summer range is a limiting factor to the herd directly related to abundance, and herd abundance is critical to maintaining the presence of the Fortymile Caribou herd in the Yukon. To support migration pathways and summer range, we suggest the following special management direction be added to Landscape Management Unit 15:

While activities are underway, special care should be taken during the months of June through November to maintain caribou summer range habitat. Specific provisions related to this time period should be considered as part of the regulatory and assessment process for individual projects.

11.2. Caribou Stewardship Areas (Caribou Overlays)

The Government of Yukon would like to continue to work with Tr'ondëk Hwëch'in and the Commission to update Caribou Stewardship Areas (caribou overlays), including boundaries and new conditions that would apply to development within the boundaries. There are shortcomings of the current caribou overlays, which are outlined in the design and writing style document attached with this submission. We suggest the Technical Working Group may be a good venue to host these discussions.

The Government of Yukon is in favour of using caribou overlays in the Final Recommended Plan, if modifications are made. Caribou overlays could be an effective tool to support project planning that mitigates impacts to caribou. Overlays should provide project-specific considerations to guide assessment and regulation, while being flexible enough to consider the context and risk of the individual project proposed and being adaptable to new circumstances. Overlays could align with the herd range boundaries of the Northern Mountain population of Woodland Caribou (Clear Creek, Hart River, and Klaza herds) and reflect important areas for the Fortymile herd. Tailoring the overlays geographically to the context of the herds in the region will be more effective than aligning with Landscape Management Unit boundaries and the Technical Working Group can work together to jointly create directions that will apply to these areas. The Government of Yukon believes that these changes are necessary to maintain protection for caribou in important habitat

areas that are also identified for industrial activity. The Government of Yukon would like to continue to work with the Commission and Tr'ondëk Hwëch'in through the Technical Working Group to further develop caribou overlays.

12. Biodiversity and Species at Risk

The Government of Yukon is proposing modifications to the Recommended Plan text to more fully address biodiversity and species at risk. There were inaccuracies and omissions related to biodiversity and species at risk in the Recommended Plan; for example, the lists of species at risk found within each Land Management Unit was often incomplete. This has now been corrected in the tracked changes document.

The Government of Yukon wishes to ensure that policy recommendations relating to biodiversity monitoring and research can continually inform management decisions and has proposed modifications to reflect this. There are also proposed modifications to align the Final Recommended Plan more closely with requirements of federal recovery strategies and management plans for listed 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, which increases the need to support and maintain these populations in the Dawson region. To see the scope of the proposed modifications, please see additional tracked changes document.

13. Naming specific Government of Yukon positions

At a variety of points in the Recommended Plan it speaks to the regional biologist making recommendations for buffers or as the point source for other technical expertise. This approach is problematic as these positions may change over time, and the required specific technical expertise may not be found at the regional biologist level. The Final Recommended Plan should not single out a specific Government of Yukon position in its text. Instead, it can refer Final Recommended Plan users to the Department of Environment at the Government of Yukon and Lands and Resources Department at Tr'ondëk Hwëch'in Government and indicate that these areas and mitigations will be identified during the assessment and regulatory processes.

14. Stewardship Trust Fund

The Plan recommends that a Stewardship Trust Fund be established to support the objectives of Chapter 11, along with the goals and objectives of the Recommended Plan. The Government of Yukon does not support this recommendation as it would require legislative change and overlaps with other existing work.

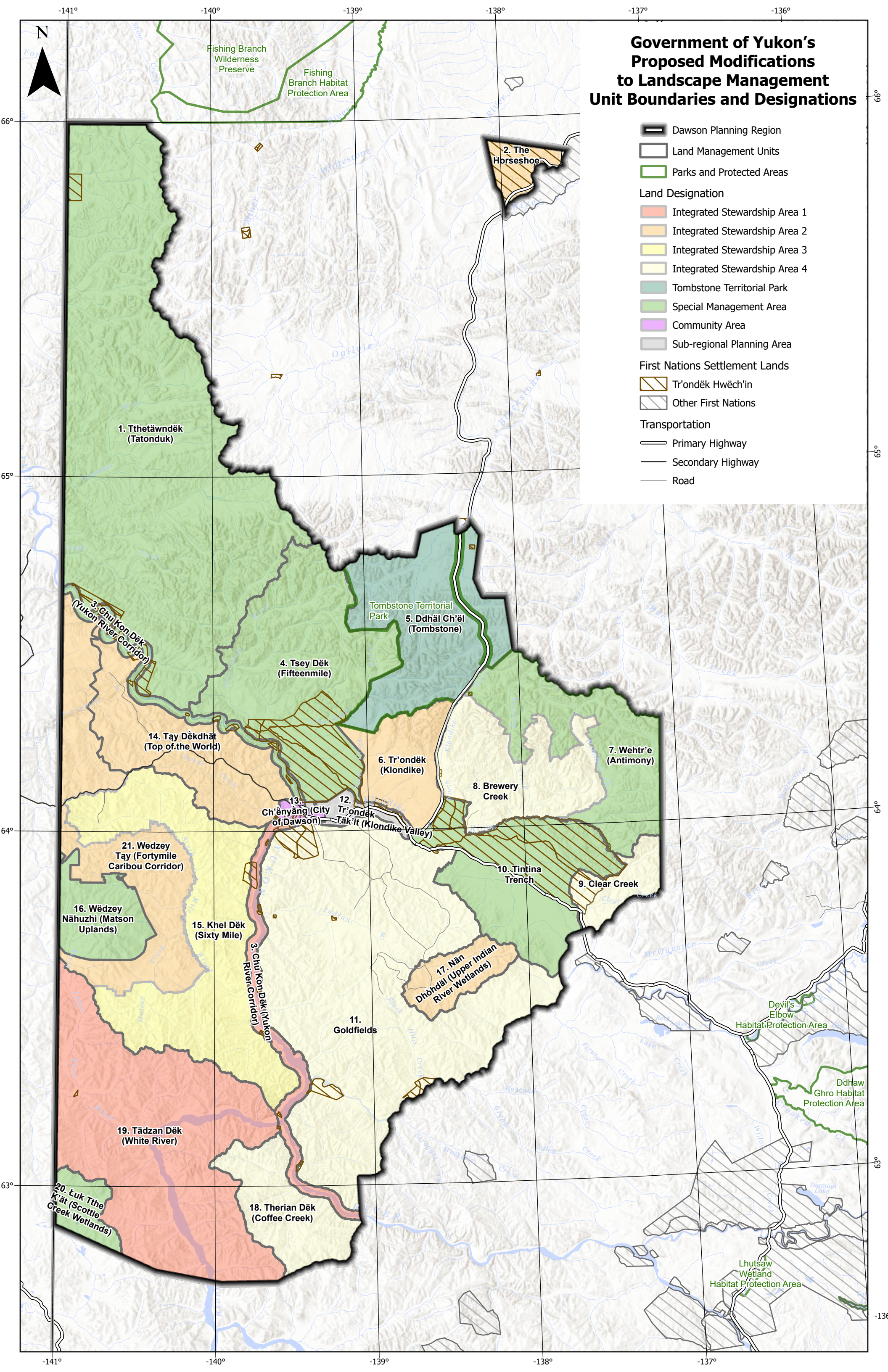
Section 11.7.3 of the Tr'ondëk Hwëch'in Final Agreement states that a regional land use plan cannot compel Parties to the Plan to create or change legislation. To create a trust fund, new legislation would have to be created and/or existing legislation would require amendment. In this instance, this would have to occur at both the Government of Yukon and Government of Canada

levels. As a result, this recommendation is outside of the scope of both the Dawson Regional Land Use Plan and the Tr'ondëk Hwëch'in Final Agreement and should therefore be removed.

The Government of Yukon currently supports several trust funds working at a variety of scales with objectives that align with many of those outlined for the proposed Stewardship Trust Fund. In addition, the Government of Yukon is exploring establishing a Heritage Fund, as announced on March 28, 2024, with potential objectives that overlap with those proposed for the Stewardship Trust Fund. Considering this, Government of Yukon does not believe that the capacity and resource burden associated with the establishment and administration of a Stewardship Trust Fund through the Dawson planning process is a strategic use of limited implementation resources.

Conclusion

As stated in the summary letter from Ministers, the Government of Yukon looks forward to continuing to work with Tr'ondëk Hwëch'in, the Commission, White River First Nation, other Yukon First Nations, stakeholders, as well as the public in the planning process outlined in Chapter 11 of Tr'ondëk Hwëch'in Final Agreement. We hope that this more detailed memo as well as the other documents in our submission package help explain our changes, reasons for them and options moving forward. The Government of Yukon would be happy to make a presentation on this package to the Commission. Please contact the Government of Yukon Land Planning Branch to arrange for a meeting date.



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 fulsomely 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.

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.

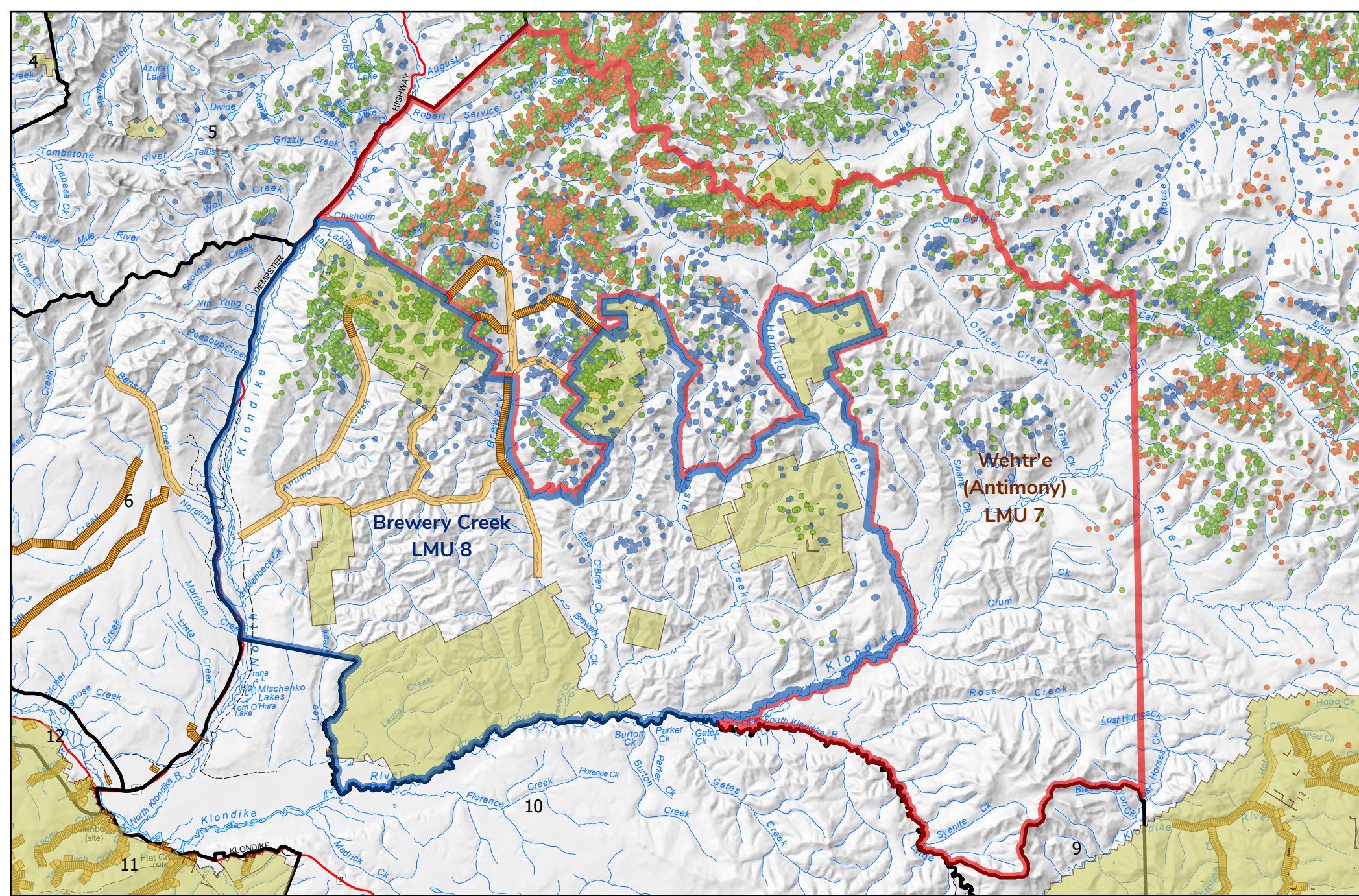
Background/Support:

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.

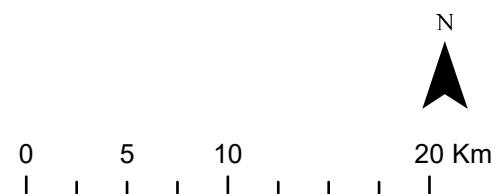
Government of Yukon Rationales for Major Proposed Modifications

- 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

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

Recommended Plan

June 2022



Produced by



**Dawson Regional
Planning Commission**

*On The Land We Walk Together
Nän kāk ndä tr'ädäl*

Signed 10th June, 2022 at the Midnight Dome, Dawson City on the Traditional Territory
of Tr'ondëk Hwëch'in.

Front image credit: Yukinobu Yamamoto



Date: June 10, 2022

LETTER OF TRANSMITTAL

To: Government of Yukon, Tr'ondek Hwech'in Government, First Nation of Na- Cho Nyak Dun and Vuntut Gwitchin Government.

The Dawson Regional Planning Commission hereby recommends the attached regional land use plan to the Parties and Affected First Nations, per the *Dawson Regional Planning Commission Terms of Reference 2019* and per Chapter 11 of the First Nation Final Agreements.

We have approached the planning process in a respectful and collaborative manner, working closely with the Parties through the Technical Working Group and Senior Liaison Committee. We are thankful for the support the Parties have provided throughout the planning process. As the Parties begin consultation on the Recommended Plan, we encourage you take a consensus approach. Open relationships built on mutual respect will be important to successful approval and implementation of this Plan. The goals of this Plan can best be achieved by a co-management approach based upon collaboration.

The Dawson Region planning team (Commission and staff) holds an excellent range of knowledge and skills. The Commission members are all long-time local residents with a deep understanding of the region, its history and its intrinsic values. The Commission staff, supported by Yukon Land Use Planning Council, are skilled in planning, strategy development, analysis, mapping, decision support, policy development, integrated resource management and communication. The Commission used a consensus approach based on collaboration to decision making through the planning process. This team has done the best that it can to develop a plan that achieves the vision of "On the land we walk together - Nan kak nda tr'adal".

We are hopeful that this Plan will be approved, and we see an ongoing role for the Commission to support the Parties in Plan implementation and review.


Debbie Nagano, Chair
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MESSAGE FROM THE COMMISSION

The Dawson Regional Planning Commission ([the Commission](#)) is recommending this regional land use plan to Government of Yukon, Tr'ondek Hwech'in First Nation, First Nation of Na- Cho Nyak Dun and Vuntut Gwitchin First Nation.

This is the first step in the land use planning approval process as established under the First Nation Final Agreements, Section 11.6.

This Recommended Plan reflects the Commission's best attempt to reflect the objectives of the First Nation Final Agreements and specifically Chapter 11 Land Use Planning ([Chapter 11](#)). It is also guided by the Dawson Regional Planning Commission Terms of Reference and ongoing dialogue with the Parties. The Commission sees the planning process as an important part of Land Claims Implementation and First Nation Reconciliation.

The Plan is based upon the concept of "On the land we walk together - Nan kak nda tr'adal" which is meant to reflect the shared responsibility that we all must be stewards of this region.

We hope that the spirit and intent of the Commission is reflected in this Plan through the concept of stewardship.

PLANNING PROCESS

During the planning process, the Commission has listened to a wide variety of people who have expressed their issues and interests.

As with any planning process, our planning has occurred in the context of change. The Dawson ~~R~~egion and the Yukon are undergoing changes related to evolving knowledge, climate change, modernizing legislation, new policies, reconciliation, and societal change. For this reason, there are many elements of adaptive management approach throughout the Plan.

PLANNING STEPS

The planning process has been a long one, first started in 2011 with the formation of the first Dawson Regional Planning Commission, then with a new start in 2019 subsequent to the resolution of the Peel Watershed Supreme Court case. The

Commission acknowledges and thanks the previous Dawson Regional Planning Commission for their work.

This Plan ~~ning has been developed using a rational approach supported by the available information. The~~ process included [the](#) collection of regional information into a Resource Assessment Report, public engagement to inform an Issues and Interests Report, development of a Draft Plan, and over five months of public engagement to seek perspectives on the Draft Plan. Throughout this process, the Commission has actively sought out the perspectives of the wide variety of stakeholders in the region. The concept of ancestral stewardship of the land, water and resources was the inspiration for the

principle of community stewardship that is foundational to the Recommended Plan. This is one example of how Traditional Knowledge complemented the planning process.

We will be providing a Methods Report which will detail the approaches used throughout the planning process, including the Structured Decision Making framework. Given the remoteness and complexity of the values throughout the Dawson Region, there are still gaps in knowledge about this region. Decisions have been made based upon the knowledge available to us at the time.

PUBLIC ENGAGEMENT

During the review of the Draft Plan, we held workshops, met with stakeholder groups, conducted a survey, and held public meetings to seek input on the Plan. As a result, we received an overwhelming response, with thousands of pages of input on the Draft Plan.

This planning process has not been easy. The range of perspectives and expectations for this region has made planning a challenge. However, the Commission has been impressed by the respectful nature of dialogue and willingness of Dawson stakeholders to listen to one-another throughout the planning process.

In development of this Recommended Plan, the Commission stayed true to "On the land we walk together - Nan kak nda tr'adal" and considered all feedback as it revisited every part of the Plan. We have tried to find common ground on all issues and have made recommendations that we feel will reduce future conflicts among land, water and resource uses.

NEXT STEPS

Under the First Nation Final Agreement Chapter 11 planning process, it is now the responsibility of the Government of Yukon, ~~Tr'ondëk Hwëch'in~~ ~~Tr'ondek Hwech'in First Nation~~ and ~~a~~Affected First Nations to undertake ~~C~~onsultation on the Recommended Plan.

The Commission hopes to support the Parties review of the Recommended Plan and the consultation process through ongoing and active engagement.

After Consultation, the Parties may approve, reject, or propose modifications to the Commission. If the Parties propose modifications or even reject portions of the Plan, the Commission will undertake additional work to develop a Final Recommended Plan.

PLAN INTERPRETATION

MANAGEMENT INTENT

When interpreting the Recommended Plan, the Parties, YESAB, and other users should put weight on the objectives and management intent statements. The specific management direction, policy recommendations, research, and actions are intended to support these objectives and management intent.

Commented [A1]: There should not be discrepancies between management intent, objectives and directions. The way this is worded may lead to challenges of recommendations, research and actions. Suggest rewording to looking to objectives and management intent statements for guidance in the case of recommendations, research, and actions being unclear during implementation.

As Plan implementation progresses, there are opportunities to improve upon the Plan through an adaptive approach.

INTERIM PROTECTION

The Recommended Plan has identified several areas for Interim Protection. We want to emphasize that these areas allow for development on existing placer claims and will allow for future development once the conditions are met to lift withdrawals. To be clear, it is not intended that these are areas of permanent withdrawal.

We recommend that the Parties prioritize these actions during implementation.

SPECIAL MANAGEMENT AREAS

The intent of Special Management Areas is that these be legally designated under legislation and jointly planned under Chapter 10 of the First Nation Final Agreements.

The Special Management Areas that are recommended in the Plan each have distinct management intent. For some areas we envision multiple uses and others are areas where the wilderness character must be preserved.

ROLE OF THE COMMISSION

DURING APPROVAL PROCESS

As mentioned above, the Commission will remain active throughout the approval process to support the review of the Recommended Plan and, in the event that modifications are required, develop a Final Recommended Plan.

AFTER PLAN APPROVAL

After approval of the Dawson Regional Land Use Plan, we believe that the successful implementation of the Plan is best assured by keeping the Commission in place. There is no one government department that is responsible for implementing regional plans. Therefore, an ongoing Commission can take a leading role, ease the workload of both Government of Yukon and Tr'ondek Hwech'in, support a co-joint management approach in the process, and support streamlined conformity checks. Implementation will stand a better chance of success if there is a Plan Champion and resources with the in depth local and Plan knowledge in place.

ADAPTIVE MANAGEMENT

The characteristics and activities of the Dawson Region will change over time, as will other context such as the regulatory framework and impacts of climate change. As change occurs, some recommendations of the Plan will lose their relevance and effectiveness, while other opportunities for better management and protection may arise. Also, as decisions are made by land and resource managers, where there is a discrepancy between a decision and the Plan, there needs to be consideration as to

whether to vary the Plan to ensure consistency with future decisions.

For these reasons, the Plan needs to be adaptive, whether through flexible recommendations, through the Cumulative Effects Framework, or through Plan monitoring, variance and amendment over time.

SUCCESSOR LEGISLATION

We are pleased to see that progress is being made on development of Yukon's lands and mining legislation within the context of Yukon First Nation Final Agreements. Our understanding is the timing is such that new legislation may be in place as early as 2023.

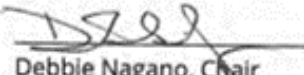
We anticipate that the new legislation will be modernized and provide a broader range of land management tools that link to land use planning. There will be a need to review and revise the Dawson Regional Land Use Plan to reflect these advances. This may be an opportunity to improve the Plan.

CONCLUSION

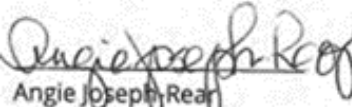
The Dawson Regional Land Use Plan brings the First Nation Final and Self-Government Agreements to life. It also aligns and supports First Nation reconciliation through clearly defined opportunities for First Nation participation in land, water and resource management. We envision the future of the Dawson region in which governments and people are working together in a good way.

A healthy and sustainable future for the Dawson region relies on the different levels of government working together to put this Plan into motion and taking responsibility to implement the recommendations of this Plan.

Dawson Regional Planning Commission - 10th June 2022


Debbie Nagano, Chair


Dan Reynolds


Angie Joseph-Rear


John Flynn


Alice McCulley


Jesse Cooke

ACKNOWLEDGEMENTS

The Commission wishes to recognize the following people and organizations for contributing their knowledge and support throughout the development of this Plan.

We thank the community of Dawson and Tr'ondëk Hwëch'in citizens for sharing their knowledge, experience, and passion for the Planning Region with us. Thanks also to the Plan Partners who represented a broad spectrum of interests for their participation and input over the years. Residents and stakeholder groups showed great respect for the planning process, the Commission, and each other. This contributed to a Plan that was able to consider all interests and values.

The Commission specifically would like to thank the members of the Senior Liaison Committee, Technical Working Group, and the Cumulative Effects Working Group. These groups were comprised of many individuals from the Government of Yukon and Tr'ondëk Hwëch'in Government and their technical knowledge and expertise were paramount in the creation of the Recommended Plan. These groups operated in the spirit of co-operation.

The Commission would also like to thank the previous Dawson Regional Planning Commission whose work on developing important documents such as the Resource Assessment Report laid the groundwork for this Recommended Plan.

We also want to recognize past Commission members, staff, and contractors that have since moved on to other projects. We value the contributions that Art Webster made during his time as the Commission vice-chair. Previous commission staff Tim Van Hinte and Katie Fraser, who led the charge on development of the Draft Plan.

John Glynn-Morris was instrumental in facilitating the engagement activities and supporting us through the planning process.

The Yukon Land Use Planning Council provided important support for the planning commission. Thank you to Ron Cruikshank, Heidi Hansen, Sam Skinner, Joe Copper Jack, Michelle Christensen, and Eric DeLong.

Lastly thank you to our staff who have worked hard to fulfill our vision for this Recommended Plan: Tim Sellars, Nicole Percival, and Charlotte Luscombe.

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LIST OF ACRONYMS

DDRRC	Dawson District Renewable Resources Council
DFO	Fisheries and Oceans Canada
DRPC	Dawson Regional Planning Commission
~~FMCH~~	~~Fortymile Caribou Herd~~
FNFA	First Nation Final Agreements
ISA	Integrated Stewardship Area
LMU	Land ~~scape~~ Management Unit
~~PCH~~	~~Porcupine Caribou Herd~~
~~RAR~~	~~Resource Assessment Report~~
SARA	<i>Species At Risk Act</i>
SMA	Special Management Area
THFA	Tr'ondëk Hwëch'in Final Agreement
~~TOR~~	~~Terms of Reference~~
YESAA	<i>Yukon Environmental Socio-Economic Assessment Act</i>
YESAB	Yukon Environmental and Socio-economic Assessment Board
YFWMB	Yukon Fish and Wildlife Management Board
YLUPC	Yukon Land Use Planning Council

Commented [A3]: Ensure that all acronyms used in the Plan are included in this list, where acronyms can be avoided it is recommended to use the full phrase for reader's ease of use.

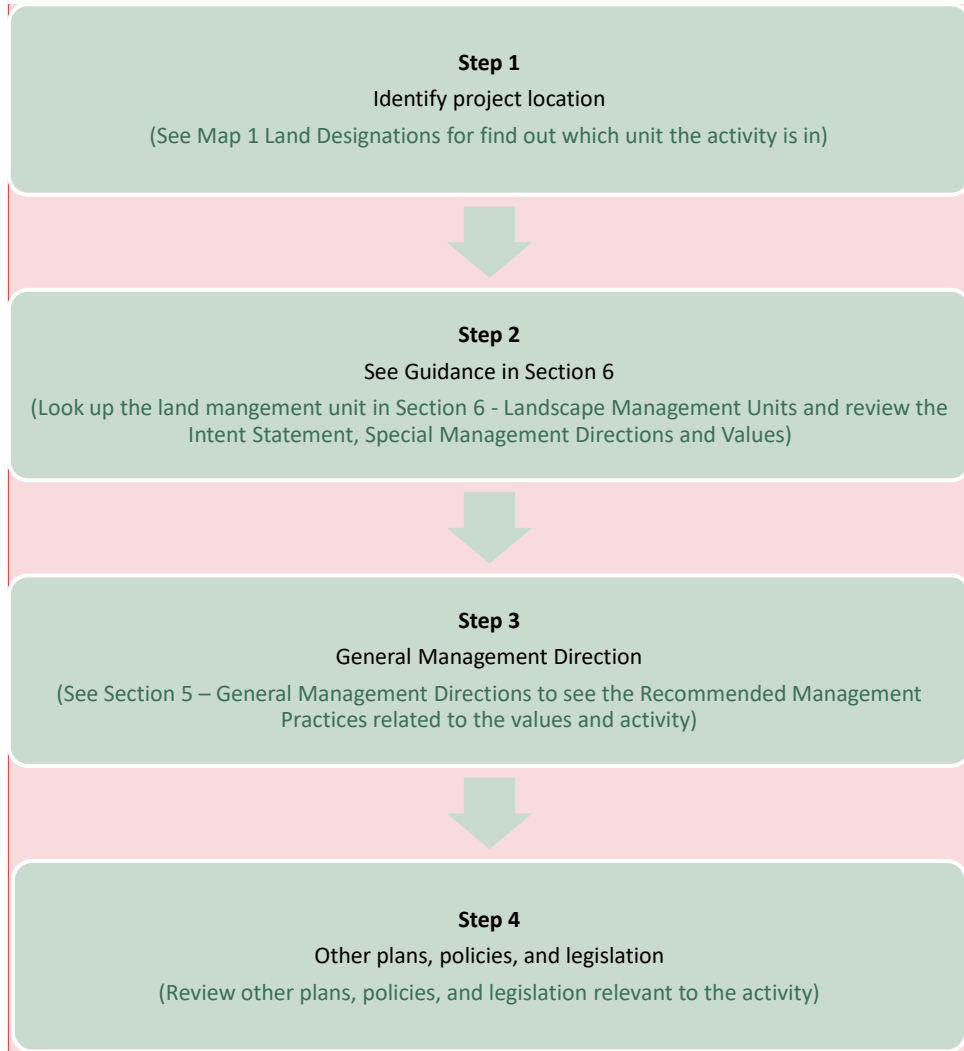
Commented [A4]: Where appropriate, use THFA rather than FNFA for greater specificity and accuracy. FNFA may still be appropriate to use as a general term or when speaking to multiple agreements.

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HOW TO USE THIS PLAN

The following chart provides an outline for how to use this Plan, whether you are a developer, other land user, an assessor, or a decision maker. A **Glossary** is provided if there are any terms unfamiliar to you.



Commented [A5]: Step 1 Identify project location - Suggest changing project to activity and clearly defining what that includes. Per glossary projects are only those activities subject to assessment by YESAB. If the Plan is meant to apply more broadly than this, it must be clear what activities the Plan applies to.

Commented [A6]: This diagram leaves out several sections of the Plan, including the cumulative effects thresholds, which may imply to a reader that these sections do not contain any useful information. See Proposed Changes for Effective Document Design and Writing Style document for further proposed modifications to improve readability.

1 INTRODUCTION

1.1 WALKING TOGETHER

This Plan is for all people who live, work, and play in the Dawson Rregion (Figure 1-1) including Tr'ondëk Hwëch'in, whose connection to the land goes back to time immemorial, multi-generational families who have made the Rregion their home, newcomers, and visitors to the Rregion. The Dawson Regional Planning Commission (~~DRPC~~the Commission) wants all people of the Rregion to be able to see themselves in the Plan.

Commented [A7]: Consolidate with Message from the Commission in order to be concise. See Proposed Changes for Effective Document Design and Writing Style document.

Commented [A8]: Most uses in text (except citations) changed to reduce use of acronyms to simplify Plan for non-technical users.

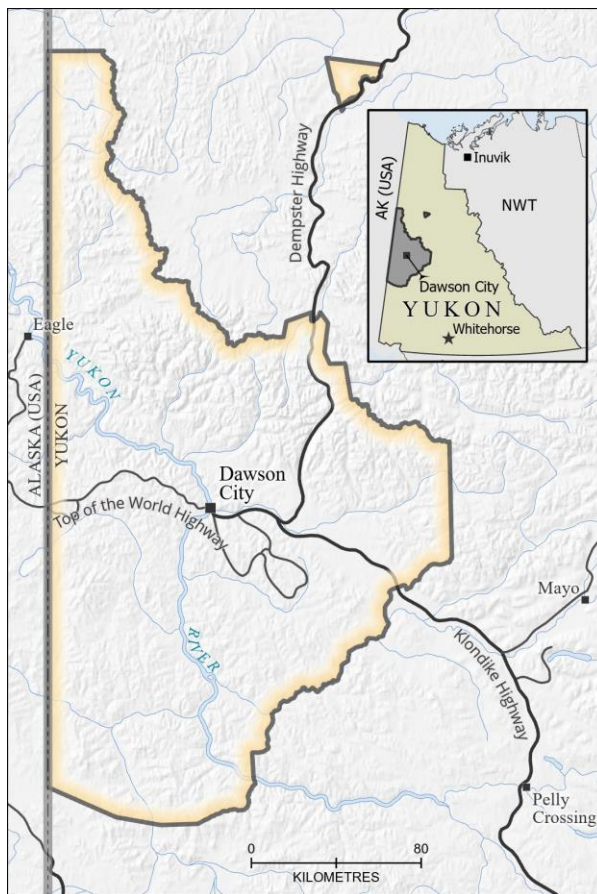


Figure 1-1+ Dawson Planning Region

The planning process has been led by local experts who live and work in the Rregion and hold an immense amount of traditional and local knowledge. These experts have worked

Dawson Recommended Land Use Plan ~~Landscape Management Units~~ Introduction on a consensus basis and have reached out to collaborate with the Parties (Government of Yukon and Tr'ondëk Hwëch'in ~~First Nation Government~~), Affected First Nations, stakeholders, and the public throughout the planning process.

When the Plan is implemented, the Commission's intent is that there will be more clarity for land users and less conflict between land uses.

The ~~Planning~~ Commission views people and the land as interconnected in its entirety and that this requires all people to take stewardship responsibility. This approach is articulated as Nän kāk ndä tr'ädäl (On the land we walk together) and reflects people's relationship with the land.

This vision is achieved through the whole community cooperating, working together, and sharing information.

When developing this Plan, the ~~Planning~~ Commission followed this philosophy. The Commission listened to the planning partners that represented a wide range of interests. They ~~deeply~~ considered the interconnectedness of the people ~~and, the~~ values of the ~~R~~region and how to develop a plan that is inclusive of everyone. The Commission is now sharing a Recommended Plan for consideration that the Commission believes best represents Nän kāk ndä tr'ädäl.

The ~~Planning~~ Commission has also taken its responsibility under the First Nation Final Agreements (FNFA) seriously, recognizing that ~~R~~regional land use planning is an important part of reconciliation, respecting the inherent rights of First Nations peoples, and the importance of the Tr'ondëk Hwëch'in perspective.

1.2 ~~VISION~~

Nän kāk ndä tr'ädäl (On the land we walk together) reflects the Commission's vision for the ~~R~~region. Flowing out of this, the following vision statements provided strategic guidance for the Plan and underpinned the planning process.

For the Region - The Dawson ~~R~~region encompasses a unique landscape that enables our community to build a diverse and sustainable economy that maintains a rich cultural legacy and a healthy environment ~~and its associated biodiversity~~.

For the Process - Shared and respectful use of natural resources is guided by the principles of sustainable development, respect for heritage and culture, traditional knowledge and conservation of fish and wildlife habitats. Ongoing community stewardship, based on consensus building, will achieve significant and lasting social, economic, and ecological benefits for all Yukoners.

For the Plan - The ~~R~~regional plan reflects community values and guides the coordinated and integrated protection, management and use of land, water, and resources (FNFA S.1-1.1.6).

Tr'ëhudë:-

Central to the ~~V~~ision is the concept of **Tr'ëhudë** which speaks to the Tr'ondëk Hwëch'in way of life and governance. Tr'ëhudë requires a reciprocal relationship with the land and all living things to ensure the land remains interconnected (Tr'ondëk Hwëch'in, 2020a).

Commented [A9]: There are multiple concepts/philosophies/ 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. Focus on the vision for the region/Plan rather than the vision for the planning process.

Tr'ondëk Hwëch'in Land Vision (Tr'ëhudè)

At the heart of Tr'ondëk Hwëch'in culture is the Spirit of the Land. The land thrives through interconnectivity and cooperation. The land is honest, it prospers with integrity. The land pays attention. The land provides, but it can also take away; it is neither good nor bad, it is a delicate balance of complex forces. Balance is the essence of the land's justice. The land teaches us, and we have a responsibility to apply those teachings and to pass them on. To respect the Spirit of the Land and to conduct ourselves as it teaches us is to honour our place in the world as Dënezhu. This is the Tr'ondëk Hwëch'in Land Vision.

Excerpt from *Tr'ondëk Hwëch'in Land Vision*, (2020a)

1.3 PLANNING VALUES, ISSUES AND GOALS**1.3.1 Resource Plan Values and Issues**

A key step in the planning process was to identify resource values and issues to be addressed. The Commission reviewed the report prepared by the previous Commission on planning issues and updated information received from the Parties, as well as considerable information received through in-person and online community engagements.

The key planning values and issues in the Region were summarized in the Commission's *Issues and Interests Report* (DRPC, 2020b) and are shown in Table 1-1 (page 10). Resource values and objectives and issues for each value are further discussed in **Section 5 – General Management Directions, Section 4 – Cumulative Effects Framework** (page 58)

Table 1-1 Key Planning Issues-Values in the Dawson Region

Ecological Integrity, Conservation and Stewardship	• Climate cChange • Biodiversity • Fish, and Wildlife and Hhabitat • Protected and Ecconserved Aareas
Culture and Heritage Resources and Community	• Harvesting Rrights and Aactivities • Heritage Rresources and Ssites • Traditional Eeconomy
Sustainable Economy	• Access and Iinfrastructure • Agriculture • Community Ggrowth and Rrecreation • Cumulative Eeffects • Forestry • Mineral Eexploration and Ddevelopment, and Mmining Ooperations • Renewable energy • Tourism

Commented [A10]: Plan issues are not discussed in this section, issues for each values are currently discussed in section 5. Title amended for clarity

Commented [A11]: Don't need page number when table immediately follows this paragraph.

Commented [A12]: This table should have the same headings (column 1) as those used for goals, the themes used for headings in sections 2 and 5 and the values table in section 6. The values (column 2) should be the same as the subsections used in 2 and 5 and the values presented in the table for section 6. See Proposed Changes for Effective Document Design and Writing Style for further information.

1.3.2 Plan Goals

Plan goals express the desired future conditions in the planning region and should be used when monitoring and measuring the success of the Plan. Management direction provided in the Plan is organized around these goals. Following the definition of sustainable development and the vision statement, the Plan identifies goals that should guide the implementation.

Ecological Goals

- ~~Maintain the planning region's biodiversity, including range distribution and variability of species and ecosystems, as well as their underlying genetic diversity. This biodiversity supports and underpins all other ecological and socio-cultural goals.~~
- ~~Healthy~~ Maintain integrity of aquatic, riparian, wetland, and terrestrial habitats that
- ~~Support~~ Support sustainable fish and wildlife populations.
- ~~Disturbances from human activities on the landscape are reclaimed in order to reduce cumulative effects, restore ecosystem functions, including key habitat.~~
- ~~Preserve ecologically representative areas and important ecosystem services within the context of climate-driven shifts to maintain the natural integrity of those areas. Safeguard biodiversity and provide resilience and integrity for natural ecosystems.~~
- Maintain connectivity between areas of key habitat, ~~while considering climate-driven shifts in habitat.~~
- ~~Reduce cumulative effects of, and restore ecosystem functions in, disturbed areas.~~
- ~~Raise awareness of, and mitigate~~ ~~ion~~ and adaptation to the effects of climate change on the landscape, fish and wildlife populations, and the people of the ~~Region.~~

Socio-cultural Goals

- Land stewardship through application of cultural and heritage values by the Tr'ondëk Hwëch'in, other First Nations, ~~Government of Yukon, Government of Canada~~ and other residents of the Dawson planning region.
- Land-based activities that strengthen connections to the land in order to promote health and well-being.
- ~~Respect and sustain~~ Traditional harvesting rights and activities ~~are respected and sustained.~~
- Strengthen and support cultural knowledge and values.
- ~~Promote public awareness, appreciation and understanding of all aspects of culture and heritage in the planning region~~
- ~~Maintain rich cultural legacy.~~

Socio-economic Goals

- ~~Allow opportunities for~~ Sustainable development ~~opportunities~~ and activities

Commented [A13]: Goals should represent desired end state, any actions to achieve the goal should be included as their own management direction rather than as part of the goal to ensure they are completed.

Commented [A14]: General biodiversity goal was needed, biodiversity discussed at length in the Plan but goal was missing.

Commented [A15]: Moved below to present goals from broad scale to specific. Goal reworded to remove action from goal. Reclaiming disturbances should be a management direction that helps achieve the goal of reduced cumulative effects and restored ecosystems rather than part of the goal itself.

Commented [A16]: Remove this specification, not needed in multiple goals when awareness and adaptation to climate change effects is its own goal.

Commented [A17]: As written, this is not a goal, and will be very difficult to monitor or measure. If the intent is for cultural and heritage values to be considered in the conduct of land stewardship by TH, FNs, and YG in implementation of this plan, then the sentence could be reframed to say such. If the intent is that land stewardship by TH, FNs, and YG in the implementation of this plan result in increased cultural and heritage value in the area, it could be stated that way.

Commented [A18]: As written, this is not a goal, and will be very difficult to monitor or measure. It is unclear what activities are included and who is performing them. We suggest clarifying what about these is desired (e.g. that there are more, that they are accessible?) These could also be actions to achieve a goal of "Promote health and well-being".

Commented [A19]: Plan was missing goal related to culture and heritage which was identified as a key planning value in table 1-1 above.

Commented [A20]: Added based on comment in s.1.4 below. Added for consistency between sections.

(both monetary-based and traditional). ~~that result in~~

- ~~Generate~~ socio-economic benefits ~~to for~~ First Nations ~~citizens~~, ~~members of~~ the community of Dawson, and Yukon ~~ers~~ as a whole.
- ~~Provide~~ Land use certainty. ~~and~~
- ~~Reduced~~ land use conflicts throughout the planning ~~R~~region.
- ~~Access infrastructure to renewable and non-renewable resources is established, maintained, and remediated in a way that minimizes conflicts and cumulative effects.~~

Commented [A21]: Covered by ecological goal “Reduce cumulative effects of, and restore ecosystem functions in, disturbed areas.” and socio-economic goals above regarding reduced land use conflict.

1.4 SCOPE OF THE PLAN

The Dawson Regional Land Use Plan (the Plan) is guided by the objectives of Chapter 11 of the FNFA, including the principle of sustainable development. Importantly, the Plan also acknowledges other chapters of the FNFA, such as Chapter 12 – Development Assessment, Chapter 13 – Heritage and Chapter 16 – Fish and Wildlife. Land use planning must ensure the spirit and intent of the FNFA, and Tr’ondëk Hwëch’in Final Agreement (THFA) are upheld. The Plan respects values and interests of the Tr’ondëk Hwëch’in, other affected First Nations and Yukoners as a whole. ~~The Plan is designed to enable the people of the planning Rregion to build a diverse economy while maintaining a rich cultural legacy and a healthy environment.~~

Commented [A22]: This section should be consolidated with sections 1.6 Terms of Reference and 1.7 Mandate of the Commission to comprehensively explain what is in the Plan and why while avoiding repetition by splitting this information across multiple sections. See Proposed Changes for Effective Document Design and Writing Style document for further suggested structural changes.

This Plan is the third of a network of ~~R~~regional land use plans to be produced through Chapter 11 of the FNFA which outlines the ~~R~~regional planning process and objectives, with additional specific provisions of the THFA.

Commented [A23]: This sentence is an overall approach to the Plan rather than related to its scope, this should be incorporated into the goals for the Plan.

A ~~R~~regional land use plan includes recommendations about how to protect, manage, and use the land, water and resources (FNFA ~~Ss.~~ 11.5.0) within a given area. It provides guidance for land and resource use decision-making and helps to achieve the kind of future people in the ~~R~~region want to see. It provides direction for all Yukon public lands and all First Nations Settlement Lands within the planning ~~R~~region. The Government of Yukon, Tr’ondëk Hwëch’in, and Government of Canada are the primary authorities with responsibility for managing the land, resources, and water in the Dawson planning ~~R~~region.

~~The Plan is not a legal document and does not replace existing legislation, nor does it affect First Nation constitutionally protected rights.~~

Commented [A24]: Add explanation of what happens in the case of a conflict between the Plan/legislation/THFA. This explanation would add clarity for Plan users and regulators.

In accordance with Chapter 11, S.11.2.2 of the FNFA, this Plan does not apply to:

- Land within the City of Dawson and areas subject to subdivision planning or local area planning outside of a community boundary (e.g., West Dawson, Sunnydale); and
- The Klondike National Historic Sites; and
- Tombstone Territorial Park.

1.5 HISTORY OF THE PLAN

Figure 1-2 shows the timeline of the Dawson Regional Land Use Plan and the Tr’ondëk Hwëch’in signed its Final Agreement with the Government of Canada and the Government of Yukon in 1998. In 2006, Tr’ondëk Hwëch’in requested the establishment

Commented [A25]: This section could be removed or moved to an appendix rather than main Plan document. This is background information that helps show why certain planning decisions were made but is not necessary for the average reader.

Dawson Recommended Land Use Plan Landscape Management Units Introduction
of a Regional land use planning commission as per Chapter 11, S.11.4.1 of the FNFA:

*Government and any affected Yukon First Nation may agree to establish a
Regional Land Use Planning Commission to develop a Regional Land Use Plan.*



Figure 1-24-2 Dawson Regional Plan Timeline
Source: DRPC 2021 with original artwork by Yukon Graphic Recording

The Dawson Regional Planning Commission (henceforth the ‘Commission’) was established in 2011, but in 2014 the planning process was suspended by the Parties until the legal proceedings relating to the Peel Watershed planning process were resolved (First Nation of Nacho Nyäk Dun v. Yukon, 2017 SCC58).

At the time of the abeyance, the Commission had published foundational documents including an Interests and Issues Report (2011), a Resource Assessment Report (2013), and Plan Alternatives (2014). The Commission had also started writing a draft land use plan and a report on the projected cumulative disturbances of future land use.

The planning process resumed in early 2019 with a new Commission of six members jointly nominated by the Tr’ondëk Hwëch’in and the Government of Yukon. The new Commission convened their first meeting in April 2019. The Commission crafted a new vision, updated its foundational documents, and developed a public engagement strategy.

Following a series of public engagement sessions in 2019, the Commission began developing the Draft Land Use Plan. The Draft Plan was released for public engagement in June 2021. Over a five-month period, the Commission sought input from the Parties,

Commented [A26]: Already introduced as “the Commission”

Dawson Recommended Land Use Plan ~~Landscape Management Units~~ Introduction
First Nation citizens, public, and stakeholder groups through a series of in-person and online meetings, workshops, and surveys.

Following this, the Recommended Plan was developed for submission to the Parties and ~~A~~ affected First Nations as required (per ~~S~~s.11.6.1 of the ~~FNFA~~THFA).

1.6 TERMS OF REFERENCE

The ~~Terms of Reference (TOR)~~ for the Dawson Regional Planning Commission was jointly prepared by the Tr'ondëk Hwëch'in and Government of Yukon, with assistance from the Yukon Land Use Planning Council (<https://dawson.planyukon.ca/index.php/the-commission/terms-of-reference>).

~~These two governments are called the 'Parties' to the Plan. Per the Terms of Reference,~~
~~t~~The six members of the Commission were jointly nominated by the Parties to the Plan but were not representatives of the Parties.

The ~~Terms of Reference~~ provided direction to the Commission for preparing a ~~R~~regional land use plan for the Dawson ~~P~~lanning ~~R~~region. It also described the roles of the Parties, the Council, and the Commission, and outlined the products, timelines, available budget, and processes. Roles, responsibilities, and inter-relationships among the Parties and/or the Council may be further defined in future agreements.

1.7 MANDATE OF THE COMMISSION

Working with the Parties, and through public participation, the mandate of the Commission is to develop a ~~R~~regional land use plan for Settlement Land and Non-Settlement Land that is consistent with and achieves the objectives of Chapter 11 of the FNFA and specific provisions of the THFA.

The existence of First Nation Final Agreements (FNFA) benefits everybody. These agreements establish a framework for sustainable development and the integrated approach to land and resource management that gives an opportunity for all voices to be heard and to secure a future for all Dawson residents, Yukoners, and Canadians (S 11.4.5.7.)

1.7.1 Final Agreement Chapter 11 Objectives

The Final Agreement Chapter 11 objectives are:

11.1.1.1 to encourage the development of a common Yukon land use planning process outside community boundaries;

11.1.1.2 to minimize actual or potential land use conflicts both within Settlement Land and Non-Settlement Land and between Settlement Land and Non-Settlement Land;

11.1.1.3 to recognize and promote the cultural values of Yukon Indian People;

11.1.1.4 to utilize the knowledge and experience of Yukon Indian People in order to achieve effective land use planning;

11.1.1.5 to recognize Yukon First Nations' responsibilities pursuant to Settlement Agreements for the use and management of Settlement Land; and

Commented [A27]: Consolidate with 1.4 Scope of the Plan

Commented [A28]: Removed to reduce the number of acronyms for ease of use.

Commented [A29]: This was already introduced in s.1.1 and "Parties" could be included in the Glossary for further clarity.

Commented [A30]: Consolidate this section with 1.4 Scope of the Plan. Some of this information could be moved to an appendix rather than kept in the main Plan text as it is background information that helps show why certain planning decisions were made but is not necessary for the average reader.

Dawson Recommended Land Use Plan [Landscape Management Units Introduction](#)

11.1.1.6 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.

The responsibilities of a Regional Planning Commission are set out in Chapter 11. Table 1-2 briefly describes how Chapter 11 responsibilities have been met in this Recommended Plan.

Table 1-2 Chapter 11 Requirements and Dawson Regional Plan Approach

Final Agreement Section	Dawson Regional Plan Approach
11.4.5.3 Shall ensure adequate opportunity for public participation	It was important to the Commission to ensure public participation throughout the planning process to ensure that the public is aware, informed, and engaged in the planning process. Therefore, the Commission used the following methods during the planning process: • Broadcasting meetings on the radio • Inviting delegates to meetings • Stakeholder roundtables • School presentations • Field trips to meet with stakeholders • Surveys • Workshops • Public chalkboard • Pop-ups • Video-conference workshops • Public meetings in Dawson, Mayo, and Whitehorse. For details about the Draft Plan public engagement, see In Your Words Report (2020a). The Recommended Plan has taken into account the broad spectrum of input, including input from the public, the Parties, Affected First Nations, First Nation citizens, and other stakeholders. This includes audio submissions, and over 1,000 pages of input on the Draft Plan.

Commented [A31]: In particular this table should be moved to an Appendix rather than main Plan document. This is background information that helps show why certain planning decisions were made but is not necessary for the average reader.

Final Agreement Section	Dawson Regional Plan Approach
11.4.5.4 Shall recommend measures to minimize actual and potential land use conflicts throughout the planning region	It was important to the Commission to apply the approach of “Nän kāk ndä tr’ädäl” (On the Land We Walk Together) which is meant to help people think about the land, resources, and water in an interconnected way. Through this approach, the Commission hopes that conflict is minimized. The process also included the analysis of future land use scenarios to forecast and understand potential land use conflicts. The Recommended Plan includes many tools and approaches to minimize land use conflicts and support compatible uses, including land designations and corridors. The key tools are the Cumulative Effects Framework, General Management Direction, and Special Management Direction (see Section 3 – Plan Concepts (page 41).
11.4.5.5 Shall use the knowledge and traditional experience of Yukon Indian People, and the knowledge and experience of other residents of the planning region	The Commission has, throughout the planning process, sought both Traditional Knowledge and Western knowledge. A wealth of knowledge has been passed along to the Commission. The Plan has adopted the concept of ancestral stewardship of the land, water, and resources as the inspiration for the principle of stewardship that is foundational to the Recommended Plan.
11.4.5.6 Shall take into account oral forms of communication and traditional land management practices of Yukon Indian People	The Commission includes Tr’ondëk Hwëch’in citizens who have shared their intrinsic knowledge of the Rregion. Various approaches were used to support the inclusion of oral forms of communication, such as audio recordings and hosting tea circles. The Recommended Plan was built with Traditional Knowledge a key consideration throughout the process. The Recommended Plan makes best attempts to reflect traditional knowledge and practices by including Tr’ëhudë statements for each of the landscape management units and recognizing and respecting Tr’ondëk Hwëch’in’s ancestral responsibility of stewardship of the land throughout the Plan.

Final Agreement Section	Dawson Regional Plan Approach
<i>11.4.5.7 Shall promote the well-being of Yukon Indian People, other residents for the planning region, the communities, and the Yukon as a whole, while having regard to the interests of other Canadians</i>	The Commission wants First Nations citizens, residents of the planning Rregion, the communities, and the Yukon as a whole, to be able to see themselves in the Plan, while recognizing that this Plan will have wider impacts beyond the Yukon. The concept of “Nän kāk ndä tr’ädäl” (On the Land We Walk Together) supported this throughout the process. As a result, the Commission feels that the Recommended Plan is balanced and reflects the social and economic well-being of residents and Yukoners. The sustainable development principles of the Plan help to ensure balance, while the Commission intends that all people think of themselves as stewards of the Rregion.
<i>11.4.5.8 Shall take into account that the management of land, water and resources, including Fish, Wildlife and their habitats, is to be integrated</i>	The Commission sees the land, resources, water, fish, and wildlife as interconnected. The Commission has sought to give fish and wildlife a voice in the planning process. The Commission feels that a healthy economy and society is based on a foundation of healthy ecosystems. The tools and approaches of the Recommended Plan facilitate integrated landscape management. In particular, the Plan adopts a cumulative effects framework that considers multiple land use activities.
<i>11.4.5.9 Shall promote Sustainable Development</i>	It is important to the Commission that sustainability of the Rregion takes a multi- generational approach. Therefore, the Recommended Plan includes measures to carefully conserve values, promote reclamation, and manage cumulative impacts of sustainable land use activities, with a focus on activities that are respectful of the Rregion.

Final Agreement Section	Dawson Regional Plan Approach
11.4.5.10 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	It is important to the Commission that the Parties follow through on implementation of an approved plan. The Commission should have an active role ~~when the Plan is being implemented~~ <u>implementation</u>, as per THFA and YESAA. Any role during implementation outside of what has been outlined in treaty or legislation can be decided at that time by the Parties. Therefore, Section 7– Plan Implementation (page 274) recommends implementation tasks and methods for monitoring that include Commission responsibilities as a Plan Champion. Potential processes and timelines for varying, amending, and revising the Plan have been suggested. The Plan also includes recommendations for conformity checks and representations as a part of the development assessment process.

Commented [A32]: Rewritten to remove passive voice, see Proposed Changes for Effective Document Design and Writing Style document for further writing style suggestions.

Also, under 11.5.1: *Regional land use plans shall include recommendations for the use of land, water and other renewable and non-renewable resources in the planning Rregion in a manner determined by the Regional Land Use Planning Commission.*

1.7.2 Other Final Agreement Chapters

The Recommended Plan also links to several other First Nation rights and objectives as identified in the ~~FNTHFA~~, including (but not limited to):

- Recognize and protect a way of life that is based on an economic and spiritual relationship between Tr'ondëk Huch'in and the land (Recital 3); ~~and~~
- Encourage and protect the cultural distinctiveness and social well-being of Tr'ondëk Huch'in (Recital 4).
- Use and enjoyment of Settlement Land (Chapter 6, Chapter 16, Chapter 17, and Chapter 18).
- Recognizes and enhances, to the extent practicable, the traditional economy of Yukon Indian People and their special relationship with the wilderness Environment (Chapter 12)
- Identify and mitigate the impact of development upon heritage resources through integrated resource management including land use planning and development assessment processes (Chapter 13).
- A Regional Land Use Planning Commission shall take into account the cultural and heritage significance of the heritage routes and sites identified in Schedule C - Heritage Routes and Sites (13.4.6.4)
- Have water that is on or flowing through or adjacent to Tr'ondëk Hwëch'in Settlement Land remain substantially unaltered as to quantity, quality, and rate of flow, including seasonal rate of flow (Chapter 14).

- Harvest for subsistence all species of Fish and Wildlife (Chapter 16).

1.8 **INDIGENOUS PLANNING AND RECONCILIATION**

In the Yukon, Regional land use planning is undertaken as an implementation obligation of Yukon FNFA. Within this context, it is important to take into consideration the *United Nations Declaration on the Rights of Indigenous Peoples* and the *Truth and Reconciliation Commission Calls to Action*.

1.8.1 **Traditional Land Management Practices**

The Tr'ondëk Hwëch'in Government provided the Commission with documents throughout the planning process that outlined how their beliefs and way of life are rooted in traditional law and their ancestral obligation to care for the land, water, and animals. The concept of trade-offs or compromises that negatively impact the ecosystems upon which they Tr'ondëk Hwëch'in and the animals rely is contrary to their belief system.

Ninānkāk hozq wëkätrënhcha (We Take Good Care of Our Land)

"We view the land in its interconnected entirety and we have stewardship responsibility to it all. Our legacy is to leave our Traditional Territory in such a way that our children can have lives as valuable and as meaningful as ours have been. We wish future generations to live connected to their home, and draw their health and well-being from all that it provides. Maintaining healthy relationship with the land now will ensure the future children will retain their culture and prosper in knowing who they are.

Protecting the land...provides our future generations with safe and clean lands to utilize and practice culture and traditions, such as hunting, fishing, trapping. Our ancestors always took care of our animals and the land and water. It is our job to continue to respect it by protecting it."

Excerpt from *Ninānkāk hozq wëkätrënhcha (We Take Good Care of Our Land)* (2020b)

The connection between people and the land is not separate. The health of the land directly impacts the health of the people today and future generations.

1.8.2 **Reconciliation**

The Plan has an important role to play in First Nation reconciliation. Through the Plan advances, the First Nation roles and responsibilities for land and resource management in the Dawson Region will be advanced and empowers First Nations will be empowered to make decisions that will have impact on future generations.

This is accomplished through various mechanisms including Special Management Areas (linked to FNFA-THFA Chapter 10), project conformity requirements (linked to FNFA-THFA Chapter 12), establishment of a joint implementation committee, and other recommendations throughout the Plan.

The Plan is intended to be implemented through a co-joint management approach between governments.

1.8.3 **United Nations Declaration on the Rights of Indigenous Peoples**

On June 21st, 2021, the United Nations Declaration on the Rights of Indigenous Peoples

Commented [A33]: Intent of this section is unclear, were these guiding principles that the Commission aimed to follow in drafting the Plan - if so they should move to section 1.9.

Commented [A34]: The 'truth' component of truth and reconciliation seems to be left out- to link to the section above (1.8.1) it seems like there is an element of surfacing/acknowledging the ways that Indigenous laws have been ignored and disrespected in processes of colonization

Commented [A35]: Example of inactive voice. Changed sentence to ensure active voice used.

Dawson Recommended Land Use Plan [Landscape Management Units Introduction](#)

Act (SC 2021 c. 14) was passed by the Government of Canada. This Act provides a roadmap for the Government of Canada and Indigenous peoples to work together to implement the Declaration based on lasting reconciliation, healing, and cooperative relations.

The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) contains several clauses relating to the rights of Indigenous peoples, including those related to land, water, and resources in their territories (United Nations, 2007).

Relevant articles include:

Article 25

Indigenous peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard.

Article 32

1. *Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources.*
2. *States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.*

The Dawson Regional Land Use Plan reflects the spiritual relationship with the land through the concepts of Nān kāk ndā tr'ādāl and Tr'ēhudē as well as adoption of a traditional approach of stewardship to the land as described in **Section 1.9.2 – Stewardship** (page 23). This re-enforces Article 25 of UNDRIP.

Moreover, the role of Tr'ondëk Hwëch'in as established under the [TOR Terms of Reference](#) for this planning Region, both as a Party and as an approval body, re-enforces UNDRIP Article 32. The ~~co~~-joint management approach to implementation will strengthen Tr'ondëk Hwëch'in's ability to determine and develop priorities for their Traditional Territory. Additionally, the [Terms of Reference](#) acknowledgement of Affected First Nations further reflects commitment to Article 32.

1.9 GUIDING PRINCIPLES

Throughout the Plan, sustainable development, stewardship, the precautionary principle, and adaptive management have been applied to guide decision making.

1.9.1 Sustainable Development

Sustainable development is defined in Chapter 1 of the [FNTHFA](#):

Beneficial socio-economic change that does not undermine the ecological and social systems upon which communities and societies are dependent.

The [FNTHFA](#) states that a commission shall promote sustainable development in

Commented [A36]: Include social values in sustainable development.

What category would residential and commercial/industrial planning and development fall under? Is it considered sustainable development as this is a relatively permanent use of land? Doing land development usually represents a permanent transfer of land to the public and it may be difficult for the land to recover from this, but at the same time providing economic and social benefits to people (e.g. new housing, new lots for emerging businesses, etc.) Is the provision of housing (residential development) and economic opportunities (commercial and industrial lots) being considered and should it be included in the guiding principles?

Dawson Recommended Land Use Plan ~~Landscape Management Units~~ Introduction

developing a ~~R~~regional land use plan (Chapter 11, S.11.4.5.9); and ensure that the 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 to ensure sustainable development (Chapter 11, S. 11.1.1.6).

The recommendations in the Plan are to be considered through the lens of sustainable development in the following ways:

- Ensure that economic development in the ~~R~~region continues with the intention of providing for current and future generations, and that it is resilient, versatile, and responsible.
- Maintain ecological integrity of land, water, and wildlife, not only through protection of these values, but through stewardship and education.
- Maintain and enhance cultural and heritage values, focusing on strong communities and enhancing a way of life that Tr'ondëk Hwëch'in and the whole community have built for generations.

Priorities for achieving sustainable development ~~must consider~~:

Sustaining ecosystem, community and cultural integrity

Sustaining lands and waters, living things, and natural processes is a fundamental priority. If the integrity of ecosystems is lost, societies and economies cannot be sustained. ~~Maintaining a connection to territorial, national and global efforts to adapt to climate change, halt biodiversity loss and reduce greenhouse gas emissions is linked to this priority.~~

Sustainable economic activities

~~A self-sufficient economy is important to assist with climate change adaptation and food security issues in the future.~~ The Plan recognizes that sustainable economic activities are of two kinds. First, there are activities that do not degrade the land or undermine communities and can be sustained indefinitely. Second, there are activities that deplete resources, but from which the land can ~~be reclaimed~~ recover.

Economic activities that degrade the land and that the land cannot ~~recover~~ be reclaimed from are not considered sustainable. The Recommended Plan addresses activities that are not sustainable through mitigations and through the cumulative effects framework outlined in **Section 3 – Plan Concepts** (page 41) to ensure sustainable development can still be achieved.

1.9.2 Stewardship

“Long ago, we were given the duty to care for our land and our communities. The beliefs and values taught to us by our Elders showed us how to care for our world. Today, we use the word “stewardship” to describe our duties towards the land, waters, animals and fish. This duty is part of our beliefs, values and customs. It is woven into our social system, our political and economic practices, and our kinship relations.”

Commented [A37]: This was already discussed in 1.7.1 and no further information is provided here, the Plan should avoid repetition.

Commented [A38]: From this sentence it is unclear whether “sustainable development” was a guiding principle for the Commission in drafting the Plan or whether it should guide users interpreting the Plan. The Plan should avoid introducing ambiguity into implementing the Plan.

The list that follows seems similarly written to Plan goals and is perhaps better integrated into that section and removed from this section.

Commented [A39]: The rest of the paragraph does not speak to this. Removed as a self-sufficient economy is a separate concept than sustainable development.

Commented [A40]: “Recover” changed to “be reclaimed” for consistency in how these terms are used elsewhere in the Plan.

Commented [A41]: Should this refer to Section 4 if talking about the cumulative effects framework?

As reflected in the vision statement, the Plan is guided by the principle of stewardship and a shared responsibility and respect for the land. It is recognized that collective responsibility and actions are needed for the continued health and vitality of the [R](#)region. Maintaining a strong community connection to the land is achievable through stewardship.

This Plan aims to recognize the different ways of being a steward of the land and supports ways to continue to foster and promote stewardship now and for future generations. This Plan uses two approaches to stewardship as a guiding principle: **ancestral stewardship** and **community stewardship**.

1.9.2.1 Ancestral Stewardship

Stewardship, as it is understood and lived by Tr'ondëk Hwëch'in, is an ancestral responsibility:

"...premised on a duty to interact with and use the land 'in a good way;' this is central to our identity as a people. We have a deep spiritual connection to the land and water. It is our responsibility to protect our Traditional Territory as a whole, and the land, water, animals and plants that have supported our people for generations. Everything is connected."

***Ninänkāk hōzō wëk'ătr'ênòhcha (We Take Good Care of Our Land),
Tr'ondëk Hwëch'in Government (2020b)***

For Tr'ondëk Hwëch'in, stewardship is not simply a concept, it is a duty to look after the land, waters, animals, and fish that is central to their identity. Take good care of the land and the land will take care of you.

"It is our law to care for the land as it cares for us. We live in balance with its rhythms and respond to its demands. We make our decisions, from the smallest to the most complex, with the future health of the land and ourselves in mind. We know that the smallest action can cascade outward in time and space and will impact the integrity of the land as a whole. In turn our beliefs, thoughts and actions also cascade outward and impact our wellness as a community. ... Our ancestral stewardship responsibility is premised on a duty to interact with and use the land "in a good way;" this is central to our identity as a people."

We are Dënezhu, Tr'ondëk Hwëch'in Government, 2019

For Tr'ondëk Hwëch'in stewardship is about the long-term health of the land. The Tr'ondëk Hwëch'in Land Vision (Figure 1-3, page 25) is an evolving project that shows us how to engage with the land through stories, [First Nation](#) traditional law, and core values that differs from the traditional Western planning approach.

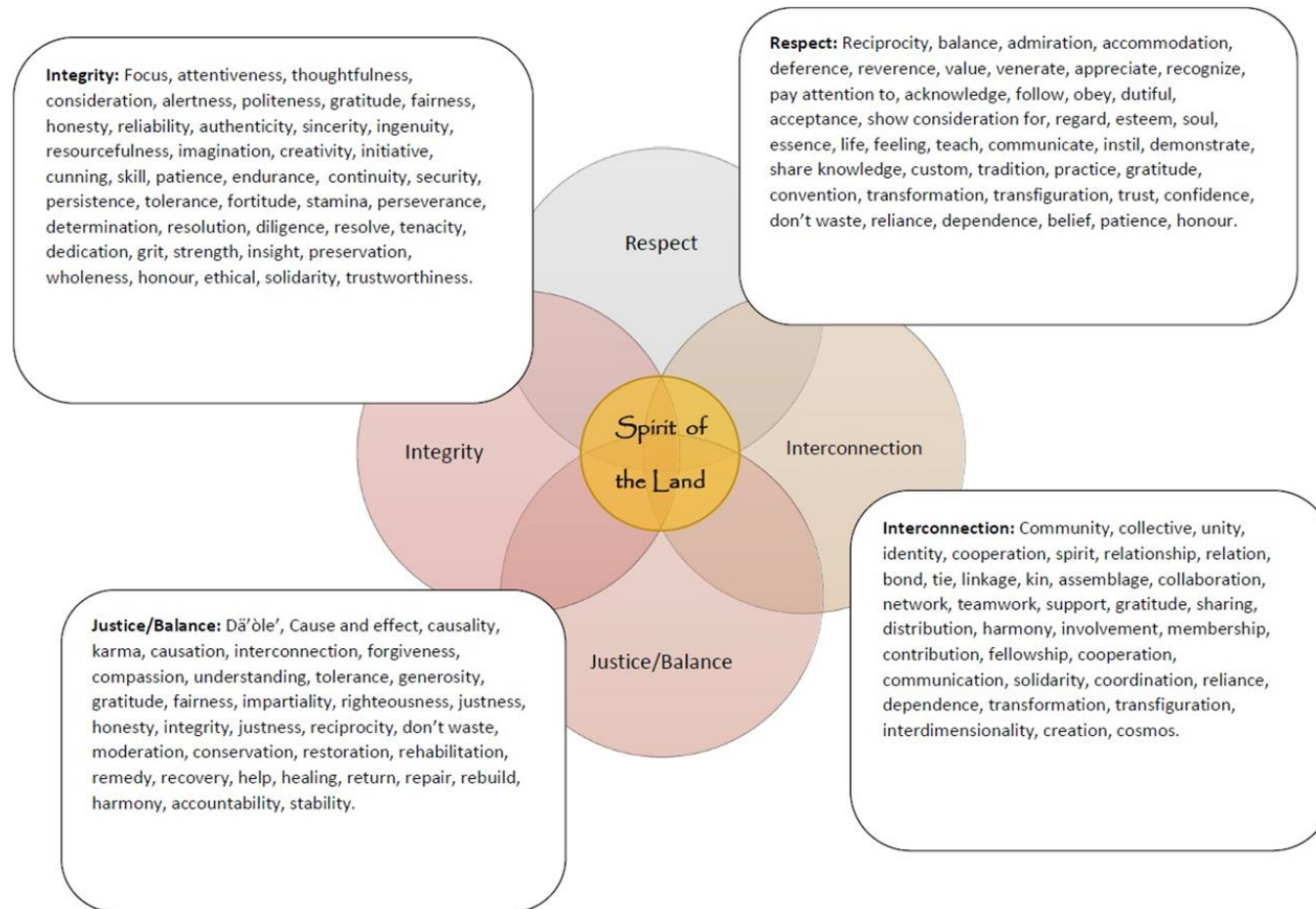


Figure 1-3 Tr'ondëk Hwëch'in Land Vision
Source: (Tr'ondëk Hwëch'in Government, 2021a)

"At the heart of Tr'ondëk Hwëch'in culture is the Spirit of the Land. The land thrives through interconnectivity and cooperation. The land is honest, it prospers with integrity. The land pays attention. The land provides, but it can also take away; it is neither good nor bad, it is a delicate balance of complex forces. Balance is the essence of the land's justice. The land teaches us, and we have a responsibility to apply those teachings and to pass them on. To respect the Spirit of the Land and to conduct ourselves as it teaches us, is to honour our place in the world as Dënezhu."

Draft Tr'ëhudè Land Vision, Tr'ondëk Hwëch'in, 2021

1.9.2.2 Community Stewardship

Community stewardship ~~as understood by non-First Nation land users is an important but different concept.~~ Stewardship of the land is broadly understood as caring for and having a sense of responsibility to the wellbeing of the land, water, and animals.

It is the Commission's hope that this Plan reflects community and Tr'ondëk Hwëch'in values and will in turn encourage all people to act as stewards of the Rregion to ensure the land, water, and animals are healthy for future generations.

People of the Rregion demonstrate their stewardship values through their actions every day. The care and time that is put into good ~~reclamation projects~~, reconnecting to the land through hiking or harvesting, and being aware of the changes and activities that occur on the land are all ways of being a steward.

"I am governed by laws for what I do out there. I don't just take what I am allotted, but I look at the land and think, 'what can the land tolerate?' I know lots of people who are out there working on the land going above and beyond what they are required to do, and that is what we want to instill in everyone. It is management, but stewardship takes it to a different level."

Dan Reynolds, Dawson Regional Planning Commission member

1.9.2.3 Stewardship and Management

~~In areas of the Region where development is permitted, there are a series of recommended management directions and actions that were created that were guided by stewardship values. Acting as a good steward of the land is to always work within these limits; to ensure the responsible use and care of the land, animals, and water; promote stewardship through education and on-the-land opportunities; and to be adaptive and flexible when necessary.~~

Some of the ways that stewardship is woven through this Plan are:

Special Management Areas (SMAs)

~~The creation of SMAs in the Plan are an expression of stewardship as these areas were identified as being of utmost cultural and ecological importance that require the greatest extent of care and are jointly managed by both Parties to the Plan.~~

Commented [A42]: This is an odd location for this insert, a better location might be in the Message from the Commission.

Commented [A43]: "Projects" not needed after reclamation when speaking to actions taken, if another word is used "reclamation activities" is preferred but not needed. This use of projects also does not match the glossary definition.

Commented [A44]: The plan's whole purpose is to provide management guidance (stewardship). This subsection is a repeat of the subsections above and planning tools/plan concept and can therefore be removed.

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.

Dawson Land Stewardship Trust

Stewardship is an action and a way of life. Creating a fund for the Region will ensure that on-the-land activities that foster or embody stewardship can continue once the Plan is approved.

Management Directions

In **Section 5 – General Management Directions** (page 70) and **Section 6 – Landscape Management Units** (page 160) guidance is provided for users. These directions give the Parties and the users of the Plan actions that are necessary to look after the identified values in the Region.

1.9.3 Precautionary Principle

Regional planning must consider potential impacts **before making resource decisions of land use designations and management directions**, while also **acknowledging the uncertainty caused by a limited understanding of some ecological functions in the North and potential future changes resulting from climate change**. **Limited understanding of land use impacts on other resources in the North makes this especially important. The Plan has adopted the following definition of the Precautionary Principle to inform its approach to planning and recommendations:**

The Plan interprets the Precautionary Principle to mean that the burden of proof rests with an activity's proponent, i.e., it must be established that activities will not substantially harm the environment before permission is granted to proceed (Sands and Peet, 2012).

Additionally, due to the limited understanding of some of the ecological functions in the North, especially in relation to the prevailing threat of climate change and what that might mean for ecosystem function and species' behaviour, **tThe pPrecautionary pPrinciple enables us encourages decision makers to make sound decisions prevent possibly detrimental outcomes even in the absence of conclusive evidence of impacts** until such a time that more evidence of the potential impacts of these decisions is known. The Plan takes a conservative approach to land management, through protective land use designations and strict management directions, to apply the precautionary principle. Finally, if scientific evidence suggests that a lack of action will result in harmful effects, regulatory action may be required by the Parties (Sands and Peet, 2012).

An example of where the precautionary principle is being applied in this Region is the Yukon River Corridor, where the Plan recommends withdrawal from additional mineral claims until such time as **Ssub-regional planning is completed**.

Commented [A45]: Plan does not make decisions. Sentence edited for clarity.

Commented [A46]: Unclear what is especially important based on limited understanding of impacts. Recommend clarifying what is important to ensure statement has purpose.

Commented [A47]: Removed as this is not a common interpretation of the precautionary principle. Suggest Principle 15 of 1992 Rio Declaration as most commonly used definition. Proposed edits reflect Rio definition.

Commented [A48]: Unclear how using precautionary principle leads to sound decision making. reworded for accuracy in statement.

Commented [A49]: Removed as YG proposes LMU 3 not be a sub-regional planning area. This is also not a good example of the precautionary principle as there is a similar level of information for this LMU as there is for other areas of the Plan and therefore there are other considerations that led to this designation. If this is a guiding principle, a specific example does not need to be provided as its use should be evident throughout the entire Plan, a sentence was proposed above to address this.

1.9.4 Adaptive Management

The Dawson Planning Region, like all Regions, is subject to environmental, economic, and social changes over time, and as such, Regional land use plans in Yukon are designed to be living documents that are open to periodic change and revision. As such, implementation should be an ongoing process and the Plan reviewed often (see **Section 7– Plan Implementation**, page 274).

Adaptive management means we must look, learn, and adjust as required (see **Figure 1-4**). Adaptive management requires monitoring and responding to changing land use and/or environmental conditions as new or better information becomes available, or if the Plan is not achieving the social, environmental, or economic goals as intended.

~~Adaptive management (see Figure 1-4 on page 29) is a management philosophy that applies a structured, iterative process to decision-making. The principle of adaptive management provides flexibility; and through continued research, monitoring, and reflection, adjustments can be made to the Plan and planning tools to ensure the Plan goals are met. This could lead to higher levels of protection being required in some areas or equal to higher levels of economic activity allowed in other areas.~~

This approach is consistent with Tr'ondëk Hwëch'in traditional land management approaches that include learning from the land, being flexible, adapting to challenges and dealing with change (Tr'ondëk Hwëch'in, 2020a)

The Plan implements adaptive management through various tools, most obviously through the Cumulative Effects Framework including measures which are triggered at precautionary, cautionary, and critical threshold levels.

Addressing the impacts of climate change is necessary to create an environment where people and nature thrive. Therefore, climate change is a central consideration in the Plan's adaptive management approach.

Commented [A50]: Section 7 should specifically address how the Plan will adapt over time as new information becomes available and circumstances change. If adaptive management is a guiding principle, the Plan needs some nimbleness to change.

Commented [A51]: This is paraphrasing the above paragraph. remove in order to be concise

Commented [A52]: Reworded because the Plan must balance ecological, socio-cultural and socio-economic goals.

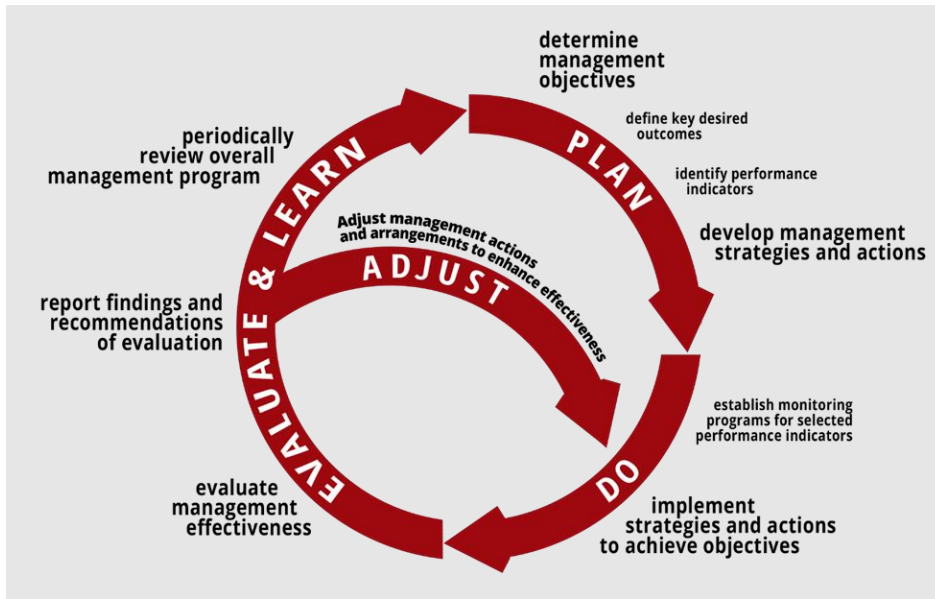


Figure 1-4 Adaptive Management Framework (Source: Jones, 2005)

2 DESCRIPTION OF THE PLANNING REGION

2.1 SETTING

The Dawson ~~P~~planning ~~R~~region is about 39 854 km² or 10% of Yukon. ~~see Figure 1-1 above for a map of the planning region's extent.~~ The planning ~~R~~region falls within the Traditional Territory of three self-governing First Nations: Tr'ondëk Hwëch'in, Vuntut Gwitchin First Nation, and First Nation of Na-Cho Nyäk Dun. Only Tr'ondëk Hwëch'in has Settlement Land within the planning ~~R~~region. ~~The northern extent of the planning Region is bounded by the contiguous boundary agreed to by Tr'ondëk Hwëch'in and Vuntut Gwitchin First Nation, and the eastern area includes a contiguous boundary agreed to by Tr'ondëk Hwëch'in and First Nation of Na-Cho Nyäk Dun, whereas the southern extent is bound by the Selkirk First Nation Traditional Territory on the southeast, and Kluane First Nation Traditional Territory to the southwest. The eastern boundary of the planning Region is the Peel Watershed planning Region, and the western boundary is the Yukon/Alaska border. White River First Nation has asserted~~ ~~Aboriginal rights in the southwest corner of the planning area.~~

The planning ~~R~~region excludes land within the City of Dawson, subdivision planning areas, local area planning (West Dawson and Sunnysdale), Klondike National Historic Sites, and Tombstone Territorial Park.

~~The planning Region's~~ ^qQuality of life ~~in the planning region~~ is attributed to numerous opportunities in mining, tourism, and other economic sectors; ~~its~~ thriving cultural landscape, and healthy ecosystems that support a wide variety of fish and wildlife populations.

2.2 LAND STATUS

The planning ~~R~~region includes Settlement Lands (administered by First Nations governments) and non-Settlement or public lands (administered by Government of Yukon). The planning ~~R~~region also contains lands that are already administered under existing plans (such as management plans, local area plans, municipal plans, and area development regulations). As such, governments continue to engage with citizens on a variety of land, resources and water planning and decision making.

These include land within the City of Dawson municipal boundary, West Dawson and Sunnysdale area, internationally designated lands, National Historic Sites, Yukon Historic Sites and Tombstone Territorial Park. The Plan does not make recommendations for these specific areas but does consider them as adjacent uses.

^q White River First Nation, who are not a self-governing First Nation under the FNFA, have identified a land selection in the southeastern corner of asserted Aboriginal rights and title in the ~~R~~region. The ~~R~~regional land use planning process has been conducted in accordance with the THFA. Therefore, "Traditional Territories" is defined in relation to the geographic area identified as a Yukon First Nation's Traditional Territory on the map referred to in 2.9.0 of the FNFA and THFA, and as agreed upon between First Nations through Contiguous Boundary Agreements.

Commented [A53]: Update this section to include most recent figures that have changed since Recommended Plan was released where available (e.g. population counts, active claims etc.). Include citations.

Commented [A54]: Map represents these areas more clearly than text description. Footnote should also be removed.

Dawson Recommended Land Use Plan ~~Landscape Management Units~~ Description of the Planning Region

2.2.1 Settlement Lands

Tr'ondëk Hwëch'in has 135 parcels of Settlement Land within the planning ~~R~~region, this count does not include those Settlement Lands located within community boundaries (e.g., Tr'ochëk, Tr'ondëk Subdivision). ~~White River First Nation has~~ There is one parcel within the planning ~~R~~region which is interim protected land as a result of preliminary White River First Nation settlement land selection negotiations, meaning it is withdrawn from placer, quartz, oil and gas, and land dispositions, while resolution of the White River First Nation's claim is ongoing. ~~is land set aside without a settled claim, and therefore the rights associated with other Site Selections may apply.~~ On Settlement Land, First Nations hold decision-making and legal powers.

2.2.2 Public or Non-Settlement Land

The Government of Yukon manages non-Settlement lands (both surface and sub-surface rights) as per the ~~FNFA-THFA~~ and the lands and resources acts of Yukon and Canada.

2.2.3 Designated Lands

There are lands within the planning ~~R~~region currently designated for protection. These include National Historic Sites, as well as International and Territorially Designated Lands.

Discovery Claim and Dredge No. 4 are both recognized as National Historic Sites in Canada as well as internationally as part of the Klondike Gold Rush International Historic Park, which has sites in Washington, Alaska, British Columbia, and Yukon, all related to the Klondike Gold Rush.

Designated Lands within the planning ~~R~~region include Tombstone Territorial Park and the ~~Forty m~~Mile, Fort Cudahy, and Fort Constantine Historic Site.

- Tombstone Territorial Park makes up approximately 5.3% ~~percent~~ of the planning ~~R~~region and was established pursuant to Schedule A of Chapter 10 of the Tr'ondëk Hwëch'in Final Agreement. The park is managed according to the Tombstone Territorial Park Management Plan, and the Commission was required to consider the *Tombstone Territorial Park Management Plan* (Tr'ondëk Hwëch'in Government and Government of Yukon, 2009) when developing the ~~R~~regional land use plan.
- Forty ~~m~~Mile, Fort Cudahy, and Fort Constantine ~~Historic Site is~~are located at the confluence of the Yukon and Fortymile Rivers, and ~~this site~~ was established as a co-managed site under Schedule A of Chapter 13 Tr'ondëk Hwëch'in Final Agreement.

Commented [A55]: Added further specificity. Also propose moving this to 2.2.3 as it is not Settlement Land.

Commented [A56]: There are also federal lands within the planning region (Bonanza Reserve on Bonanza Creek Road, Bear Creek Compound). Recommend including federal lands within this section for accuracy.

Commented [A57]: Townsite of Forty Mile is two words, river and caribou herd are one word

2.2.4 Adjacent Designated Lands

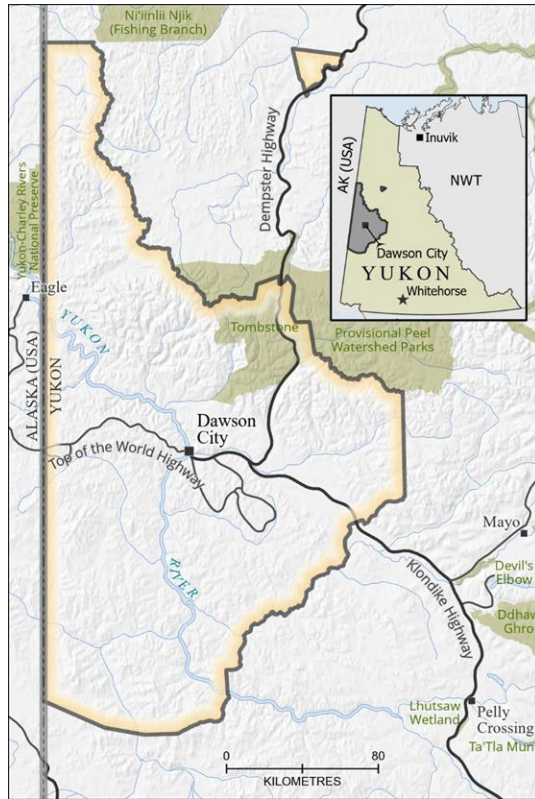


Figure 2-12-12-1 Adjacent protected lands surrounding the Dawson Planning Region

The planning process considers adjacent Regions and internal excluded Regions in the planning process, as these areas will relate directly to land use within the planning boundaries.

The Dawson **P**lanning **R**egion is adjacent to two other planning Regions in Yukon for which plans have been approved: the North Yukon and the Peel Watershed. Plans for these **R**egions were also completed under Chapter 11 and include **Landscape** Management Units with land designations.

Existing or proposed protected areas immediately adjacent to the planning **R**egion include Ni'inlii Njik (Fishing Branch) Territorial Park and Kit Range/North Cache Creek, located in the Yukon, and Yukon Charley Rivers National Preserve, located in Alaska (see green shaded areas in Figure 2-1).

Fishing Branch is located within the North Yukon **P**lanning **R**egion approximately 100 km south of Old Crow and was established in 2000 under the *Yukon Parks Act* as set out in the Vuntut Gwitchin Final

Agreement. The Ecological Reserve is exceptional primarily because of the seasonal congregation of grizzly bears to feed on fall chum salmon.

Kit Range/North Cache Creek is located within the Peel Watershed **P**lanning **R**egion and is approximately 973 km² in size. It is located directly north of Tombstone

Territorial Park and will serve to maintain the wilderness character of the area and to continue to support community cultural activities.

Yukon-Charley Rivers National Reserve is located immediately west of the planning **R**egion, within Alaska, and is approximately 10,226 km² in size. It was designated in 1980 in order to provide protection for the entire one-million-acre watershed of the Charley River and a 115 mile stretch of the Yukon River. Alaska's Upper Yukon Area Plan also borders the planning area.

Dawson Recommended Land Use Plan ~~Landscape Management Units~~Description of the Planning Region

2.3 ENVIRONMENT

The Dawson planning ~~R~~region is bisected by the Taiga Cordillera Ecozone in the north and the Boreal Cordillera Ecozone in the south. The Taiga Cordillera is a subarctic ~~R~~region that covers most of the northern half of Yukon and the southwest corner of the Northwest Territories. The Boreal Cordillera is an extension of the boreal forest zone that stretches from Labrador to Yukon.

Most of the planning ~~R~~region was part of Beringia, a landscape spanning northwestern North America to eastern Siberia. ~~This unglaciated area was a refuge for plants and animals, supporting many glacial species that are found nowhere else in the world. Beringia was unglaciated during the Pleistocene epoch and as a result has some of the highest occurrences of endemism in North America and is a unique biodiversity hotspot relative to most areas in the north.~~

~~In particular, remnant patches of steppe ecosystems, found on steep slopes along riverbanks and less commonly low elevation flat areas, host a large portion of the endemic vascular plants in this region.~~

Most of the ~~R~~region is forested but there are areas of alpine, subalpine, taiga shrub, ~~dry meadows~~ and wetlands. Wetlands cover roughly 10% ~~percent~~ of the planning ~~R~~region. Active riparian zones (areas along rivers and streams that are periodically flooded by flowing water) cover about four percent of the planning ~~R~~region.

The largest sub-watershed in the ~~R~~region is the Central Yukon, which includes tributaries of Sixty Mile River and the Indian River. The Yukon River is the largest river in the planning ~~R~~region and generally flows north and west to the Canada- Alaska boundary. Significant tributaries to the Yukon River include the Klondike River, White River and the Stewart River.

~~The ~~R~~region is underlain by continuous and discontinuous permafrost; permafrost is generally more widespread in the northern and higher elevation areas of the planning ~~R~~region, on north-facing slopes and in valley bottoms.~~

The most distinct geologic feature of the planning ~~R~~region is the Tintina Trench, which runs northwest-southeast, a nearly 1,000 km fault line along the continental margin of ancient North America. ~~The Tintina Trench is a major migration corridor for sandhill cranes, tundra swans, peregrine falcons and numerous other bird species.~~ To the north of the fault, rocks and mountains were formed from sediments deposited along the ancient coastline (e.g., shale, slate, sandstone and chert). Gold eroding from quartz veins was concentrated by pre-ice age rivers into placer sand and gravel deposits.

Wildfires and flooding represent the two greatest natural disturbances in the ~~R~~region. The Klondike Plateau (Map 5 Resource Assessment Report, DRPC 2020) has some of the highest levels of fire activity in Yukon, with an average fire cycle of approximately 100 years. The Dawson Fire Management District has the highest frequency of fire and the largest area burned by wildland fire in the Yukon (Government of Yukon, 2012).

Flooding in the planning ~~R~~region can occur as a result of a variety of hydrological processes depending on stream or river size and morphology. Flooding on the Klondike

Commented [A58]: Changed to improve accuracy

Commented [A59]: Changed to improve accuracy. See Bonnaventure et al., 2012 permafrost probability model (<https://yukon.maps.arcgis.com/apps/webappviewer/index.html?id=534f141ffa5f4796954627dc98f82b99>) and pages 43-44 of Benkert et al. 2014, Dawson City Landscape Hazards (https://ygsftp.gov.yk.ca/publications/openfile/2014/OF2014-12/Dawson_report.pdf) for further information.

Dawson Recommended Land Use Plan ~~Landscape Management Units~~ Description of the Planning Region

and Yukon Rivers has historically been driven by ice jams that form during spring breakup. Freshet can also cause peak water levels on these rivers, but freshet-related flooding has historically been less severe. Peak water levels on smaller streams and rivers can be driven by ice jamming, spring freshet, or summer precipitation.

The annual mean temperature for the planning region is -7.6°C, with an average of 340mm of precipitation. Average winter temperatures are -25°C, and the majority of precipitation occurs in summer. Increasing temperature and changes to precipitation have led to increased disturbance due to permafrost thaw and may also be impacting fire behaviour and forest recovery from wildfire (Perrin and Jolkowski, 2022).

The boreal forest supports a wide range of values including wildlife habitat, ecological health, carbon sequestration, and a sustainable renewable resource economy.

Some key-species in the Rregion that have high biocultural importance to local people include but are not limited to: caribou (including the Fortymile, Clear Creek, Nelchina, Hart River and Porcupine herds), moose, sheep, grizzly bear, wolverine, and salmon.

The planning region is also home to several species that have otherwise limited range distributions, such as collared pika, Ogilvie Mountains collared lemmings, Yukon podistera and Bering cisco. As such, the global stewardship responsibility for these species in the planning region is high.

2.4 PEOPLE AND COMMUNITIES

The Dawson planning Rregion is contained entirely within Tr'ondëk Hwëch'in Traditional Territory. It also contains areas of overlap with the Traditional Territories of the First Nation of Na-Cho Nyäk Dun ~~and~~, Vuntut Gwitchin First Nation and the asserted traditional territory of White River First Nation. The Rregion contains unique historical, archaeological, and palaeontological values.

Since time immemorial, Tr'ondëk Hwëch'in people have lived and travelled in a large area of the Yukon River valley and its tributaries, spanning the Yukon-Alaska border. They relied heavily on the salmon runs of the Yukon River and continue to utilize fish camps along its shores. They hunted big game, trapped furbearers, and harvested other resources by moving to different areas of the land according to the seasons. They interacted with other groups through extensive trading networks to exchange resources. To this day, most of these traditional practices continue.

Today, Tr'ondëk Hwëch'in maintain strong cultural connections to the Rregion. Language, song, and celebration, in addition to cultural and subsistence land use, continue to grow and thrive.

Since first contact with Europeans, Tr'ondëk Hwëch'in people and their traditional economy have been significantly impacted by economics, epidemics, and conflicts well beyond their homelands. Settlement areas important to the Tr'ondëk Hwëch'in within the Rregion include Tr'ochëk and Moosehide/Iëjik dha dezhu kek'it.

The first direct European influence came to the Rregion when Jack McQuesten established a trading post at Fort Reliance on the Yukon River in 1874. The town of Forty

Commented [A60]: Perrin, A. & Jolkowski, D. (2022). Yukon climate change indicators and key findings 2022. YukonU Research Centre, Yukon University, 126p.

https://www.yukonu.ca/sites/default/files/inline-files/Indicators2022_FinalReport.pdf

Commented [A61]: "Key" is vague, Plan speaks to biocultural importance here so suggested change makes this explicit.

Commented [A62]: Rare species within the planning region.

Dawson Recommended Land Use Plan ~~Landscape Management Units~~ Description of the Planning Region

~~m~~Mile was established ~~twelveen~~ years later to accommodate miners and traders who had moved to the area. The discovery of gold in the Klondike valley in 1896 led to the establishment of the City of Dawson and the subsequent Klondike Gold Rush. By the summer of 1898, the City of Dawson was the largest city in Canada west of Winnipeg, with a population of 40,000. Its population quickly declined to 5,000 people in 1902.

The ~~town of the~~ City of Dawson, located 536 km north along the North Klondike Highway from Whitehorse, is the only major permanent community in the planning ~~R~~region. The Yukon Bureau of Statistics estimate that as of December 2017 there was a population of 2,220 people residing in Dawson and the immediate surrounding area (including West Dawson, Sunnydale, Rock Creek, and Henderson Corner), which represents approximately 5.7% ~~percent~~ of Yukon's total population of 38,630. Several settlements with permanent residents occur within the ~~R~~region outside of the ~~community~~ City of Dawson. These areas include Sunnydale and West Dawson, Bear Creek, Rock Creek, and Henderson's Corner. A small number of residential properties also occur along major highway corridors.

2.5 ECONOMY

The ~~R~~region boasts a diverse economy that includes mining, tourism, agriculture, and forestry alongside a traditional economy characterized by a stewardship and subsistence mode of production. The ~~government-public~~ sector is an important employer in the ~~R~~region and the fastest-growing sectors of the ~~R~~regional economy ~~is~~ ~~in~~are art, recreation, and cultural resources.

2.5.1 Transportation

The ~~R~~region contains an existing highway network that is important to the ~~R~~region and Territory for transporting goods and services to the ~~R~~region and provides access to the North and Alaska. The notable routes in the ~~R~~region include the Dempster Highway, the North Klondike Highway, ~~and~~ the Top of the World Highway. Many of the highways in the ~~R~~region are in areas of permafrost and are affected by permafrost thaw related to development and/or climate change.

The ~~R~~region's river network is also an important historic and modern transportation link for industry and provides tourism and cultural benefits to the ~~R~~region.

2.5.2 Non-Renewable Resources

For well over a century, economic development in the Dawson ~~P~~planning ~~R~~region has been closely linked to its mineral wealth, and there is a good potential for the long-term health of the mining industry in the ~~R~~region. Hard rock (quartz) and placer exploration and mining are distinct land use activities; each has its own pattern of exploration, development, production, and reclamation. 9.7% ~~percent~~ of Dawson's resident employment is in non-renewable resources (as compared to 2.3% ~~percent~~ of Yukon's population). Non-renewable development is also supported by other economic activities, including supporting sectors such as fuel delivery, equipment rentals, hospitality, and transport services.

Commented [A63]: Forty Mile established in 1886. Changed for accuracy.

Commented [A64]: Consistency of use of Dawson, City of Dawson, Dawson planning region, Dawson area. Ensure that appropriate and clear term is used. City of Dawson is the official name, use this rather than town, community or municipality for clarity and consistency. When speaking to the planning region use Dawson planning region rather than simply Dawson region.

Commented [A65]: Update figures for current relevancy

Commented [A66]: Clarify if this is by employment, GDP or both and include citation. Also indicate what this means for the overall economy, fastest growing could still be the smallest sector. More detail is needed to provide reader with a fulsome picture of what is driving the economy in the region.

Commented [A67]: Use standard names from North American Industry Classification System to describe sectors. It is unclear what the "cultural resources" sector is.

Commented [A68]: Add information on existing resource road network, these roads are used throughout the region. Access and access management are issues spoken to throughout the Plan and resource roads play a key role in this.

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2.5.2.1 Hard Rock Mining

Commodities of potential and established economic interest in the Dawson ~~R~~region include precious and base metals, notably gold, silver, copper, cobalt, molybdenum, lead, zinc, and uranium. The ~~R~~region hosts several critical metal occurrences, including minerals used in the production of batteries for electric vehicles (the battery metals). Hard rock mineral exploration is a significant economic activity within the planning ~~R~~region. Approximately 10% ~~percent~~ of the labour force are directly involved in the mining industry (placer/hard rock). In 2018, exploration expenditures in the ~~R~~region reached a record high of \$147 million. In 2020, there were 26 active mineral exploration projects in the planning ~~R~~region being undertaken by 16 companies or individuals. As of May 2021, there were 40,745 active and pending quartz claims in the planning ~~R~~region (39,274 and 1,498, respectively) covering an area of 8,020 km², or 21.3% ~~percent~~ of the ~~R~~region (excluding Tombstone Territorial Park in which staking is prohibited).

2.5.2.2 Placer Mining

Due to its unglaciated terrain and extensive mineralization, the Dawson Mining District is the most productive placer mining district in the territory. In 2020, placer gold production in the Yukon had an estimated value of \$173 million. 87% of this value enters directly into the local and Yukon economy via goods and services, fuel purchases, and wages. As of December 2018, there were 18,291 active and pending placer claims in the planning ~~R~~region covering an area of 2,556 or 5.6% of the ~~R~~region. Claims are primarily located within the watersheds of the Klondike, Indian, and west Yukon Rivers (Fortymile and Sixty Mile rivers, and Moosehorn Range), as well as tributaries to the lower Stewart River. More than 1,900 km of placer streams (i.e., major gold-bearing streams with significant mechanized placer mining operations) are found within the planning ~~R~~region.

2.5.3 Renewable Resources

According to the 2016 census, 1.1% ~~percent~~ of Dawson resident employment is in renewable resources (agriculture, forestry, fishing, hunting), the same proportion as for Yukon's population (also 1.1 percent).

2.5.3.1 Forestry and Timber

~~Timber harvest is active in t~~The Dawson ~~P~~planning ~~R~~region ~~has an active forestry economy, and it that~~ began in the late nineteenth century. Forest management in the ~~R~~region is guided by the Dawson Regional Forest Resources Management Plan which was developed in partnership with Government of Yukon and Tr'ondëk Hwëch'in.

Timber harvest requires road, trail, or river access and often, road access created by other land users creates opportunity for the efficient harvest of mature timber.

Most forestry roads in the Dawson ~~P~~planning ~~R~~region are seasonal, temporary roads, with controlled access, which are ~~decommissioned as per Yukon's Forest Resources Roads Standards~~ once harvest and reforestation activities are complete.

2.5.3.2 Agriculture

The Dawson ~~P~~planning ~~R~~region contains some of the best agricultural land in the Yukon

Commented [A69]: Propose adding a section speaking to critical minerals which should include:

- Their use as raw inputs for clean technologies will hasten the transition to a greener economy and reach the global CO2 emission goals.
- A statement on global and federal support for securing critical mineral supply chains.
- A table that shows how nickel, cobalt, copper and manganese are utilized across clean energy technologies.
- Access scenarios

Commented [A70]: Provide further information on the overall trends for the region rather than figures from individual years as trends provide a better representation of the industry rather than a single year which could be an outlier.

Commented [A71]: Staking is prohibited but claims still exist in the park. Confirm if number includes or excludes these claims and add more to this disclaimer if needed.

Commented [A72]: Same as above, provide further information on the overall trends for the region rather than individual years.

Commented [A73]: Citation needed

Commented [A74]: Update figures based on 2021 census

Commented [A75]: Forestry includes more than timber harvest. Edited for accuracy

Commented [A76]: Provide brief description of what this includes. The Plan should be explicit about requirements and not be depend on other documents to provide direction.

Add note that decommissioning is not the same as reclamation/restoration/recovery as decommissioning is more focused on closing access than returning to a pre-disturbance landscapes.

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and current agricultural production in the Dawson ~~R~~region is geared towards the local market. Yukon Farm Products and Services guide lists 12 farms in the Dawson area, supplying vegetables, herbs, berries, chicken, eggs, pork, preserves, syrups, ornamentals, bedding plants, field crops, hay, and dairy products. Potential exists to expand food production and value-added operations.

In recent years, Tr'ondëk Hwëch'in has continued the development of the Teaching & Working Farm (Nän kāk nishi tr'ënòshe gha hëtr'ohq'h'ay (On the land we learn to grow our food). The farm is an important education tool, employer, and revenue generator for Tr'ondëk Hwëch'in and is a valued program within the community.

The farm supplies local vegetables, eggs, poultry, and pork for Tr'ondëk Hwëch'in events and market sale.

Warmer temperatures due to climate change may increase the viability of some crops providing different agricultural opportunities in the future. However, other impacts such as increasing climate-related extreme events or significantly drier or wetter seasons may present significant challenges to local agriculture.

Commented [A77]: Added climate change considerations related to agriculture.

2.5.3.3 Traditional Economy

Traditional economy is based on the harvest of natural resources; it provides meat, fish, berries, fuelwood, and income from fur. It also provides raw materials for cultural products. There are direct and indirect values associated with the traditional economy that are linked to health and wellbeing, spirituality, community, culture, and stewardship.

The importance of traditional land-based activities is not fully accounted for by its monetary contribution to the regional economy. Country food is crucially important for nutritional well-being. The activities of harvesting materials are a source of cultural value and social well-being which are not easily quantifiable in the western sense.

There are many traditional travel and trading routes throughout this ~~R~~region that continue to be important to the traditional economy.

The ~~R~~region includes 42 trapping concessions for harvest of furbearers such as wolf, lynx, beaver, and marten. Several of these concessions are held by Tr'ondëk Hwëch'in citizens (approximately 40 percent).

It is important to understand the interconnectivity of values and resources that are essential to, and by-products of the ~~T~~traditional ~~E~~economy.

2.5.3.4 Tourism

Tourism is the largest employment sector in the Dawson ~~R~~region, with 27% percent of the employment. The Dawson ~~P~~planning ~~R~~region offers considerable opportunities for tourism this sector. The community City of Dawson includes well established tourism services, attractions, accommodations, and businesses. Tourism in the ~~R~~region is a significant contributor to the local and territorial economies.

Commented [A78]: Include reference to Tr'ondëk-Klondike UNESCO World Heritage status as a tourism draw.

Commented [A79]: Cite figure and indicate if this varies seasonally.

While the Yukon is marketed primarily as a wilderness destination, the Dawson ~~P~~planning ~~R~~region uniquely represents other tourism values, including the rich cultural

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history of the Tr'ondëk Hwëch'in, the place of the Klondike Gold Rush, and contemporary placer mining.

Tourism provides seasonal and year-round jobs for residents, as well as seasonal jobs for transient summer workers. Prior to the COVID-19 pandemic, there were significant increases in visitor numbers and tourist spending, with the addition of new attractions such as the Inuvik to Tuktoyaktuk highway opening, and television production in Dawson.

The ~~R~~region also includes four big game outfitting concessions that provide employment and income for outfitting operations in the ~~R~~region.

2.6 TR'ONDËK HWËCH'IN HOLISTIC VIEW

The Tr'ondëk Hwëch'in traditional view of the land is much different than as described above in this section. The following excerpts from We are Dënezhu (2019) provides a brief introduction to this perspective.

The Tr'ondëk Hwëch'in have occupied this territory for all time. They are Dënezhu.

"Our land lives and breathes. It is alive with power. Our land is the earth, the water, the sky, the stars and the wind. It is the people and the animals, the fish and the plants. It is a life force. Our land shapes our world. Our beliefs, thoughts, and actions are responses to the land itself and in return the land provides for us. We work together to maintain this reciprocal relationship."

"We are people of this land. It has shaped us for generations and we have cared for it as it has cared for us. The land itself brought our worldview into being. It teaches us that we are an essential part of a bigger environment. We understand ourselves and our place in the world in relation to all other beings. This is the foundation of our identity."

"Our enduring relationship with our land is our heritage. Our stories are written on the land and our place in this world is created, understood and owned through these stories."

We are Dënezhu, Tr'ondëk Hwëch'in Government, 2019

Section 6 – Landscape Management Units (page 160) includes many stories illustrating the interrelationship of the land, water, and resources to Tr'ondëk Hwëch'in tradition and culture.

2.7 CLIMATE CHANGE

Climate change is anticipated to have ~~a~~ significant impacts on the Region. Warming trends in the Dawson ~~P~~planning ~~R~~region exceed those of southern ~~R~~regions of Canada. From 1955 to 2004, weather stations in Dawson and Mayo (~~outside of the planning region~~) reflect a warming trend of approximately six degrees Celsius per century. Trends in precipitation over the last century show greater spatial variability in central Yukon, with a ~~29% percent~~ per century decline in precipitation in the Dawson area, yet ~~significant a 27% per century~~ increase in the Mayo (~~27 percent per century~~) and ~~a 30% per century increase in~~ Pelly (~~Mayo and Pelly are outside of the planning region~~) (~~30 percent per century~~) areas (Werner et al., 2009).

Commented [A80]: Added more information regarding expected changes to temperature and precipitation in the region based on modelled projections. Modelling was also completed for each LMU and is provided in the memo for consideration by the Commission.

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~~It is expected that temperature increases will be greater in Arctic and sub-Arctic Regions than in southerly parts of Canada (Statistics Canada, 2011). Models also indicate that the annual average precipitation amounts are expected to increase by 10 to 40 percent in the Dawson area, while drier conditions are expected to the north and east of the City of Dawson. More precipitation is expected during the winter months than in the summer. When considering future climate change, it is important to use scenarios that outline a range of potential future greenhouse gas emissions pathways. This helps account for variability and uncertainty. Climate projections presented in the Plan include a moderate emissions reduction scenario (SSP245), and a “worst case” high emissions scenario (SSP585) where emissions continue to rise significantly.~~

~~Climate projections were extracted in September 2023 using the data provided on climatedata.ca, the official provider of climate projections for Canada. The dataset used was produced by the Pacific Climate Impacts Consortium which downscaled twenty-six Global Climate Models from the CMIP6 experiment using a Quantile Delta Mapping method.~~

~~The data presented here represents the median range of projections (the 10th and 90th percentiles) for two future periods of 30 years (2041-2070 and 2071-2100), for two climate scenarios: SSP245 and SSP285 and are expressed as changes compared to an historical baseline which was set to 1971 to 2000. Using 30-year averages as well as two different ensembles of scenarios helps to increase the confidence in the values presented. However, sharing of lived experience and the expansion of continual monitoring of climate variables in the planning region is necessary to further align on-the-ground changes with computer model outputs.~~

~~Climate projections indicate that average annual temperatures for the planning area will increase by between 2-4°C by mid-century, and as much as 4-6°C by the end of century under a moderate emissions scenario. A high emissions scenario projects that average annual temperatures in the planning area will increase by 3-6°C by mid-century, and as much as 5-9°C by end of century. Temperature increases are greatest in winter, and in the more northerly parts of the planning area.~~

~~Climate projections predict a significant rise in total precipitation across the region. In a moderate emissions scenario, average annual precipitation for the planning area is projected to increase by between 10-33% by mid-century, and by 27-44% by the end of the century. In a worst-case scenario, average annual precipitation could increase by 16-39% by mid-century, and by 25-64% by end-of-century. Projected changes in precipitation are greatest in spring and fall. At these times, average temperatures are still projected to remain below zero, suggesting that this precipitation will primarily fall as snow. However, this may vary significantly from year to year.~~

Commented [A81]: Accurate statement but outdated reference.

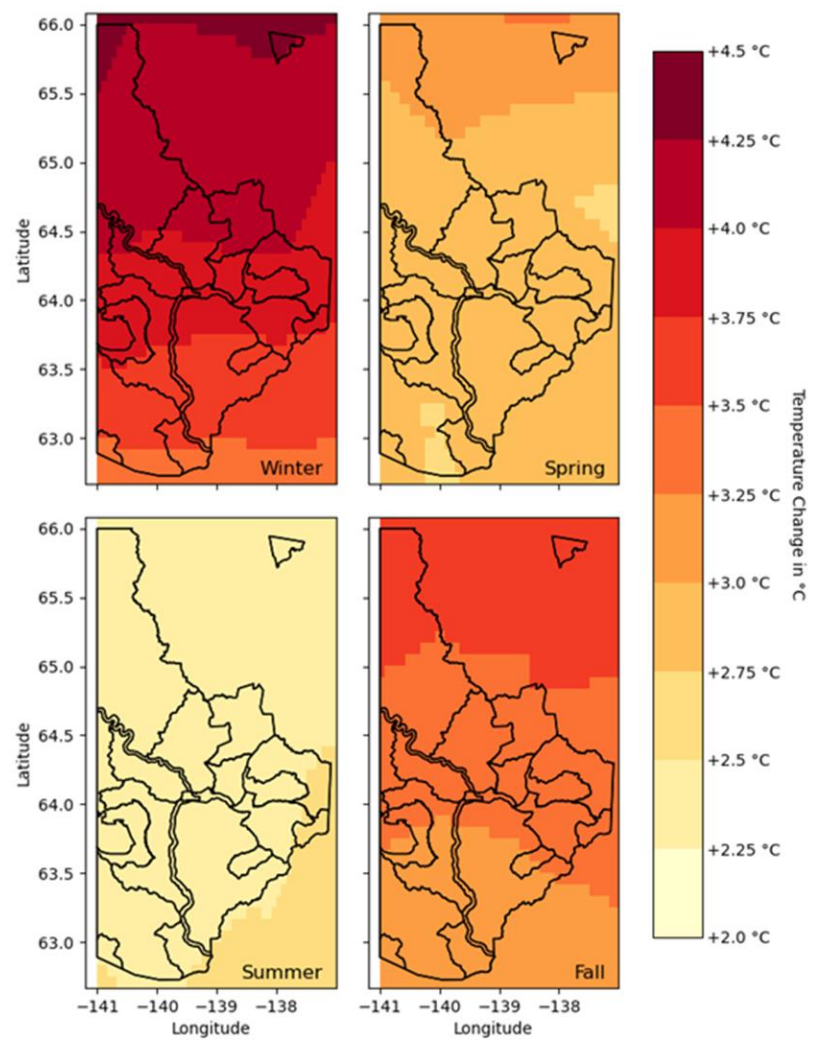


Figure 2-2 Projected seasonal temperature changes for the 2040s under climate scenario SSP245 (Relative to 1971-2000 baseline).

Dawson Recommended Land Use Plan Landscape Management Units Description of the Planning Region

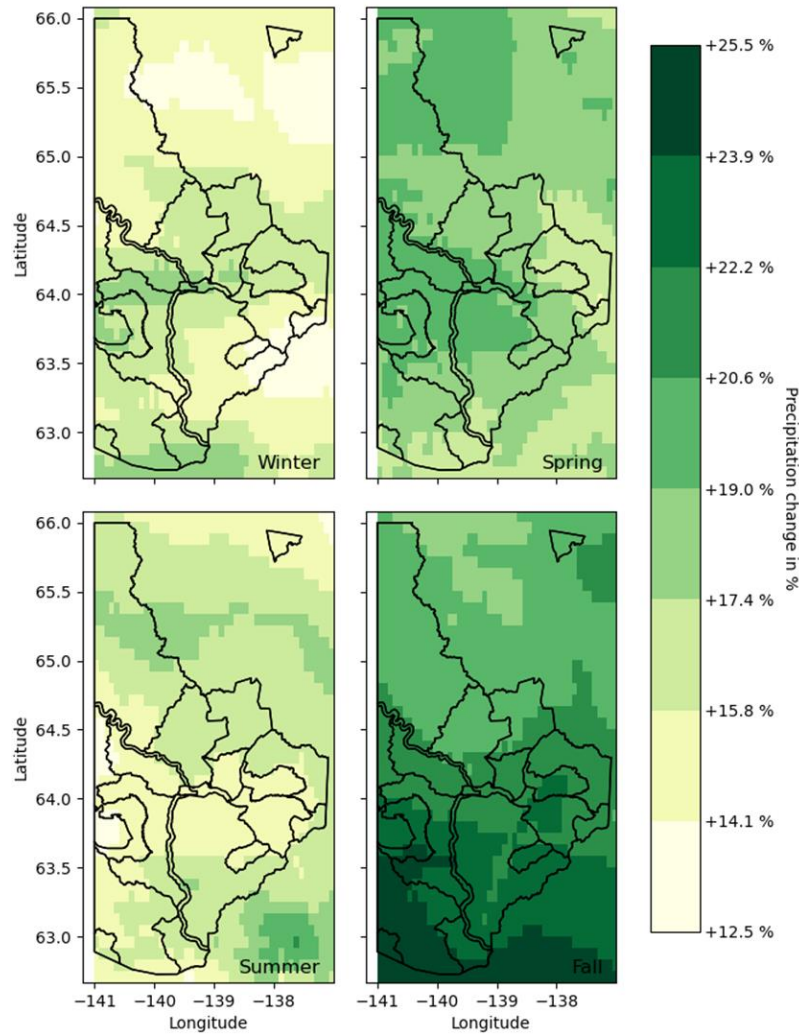


Figure 2-3 Projected seasonal precipitation changes for the 2040s under climate scenario SSP245 (Relative to 1971-2000 baseline).

These changing temperature and precipitation patterns have cascading effects on the environment and communities, such as changing flooding risks, exacerbating accelerating permafrost thaw, altering wildfire regimes, and impacting access to land and water. These changes would in turn impact wildlife and fish, and habitats further impacting the traditional economy and subsistence land uses. Many climate change

Dawson Recommended Land Use Plan ~~Landscape Management Units~~Description of the Planning Region

~~impacts will be irreversible on any meaningful timescale. Preserving ecologically representative areas and connectivity are examples of activities that will help retain the climate resilience of wildlife and fish.~~

A changing climate can affect many of the interests and activities in the Dawson Planning Region. ~~It is therefore important that consideration be given to both challenges and potential opportunities associated with climate change during the planning process.~~Management direction to employ adaptive management and apply the precautionary principle provide opportunities to iteratively consider climate change during implementation and review of the Plan.

3 PLAN CONCEPTS

This section of the Plan describes the management and conservation tools used by the Plan. The vision, goals, principles, and objectives of the Plan are used to guide the application of these tools in land use management decisions in the Dawson Pplanning Rregion.

These concepts have been selected to ensure consistency with good planning practice and the applied concepts in other Rregional land use plans in Yukon:

- Landscape Management Units
- Land Use Designation System
- General Management Directions
- Special Management AreasDirections
- Results Based Management Framework
- Cumulative Effects Management

Commented [A82]: Assumed typo, changed to match heading for 3.4, pluralized as there are multiple directions

3.1 LANDSCAPE MANAGEMENT UNITS

The Dawson Pplanning Rregion has been divided into discrete areas of land. Consistent with other Rregional land use plans, these are called Landscape Management Units (LMUs). Each LMU is identified and delineated from the others based on a review of human use, ecological properties, current and anticipated levels of development, and/or identified land use issues. Each LMU has a distinct management intent which translates to differences in how they are designated for land use and what special management directions apply (see Section 6 – Landscape Management Units).

As much as possible, the boundaries of each LMU follow an existing natural (e.g., watershed, major river), or man-made (e.g., highway, Tr'ondëk Hwëch'in land selections) boundary. Where applicable, LMU boundaries have been delineated to be consistent with adjacent Rregional land use plans.

The Plan recommends establishing establishes 21 LMUs within the Dawson Pplanning Rregion (see Map 1 – Land Designations). The management intent for each LMU has been included in Section 6 – Landscape Management Units (page 160) including the recommended land use designation and any special management directions recommended.

Commented [A83]: "Management intent" is used in Table 3-1 and is not the same as the "Intent Statement" included for each LMU, the management intent in Table 3-1 seems to link more closely to the designation as described in the next section.

Commented [A84]: Brought into last sentence of first paragraph to avoid repetition.

3.2 LAND USE DESIGNATION SYSTEM

The purpose of a Land Use Designation System is to describe set the management intent of each identified Landscape Management Unit (LMU) (Table 3-1). Each LMU has been assigned a land use category designation depending on the priority values and land use issues identified within the area, and the sensitivity of each area to disturbance.

Based on identified values and sensitivity to disturbance, different areas in the Dawson Rregion require different land management. Some areas are more sensitive than others and require careful land management, whereas others may be less sensitive or have important economic features.

Commented [A85]: Defined above

Commented [A86]: These two paragraphs repeat the same concept.

The designation system recommended for the Dawson planning Region is similar to that used in other planning Regions in Yukon with slight variations. It is composed of three major categories to guide the management of land use activities:

- Integrated Stewardship Areas; and
- Special Management Areas; and
- Future Planning areas

Areas requiring further consideration are labelled as future planning areas with interim management until such time as further planning occurs.

In addition to directions related to the designation, general management directions and special management directions, in some land management units, additional overlays or corridors directions will apply these are within overlay areas in applicable landscape management units:

- Overlay Areas; and
- Corridor Areas:

Table 3-1 on page 46 describes in detail the proposed Land Use Designation System used for the Dawson Planning Region:

3.2.1 Integrated Stewardship Areas

The Integrated Stewardship Area (ISA) designation is used to identify areas where there are a multitude of activities happening on the land that should be allowed to continue and expand. These areas have not been identified as having the highest conservation value. The intent of all ISAs is to enable existing and future economic activities for both surface uses and subsurface resource extraction. ISAs also encompasses the cultural landscapes, recreational areas, and important wildlife habitat. General Management Direction in Section 5 – General Management Directions (page 70) applies in ISAs.

ISAs allow for existing and new industrial land uses, including but not limited to mining and exploration, forestry, agriculture, traditional economy, tourism, and renewable energy, and other land use activities. Existing and new surface access is also allowed. Land management in these areas is based on the concept of stewardship as described in Section 1.9.2 – Stewardship (page 23). Land use in these areas is subject to existing regulatory processes and special management directions, which depend on specific values or issues identified in each LMU.

ISAs are each assigned a land sub-designation (ISA 1-4) to further indicate the relative level of conservation or development focus (see Table 3-1). These land designations are differentiated by the development category management intent and cumulative surface disturbance and linear feature density indicator thresholds. Cumulative effects indicators are tracked, monitored, and compared to their designation's threshold to determine conformity with each LMU.

3.2.2 Special Management Areas

A Special Management Area (SMA) is a conservation area identified and established within a Traditional Territory of a Yukon First Nation under a Final Agreement (Chapter 10) that includes both public land and First Nation Settlement Land.

Commented [A87]: Unnecessary information

Commented [A88]: Repetitive

Formatted: Body Text, No bullets or numbering

Commented [A89]: Brought reference to table into first sentence of first paragraph of section.

Commented [A90]: Rephrase to what these areas are rather than what they aren't. Some ISAs may include high conservation values (e.g. species at risk habitat) but that may not translate to a need for an SMA designation for the whole LMU.

Commented [A91]: YG's understanding is that GMDs are meant to apply to all designations not just ISAs but this statement is not included in s.3.2.2 or 3.2.3. Propose removing text here and adding statement of where they apply to s.3.3.

Commented [A92]: Uses are not limited to industrial land uses, glossary definition of industrial land use does not include outfitting, tourism, recreation etc. which would all be allowed.

Commented [A93]: This conflicts with some special management directions for ISAs (e.g. LMU 21 SMDs 2 and 4 prevent quartz exploration and development). If there are management directions that apply to all ISAs (or to one of the four subtypes), they should be clearly articulated including any restrictions. This information should be presented in a separate section of the Plan along with other applicable directions for ease of use by Plan readers. See Proposed Changes for Effective Document Design and Writing Style document for more fulsome depiction of proposed structural changes.

Commented [A94]: This is not unique to ISAs, a general statement should be added to the Plan that all land uses are still subject to regulatory processes in addition to the management directions set out in the Plan.

Commented [A95]: Development category is undefined, Table 3-1 includes a "Management Intent" column.

Commented [A96]: Not all disturbances are included in surface disturbance therefore not cumulative.

Commented [A97]: Changed for consistency

Commented [A98]: Repetitive, explained in 3.6 below

Commented [A99]: SMAs in the Plan are not the same as those established under Chapter 10. They could be established under Chapter 10 but inclusion in a land use plan does not do this automatically. Chapter 10 also does not require that SMAs be conservation areas.

A Special Management Area is intended to be jointly managed by Government of Yukon and Tr'ondëk Hwëch'in, in the spirit of Chapter 10 of the THFA, for conservation. During Plan implementation SMAs will require permanent prohibition of entry orders for placer and quartz, withdrawal from disposition for oil and gas, development of a management plan and legal designation.

The level of protection within an SMA will be based on the recommended management intent and special management directions, which are set out in **Section 6 – Landscape Management Units** (page 160).

The management of each SMA will be further defined in a management plan developed for each area, with ~~co-joint~~ management among the Government of Yukon Government and First Nation governments, ~~and input from Renewable Resource Councils and Fish and Wildlife Management Board, depending on the area and the jurisdiction.~~

Further work to understand how climate change is affecting these areas (i.e., monitoring changes, forecasting future conditions) can help inform conservation approaches. Retaining the natural landscape is a way to maintain ecosystem resilience in the Rregion.

An SMA in the Plan, is an area managed for conservation. Land use activity in SMAs is allowed in accordance with the management intent and directions of the individual LMU. Existing dispositions are honoured and work is otherwise allowed to continue provided it meets Plan thresholds and management directions. Staking new placer or quartz claims is prohibited in SMAs. Industrial land use is generally not allowed in these areas. However, exceptions may be made whereby industrial activity may be allowed in existing land dispositions and surface access may be established to access those dispositions, if specified in the special management directions. All other lands within these areas should be permanently withdrawn from any new industrial land use dispositions and surface access.

These areas require legal designation, which should be determined by the Parties through implementation, provided that the Plan's management intent and direction is respected supported. In the spirit of Section 10.5 of the THFA, Management of Future SMAs, the Government of Yukon 'otherwise agrees' such that the Parties to the Plan:

1. will have joint management authority for all of the SMAs in the Dawson planning region;
2. shall jointly prepare, or have prepared a management plan for each SMA;
3. shall jointly make best efforts to complete the management plans within five years of the establishment of the SMAs; and
4. shall jointly review each management plan at least once every 10 years.

3.2.3 Sub-Regional Future Planning Areas

This Plan identifies three areas for future planning and makes recommendations for sub-regional plans to be completed for the interim management of these areas. The areas that are recommended for future or sub-regional planning are **LMU 3: Chu-Kon-Deh (Yukon River Corridor)** (page 174), **LMU 12: Tr'ondëk Tāk'it (Klondike Valley)** (page 218), and the **Dempster Highway Corridor (Section 5.4.3.1.1)** (page 130). Detailed

Commented [A100]: Removed as this is part of the Chapter 10 definition, the Plan does not need to follow this.

Commented [A101]: Most of the Special Management Areas state that industrial land uses are allowed up to a threshold level and do not specify that this would need to be within existing tenure. In addition, forestry and agriculture (industrial land uses per the glossary) are allowed in certain SMAs and do not have existing dispositions. This creates a contradiction with some LMU descriptions (LMU 4 for forestry, LMU 10 for agriculture and forestry). To maintain the ability for those uses in these LMUs this sentence needs to be re-phrased.

Commented [A102]: YG supports the inclusion of language similar to the Peel Watershed Regional Land Use Plan to clarify governance and management roles for the Parties related to SMAs. Specific suggestions have been included in tracked changes below.

Commented [A103]: If YG's proposed modification to LMU 3 is accepted, change this to "two".

Commented [A104]: See letter and memo for further information on YG's recommendations for LMU 3.

interim direction and intent statements and guidance can be found in **Section 6 – Landscape Management Units** (page 160), **Section 5.4.3.1 - Existing Highway Access** (page 130) and **Section 7 – Plan Implementation** (page 274).

3.2.4 **Overlay Areas**

In addition to SMAs and ISAs, some areas require special consideration and additional management direction to balance competing land uses and address specific planning issues. These areas require an overlay over the existing designations.

3.2.4.1 **Caribou Stewardship Area**

A Caribou Stewardship Area is an ISA with a specific conservation focus and it applies to **LMU 7: Wehtr'e (Antimony)** (page 196) and **LMU 21: Wëdzey Tay (Fortymile Caribou Corridor)** (page 268). The intent of these areas is 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.

The intent is not to allocate these areas with a legal designation for protection, and they are not intended to be permanently withdrawn from activity.

Limited industrial land use is allowed within existing dispositions, however all other lands not currently holding mineral or other land use tenure should be withdrawn from mineral staking on an interim basis. Recommendations for removing interim withdrawals and additional Special Management Directions are specified in **LMU 7: Wehtr'e (Antimony)** (page 196) and **LMU 21: Wëdzey Tay (Fortymile Caribou Corridor)** (page 268).

3.2.4.2 **Wetland Stewardship Area**

A Wetland Stewardship Area is an ISA with a wetlands-specific conservation focus and it applies to **LMU 17: Nän Dhöhdät (Upper Indian River Wetlands)**.

The intent is not to allocate these areas with a legal designation for protection, and they are not intended to be permanently withdrawn from activity.

Limited industrial land use is allowed within existing dispositions, however all other lands not currently holding mineral or other land use tenure should be withdrawn from mineral staking on an interim basis. The intent for this ISA as well as recommendations for removing the interim withdrawals and additional Special Management Directions are specified in **LMU 17: Nän Dhöhdät (Upper Indian River Wetlands)** (page 248).

3.2.4.2 **Wetland of Special Importance**

Through the territorial Policy for the Stewardship of Yukon's Wetlands, a Wetland of Special Importance is an area wherein the wetlands merit enhanced protection and specific mitigation measures to ensure there is **no loss or reduction of wetland benefits**. Wetlands of Special Importance can be identified through regional land use planning. The Wetlands of Special Importance boundaries can be applied to a portion of a Landscape Management Units, or extended across several units, depending on the distribution of wetlands of interest.

The Plan includes three areas which should be identified as Wetlands of Special

Commented [A105]: This information should be limited to one section for ease of use.

Commented [A106]: Given that overlays currently apply to entire LMUs, it is unclear why a separate additional designation is needed rather than simply adding special management directions related to these values to the LMU. YG would like to continue working with the Commission and TH to revise the caribou overlays, including boundaries, which would improve their usefulness. Wetland overlays apply to a single LMU and should be removed as a separate designation.

Commented [A107]: YG would like to work with TH and the Commission to update Caribou Overlays including boundaries and an approach that would achieve the intent of these overlays. See memo for written reasons for this proposed modification.

Commented [A108]: YG does not support the use of interim withdrawals. See Major proposed changes document for written reasons for this proposed modification.

Commented [A109]: Structural redundancy, WSA overlay only applies to LMU 17 so any directions related to it should be brought forward as special management directions for this area rather than included as a separate overlay.

Commented [A110]: New section proposed to identify WSIs that should be designated under Wetland Policy.

Importance:

- Flat Creek Wetlands
- Ladue River Wetlands
- Scottie Creek Wetlands

Flat Creek Wetlands

This Wetland of Special Importance encompasses all wetlands located in **LMU 10: Tintina Trench** which forms part of the Klondike River catchment, excluding those wetlands within the Agriculture Corridor Area (see **Section 3.2.5**). This includes wetlands within the Flat Creek, Medrick Creek, Florence Creek, Burton Creek, Parker Creek, Gates Creek and Glacier Creek drainages, as well as portions of the Little South Klondike and North Klondike river drainages within LMU 10.

Ladue River Wetlands

This Wetland of Special Importance encompasses the entirety of the Ladue River catchment within the planning region. This drainage extends from the confluence of the Ladue River and the White River northwest to the North Ladue River (within **LMU 19: Tādzan Dēk (White River)**) and along the North Ladue River to the Matson Uplands, including a small portion of **LMU 21 Wēdzey Tay (Fortymile Caribou Corridor)** and **LMU 16: Wēdzey Nāhuzhi (Matson Uplands)**.

Scottie Creek Wetlands

This Wetland of Special Importance encompasses all wetlands within the entirety of the Scottie Creek drainage within the planning region (**LMU 20: Łuk Tthe K'āt (Scottie Creek Wetlands)**).

3.2.5.3.2.4.3 Corridor Areas

~~In addition to SMAs and ISAs, some areas require special consideration and additional management direction to balance competing land uses and address specific planning issues. These areas require an overlay over the existing designations and are called Corridor Areas. In these Corridor Areas, multiple land uses such as industrial activities, residential areas, transportation, infrastructure development, tourism and recreation, and traditional economic and subsistence use intersect with key ecological values. Corridor Areas may require specific management directions to address these overlapping or complex land use issues.~~

- ~~Agricultural Corridor Areas are defined as being 2 km on both sides from the centreline of the North Klondike Highway within:~~
- ~~Applies to LMU 10: Tintina Trench (page 212)~~
- ~~Highway Corridors are defined as being 300 metres on both sides from the centre line of the highway. See s. 5.4.3.1 for further information on Major Highway Corridors in the Region. are:~~
- ~~Dempster Highway Corridor²~~

Commented [A111]: Name kept consistent with what was previously in the Plan however, Tintina Trench wetlands may better represent the now larger area.

Commented [A112]: Changed to a subsection of overlays as corridor areas do not appear to be otherwise distinct from other overlay types. However, this section does not detail any directions that apply only within these areas and it is therefore unclear why a separate sub-designation is needed when general or special management directions could otherwise cover off concerns. If so this section could be removed to simplify the number of designations for ease of use.

Formatted: Heading 4

Commented [A113]: Moved to beginning of overlay section.

Commented [A114]: Directions for agricultural corridor are unclear, if this only applies within LMU 10, there is no need for a separate overlay. Any directions related to the corridor can be included as special management directions for LMU 10 and the overlay can be deleted.

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²Sub-regional planning is recommended as per the Terms of Reference for the Dawson Regional Land Use Plan. See also **Section 5.4.3.1.1 – Dempster Highway Corridor** (page 140).

Dawson Recommended Land Use Plan

~~Landscape Management Units~~Plan Concepts

- ~~North Klondike Highway Corridor~~^a

^aA section of the North Klondike Highway Corridor is contained within **LMU 12: Tr'ondëk Tāk'it (Klondike Valley)** (page 241) which is recommended for sub-regional planning.

~~—Top of the World Highway Corridor~~

~~3.2.63.2.5~~ **Other Areas**

~~In accordance with the THFA and TOR, there are areas within the planning Region that will not be provided a designation, as they will not be planned for by the DRPC:~~

- ~~• Areas subject to local planning (i.e., the City of Dawson and West Dawson / Sunnydate)~~
- ~~• The Klondike National Historic Sites~~

Commented [A115]: This information is already captured more comprehensively in section 1.4. Recommend removing to avoid unnecessary repetition, if keeping Tombstone Territorial Park should be added to the list of excluded areas.

Table 3-1 Summary of Land Designation System for Dawson Region

Category	Sub-category	Management Intent	Description
Integrated Stewardship Area <i>Areas where development can occur, subject to special and general management direction and monitoring of cumulative effects indicators.</i>	ISA 1	Lowest Development	- Very high ecological or heritage/cultural value within a sensitive biophysical setting - The priority in this area is to maintain ecological integrity and ~~cultural heritage~~ resources - Lowest threshold for development
	ISA 2	Low Development	- High ecological and cultural values within a moderately sensitive biophysical setting - The priority in this area is to maintain ecological integrity and ~~cultural heritage~~ resources and minimize land use impacts - Low threshold for development
	ISA 3	Moderate Development	- Moderate ecological and cultural values within a moderately sensitive biophysical setting - Conservative threshold for development
	ISA 4	Highest Development	- Lower ecological or heritage/cultural value within a moderately sensitive biophysical setting - Higher threshold for development
Special Management Area <i>Areas managed for conservation of ecological and ~~cultural heritage~~ resources, and long-term maintenance of wilderness</i>	SMA	Highest Conservation Maintain ecological integrity and cultural values.	- Recommended for permanent withdrawal from ~~any new industrial land use, mineral staking and surface access~~ ~~Identified as a Special Management Area consistent with Chapter 10 of the FNFA, with a requirement for a legal designation~~ - Requires the development of a management plan ~~Recommended that lapsed tenure should not be renewed, and no new mineral staking, or dispositions permitted~~

Commented [A116]: Both the characteristics of the area and the management directions are listed here. Need to make them separate and list the designation specific management directions in the latter section (as per suggested structure, between General and Special management directions). See Proposed Changes for Effective Document Design and Writing document for additional details.

Commented [A118]: Clarify if this is meant to apply to only mineral tenure or other withdrawals. SMA directions only speak to mineral withdrawals (except LMU 1 which also mentions oil and gas). LMU directions will need to provide clear guidance on what uses are and are not allowed. The glossary in the Plan includes agriculture and forestry in industrial land use. The descriptions of several LMUs, including 4 and 10, appear to contradict this definition as they appear to support some forestry and agriculture in their boundaries.

Commented [A117]: This is incorrect, given that some SMAs currently have ISA 2 thresholds they do not actually have the highest conservation in the Plan.

Commented [A119]: Designating an area an SMA in the Plan is not the same as designating an area as an SMA under Chapter 10.

Commented [A120]: Withdrawal accomplishes no new staking while allowing claims in good standing to continue being developed.

Category	Sub-category	Management Intent	Description
<i>characteristics</i>			
Sub-Regional Future Planning Area	SREPA	Additional planning required	- These ~~include are the~~ LMU 12: Tr'ondëk Täck'it (Klondike Valley), ~~Yukon River Corridor~~ and the Dempster Highway Corridor. - Highest levels of land use and development pressure
Caribou Stewardship Area	Overlay	Maintain ecological integrity and cultural values while allowing for low levels of carefully managed land use activities.	- Existing surface and subsurface rights (e.g., mineral, forestry, etc.) are recognized, including access ~~Recommend no new staking on an interim basis (specific to LMU)~~ - Surface access and surface disturbance thresholds equivalent to ISA 1 or 2 (specific to LMU) and under strict Special Management Direction (see Section 6 – Landscape Management Units, page 160).
Wetland Stewardship Area	Overlay	Maintain wetland functions, benefits, ecological integrity, and cultural values while allowing for low levels of carefully managed land	- Applies to LMU 17: Nän Dhòhdäl (Upper Indian River Wetlands) (page 244). - Existing surface and subsurface rights (e.g., mineral, forestry, etc.) recognized, including ability to access. - Recommend no new staking on an interim basis. - Surface access and surface disturbance thresholds equivalent to ISA 2 (Low Development) and under strict Special Management Direction.

Commented [A116]: Both the characteristics of the area and the management directions are listed here. Need to make them separate and list the designation specific management directions in the latter section (as per suggested structure, between General and Special management directions). See Proposed Changes for Effective Document Design and Writing document for additional details.

Commented [A121]: See letter and memo for YG recommendations related to this area.

Commented [A122]: YG does not support the use of interim withdrawals.

Commented [A123]: As this only applies to LMU 17 an overlay is not needed.

Category	Sub-category	Management Intent	Description
		use activities.	
Wetlands of Special Importance	Overlay	<u>Halt the loss or reduction of wetland benefits and cultural values, while allowing for low levels of carefully managed land use activities which do not negatively impact these wetlands.</u>	• <u>Applies to Flat Creek, Scottie Creek and Ladue River wetlands (see page 44).</u> • <u>Existing surface and subsurface rights (e.g., mineral, forestry, etc.) recognized, including ability to access.</u> • <u>No development which could result in a loss of wetland area (all classes) or decrease wetland benefits should be allowed.</u> • <u>A buffer, as outlined in Policy Recommendation 50, shall be applied around all wetlands within a Wetland of Special Importance.</u> • <u>Recommend designation of these areas as Wetlands of Special Importance, as per A Policy for the Stewardship of Yukon's Wetlands.</u>
Major Highway Corridors	Overlay	Corridor areas are for features where adjacent land requires special consideration and additional	• <u>Land within 300 meters on either side of the highway centreline of the Dempster, Klondike, and the Top of the World Highways (see Section 5.4.3.1 - Existing Highway Access, page 130).</u>
Agricultural Corridor Area	Overlay		• Applies to LMU 10: Tintina Trench (page 212). • Allows for agricultural leases ~~permitted~~ within a 2 kilometer buffer on either side of the North Klondike Highway.

Commented [A116]: Both the characteristics of the area and the management directions are listed here. Need to make them separate and list the designation specific management directions in the latter section (as per suggested structure, between General and Special management directions). See Proposed Changes for Effective Document Design and Writing document for additional details.

Commented [A124]: Add bullet that surface disturbances thresholds do not apply within highway corridors (as per 3.6.3.1)

Commented [A125]: Explain what happens within this area or delete.

Commented [A126]: Clarify if/what surface disturbance thresholds apply within agriculture corridor. YG suggests that the surface disturbance and linear density thresholds for the agricultural corridor should be determined included in the overall calculation for the LMU 10 thresholds (ISA 2 threshold level), ie. it should not be separated from the rest of LMU 10 with respect to cumulative effects thresholds.

Category	Sub-category	Management Intent	Description
		management direction beyond the designation.	

Commented [A116]: Both the characteristics of the area and the management directions are listed here. Need to make them separate and list the designation specific management directions in the latter section (as per suggested structure, between General and Special management directions). See Proposed Changes for Effective Document Design and Writing document for additional details.

Units Plan Concepts

3.3 GENERAL MANAGEMENT DIRECTIONS

General management directions are meant to guide land use decisions in the Planning Region. They are communicated in this Plan in the form of strategies and recommendations and are intended to be integrated into existing regulatory and/or assessment processes, such as YESAB (Yukon Environmental and Socio-economic Assessment Board) project assessments and other land application review processes. General management direction for the Plan is organized around a results-based management framework. General management directions apply across the planning region in all LMUs.

3.4 SPECIAL MANAGEMENT DIRECTIONS

Special management directions are conditions ~~to be applied to specific Landscape Management Units where development is allowed. While industrial land uses are allowed within ISAs, and within existing tenure in SMAs, it~~ is important that effects from development on priority values are avoided or minimized. This Plan aims to accomplish sustainable development through recommended special management directions. In general, the recommended special management directions fit into the following categories:

- Reduction in spatial and temporal overlap of industrial activities and ecological and cultural values. For example: timing windows for certain activities that account for changing climate conditions, special management for key species, no development areas;
- ~~Minimization Reduction~~ of adverse effects from ~~surfaceground~~ disturbance to key values. For example: management strategies, access management planning;
- ~~Coordinationed of~~ development that allows for best use of land first and reduction in land use conflicts;
- ~~Consideration for climate impacts that may pose risk to a planned activity, or limit the effectiveness of standard risk management practices; and~~
- Recommendations that support how future resource extraction projects are managed.

3.5 RESULTS BASED MANAGEMENT FRAMEWORK

A results-based management framework is a structured way to determine if the Plan goals and objectives are being met. It is a way to link general, higher-level objectives with more detailed, operational decisions. The results-based management framework and its various components are summarized in Figure 3-1 ~~on page 49~~ and guided the development of **Section 6 – Landscape Management Units**, beginning page 160.

Commented [A127]: Add disclaimer that these and the special management directions apply in addition to any other legislative and regulatory requirements.

If something is already required, no need to add a general management restating (i.e. remove any directions saying "if required by the Parties...").

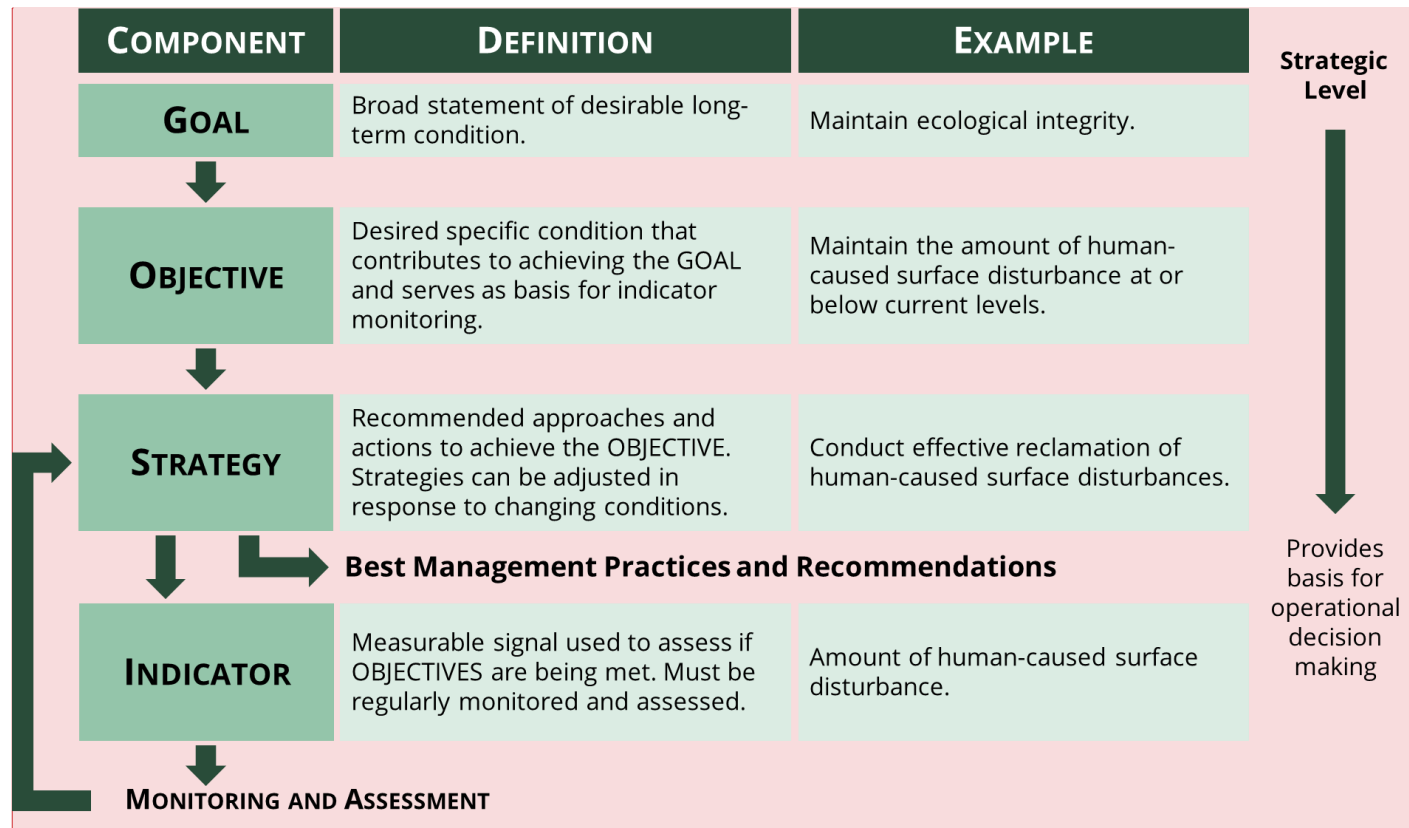
Commented [A128]: Special management directions also indicate where development is not allowed.

Commented [A129]: Important to minimize effects of all development not just industrial land use.

Commented [A130]: This hasn't been done in this document to date and the scale of the work required to accomplish this is too large to be accomplished at this stage of the process given the draft workplan and timelines that the Commission has provided to the Parties.

Commented [A131]: This is not providing any management direction. Maybe it meant to say "recommendations that, if followed, would reduce the negative impacts of resource extraction projects"?

Or, take it out as it is too specific (resource extraction projects.)



Commented [A132]: Plan should more closely align the objective, strategy and indicator examples. In this case, measuring the amount of surface disturbance seems to flow from the objective of maintaining surface disturbance at or below current levels but does not relate to the strategy of conducting effective reclamation. YG recognizes that there are likely to be multiple strategies and indicators but recommends that the examples provided follow the flow indicated in the diagram.

Figure 3-1+ Results-Based Management Framework

3.6 CUMULATIVE EFFECTS MANAGEMENT

This sub-section outlines the recommended cumulative effects framework for the Dawson ~~R~~region, how it is used in the Plan as well as additional components for the framework to be developed as part of implementing this Plan. A detailed explanation of the framework's components is found in **Section 4 – Cumulative Effects Framework** (page 58).

Section 4 also identifies additional values and indicators that should be considered and developed in the future as part of the cumulative effects framework for the Dawson ~~R~~region. ~~The only indicators ready for immediate implementation upon approval of this Recommended Plan are surface disturbance and linear feature density.~~ Other components and indicators will require further work during implementation.

3.6.1 Overview

The cumulative effect of new cabins being built in an area may have the effect of reducing places someone can hunt in an area.



One cabin may not have a very big impact on the allowable hunting area, but the accumulation of many cabins may significantly impact someone's ability to access hunting areas.



Figure 3-2 An ~~illustration~~example of how cumulative effects have an impact on the Region's values

~~(or thresholds)~~ of development. Lower development areas have lower ~~limits (or thresholds)~~ – see Figure 3-3 and Figure 3-4.

It is important for the Plan to consider cumulative effects because it provides a way of understanding how the ~~things that we value or care about~~ in the ~~R~~region are affected by ~~the human activities that happen in the Region~~ (see Figure 3-2).

The ~~short term requirement of this Plan is calls~~ for cumulative effects to be managed based upon surface disturbance and linear features ~~density indicators~~.

Most simply stated, the Plan has set thresholds that ~~are the acceptable level of development provide guidance to the Parties about levels of development (including i.e. surface disturbance and access linear feature density)~~ that can happen in the different units in the planning ~~R~~region. Higher development areas have higher ~~limits~~

Commented [A133]: See Proposed Changes for Effective Document Design and Writing Style document for suggested restructuring (combine some content with Section 4).

Commented [A134]: Lichen and fire history maps are also available if desired. These indicators are not tied to human activity in the same way surface and linear disturbance are.

Commented [A135]: Revise statements about thresholds as acceptable levels of development throughout the Plan. This wording does not reflect the differences in pre-cautionary, cautionary and critical thresholds outlined in Table 3-3.

Commented [A136]: Use one term (limits or thresholds) consistently throughout Plan not both.

Commented [A137]: These figures help illustrate what different levels of development can look like on the landscape but are unrelated to thresholds.

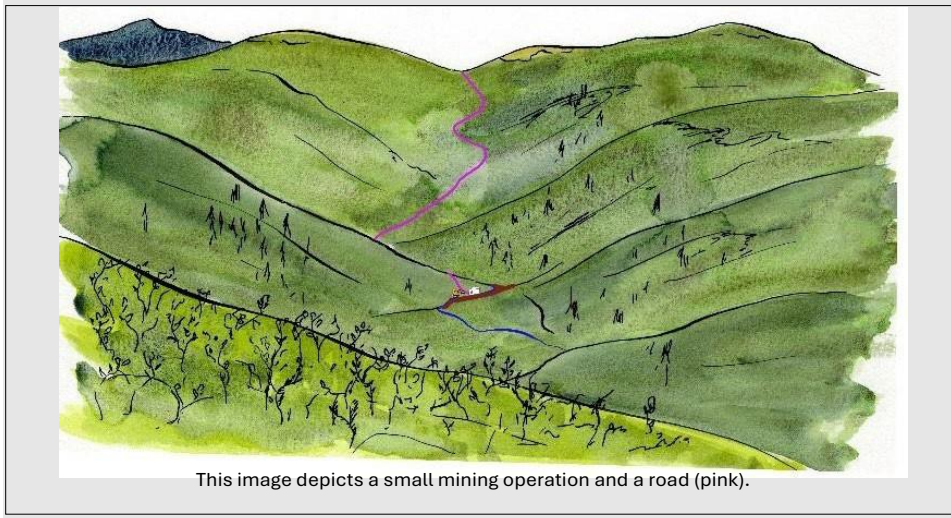


Figure 3-33 Illustration of an area with low development

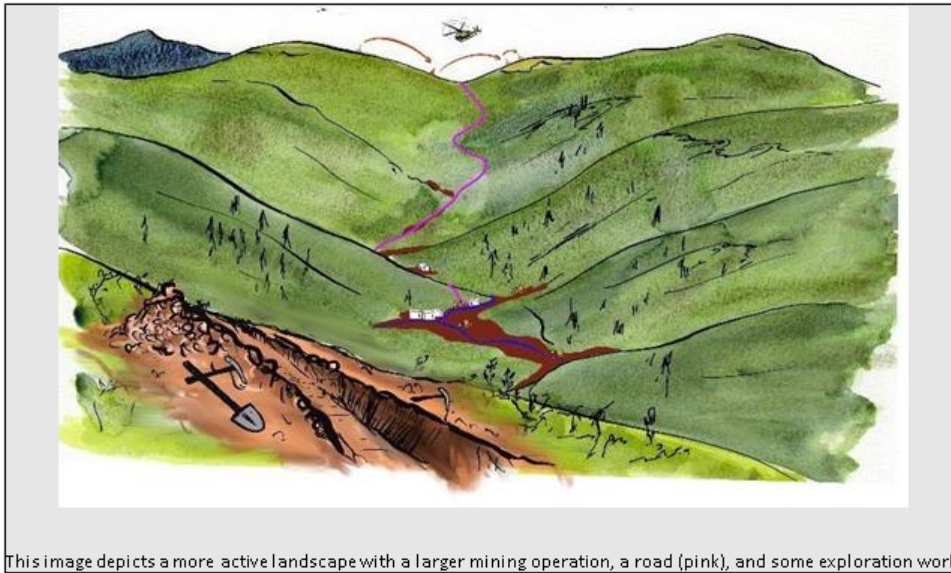


Figure 3-44 Illustration of an area with high development

This ~~threshold~~ approach allows ~~decision-makers to make~~ consistent decisions ~~s making~~ across the ~~R~~region based upon how each Land~~scape~~ Management Unit's ~~has been~~ designat~~ion~~ed.

When setting the threshold levels, the Commission considered the current level of development in each unit, the values in that unit, and the future development projected for that unit. Further details on this process and framework are set out on the following pages.

The cumulative effects framework will be adapted as new information, ideas, and approaches become available. Therefore, ongoing changes to the cumulative effects framework are anticipated and would not require an amendment to the Plan if they are in line with the values and intent as set out in this Plan.

~~Also, s~~Successful management under this framework will require cooperation of the Commission, Government of Yukon, Tr'ondëk Hwëch'in Government, YESAB, and industry operating in the ~~R~~region. Reporting and sharing of development activity is a key to the cumulative effects framework.

3.6.2 Background

The Dawson ~~R~~region is an active landscape that hosts many activities including mining, traditional economy, forestry, recreation, tourism, and other activities. Furthermore, it is an essential cultural landscape and ~~contains~~ important habitat ~~to for~~ fish and wildlife.

With all these interests on the landscape, it is necessary to monitor ~~the~~ cumulative effects ~~and to understand the~~ impacts of different activities on the ~~R~~region's values, ~~and their relationship to and with each other~~. Cumulative effects are ~~the net changes in environmental, societal, cultural and economic values that result from multiple interactions among human activities and natural processes to values in the environment, society and economy that result from a land use activity~~ in combination with other past, present, and future activities. ~~While one activity may have only a small direct effect, one activity collectively with other activities may result in a greater combined effect on values.~~

Cumulative effects management is one of the tools that will help the Regional Plan to achieve the objective of Sustainable Development as defined in the ~~FNTH~~FHA, and to facilitate connections to cumulative effects as set out in the *Yukon Environmental Socio-Economic Assessment Act* (YESAA). ~~In the Yukon, there is yet to be a broad Cumulative Effects Framework developed for the territory. As such, the framework presented in this Plan is intended to be implemented with the best available data at the time of approval, with the understanding that this framework is intended to be further developed and refined. The Parties will continue to work to make changes and incorporate additional indicators for values as guided by the recommendations in this section.~~

~~Managing cumulative effects is best accomplished by applying a suite of integrated and coordinated actions to land management, such as project assessment, mitigation, government policy, legislation, and planning.~~

Commented [A138]: Clarify how changes to Cumulative Effects Framework will occur if not through Plan amendment. As currently the only mechanism to adjust the cumulative effects framework is through plan.

Commented [A139]: These paragraphs do not fit well in this section. May be better suited to section 4.

Commented [A140]: Definition should be moved to beginning of this section to increase readability and clarify for plan users.

Commented [A141]: Removed as this is redundant

Commented [A142]: Removed as this statement is overly broad

3.6.3 How is the framework applied in the Plan?

3.6.3.1 Recommended Plan Indicators

The following section outlines the indicators that are ready for implementation upon approval of the Dawson Regional Plan. Currently, the focus is on ecological components only. Other components related to socio-cultural and socio-economic values will may be implemented later after further research and development by the Parties.

In this Recommended Plan, the recommended indicators are surface disturbance and linear feature density. ~~Surface disturbance and linear feature density~~ These have been chosen for many reasons including:

- Consistency with other Yukon ~~R~~regional plans.
- ~~They~~ Relation to many ~~R~~regional values and issues such as amount of habitat connectivity, habitat intactness, patch size, industry growth/decline, access, and hunting pressure.
- ~~Impacts to values can be monitored and linked to these indicators.~~
- They can be applied in the regulatory framework (e.g., land use permits); and
- ~~Current Recent~~ data (2019/2020) is available for the Dawson ~~R~~region.

The key driver of surface disturbance and linear features in the Dawson ~~P~~lanning ~~R~~region is mineral exploration and development activities.

3.6.3.1.1 Surface Disturbance

Surface disturbance ~~will be measured~~ is defined as the percentage of total area of a Landscape Management Unit that is physically disturbed by human activities. ~~The amount of surface disturbance refers to the area of land physically disturbed by human activities. This Surface disturbances includes activities such as tree cutting clearing, soil changes, hydrology changes, structures, and cleared sites (e.g., placer mine sites, gravel quarries, drill pads, helicopter pads and other structures or cleared sites). These disturbance footprints represent a decrease in habitat.~~

The following are not currently included in the surface disturbance ~~measurement~~ calculation:

- Areas of previous disturbance considered “reclaimed” or “recovered”.
- ~~Areas of wildfire disturbance~~ disturbed by natural events (e.g. disturbed by wildfire or permafrost thaw) and not subsequently by human activity.
- Undisturbed areas that are tenured or permitted. For example, if a placer claim exists but is not cleared.
- Disturbance within 300 meters either side of centreline of major highway corridors. (Klondike, Dempster and Top of the World) (300 meters either side of centreline); to reduce encroachment in areas of undisturbed habitat.
- Linear features, including Rroads, trails, and seismic lines (these are calculated under included in linear feature density calculations).

The above exclusions were considered when the threshold levels of this framework were set.

Surface Disturbance and Fire

Commented [A143]: Hard to directly tie habitat to surface disturbance as habitat is different for different species and could change from habitat for one species to another as a result of disturbance.

Commented [A144]: Redundant

Commented [A145]: Not current data, activity has occurred since satellite imagery used to create features was captured.

Commented [A146]: These are outcomes of disturbance rather than disturbance activities

Commented [A147]: Disturbances may change habitat (i.e. create habitat suitable for one species but not another) without decreasing it overall.

Commented [A148]: Some of these could be included in the future depending on outcomes of research as noted in recommendation 7 re. wildfire.

Commented [A149]: Only one of these terms should be used to describe when lands are excluded from SD calculations. Terms should not be used interchangeably.
YG would like to keep working on these definitions through the cumulative effects working group to identify which should be used.

Commented [A150]: Reworded to expand to other natural disturbances and clarify that if human disturbance occurs after a natural disturbance it should count towards the thresholds.

Commented [A151]: Clarify if this should be “major highway corridors” as defined elsewhere in the Plan (i.e around North Klondike, Dempster and Top of the World highways) or if it applies also to other roads (all public roads considered “highways” under the Highways Act.)

Commented [A152]: This does not reduce encroachment in areas of undisturbed habitat, it is an artifact of the mapping that was done and is tied to corridors dictated by Highways legislation

Commented [A153]: Important to specify this as all linear features should be excluded not just those listed in the bullet

It is important to note that the Plan is currently measuring surface disturbance in terms of human-caused disturbance (as defined above). ~~Surface disturbance measurements do not include natural disturbances like fire~~ Disturbance by other means (i.e., fire) ~~is not currently in the surface disturbance equation~~. Fire is certainly a disturbance on the landscape and can have enormous impacts on the values of the ~~R~~region. Fire is a naturally occurring phenomenon, but instances of fire may be exacerbated due to human activities causing changes to ecosystem functions on the landscape and the potential impact of climate change changing the ~~R~~region's fire regime. Therefore, this Plan makes recommendations to the Parties to undertake further research on incorporating fire disturbances into the framework, with particular attention to quantifying burn severity, as well as ecosystem recovery following a fire.

Surface Disturbance and Permafrost Thaw

Permafrost thaw in response to climate change is causing surface disturbance, impacting wetland behavior, vegetation, and carbon emissions and uptake from natural landscapes. Examples of disturbance include increased landslide and thaw-slump behavior, differential thaw settlement leading to changes in water bodies and wetland, and thermal erosion. Disturbance by permafrost thaw is not currently in the surface disturbance equation, but is causing changes to habitat for multiple values. Therefore, this Plan makes recommendations to the Parties to undertake further research on incorporating permafrost thaw-related disturbances into the framework.

Surface Disturbance and Reclamation

~~To provide an incentive for industry and government to take action to mitigate ecological impacts of disturbance,~~ Reclamation activities are ~~to be considered~~ part of the cumulative effects framework. In most areas, reclamation should focus on restoring the original ecological function of an area. ~~Reclamation activities would also benefit from considering climate projections to ensure measures are effective under future climate conditions.~~ It is understood that some ecological systems may not be able to ~~be restored~~ to their original function. However, best efforts should be made for a value-based approach that focuses on the ecological function. ~~Once an area has been reclaimed, the calculation for disturbance can be amended to remove this disturbance; it can be excluded from the surface disturbance quantum.~~

Values-based reclamation focuses on reclaiming an area to reflect an identified value. For example, ~~restoration reclamation~~ in a high value caribou area could aim to restore lichen rather than species of willow that might be more suitable for moose habitat. A recommendation for this is found in **Section 4.5.1 – Cumulative Effects Framework: Recommendations**, page 68.

3.6.3.1.2 Linear Feature Density

~~The amount of L~~linear feature density is the ~~total~~ length of ~~all human-created linear features (i.e.g., roads, seismic lines, trails) in a Land~~scape Management Unit ~~divided by the total area of the Landscape Management Unit~~. This is measured as kilometers of ~~access-linear features~~ per square kilometers of area.

Commented [A154]: Added as permafrost thaw is another natural event that may contribute to disturbance on the landscape. Flooding, landslides and other natural events could also cause disturbance and should also be excluded from threshold calculations.

Commented [A155]: Thresholds do not incentivize reclamation but it should still be considered as part of the calculation.

Commented [A156]: The Cumulative Effects Working Group would like to continue to work with the Commission to define this term and the stage at which land may be excluded from surface disturbance calculations.

Commented [A157]: Changed for clarity

Commented [A158]: Clarify if there is a width requirement for linear features, Yukon Government suggests that this should be defined as above 1.5m wide, to match the satellite data conditions

Commented [A159]: Linear features do not directly measure access and the terms should not be used interchangeably. There is no connectivity information in the linear feature data. Linear feature density can indicate increased likelihood of accessibility, but there is not a direct link. The disturbance remains on the landscape and continues to effect local habitats, even if access is restricted.

How linear feature density is measured in this Plan can be understood as follows:

100 km of roads, trails, and cutlines in an LMU with an area of **500 km²** has a linear feature density of **0.2 km/ km²**.

Linear feature density is important since it can be an ~~indicator measure~~ of fragmentation and accessibility. ~~As linear features increase, access is also likely to increase.~~ In turn, greater accessibility means added opportunities for wildlife harvesting, increased predation rates, and a change in how people and wildlife use the land.

~~Some important points of consideration for linear feature density:~~

This Plan weighs all linear features equally. However, it is understood that features actively used by humans, such as roads, have a bigger impact on ecological values than ~~inactive features such as for example~~ seismic lines. Not enough data or capacity is currently available to weigh the linear features by intensity of use as part of the cumulative effects framework, therefore the measure is simply based on whether a linear feature exists, not its level of use.

~~Areas with higher linear feature density may provide greater access potentially exposing people and values to climate change impacts. Areas with higher linear feature density may benefit from more detailed consideration of climate change impacts on activities and values.~~

- ~~• The impact of linear features extends beyond the feature itself; caribou respond to linear features of up to 2 kilometers (Polfus et al. 2011).~~

Linear Features ~~Density~~ and Reclamation

~~To provide incentive for industry and government to take action to mitigate ecological impacts of access, r~~Reclamation activities are ~~to be considered~~ part of the cumulative effects framework. For roads and trails, reclamation should focus on ~~restoring the original ecological function of the area, restricting access to an area and decommissioning.~~ It is understood that access may support socio-cultural and socio-economic values in the short term, but from an ecological perspective, mitigations are required.

A recommendation to the Parties regarding reclamation and restoration is found in **Section 4.5.1 – Cumulative Effects Framework: Recommendations** on page 68.

3.6.3.2 Applying Thresholds

The recommended surface disturbance and linear feature density thresholds provide guidance on the acceptable limits of human-caused disturbance in each LMU.

The four tiers of the Integrated Stewardship Areas (ISA 1 to 4) are differentiated by their cumulative effects thresholds and their management intent, as shown in Table 3-2. Thresholds are also applied to the Special Management Areas with the understanding that there may already be some level of activity in these areas.

~~The Commission considered the tolerance for further development and then applied these numbers to disturbance thresholds. Disturbance in areas of high valued habitat,~~

Commented [A160]: Not all linear features provide additional access

Commented [A161]: This may have impacted how density thresholds were set but does not change how they are tracked.

Commented [A162]: Density is not reclaimed, linear features are

Commented [A163]: This wasn't the same as "values-based restoration" and was inconsistent with the intent for SD reclamation above. Defining reclamation of linear features as this, then removing it from the disturbance database/tracking (if done many, many times) would make the land appear on paper as though disturbance is minimized, but functionally it will still be disturbed. The Parties need to continue to work together on this to provide guidance to industry on what reclamation and values-based restoration could look like in different ecosystems. The Cumulative Effects Working Group would be a logical venue for this work to take place.

Dawson Recommended Land Use Plan Landscape Management Units Plan Concepts

such as caribou, has a bigger ecological impact. Certain habitats in the Region are of more critical importance than others. For example, ridgetops have been described as very important for the summer and fall migrations of the Fortymile Caribou Herd. This type of information has been considered when establishing threshold levels.

All thresholds in the Plan allow for some additional surface disturbance and linear feature density to occur. In some areas the additional development is higher than other areas. The thresholds for some LMUs allow for further development than other LMUs depending upon the values specified for the LMU in the unit and the tolerance for development as described above. Table 3-3 outlines the intent and descriptions of the three thresholds tiers.

Table 3-2 Dawson Region Thresholds

Designation	Management Intent	Precautionary		Cautionary		Critical	
		Surface (%)	Linear (km/km ²)	Surface (%)	Linear (km/km ²)	Surface (%)	Linear (km/km ²)
ISA 1	Lowest Development	0.0625	0.0625	0.1875	0.1875	0.25	0.25
ISA 2	Low Development	0.25	0.125	0.75	0.375	1.0	0.5
ISA 3	Moderate Development	0.5	0.25	1.5	0.75	2.05	1.0
ISA 4	Highest Development	1.0	0.5	3	1.5	45.0	2.0

Table 3-3 Threshold Tiers in the Dawson Region

Precautionary	The precautionary level represents a point at which it is important to improve information collection and understanding of cumulative effects in an area. Above this level, activity can continue at the same pace, as long as measures are being taken to improve information and awareness.
Cautionary	When the cautionary level is reached, it means that disturbance indicators are close to reaching undesirable levels. Above this level, undertake actions that slow the pace and scale of impacts. Provides an early warning signal. Allows time for proactive management to avert or limit potential impacts.
Critical	Represents the point at which the indicators have reached unacceptable levels. Projects that would surpass the critical threshold for that LMU

Commented [A164]: Clarify if ecological values were prioritized above other values (socio-economic) when determining thresholds or if some areas were prioritized for development despite ecological values.

Commented [A165]: YG recommends returning to the critical surface disturbance thresholds levels from the Draft Plan. YG is not requesting changes to the linear feature density thresholds or surface disturbance thresholds at the precautionary or cautionary levels.

Commented [A166]: In the Draft Plan, Government of Yukon recommended that this precautionary level should be removed, as the Draft Plan recommendation for information to be collected was associated with surface disturbance, which we have since updated. We don't think anything more needs to be collected at this stage, and would continue to recommend that this level of threshold not be used. Given the amount of work, resources and capacity associated with this plan, Government of Yukon does not recommend any more information be collected at the precautionary level. Tying values to disturbance thresholds (and cumulative effects) would be challenging at this level of development, but this should be captured at later levels (and in table 3-3 it's currently not). We recommend moving this point to the cautionary threshold

Commented [A167]: Clarify that these actions would be the responsibility of the Parties and YESAB through recommendations and regulatory decisions.

Commented [A168]: Assume that this was meant.

	will be found not to conform during the Plan conformity evaluation process ~~for further information on conformity see~~ Section 7.5 Plan Conformity and Assessment. Before this level is reached, the Parties should take action that will limit further disturbance and <del>linear features</del>~~access~~. This may include ceasing activities that create additional surface ~~disturbance~~ or linear features ~~density disturbance~~.

Commented [A169]: Clarify in the text that if either linear feature density or surface disturbance critical thresholds are reached that the project should be found to not conform

Commented [A170]: An explanation is needed for non-conformity, reference to section 7.5 added.

Commented [A171]: Access is not synonymous with linear features

4 CUMULATIVE EFFECTS FRAMEWORK

4.1 INTRODUCTION

The purpose of a cumulative effects framework is to guide management decisions in conjunction with the management intent, special management directions, and general management directions set out in the Plan. Just like the Plan, this framework is also based on an adaptive approach to the management, monitoring, and assessment of priority ecological, economic, and cultural values and ~~to attempt to~~ provide balance to all three. The framework seeks to connect values-based indicators to management objectives and adaptive management triggers to achieve the goals of the Plan. ~~Through adaptive management, t~~he health of the values should be assessed and monitored to inform decisions in implementation ~~through adaptive management~~.

~~Currently there is no territory-wide cumulative effects framework in the Yukon. There are however excellent examples of frameworks in other jurisdictions that can be considered for this Plan. One example that was considered is the Marine Plan Partnership for the North Pacific Coast (MaPP) framework (MaPP, 2020):~~

The diagram below ~~conceptualizes~~ represents the cumulative effects framework recommended for the Dawson ~~R~~egion. It will fall to the Parties to implement this framework based upon ~~the values-based indicators including~~ surface disturbance and linear feature density, ~~wildfire, lichen cover and caribou demographic rates. indicators as well as work~~ It will also fall to the Parties to further develop other components of the framework as illustrated in Figure 4-1 on page 59.

Based upon this framework and the results, decision-makers can adapt land management decisions. Therefore, the framework is critical to the adaptive management of the Region.

Commented [A172]: There is some confusion regarding "cumulative effects indicators or thresholds" where it should be surface disturbance/linear feature density thresholds. This should be corrected throughout the Plan.

Commented [A173]: See Proposed Changes for Effective Document Design and Writing Style document for proposed structural changes. This section should be combined with s.3.6.

Commented [A174]: Update diagram to include roles, responsibilities and outcomes.

More information regarding how the concepts in this figure relate to management, monitoring and the role that indicators and thresholds have within that context would be helpful with implementing this framework

Commented [A175]: Add reporting interval for indicators.

Goal is to provide a more holistic view of values with respect to cumulative effects. Currently Plan has a "surface disturbance framework" that doesn't clearly link to cumulative effects. By expanding the indicators identified in the Plan and the **disturbance report**, we'll provide range-based indicators to inform decision making. We already monitor these indicators, so it makes sense to include them.

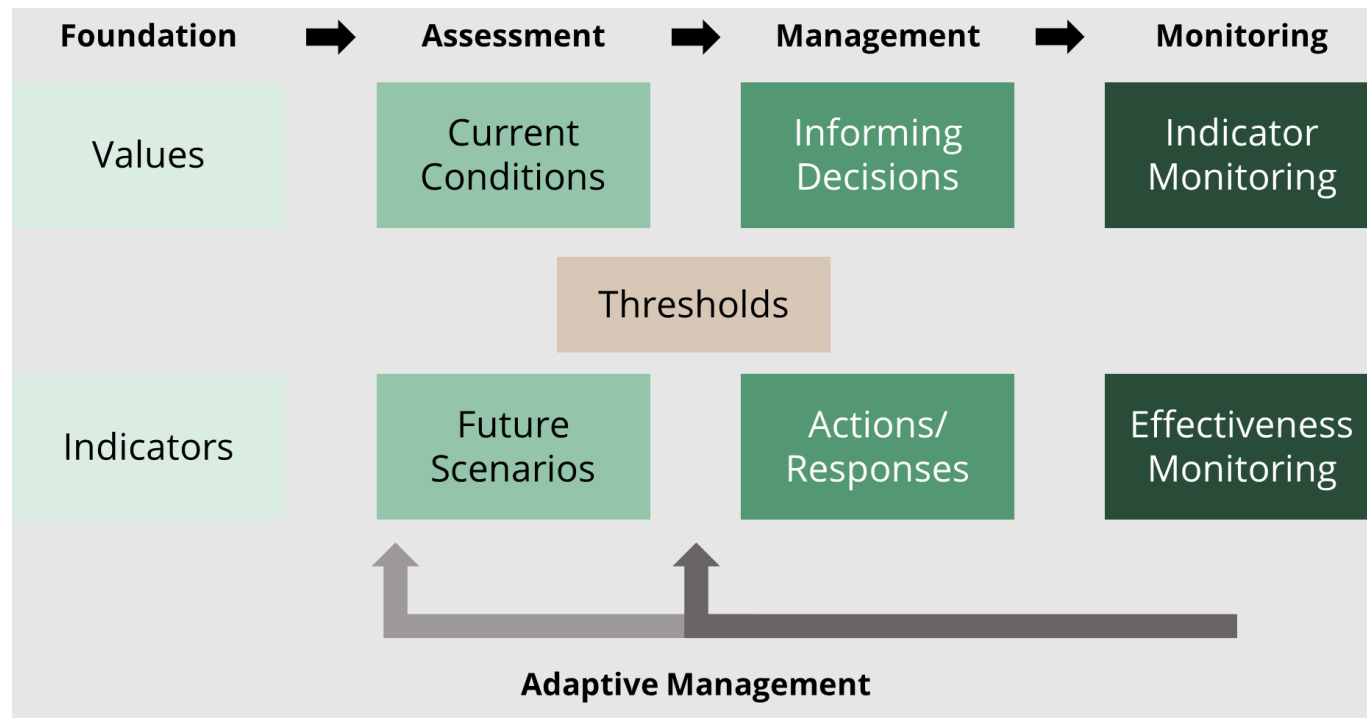


Figure 4-1 Dawson Region Cumulative Effects Framework

4.2 CUMULATIVE EFFECTS FRAMEWORK: FOUNDATION

4.2.1 Values

The values for the **R**region are listed in Sections 4 and 5 of this Plan as are the objectives for the future of the values. The Commission has highlighted these as important to the people who live, work, and visit the **R**region. This framework focuses on some priority values that have been identified through the planning process thus far. It is important to note that the framework needs additional work undertaken to identify further socio-cultural and socio-economic priority values and make **additional** linkages to values-based indicators that will be discussed further and identified in the Recommendations to the Parties.

Figure 4-2 shows the values identified by the Commission for consideration in the cumulative effects framework. This is not an exhaustive list, but rather a starting point for the framework and the goals associated with these values can be found in **Section 1.3.2 – Plan Goals**:

- **Ecological:** Caribou, moose, wetlands, water
- **Socio-cultural:** Harvest, traditional economy, recreation
- **Socio-economic:** Wellbeing, employment, housing

There are naturally connections between the values listed in the Plan. For example, the socio-economic value that is associated with industrial activities may influence the presence of caribou and in turn may affect both First Nations harvest rights and non-First Nations harvest opportunities.

4.2.2 Indicators

An indicator is a measurable signal that can be used to **assess and** track the condition of ecological, socio-cultural, or socio-economic values (for example habitat quality, harvest **sustainability**, or unemployment rate). **Where an indicator is tracked over time, it can be used to assess the condition of the value and** the impacts that we are having on the **R**region's values (see Figure 4-3)

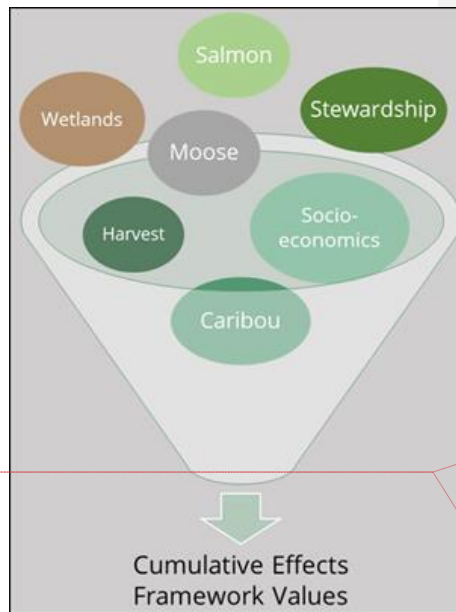


Figure 4-2 Values identified for Dawson Region Cumulative Effects Framework

Commented [A176]: Picture is unnecessary and confusing - are the top circles the values or do they combine to form new (unlisted) values for the framework? Include values in text instead.

Commented [A177]: socio-economics seems to be a different scale than the other values listed in the table. Suggest breaking this down instead into some of the values articulated below for consistency such as wellbeing, employment or housing

Commented [A178]: A second example that does not rely on the environment versus economy dichotomy would be useful. For example, there are numerous feedback loops between socio-economic and socio-cultural values.

Commented [A179]: Harvest success may not be an appropriate indicator as it can be an effect of the level of access – it does not speak to whether the harvest level is sustainable. Harvest success can remain high even when a population is being decimated.

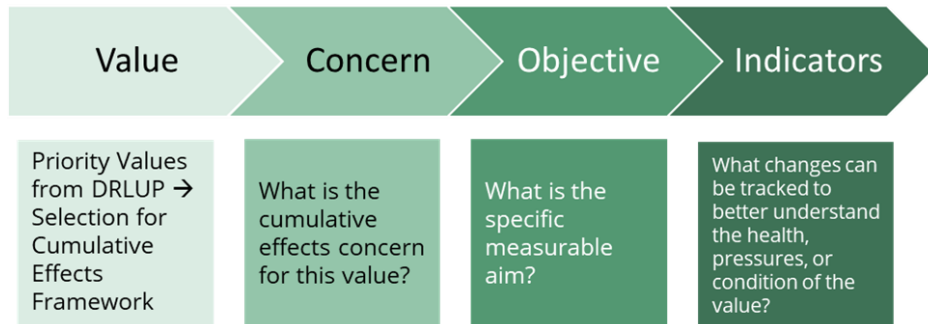


Figure 4-3 How Values are Linked to Indicators

There are many indicators that can be used, but their use is limited by restraints such as data availability. In general, indicators should be:

- Practical** Is the indicator feasible to monitor (i.e., capacity and resources)? Is there sufficient data? Is it easy to understand?
- Measurable** Can useful data be ~~collected~~ generated to inform or predict the potential impacts on a value?
- Accurate** Does the indicator accurately reflect changes in the value?
- Sensitive** How sensitive is the indicator to development or mitigation?
- Relevant** Is the indicator related to the applicable impact or value?

The values chosen must be connected to an objective statement (see **Section 5 – General Management Directions**, page 70) to provide guidance on the desired future state of the value. For example, one of the Plan’s caribou objectives is:

“Healthy and resilient caribou herd populations that grow towards historic levels.”

The following is a sampling of potential indicators that ~~may be~~ ~~are being~~ considered related to some of the priority values:

Ecological indicators for caribou

- Surface disturbance and linear feature density
- Persistent use of summer/fall migration pathways
- Quantity of effective summer/winter habitat
- Wildfire disturbance
- Percent of lichen cover
- ~~Distribution of caribou~~
- ~~Permafrost thaw and ground surface change due to differential thaw settlement~~
- ~~Prolonged extreme heat or cold~~

Effects Framework

- ~~Deep, hard and/or iced snowpack that restricts forage.~~

Socio-cultural indicators for harvest

- Ability to meet subsistence harvest needs
- Effort (time, distance traveled, cost ~~(monetary)~~, etc.)
- Demographic trends in caribou and moose populations
- Total amount of ~~area available for hunting~~ ~~ingable area~~
- Traffic patterns in important harvest areas

Socio-economic indicators for wellbeing

- Community vitality (crime severity index, sense of belonging)
- Democratic engagement
- Education (graduation rates)
- Health (life expectancy, overall and mental health ratings)
- Leisure (physical activity levels)
- Living standards (employment, income)
- Overall life satisfaction

Economic indicators for quartz and placer mining

- Gold production (placer and quartz independently)
- Quartz exploration (expenditures, annual reporting)
- ~~Surface disturbance and linear feature density~~

Work on indicators is ongoing regarding socio-economic indicators and will focus on the ~~R~~ regional economic impact of four key sectors: mining, tourism, forestry, and agriculture.

- **Economic input** could be measured using indicators such as investment, employment, and income.
- **Economic output** would use similar data and be informed by multipliers.

~~Indicators used to infer Cumulative effects~~ ~~indicators~~ ideally should be clearly linked to values, and as such are referred to as values-based indicators. Recommendations for ~~cumulative effects~~ ~~values-based~~ indicators are found in **Section 4.5.1 – Cumulative Effects Framework: Recommendations** on page 68.

4.2.3 Thresholds

Thresholds are set for the surface disturbance and linear feature density (see Table 3-3 on page 57 ~~or Appendix 3: Cumulative Effects Framework~~ ~~Surface Disturbance and Linear Feature Density Thresholds~~).

These indicate the point at which management actions should change or new actions be applied; they are essentially a call to action.

~~The~~ thresholds provide guidance on the acceptable limits of human-caused disturbance in each LMU. In Integrated Stewardship Areas, the Plan uses thresholds to balance potential risks to ecological and cultural resources with economic development. Different thresholds are identified for each class of Integrated Stewardship Area (ISA). These thresholds are further divided into precautionary,

Commented [A180]: This is not a valid or specifically relevant indicator for mineral activity, disturbances are caused by more than mineral development.

Commented [A181]: Appendix 3 is unnecessary, repeats information found in Table 3-2 and 3-3 with no new information.

~~Effects Framework~~

cautionary, and critical levels. More information on the thresholds and their associated responses is described throughout this section.

Thresholds are intended to provide clear, measurable, and objective direction for the assessment and permitting regime. The thresholds are set at levels that have considered:

- The local and traditional knowledge held by the Commission.
- A broad array of public and plan stakeholder input.
- Academic research on ecological value responses of caribou, moose, and grizzly bears (in relation to linear feature density).
- The level of socially acceptable change.

Thresholds ~~awere~~ also ~~hi~~nformed by growth scenarios of gold production ~~and mineral exploration~~ over the next 20 years.

As this framework is rooted in adaptive management, it is expected that ~~in~~-during implementation these thresholds may change as a result of ongoing management and monitoring, ~~and as new indicators are developed~~.

4.2.4 ~~Recovery from Extreme Events~~

~~With climate change, extreme conditions are projected to become more frequent and severe. A single extreme summer heat event, a high snow year, drought, or major summer storm can have lasting impacts that may require a temporary adjustment of activities to allow key species to recover, or existing infrastructure to become stable (if, for example, groundwater levels need to fall).~~

~~An adaptive management framework informed by targeted monitoring can support decision-making related to thresholds.~~

4.3 CUMULATIVE EFFECTS FRAMEWORK: ASSESSMENT

4.3.1 Current Conditions

When assessing the current conditions as part of the ~~cumulative effects~~CE framework, the current condition is not simply a moment in time. Assessment considers the past, current, and foreseeable activities on the landscape.

The Government of Yukon has provided surface disturbance and ~~linear feature density~~ mapping that was current as of 2020, and it is this information that informed the thresholds described in this Plan. Surface disturbance and linear feature density were ~~measured-calculated~~ using ~~mapped features from~~ 1.5-metre ~~resolution~~ SPOT satellite imagery ~~collected in 2019 and 2020~~.

~~The current condition of these i~~Indicators can be ~~tracked~~updated using project reporting, field verification, and updated imagery. ~~Ongoing disturbance can be mapped using Government of Yukon's disturbance mapping guidelines. At present the surface disturbance and linear feature density data does not include near-future or foreseeable disturbance. This information can be modelled by tracking anticipated disturbance related to approved permits in the Region.~~

Commented [A182]: Clarify process for amending thresholds, add to Section 7 Plan Implementation, reference here. Suggest that any threshold amendments would require a full plan review given their implications for so much of the plan content.

Commented [A183]: This should be considered as part of the cumulative effects framework as well as for adaptive management generally.

Commented [A184]: Maps show features which can be used to calculate density

Commented [A185]: 3.6.3.1.1 above states that undisturbed areas that are tenured or permitted are not included in disturbance calculations. Clarify at what point disturbances will be counted: when they are permitted or when they occur? It would be more accurate to count disturbances when they occur, but currently there is no infrastructure and systems in place to do so on a frequent basis. The alternative of calculating based on permits comes with it's own set of complications as proponents frequently apply for more disturbance than they actually create.

~~Effects Framework~~

~~Current disturbance mapping can be found on the Geomatics Yukon website (<https://yukon.ca/en/geoyukon>).~~

4.3.2 Future Scenarios

During the planning process, future ~~surface~~ disturbance was modeled using ~~mineral development~~ growth scenarios ~~of placer mining, mineral exploration, and quartz mining~~. This modelling helped project what the ~~R~~region ~~w~~ould look like in low- and high- growth development scenarios based on ~~20 years of~~ gold production ~~in the year 2040~~ ~~from placer mining, quartz mineral exploration and quartz mining~~. The model did not predict the response of ecological values (e.g., caribou, moose) to ~~surface changes in~~ disturbance, nor did the model consider external factors such as invasive species and climate change. ~~Further modeling by the Parties is recommended to strengthen the relationship between the values and these indicators in the Dawson Region.~~

More information on future scenarios can be found in the report entitled: “*Exploring the Cumulative Effects of Future Land Use in the Dawson Planning Region*” (DRPC, 2022).

4.4 CUMULATIVE EFFECTS FRAMEWORK: MANAGEMENT

4.4.1 Informing Decisions

The guidance set out in the cumulative effects framework is intended to help to inform recommendations through the YESAA process and choices of decision bodies through the development assessment process. When determining whether a project is in conformity with the Plan, a recommendation or decision body should ~~assess whether the project meets conformity alongside all other projects within an LMU. It should also~~ apply the cumulative effects framework (Figure 4.1), ~~including the assessment of current and future conditions~~, in conjunction with the LMU management intent, special management directions, and general management directions.

Many activities in the Dawson ~~R~~region are not required to go through the YESAA process, and therefore other decision-makers must also be aware of the Plan and the status of thresholds to inform their decisions. This applies to Government of Yukon, First Nations governments, and other regulatory bodies such as the Department of Fisheries and Oceans (Government of Canada).

The expectations are set out in **Section 4.5 – Cumulative Effects Framework: Monitoring** (page 67) for the appropriate mitigations at the precautionary, cautionary, and critical threshold levels.

4.4.2 Responses

~~In some cases, decisions about actions to be undertaken may need to be initiated by the Parties, not through any approval process, but The Parties may need to make decisions about initiating adaptive management action, such as in a~~ response to changing conditions or new information. This is an important part of the adaptive approach undertaken through this framework.

Commented [A186]: Include in recommendations section rather than in-text to ensure it isn't lost.

Commented [A187]: Unclear what approval process previous sentence spoke to. In general, the Parties will need to take actions but they are constrained by legislation as to what those actions can be and would often apply going forward rather than retroactively to existing development. This section should tie to the adaptive management section and be discussed as part of Plan implementation.

Effects Framework

This Plan provides examples of mitigations or management practices throughout that are intended to limit the negative impacts of a project. ~~These responses~~ Adaptive management should work in tandem with the indicators set out in a cumulative effects framework on a project level basis to minimize negative effects on a value.

As stated above, values are often linked to each other and mitigations to improve the health of one value may negatively impact another value (MaPP, 2020). This point emphasizes the importance of a cumulative effects framework to take on a holistic approach considering the implications of project approvals on the ecological, socio-cultural, and socio-economic values in the Rregion.

The decision of which action or intervention is appropriate in response to cumulative effects concerns will depend entirely on the priority value affected, the ecological composition of the LMU, the activities on the land, and the best available data and management directions for the LMU. ~~The Plan includes examples of management actions and interventions that can be applied at the discretion of the Parties — see Figure 4-4 on page 66. This list was developed through the work of the Commission at a series of workshops, public engagement, and stakeholder and Party input. It is not an exhaustive list of options.~~

Improve the understanding of impacts

- Increase monitoring (community monitoring, wildlife guardians)
- ~~Re-inventory~~Update disturbance mapping
- Improve wildlife and habitat inventory (e.g., map habitat suitability)
- Research into cumulative effects (e.g., zone of influence, combined impacts of multiple projects)
- Natural factor assessment (fire, precipitation, predators, etc.)
- ~~Working group (RRC to lead)~~
- Review Traditional Knowledge
- Education, communication, and training
- Improve reclamation guidance
- Projection of future climate conditions and interpretation of the impacts of these changes on values.

Slow the pace and scale of impacts

- Increased mitigations
- Harvest Management planning and enforcement
- Reduce ~~licensed~~ hunting as required
- Increase hunting enforcement
- Access control
- Road deactivation
- ~~Habitat Undertake~~ reclamation (e.g., tree planting, contouring, habitat enhancement)
- Active forest fire response to protect the habitat of rare and at-risk species
- Focused protection of key habitats (except where this action would affect capacity from efforts to protect human life)
- ~~Incentives for applying technology to development activities~~

Commented [A188]: Remove, include in general/special management directions or recommendations to the Parties where appropriate. Table should also be moved but was left here to allow additional proposed changes to be tracked.

Commented [A189]: Plan cannot direct RRC in this manner as the RRC is not a plan party. Delete as this is out of scope.

Commented [A190]: Habitat enhancement is separate from reclamation and may be more appropriate as a desired outcome rather than as a reclamation action.

Commented [A191]: Action doesn't match heading

Effects Framework

- Coordination of land use between users
- Increased inspections (Client Monitoring and Inspections, Government of Yukon)
- First Nation monitoring/stewardship/guardians
- Increase industry security deposits
- Off-setting and credits
- **Incentives for reclamation and reducing impacts**

Limit further disturbance and access:

- Moratorium on mineral staking
- Freeze on access and land use permits
- **Habitat Complete** reclamation (including legacy features)
- Shut down operations, unless operating in previously disturbed areas
- Regional plan variance or amendment (based on new values-based assessments)

Commented [A192]: Action doesn't match heading**Commented [A193]:** Habitat enhancement is separate from reclamation and may be more appropriate as a desired outcome rather than as a reclamation action.

Figure 4-4 Examples of responses that could be undertaken management actions and interventions that could be applied at the discretion of the Parties

4.5 CUMULATIVE EFFECTS FRAMEWORK: MONITORING

Monitoring of the values and indicators is an essential element of the cumulative effects framework. Ongoing monitoring and check-ins must occur to ensure that the desired objective for the values is being achieved, and if they are not, this should trigger a change in the management regime or application of new management practices to achieve the goals and objectives of the Plan.

This monitoring regime includes:

- Ongoing surface disturbance and linear feature **density** tracking and mapping
- **Annual Regional planning commission report**
- Year status report

Due to the nature of some of the values of this framework there will be an inherent lag time anticipated in the response of the values to any management actions applied to them. Examples of this temporal lag are:

- Years or decades for a **wildlife population to decline or recover from respond to** disturbance or policy change (i.e., management plan, new access routes, etc.)
- Future disturbance associated with approved **industrial development** permits (which can be **active for** 10 years).
- The time that it takes for **ecosystem function to be restored in a disturbed area to recover (i.e., new vegetation growth). Recovery Restoration** of ecosystem function can take months to **yearsdecades**. For example, lichen takes significantly longer to grow than willow trees.

Commented [A194]: Clarify difference between these two reports.

3-5 year report may be more appropriate given capacity and resource constraints.

Commented [A195]: Word missing**Commented [A196]:** Simplified**Commented [A197]:** Changed as this is more consistent with how "restoration" is used in the Plan than "recover(y)".**4.5.1 Cumulative Effects Framework: Recommendations****Recommendations to the Parties****Indicator Recommendations**

Effects Framework

1. Policy Recommendation	Parties should ~~continue to~~ develop values-based indicators for SOCIO-CULTURAL values listed in the Plan. ~~The Commission have identified the following values-based indicators that could be included as part of a values-based cumulative effects framework:~~ ~~Harvest effort~~ ~~Ability to meet needs~~ ~~Changes to huntable area~~ ~~Traffic patterns in harvest areas;~~ ~~Other~~ Values-based indicators should be jointly identified by the Parties as new information and data become available. Indicators based on socio-cultural values should incorporate traditional knowledge and on-the-land experience. The Parties should look to other initiatives in Canada where indicators of this nature have been developed, ~~including for example the Metlakatla Cumulative Effects Management Program in British Columbia.~~
2. Policy Recommendation	Parties should ~~continue to~~ develop values-based indicators for SOCIO-ECONOMIC values listed in the Plan. ~~The Commission have identified the following values-based indicators that could be included as part of a values based cumulative effects framework:~~ ~~Housing~~ ~~Jobs~~ ~~Wellbeing indicators;~~ ~~Other~~ Values-based indicators should be jointly identified by the Parties as new information and data become available.
3. Policy Recommendation	~~Government of Yukon to~~ ~~The Parties should~~ develop policies along with a process and methodology to monitor and update all additional ~~selected~~ values-based indicators ~~proposed~~.
4. Policy Recommendation	Reclamation, Recovery and Restoration The Parties must define what is meant by reclamation, ~~recovery~~ and restoration and how these concepts relate to the Dawson Regional Plan's cumulative effects framework. ~~Restoration should be values-based and focus on returning the disturbed area as close as possible to its original ecological function, recognizing that this may be harder for some ecosystem types (for example, restoring a bog to a bog);~~
Surface and Linear Disturbance Recommendations	
5. Research Recommendation	To improve surface and linear disturbance tracking, other sources of imagery should be considered, based on cost, ease of use, resolution, update frequency and suitability.
6. Research Recommendation	Undertake and evaluate values-based indicator research, with a priority placed on the impacts of human-caused disturbance ~~and disturbance from wildfire and permafrost thaw~~ on caribou, moose, salmon, and wetlands ~~within the context of the cumulative effects framework. Based on this research, Parties may recommend changes to indicators and the cumulative effects framework.~~

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Commented [A198]: Parties can consider, does not need to be included in recommendation.

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Commented [A199]: Parties can consider, does not need to be included in recommendation.

Commented [A200]: Changed to reflect intent to work with TH; limited to work on selected rather than proposed indicators.

Commented [A201]: The Parties are working together through the cumulative effects working group to address this prior to the completion of the final Plan. No definitions have been agreed to yet, goal for "restoration" may change through these discussions.

Commented [A202]: Move to section 3.6.3.2 as these relate to surface disturbance and linear thresholds in the Plan

Commented [A203]: Incorporates multiple recommendations into single, comprehensive recommendation.

Effects Framework

7. Research Recommendation	~~Research wildfire disturbance and permafrost thaw as an indicators within the context of the cumulative effects framework.~~
Research Recommendation	Research ways to incorporate the impacts of projected climate change on values and land use patterns into the cumulative effects framework.
8. Recommended Action	~~Based on the above research, the Parties should assess and revise indicator thresholds to meet plan objectives.~~
9. Recommended Action	~~Based on the above research, the Parties should assess whether to revise the cumulative effects framework.~~
10. Recommended Action	Government of Yukon develops standard estimates of surface disturbance and linear feature density to be applied for different types of Class 1 and 2 activities so that ~~cumulative effects~~ surface disturbance and linear feature density may be estimated without being onerous to proponents of smaller projects.
Monitoring and Management Recommendations	
11. Policy Recommendation	~~The Parties should work with DRPG, YLUPC and YESAB to ensure conformity checks include cumulative effects surface disturbance and linear feature density threshold assessment. This work should include clarifying information requirements in project proposal for determining conformity. A worksheet or separate application should be considered.~~
12. Recommended Action	Short term Government of Yukon produces an annual summary of surface disturbance and linear feature density for each LMU. Medium term Government of Yukon develops an indicator tracking system that is to be publicly accessible for use in conformity checks and in proposal development. Long term Government of Yukon develops an online platform that would allow proponents to have information that supports their project design. This would make assessment and permitting processes more efficient. Furthermore, this aligns with the Commission's desire to have proponents working in the Dawson planning Region to take on a greater role as stewards of the land.

Commented [A204]: Incorporated into amended recommendation 6.

Commented [A205]: Incorporated into amended recommendation 6.

Commented [A206]: Incorporated into amended recommendation 6.

Commented [A207]: Other pieces contribute to cumulative effects, only estimating disturbance.

Commented [A208]: Remove, redundant as conformity must already consider this if its part of the Plan

Commented [A209]: Impractical in the short-term as a tracking system is not yet in place. The Government of Yukon is proposing an approach to track surface disturbance every five years with a focus on areas with greater intensity of development

Commented [A210]: Don't need justification in recommendation.

5 GENERAL MANAGEMENT DIRECTIONS

5.1 OVERVIEW

This section provides general management direction for the Dawson Planning Region. General management direction identifies management practices, recommendations, strategies, and conditions of development that will assist land managers and assessors to meet Plan goals. The content in this section is informed by the planning concepts outlined in **Section 3 – Plan Concepts** (page 41), the Commission’s direction, expert input (stakeholders, technical working groups, etc.), public input, YESAB reviews, other land and resources plans, and external research.

These recommendations and strategies are designed to achieve follow the Plan’s core principles as outlined in **Section 1.9 – Guiding Principles** (page 22), including stewardship and sustainable development. This section is organized around the three major themes:

- **Ecological Integrity, Conservation and Stewardship**
- **Culture and Heritage Resources and Community**
- **Sustainable Economy**

5.1.1 How to Read this Section

This section of the Plan is intended to be read and considered in its entirety. Economic, ecological, and cultural values in the Dawson Planning Region are complex and connected in many ways. For example, when considering the general management directions for a value (e.g., caribou or moose), users of the Plan should also cross-reference other applicable sections that are directly related to the management of those values (e.g., transportation and access).

Each section below follows the same general format, which consists of:

Topic Overview: a broad overview of the value or resource being discussed. This subsection is not meant to reiterate all related resource information. Rather, it is meant as a summary of the main attributes of the topic being discussed.

Objectives: Statements developed by the Commission that indicate what they would like to achieve for a particular value or resource.

Key Planning Issues: A summarized list of what the problem is problems for the value or resource. The issues listed should connect to the stated objectives and recommendations.

Recommended Planning Strategies

How the objective can be achieved. Table 5-1 summarizes the difference between management practices and recommendations.

Table 5-1 Overview of how to use Recommended Planning Strategies

Recommended	Consist of approaches or actions to be used by proponents, land

Commented [A211]: Add a summary table of all general management directions at the end of this section or as an appendix for ease of use.

Commented [A212]: Tie this back to Table 1-1 Key Planning Considerations, and discussed in 1.3.2 Plan Goals. Additionally, should indicate that sections are categorized by the values identified in 1.3.1.

Commented [A213]: The Plan should cross-reference where other sections apply, include reference to specific recommendation as applicable rather than create new duplicative recommendation.

Commented [A214]: Don’t need to say what it isn’t

Commented [A215]: Redundant, the Plan as a whole is developed by the Commission

Commented [A216]: Be consistent with terms. From figure 3-1 Objective: Desired specific condition that contributes to achieving the GOAL and serves as basis for indicator monitoring.

Commented [A217]: Be consistent with terms. From figure 3-1 Strategy: Recommended approaches and actions to achieve the OBJECTIVE. Strategies can be adjusted in response to changing conditions.

Commented [A218]: The Plan as a whole is recommended to the Parties and accepted as a whole, this does not need to be repeated across the Plan.

Management Practices	users and project assessors to help achieve Plan objectives. ~~While Plan objectives define what outcome is intended for a particular value, strategies describe how the desired outcome will be achieved.~~		
Recommendations to the Parties	Consist of broad guidance to the Parties on the use and conservation of land, water and other renewable and non-renewable resources in the planning ~~R~~ region.	Policy Recommendations	Direction on land use issues and their management
		Research Recommendations	Topics to be investigated in more detail or information gaps to be filled.
		Recommended Actions	Work to be undertaken by the Parties

Commented [A219]: Repeated above

All ~~Recommended~~ Management Practices and Recommendations to the Parties are summarized in **Appendix 1: Recommended Planning Strategies Overview**.

5.2 ECOLOGICAL INTEGRITY ~~AND~~ CONSERVATION ~~AND~~ STEWARDSHIP

Commented [A220]: Changed to match goals from s.1.3

~~Ecological integrity, conservation, and stewardship is a priority for the region.~~ Healthy air, water, vegetation, and wildlife are critical to sustaining life. Ensuring that ecological systems and their services are maintained is central to sustainable development and maintaining fish and wildlife populations and their habitats is an important planning issue in the ~~R~~region. ~~In addition to the directions provided in this section, Cumulative effects analysis and management as described in Section 3.64 – Cumulative Effects Framework Management (page 58) will be also be crucial for ensuring the Rregion’s ecological values are preserved for future generations.~~

Field Code Changed

~~Ecological integrity and connectivity, conservation, and stewardship is a priority for the Region as is the need for protected and conserved areas as well as the importance of intact fish and wildlife populations.~~

Commented [A221]: Well the cumulative effects sections will support this (along with special management and overlay directions), this section of the plan should focus on how the general management directions will help achieve this.

Perspectives on Ecological Integrity and Conservation

“Establish a network of protected areas within the region, with special consideration for river and stream corridors that contain spawning and rearing habitat, and corridors used by wildlife for calving, overwintering and summer feeding grounds linked with uninterrupted migratory routes (avoid habitat fragmentation).”

Survey response, 2019

“I see this plan as an opportunity for us to offer future generations gifts of abundance and choice. By setting aside lands for ecological protection and choosing not to allow development now, we leave the option open to future residents of the region to expand areas of industrial development - or not - based on the best available knowledge, and to experience the healthy populations of animals we are privileged to know today.”

Draft Plan Response, 2021

Commented [A222]: These are part of the broader priority. Priority sentence moved to the beginning of the section to introduce the topic.

Management Directions

“We should assess every action or development in terms of its long term affect on the land. We should prioritise the health of our forests and rivers in every single decision we make.”

Survey response, 2021

“Human development should be limited in areas of high conservation values. I do believe that there is value in concentrating development in historically developed areas”

Survey response, 2021

This section of the Plan describes objectives and strategies designed to achieve the goals related to ecological integrity and conservation (see **Section 1.3.2 Plan Goals**).

Ecological Goals

- Healthy aquatic and terrestrial habitats that support sustainable fish and wildlife populations.
- Disturbances from human activities on the landscape are reclaimed in order to reduce cumulative effects, restore ecosystem functions, including and maintain key habitats.
- Preserve ecologically representative areas and important ecosystem services within the context of climate-driven shifts to maintain the natural integrity of those areas.
- Connectivity between areas of key habitat, while considering climate-driven shifts in habitat.
- Awareness, mitigation and adaptation to the effects of climate change on the landscape, fish and wildlife populations, and the people of the Region.

Commented [A223]: To avoid duplication, refer back to the goals in s.1.3.2 rather than repeat them here.

5.2.1 Key Species Habitat

Maintaining sustainable fish and wildlife populations and their habitats is a significant planning concern for the Region. Maintaining healthy terrestrial (e.g., boreal forest, taiga) and riparian (e.g., rivers, creeks, wetlands) habitats, and managing threats to these habitats (e.g., from mineral development, roads, invasive species etc.), are important considerations in this Plan. Locations of key wildlife habitat are shown on Map 4 – Selected Ecologically Important Areas and Map 5 – Ungulates.

“To protect the fish and wildlife, large tracks of land must be set aside for conservation. Particularly land that provides food and shelter for fish and wildlife. Northern land is not high-yielding so each species requires a large area of diverse habitat.”

Survey response, 2019

The Dawson Planning Region contains several key species including, but not limited to: salmon, moose, caribou, grizzly bears, sheep, fur-bearing animals, freshwater fish, birds, and species-at-risk. In the Yukon wildlife is regulated under territorial and federal legislation including the:

Commented [A224]: These maps do not highlight all areas spoken to in special management directions. Additional maps or other resources should be provided indicating where these areas are.

If a map is referred to in a special management direction, it is important that they provide the relevant resources. See comments in the special management direction for more details.

Commented [A225]: These are not included in key species, fur-bearing animals has no section while the others are under s.5.2.2 Other Fish and Wildlife Habitat. Suggest having single fish and wildlife section with all of the subsections currently included in 5.2.1 and 5.2.2.

Dawson Recommended Land Use Plan Management Directions

Landscape Management Units General

- *Yukon Wildlife Act (Yukon)*
- *Migratory Birds Convention Act*
- *Fisheries Act*
- *Species at Risk Act.*

Formatted: Font: Italic

Wildlife management is also guided by the FNFA, particularly Chapter 16 – Fish and Wildlife.

First Nations people have relied on the wildlife of the Region for thousands of years. Both First Nations and non-First Nations people continue to rely on these species today. The integrity of key habitat areas is essential to ensure that wildlife populations are sustained for current and future generations. Additionally, the Crown has a constitutional obligation to protect Indigenous rights, including the right to subsistence harvesting rights.

Commented [A226]: Changed to be more inclusive of asserted Aboriginal and treaty rights.

5.2.1.1 Caribou

Caribou in the Region hold immense value from an ecological and socio-cultural perspective for the Tr'ondëk Hwëch'in and the people of the Yukon at large. The international transboundary nature of caribou migration and movements within the territory poses unique planning challenges. Special consideration must be given to ensure that populations are sustained for current and future generations.

There are five-six caribou herds that live in or travel through the Planning Region: three populations of migratory caribou, (the Porcupine caribou herd, which are Barren-ground Caribou (migratory herd); (PGH); the Fortymile (FMCH); and Nelchina Herds, which are migratory caribou); and three populations of herds that belong to the Northern Mountain population of Woodland Caribou – (Clear Creek and, Hart River and Klaza). The ranges of all caribou herds cover nearly the entire planning Region, extending into other areas of the Yukon and into Alaska (see Map 5 – Ungulates).

Commented [A227]: Suggested changes here and in the glossary to be clear about the herds that are in the region, and how they are classified by the Government of Canada.

Only Porcupine are Barren-ground, they are also a migratory herd.

Nelchina and Fortymile have not been assigned a designated unit yet, they may be referred to as migratory caribou.

There are three herds that belong to the Northern Mountain population of Woodland Caribou.

To date, the direct and negative effects of human disturbance on caribou distribution has outweighed the indirect effects of climate change; however, as climate has a direct effect on caribou habitat (e.g. changes to forest cover, increased wildfire occurrence, shifts in pathogen distribution), it is expected that climatic changes will accelerate caribou range contraction in the future. Changing temperatures and precipitation may also impact caribou demographics (e.g. calf recruitment and adult female survival).

Commented [A228]: Suggested change to provide context for the current and potential future threats to caribou.

Planning Strategy

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.

Key planning issues and interests related to migratory caribou include:

- The predominant migratory herd in the **R**region is the **FMCH**Fortymile caribou herd, who occur throughout all but the northernmost portions of the **P**planning **R**region. They **FMCH has been identified as are** the primary herd of concern in the **P**planning **R**region, given that they are subject to current and future conflict with certain land uses in the **R**region.
- **There are three key habitats that the FMCH occupy in the Region: summer range, winter range, and migratory pathways.** Winter range for the **FMCH** Fortymile caribou herd is abundant in the **R**Region but use of this habitat is challenging to predict from year to year. Conversely, summer ranges and migratory pathways are well- known, and these areas are considered essential to the **herd's** persistence **of the FMCH** in the territory.
- **The Porcupine caribou herd are part of the is a migratory bBarren-ground caribou population. designated unit under the Species at Risk Act.** The Committee on the Status of Endangered Wildlife in Canada have recommended **bBarren-ground caribou be listed as Threatened and if this designation is adopted by the federal minister, critical habitat will need to be identified and protected, but the population is not currently listed under the Species at Risk Act. If listed, a national recovery strategy would be developed including defining critical habitat for the species, that is habitat that necessary for its survival or recovery.** Porcupine caribou occupy habitats that include roughly half of the Planning Region, north of the Yukon and Klondike Rivers.
- Both Tr'ondëk Hwëch'in and Government of Yukon are signatories to the *Porcupine Caribou Management Agreement* and have agreed to "co-operatively manage[...]the Porcupine Caribou and its habitat[...]so as to ensure the conservation of the Herd with a view to providing for the ongoing subsistence needs of native users." (PCMA, 1985).
- The **P**planning **R**region's alpine and subalpine ridges are key migratory routes that enable caribou to access key habitat throughout the year. These areas also offer important economic transportation routes and areas of interest for mineral exploration and development.
- Many factors may cause range use to change over time including climate change, natural processes, and human activities. Consistent with the precautionary principle, a high degree of caution in harvest and management strategies is warranted across herd ranges of migratory caribou.

Commented [A229]: Throughout this section, "key" suggests there are other issues (that may have been considered but are not as pressing), no need to say "include".

Commented [A230]: Repetitive, following sentences are key issues with habitat

Commented [A231]: YG recommends the text changes because the Porcupine caribou are not currently listed under SARA.

In addition, critical habitat (which has a specific meaning under the Act) would be defined through a national recovery strategy after listing. It is unlikely that the entire Porcupine caribou range would be considered critical, but that would be decided in a future process if they are listed.

Key planning issues and interests related to woodland-Northern Mountain caribou include:

- The eastern extent of the **R**region is used heavily by **Northern Mountain woodland**-caribou year- round.
- Rut is a sensitive period for **woodland**-caribou (approximately September 15 – October 2010 for Northern Mountain caribou) as are calving and post-calving periods, though caribou typically are dispersed during calving. **which may reduce the risks of development activities impacting on a significant portion of**

Dawson Recommended Land Use Plan
Management Directions

Landscape Management Units General

- the herd.
- As the climate changes, in more northern populations, animals will be more sensitive to more variable winters with a higher frequency of freeze-thaw events that affect demography.
- Maintaining access to habitat through key migration pathways is a pertinent issue. Overlapping placer and quartz activities within key migration routes/ridges can create barriers to migration.
- Alteration of winter habitat including lichen removal, wild fire, and the creation of permanent structures may result in changing patterns of use over time.

Commented [A232]: YG has observed a considerable shift in the distribution of Clear Creek caribou during calving and post-calving since 1997, likely as a result of increased development activities in that portion of the range. This sentence downplays potential effects during this season simply because they aren't aggregated during calving like migratory caribou.

Commented [A233]: YG requests this addition to provide another key issue wrt climate change for Northern Mountain caribou.

Recommended Management Practices

a	Planning for, and assessment of, placer and quartz operators exploration and mining activities should define and implement follow safe operating distances from caribou as advised by regional biologists determined during assessment and regulatory processes.
b	Higher densities of placer mining activity should be avoided within high quality caribou habitat. This determination should be made based on surface disturbance and linear feature density tracking as a part of the cumulative effects framework taking into consideration habitat type and caribou species.
c	High concentrations of small-scale disturbance, and any large quartz exploration projects (Class 4) or and quartz mines should be avoided within key migration routes. This determination should be made based on surface disturbance and linear feature density tracking as a part of the cumulative effects framework taking into consideration habitat type and caribou species.
d	Avoid Activities in the following areas during use periods should be avoided in high quality caribou habitat during important biological periods. Consider the following when determining timing windows for industrial operations: (see Map 5 – Ungulates) - Concentrated critical summer and winter habitat areas. - Migration corridors during fall, summer, and spring migration; rutting areas for Northern Mountain woodland caribou. - Concentrated Northern Mountain woodland caribou use areas. Consider climate trends and extremes relevant to habitat areas and/or shifts in the times when habitat is used by caribou.
e	New road and trail development should be avoided or minimized within the following: - Identified seasonal migration corridors (e.g., along alpine/subalpine ridges) - Areas that bisect corridors at critical migration pinch points; and - Mapped Northern Mountain woodland caribou rutting range.

Commented [A234]: YG would like to see these text changes so that the management practice is more applicable to proponents themselves.

Additionally, project-level assessment or regulatory process are the correct venue for determining the specifics for safe operating distances. Regional biologist may be one source, but there may be others as well.

Commented [A235]: Map 5 does not show the concentrated critical summer and winter habitat areas, migration corridors, rutting areas, or concentrated use areas. It shows mineral licks and caribou ranges (for which we have provided updated data).

This reference to Map 5 could be deleted. Direction is provided at a project level scale during assessment and regulatory processes.

Commented [A236]: YG requests this addition to give direction to consider relevant climate impacts on habitat for caribou.

Commented [A237]: Mapped does not need to be specified.

All of these three points are information gathered during assessment and regulatory review processes.

Recommendations to the Parties

To support the long-term persistence and prevent long-term decline of caribou in the Dawson Planning Region, the following research and policy recommendations are proposed:

Management Directions

13. Research Recommendation	The Parties should work ~~together, and~~ collaboratively with ~~each other and~~ other planning partners (e.g., ~~Dawson District Renewable Resources Council (DDRRC)~~ and Yukon Fish & Wildlife Management Board, PCMB) to improve research, knowledge, and understanding of caribou in the ~~P~~lanning ~~R~~egion. Key considerations for a research and monitoring program may include: ◆ Improved understanding of caribou–industry interactions, ~~including monitoring and assessing changes to migration patterns and effects to habitat use and distribution,~~ to support stewardship objectives and adaptive management. • ~~Continued monitoring of caribou migration patterns and habitat to reflect changes in industrial development activity and cumulative habitat alteration (i.e., development, fire, climate shifts, etc.) and identification of potential effects on caribou habitat use and distribution.~~ • ~~FMCH and PGHM~~ Mitigations should be designed to address ~~impacts to caribou migration of the herd to~~ maximize efficacy. ~~Mitigations should consider how to incorporate available collar data.~~ ◆ Undertake ~~habitat modelling to assess lichen mapping/modelling to monitor implications of~~ possible effects of natural processes and climate change (i.e., increase in ~~precipitation, temperatures and~~ fire activity, etc.) on the main forage species (lichen) for caribou. • ~~Develop caribou movement alert system based on collared caribou to maximize efficiency and compliance for project proponents.~~
14. Research Recommendation	~~The Parties should collaborate with the Porcupine Caribou Management Board to determine the availability and suitability of habitat within LMU 2: Horseshoe (page 470). Based on the results, special management directions for any future development in this area should be developed as appropriate.~~
15. Research Recommendation	~~The Parties should continue to work towards linking the cumulative effects indicator of surface disturbance to the value of caribou as per the recommendations in the Cumulative Effects section of this Plan (Section 4 – Cumulative Effects Framework, page 58).~~
16. Recommended Action	~~The Commission supports the continued implementation of the Fortymile Caribou Harvest Management Plan and the Porcupine Caribou Harvest Management Plan to ensure survival of the herds for current and future generations.~~

Commented [A238]: Bullets combined to simplify

Commented [A239]: Duplicates special management direction 6.2.1

Commented [A240]: Redundant, recommendations in cumulative effects framework section provide stronger direction that achieves this.

Commented [A241]: The recommended action does not provide an action statement, therefore can be deleted.

The Parties have already committed, by signing the two plans referenced, to implement them.

Management Directions

17. Recommended Action	The DDRRC together with technical specialists with Tr'ondëk Hwëch'in and Government of Yukon are currently developing management guidelines for the FMCH. This Plan supports the finalization and implementation of these guidelines.
18. Recommended Action	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. As indicated in Section 5.4.3.2.2 – Access Management Planning Recommendations, priority LMUs include: • LMU 7: Weht're (Antimony) (page 196) • LMU 11: Goldfields (page 218) • LMU 15: Khel Dëk (Sixty Mile) (page 238) • LMU 9: Clear Creek (page 208) • LMU 18: Therian Dëk (Coffee Creek) (page 254) Access management plans should consider the management strategies recommended in this Plan in addition to others developed collaboratively by the Parties.

Commented [A242]: As written, this recommended action does not provide an action statement. The work referenced in this action is important, and already committed to.

If the goal of this action was to highlight the importance of this work, it could be rephrased as a recommendation to implement the management guidelines in assessment and regulatory processes as soon as available.

If the goal of this action statement is to recommend completing this work in a timeframe, it could be re-phrased that way.

Otherwise remove.

Commented [A243]: Consolidate with recommendation 21 and 102 to avoid duplication

Commented [A244]: Additional information on moose management added.

Commented [A245]: https://yukon.ca/sites/yukon.ca/files/env/env-science-based-guidelines-management-moose-yukon_3.pdf

5.2.1.2 Moose

Moose in the Yukon are managed at the scale of Moose Management Units (MMUs) and according to the “Science-based guidelines for the management of moose in Yukon” (2016). Moose are known to live throughout most of the Planning Region and use a variety of habitats depending on the season, their sex and stage of life. They have been known to favour use linear features on the landscape, such as roads and trails, and tend to move into river valleys in the winter to avoid deep snow and to have access to food. Late winter habitat, although infrequently used for a short portion of the year, is considered critical to survival during periods of high snowfall accumulation. The area southeast of the City of Dawson Dawson Goldfields MMU supports a stable moose population at relatively high densities and the current harvest is considered sustainable. Moose are an important component of the traditional diet and are essential to the good health of the First Nation and non- First Nation people of Dawson.

Moose are somewhat tolerant of disturbance from land use activities but are susceptible to increased harvest and predation as a result of new road and trail access development through increased harvesting pressure and predation. Management of linear features and their use as access is therefore an important consideration for this species. Mitigations relating to moose are closely tied to access in the Region (see Section 5.4.3 – Transportation and Access, page 129).

Planning Strategy

Objectives:

1. A resilient and healthy and growing moose population sufficient to support herd health.
2. as well as Able to continue current and future moose harvest in the future

Commented [A246]: Linear features do not imply access on their own

Commented [A247]: These objectives are better separated as they have two purposes one ecological and one socio-cultural.

Commented [A248]: Increasing this moose population is not stated anywhere else in moose management documents. This is already a high-density population compared to many areas in the Yukon.

Commented [A249]: Moose do not congregate as herds.

Commented [A250]: Harvest per the glossary only applies to FN hunting. If this is meant to apply more broadly, the definition or term used here should be changed.

This applies throughout the document. The plan reads as if licenced hunting is intended to be included in all the points made about harvest, therefore, the definition should change in the glossary to include it.

Management Directions

at levels ~~similar to present harvest.~~

Commented [A251]: Added specificity as future harvest could be at various levels, this provides an objective target.

Key planning issues and interests related to moose include:

- New and existing access ~~features~~ (i.e., roads and trails) contribute to:
 - ~~Harvest and predation hunting~~ pressure on moose populations
 - ~~Fragmentation or loss of habitat~~
 - Increased levels of development ~~supported by new and expanded linear features such as roads and trails transect moose habitat resulting in fragmentation or loss of habitat.~~
- Disturbance in key calving areas could have adverse effects on ~~recruitment of moose into the populations.~~

Recommended Management Practices

a	Avoid or minimize development activity within seasonal use/concentration areas and movement corridors, with specific emphasis on ~~known key calving areas and~~ areas of post-rut aggregation ~~and late-winter habitat.~~
b	Avoid or minimize new road and trail access: • ~~That will result in 'loop road' connections to decrease harvesting pressure.~~ • ~~Within key moose habitat areas where access is currently limited to minimize adverse effects from overharvesting, increased predation, and moose/ vehicle collisions.~~
c	~~Temporarily reduce human disturbance in key late-winter habitat during years of above-normal snowfall, which are projected to increase under a changing climate.~~

Commented [A252]: The Department of Environment has very little information on moose calving areas and don't usually request this information from proponents. Changed wording based on information that we have and ask proponents to collect.

Commented [A253]: Don't need to include justification in recommendation

Commented [A254]: Added to provide a specific management practice that could make a difference to moose during climate events that are challenging for them.

Recommendations to the Parties

19. Research Recommendation	The Parties should work together, and collaboratively with other planning partners (e.g., DDRRC and Yukon Fish & Wildlife Management Board) to improve research, knowledge, and understanding of moose in the planning ~~R~~region ~~to help inform future decisions.~~ Key considerations for a research and monitoring program may include: • Improved mapping of important riparian habitat used for calving ~~areas~~ and ~~the~~ effects of land use activities on these areas. • ~~Developing a cumulative effects indicator and threshold based on moose habitat in LMU 11: Goldfields (page 218).~~ • ~~Potential consideration could include a road density threshold of 0.6 km/km² (Beazley, et al., 2004).~~ • Continued monitoring of ~~moose~~ population trends in areas that experience significant access development and/or ~~hunting~~ pressure ~~to help inform land planning decisions.~~ • Continued work on identifying key mineral licks that ~~are may be~~ affected by ~~land use~~ disturbance. • ~~Long-term study involving moose and socio-cultural indicators in reclaimed placer areas to further define 'successful' reclamation and its effects on the community.~~

Commented [A255]: Indicator needed for planning region not just this LMU.

Commented [A256]: Redundant, already stated in opening paragraph

Commented [A257]: Clarify if hunting or harvesting. Should use only one term consistently throughout the Plan unless needed for a specific purpose. Generally, YG 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.

Commented [A258]: Covered by recommendations 1,4 and 6.

20. Research Recommendation	Continue to monitor moose population density. ~~to contribute to access development decision making processes~~ abundance and composition.
21. Recommended Action	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. As indicated in Section 5.4.3.2.2 – Access Management Planning Recommendations , priority LMUs include: • ~~LMU 7: Wehtr'e (Antimony)~~ (page 196) • ~~LMU 11: Goldfields~~ (page 218) • ~~LMU 15: Khet Dök (Sixty Mile)~~ (page 238) • ~~LMU 9: Clear Creek~~ (page 208) • ~~LMU 18: Therian Dök (Coffee Creek)~~ (page 254) Access management plans should consider the management strategies recommended in this Plan in addition to others developed collaboratively by the Parties.
22. Recommended Action	Promote the practice of progressive reclamation ~~when of~~ disturbed moose habitat areas to ~~re~~ create suitable moose habitat (e.g., wetlands) where appropriate.
Recommended Action	Implement targeted monitoring of precipitation-as-snow for key late-winter habitat.

Commented [A259]: Consolidate with recommendations 18 and 102

Commented [A260]: Given values expressed elsewhere, areas should only be reclaimed to moose habitat where that was their original use.

Change to management practice for proponents rather than recommendation to Parties.

Commented [A261]: Given high snowfall accumulation's impact on moose, recommend a targeted monitoring for critical late winter habitat. This will also help meet new management practice 5.2.1.2 c.

5.2.1.3 Salmon

"Salmon, particularly Chinook habitat in the Yukon River and spawning streams is a critical indicator of ecological viability"

(Survey Response, 2019)

"Every Yukon Salmon that is destined to spawn in the mainstem of the Yukon River Watershed in Canada (all major tributaries except for the Porcupine) enters the Yukon Territory in the Dawson planning region. Every Yukon River salmon that out-migrates to the Bering Sea from the mainstem of the Yukon River watershed in Canada leaves the Yukon Territory from the Dawson planning region."

(Yukon Salmon Sub-Committee, Draft Plan Response 2021)

The ecological and socio-cultural importance of salmon in the Rregion is widely known. For thousands of years the Tr'ondëk Hwëch'in people have gathered along the Yukon River during late spring and early summer to fish. More recently, the river supported a commercial salmon fishing industry. The presence of salmon influenced the rhythm of life in the Rregion. However, this situation has changed as the abundance of salmon can no longer support even traditional harvesting the way it once did. Salmon fishing continues today in small numbers to pass on the traditional knowledge to youth, to keep important cultural connections, and to instill stewardship values.

Three species of salmon live in the planning Rregion: cChinook and chum have populations in the Yukon River, and these species are joined by coho in the Porcupine

Commented [A262]: Chinook should always be capitalized, chum and coho are not

Management Directions

River watershed. Despite high levels of suspended sediment near the City of Dawson, the Yukon River remains an important migratory habitat for juvenile and adult Chinook and chum salmon.

Salmon, like migratory caribou, are a far-ranging species as their migration route extends beyond the borders of the planning Region to other parts of the Yukon and into Alaska to the Bering Sea. They use the rivers, lakes, streams, and tributaries of the Region to survive.

Commented [A263]: Confirm with DFO if migrating salmon use lakes in the region, if not remove

Fish Habitat Management System for Placer Mining

The Fish Habitat Management System for Yukon Placer Mining (FHMS) was designed to replace the *Yukon Placer Authorization*, which was phased out in the early 2000s. The FHMS is implemented by the Government of Yukon, Council of Yukon First Nations, and Department of Fisheries and Oceans and manages placer mining activities under the *Fisheries Act*. The system has two management objectives:

- A sustainable placer mining industry in the Yukon; and
- The conservation and protection of fish and fish habitat supporting fisheries

The FHMS consists of three main protocols: 1) an Aquatic Health Monitoring Protocol, 2) the Water Quality Objectives Monitoring Protocol, and 3) the Economic Health Monitoring Protocol. These monitoring programs are intended to help ensure the FHMS is working effectively towards its objectives. An important design feature of the FHMS is the Adaptive Management Framework, which describes how information generated from the three monitoring programs as well as traditional knowledge will be considered within the system and provides for recommendations on where adjustments may need to be made to ensure the FHMS continues to operate as intended.

Planning Strategy**Objectives:**

1. ~~Stewardship of rivers enhance salmon habitat and support salmon recovery.~~
1. ~~Salmon migration routes allow for salmon recovery. Enhance and rehabilitate salmon spawning and rearing habitat.~~
2. ~~Maintain migratory salmon routes to limit disturbances that affect spawning migrations.~~

Commented [A264]: As written, this read as general statements. Changed to objective statements with the same content.

Key planning issues and interests related to Salmon include:

- The cumulative effects across large spatial scales of land use activities may cause direct and indirect habitat loss and disruption to migratory routes.
- Sedimentation in watercourses due to anthropogenic ground disturbance or release of surface waters high in dissolved substances from industrial activities can affect salmon habitat.
- Development along salmon-bearing watercourses can result in changes to water quantity and quality.
- ~~There is uncertainty of the effects of climate change is affecting on salmon~~

Dawson Recommended Land Use Plan
Management Directions

Landscape Management Units General

habitat ~~though increasing ocean and stream temperatures, reduced flows, and increased sedimentation through erosion.~~

- Increased use of high-powered motorboats, jet boats and barges.
- There is a lack of data on sensitive overwintering, rearing, and spawning habitats for salmon in the Rregion.

Recommended Management Practices

a	Avoid direct disturbance to ~~known~~ sensitive over-wintering, rearing habitats for juveniles, as well as spawning habitats for salmon.
b	Minimize surface and vegetation disturbance in riparian areas by ~~maintaining riparian buffers/setbacks from development activities where possible.~~
c	Avoid ~~significant levels of~~ winter in-stream water withdrawals in ~~or upstream of known~~ sensitive over-wintering and rearing fish habitat.
d	~~Avoid or minimize adverse effects of large-scale industrial and/or infrastructure projects within river corridors.~~
e	Avoid direct or indirect blocking of ~~identified~~ fish migration routes.
f	~~Implement~~ ~~Adhere to~~ timing windows for lifecycle related habitat types (i.e., overwintering habitat and water withdrawals, spawning streams etc.) as per Freshwater Timing Windows Identified for the Yukon (https://www.dfo-mpo.gc.ca/pnw-ppe/timing-periodes/yk-eng.html).

Commented [A265]: Added detail about how climate change affects salmon habitat.

Commented [A266]: As written, this doesn't provide the rationale for use of boats and barges as an issue.

If the concern is higher erosion due to waves caused by the boats and resulting impact on salmon habitat, it could state that. If the concern is direct impacts to salmon, it could state that.

Commented [A267]: "Known" and "identified" removed from management practices as proponents are expected to avoid impacts to these areas regardless and may need to do work themselves to identify them.

Commented [A268]: Specify buffer distances that minimize run-off, and sediment/chemical influx.

Commented [A269]: Specify buffer distances from the *Fisheries Act* that minimize run-off, and sediment/chemical influx.

Commented [A270]: "Significant levels" is undefined qualifier

Commented [A271]: Redundant, already required for projects generally not just within these areas

Recommendations to the Parties

23. Policy Recommendation	~~The Parties should~~ implement the recommendations found in the Review and Evaluation of Adaptive Management in the Fish Habitat Management System for Yukon Placer Mining (Olson, et al., 2020).
24. Research Recommendation	A comprehensive, publicly accessible aquatic habitat inventory should be conducted ~~in [specify LMUs of interest]. prior to mining and other land use activities in areas that have not yet been mined to determine whether salmon habitat is at risk.~~ Such an ~~assessment inventory~~ should identify and map key habitat with specific focus on spawning and over-wintering areas ~~and their response to climate change impacts. This information should be used to update classification of streams and Areas of Special Consideration identified on the Yukon Placer Fish Habitat Suitability maps for watersheds in the planning region.~~
25. Research Recommendation	~~Working with other organizations as necessary, including Fisheries and Oceans Canada (DFO), the Parties should continue to re- evaluate the effectiveness of the Fish Habitat Management System for Yukon Placer Mining.~~

Commented [A272]: Rather than referring to the report generally, include any recommendations relevant to achieving the Plan's goals/objectives in the Plan.

Commented [A273]: Changes made to focus research within areas of interest and add use for results.

Commented [A274]: Covered by recommendation 23

Management Directions

26. Research Recommendation	The Parties, together with other ~~potential planning partners~~ <u>relevant organizations</u> (e.g., YSSC and DFO) should collaborate and implement research strategies focusing on: - Recognizing the work done to date, continue to gain a better understanding of Yukon River Chinook salmon rearing and overwintering habitat in the planning ~~R~~region. ~~Developing a publicly available aquatic inventory of streams, rivers, and tributaries in areas that have not been mined or areas not currently being mined, to ascertain if salmon habitat or freshwater fish habitat is likely to be at risk if developed.~~ - Examine the current water withdrawal tracking system to explore opportunities for improvement and to better understand the impact on aquatic habitat in the ~~R~~region. - Understanding and assessing the cumulative effects of land use activities on salmon and their habitat to further inform indicators and thresholds in Plan monitoring and implementation. ~~Research the impact of use of high-powered boats on salmon and salmon habitat, which cause significant wake and turbulence leading to damage to riverbanks and mouths of small tributaries, resulting in adverse effects to salmon and their habitat (see Section 5.4.3.5 – Water Access, page 143).~~ <u>Study climate change impacts on salmon habitat in the planning region.</u>
27. Recommended Action	~~Evaluate the existing watershed authorizations under the Federal Fisheries Act, the Fish Habitat Management System, and the adaptive management framework within the FHMS, and how this system can work better as a part of and within the Rregion.~~
28. Recommended Action	Implementation of long-term water quality monitoring, which should be used to inform decision making to protect salmon habitat, similar in scope to the Environment and Climate Change <u>Canada</u> National Long-term Water Quality Monitoring Data. A station currently exists within the ~~P~~planning ~~R~~region at the Klondike River. Additional stations could be installed at the following important major watercourses: - Yukon River South and North - Sixty Mile River - Indian River - White River - Stewart River - Fortymile River - Fifteen Mile River

Commented [A275]: Repeats 24, redundant - remove

Commented [A276]: Text seems to presuppose the effects without supporting evidence; conversely, if there is research already supporting this, clarify why this research is recommended.

Commented [A277]: Covered by recommendation 23.

Management Directions

29. Recommended Action	Continue to support ongoing work on ~~e~~ Chinook salmon ~~habitat~~ restoration projects by Tr'ondëk Hwëch'in and other organizations in collaboration with potential planning partners (e.g., Yukon Salmon Sub-Committee, Fisheries and Oceans Canada, Yukon River Panel).
30. Recommended Action	The Parties should create/fund an educational platform to ~~educate/inform~~ the public on the impact of land uses on salmon habitat, ~~and mitigation through~~ best management practices/management strategies ~~to mitigate effects, to~~ ~~communicate~~ the cultural importance of salmon, and ~~to foster~~ stewardship initiatives.

5.2.1.4 Sheep

Sheep generally live in high-elevation and alpine habitats. Alpine tundra and mountain ranges within, and to the northwest, of the Tombstone Range are important year-round habitat for sheep. Critical winter habitat for sheep generally includes relatively snow-free, wind-swept slopes. Sheep return regularly to the same winter ranges, lambing areas, and migration corridors. Consequently, these are considered as sheep key habitats (see Map 5 – Ungulates).

Planning Strategy

Objectives:

1. Healthy sheep populations are sustained ~~through protection of sheep habitat and limiting disturbance during key times (i.e., lambing, over-winter).~~

Key planning issues and interests related to ~~S~~sheep include:

- Availability of and access to critical late winter habitat. ~~The DRPC Dawson Planning Region~~ Resource Assessment Report, Section 11.2.3.3, offers more detailed description of sheep habitat types (DRPC, 2020c).
- Sheep are vulnerable to disturbance from various activities (e.g., low-flying ~~planes and helicopters/aircraft~~), especially during lambing season in May - June).

Recommended Management Practices

- ~~a~~ In specific LMUs where sheep habitat is of concern, Special Management Direction is provided including:
- ~~Avoidance of industrial activities within sensitive sheep habitats and key areas, with emphasis on winter range avoidance (Map 5 – Ungulates).~~
 - ~~Implementation of timing windows for land use activities and aerial access restrictions during lambing periods in areas of known key sheep habitat.~~

Recommendations to the Parties

Commented [A278]: YG recommends removing this subsection and adding relevant information to specific LMUs as applicable. This is similar to approach currently used in the Plan for sharp-tailed grouse which has special management directions but not its own subsection in 5 as there are no general management directions.

Commented [A279]: Year round Key habitat also includes south facing river cliffs, benches and rocky outcrops on steep valley sides, especially in the Yukon river corridor between the Yukon/ White river confluence and Minto.

Commented [A280]: These are actions that could be taken to achieve the objective, they should be incorporated into management directions.

Commented [A281]: Corrected report name.

Commented [A282]: Redundant, could state similar to 5.2.1.5 (Bears) that no recommended management practices are suggested at this time [because concerns are covered off by special management directions for relevant LMUs].

31. Policy

Recommendation

The Commission have recommended that **LMU 1: Tthetäwndäk (Tatonduk)** (page 164), **LMU 4: Tsey Däk (Fifteenmile)** (page 180) and **LMU 7: Wehtre'e (Antimony)** (page 196) be designated as Special Management Areas. These three LMUs contain the highest quality known sheep habitat in the Region (DRPC, 2020c).

Commented [A283]: LMU 7 is an ISA 1 not an SMA though YG supports an SMA designation with modified boundaries.
If measures are needed to address concerns for sheep in this LMU, they should be added as special management directions.

Commented [A284]: Don't need recommendations in the Plan to accept other parts of the Plan. Parties sign off on the Plan as a whole.

Commented [A285]: Provide additional context on what this relates to (e.g. behaviour of bears, use of the region etc.)

5.2.1.5 Grizzly and Black Bears

Approximately 6,000–7,000 grizzly bears ~~are thought~~ live in ~~the~~ Yukon and this species can be found throughout the ~~P~~lanning ~~R~~egion. Their habitat requirements are an array of diverse ecosystems that occur over large areas, and as such they are indicators of healthy and large wilderness areas. There is little scientific data about grizzly bears in Yukon and the ~~P~~lanning ~~R~~egion as few studies have been conducted. ~~There is, however, but~~ good local and traditional knowledge ~~exists on the species~~. In June 2018, ~~this species grizzly bear~~ was listed as a species of “Special Concern” in western Canada under the ~~Federal~~ Species at Risk Act. More information about bear habitat requirements and bear density in the ~~R~~egion can be found in the ~~DRPC-Dawson Planning Region~~ Resource Assessment Report (2020c).

Black bears are also found in the ~~R~~egion. However, black bears are not considered a key species in this Plan.

Planning Strategy

Objectives:

1. Healthy grizzly bear populations are maintained.
- 1-2. ~~including p~~Preservation of key habitat and connectivity corridors.
- 2-3. Low numbers of human/bear conflict.

Commented [A286]: Habitat is separate from population

Key planning issues and interests related to ~~G~~grizzly and ~~B~~black ~~B~~bears include:

- Fragmentation of large tracts of land can degrade bear habitat and cause adverse effects on healthy bear populations.
- Linear feature density (i.e., roads and trails) ~~at a density~~ of 0.6km/km² ~~may lead~~ to declines in grizzly bear populations (see **Section 4 – Cumulative Effects Framework**, page 58).
- ~~Climate change may result in increased human-bear conflicts (e.g. may lead to shifts in timing or abundance of food sources and longer active periods/shorter denning seasons).~~
- ~~A~~Bear-human conflicts resulting in mortality predominantly include lethal removal of bears from areas of human activity.

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Commented [A287]: Adapted from p.20 of the Conservation Plan for Grizzly Bears in the Yukon.

Commented [A288]: This statement is not directly related to planning. The subject of minimizing human-grizzly bear conflicts is covered in Goal 4 of the Conservation plan for Grizzly Bears in the Yukon. Delete the point here, as there are no direct recommended actions associated with the concern.

Recommended Management Practices

No ~~recommended~~ management practices are provided at this time. Existing policies and legislation should be consulted, including the Conservation Plan for Grizzly Bears in the Yukon (Government of Yukon, 2019).

Recommendations to the Parties

Management Directions

32. Research Recommendation	The Parties should work together, and collaboratively with other planning partners (e.g., DDRRC, PCMB, Fortymile Harvest Management Committee, and <u>Yukon Fish and Wildlife Management Board (YFWMB)</u> to improve research, knowledge and understanding of grizzly bears in the planning <u>R</u>region. • Key considerations for a research and monitoring program should focus on identifying and mapping key habitat areas and other research topics identified under Goal #3 of the Conservation Plan for Grizzly Bears in Yukon (2019). • <u>To better understand how climate change may influence human-grizzly bear conflict, monitor climate change impacts to grizzly bears, including their seasonal behaviour and food sources.</u> • Management decisions for grizzly bear habitat management should have a strong foundation in local Traditional Knowledge. • <u>Decisions should be developed and promoted as an educational tools</u> to promote stewardship of bear habitat.
33. Recommended Action	<u>The Parties should establish the proposed SMAs identified for conservation management in this Plan to ensure there is a large-scale connected landscape that protects key grizzly bear habitat.</u>
34. Recommended Action	The Parties should continue to work at implementing the Conservation Plan for Grizzly Bears in Yukon in collaboration with the Yukon Fish and Wildlife Management Board (<u>YFWMB</u>), with specific attention to Goal #2 (Take care of the land and other species that grizzly bears require).

Commented [A289]: Decisions are not educational tools.

Commented [A290]: Don't need recommendations to accept other parts of the Plan, Parties sign off on the Plan as a whole.

5.2.2 Other Fish and Wildlife Habitat

5.2.2.1 Resident Fish Species

Maintaining healthy fish populations in the Rregion is not only important to ensure overall balance in the ecological functions in the Rregion, but it is also critical to sustaining traditional harvesting activities. There are many known resident (non-salmon) fish species that occur in the Pplanning Rregion. Most populations of all species live in streams, rivers, and off-channel habitats in the summer, and some are known to migrate to lakes to over-winter.

Commented [A291]: List resident fish species of interest. Possibilities include: Arctic grayling, Burbot, Inconnu, Northern pike, Lake trout, broad whitefish and lake whitefish.

Planning Strategy

Objectives:

1. Sustainable freshwater fish and wildlife populations, supported by
2. Healthy aquatic and terrestrial habitats.

Key planning issues and interests related to Grizzly and Black Bears resident fish species include:

- Fish are sensitive to aquatic habitat disturbances and changes in water quality

Commented [A292]: Population and habitat are two separate objectives. Focused objectives to fish given section focus.

Management Directions

- and quantity. Both natural and human-caused changes to land and vegetation around water features affect water quality and quantity.
- Fish over-wintering and spawning areas are of ~~critical~~ vital importance to the maintenance of healthy fish populations. These areas are particularly sensitive to habitat disturbances and changes in water quality and quantity, but in the Dawson Planning Region, their locations are poorly understood.
 - Rivers, lakes, and wetlands are important for both ecological function and land-use activity. The potential for impacts, and land-use conflicts, in these areas is high.

Commented [A293]: “Critical” is a defined term under the *Species at Risk Act* with specific provisions and requirements for “critical habitat”, edit suggested to avoid confusion

Recommended Management Practices

A	~~The management strategies listed in Subsection 5.2.1.3 – Salmon should be considered to reduce the potential effects of land use activity on fish, aquatic habitats, and water quality, where applicable. Implement timing windows for lifecycle related habitat types (i.e., overwintering habitat and water withdrawals, spawning streams, etc.) as per Freshwater Timing Windows identified for the Yukon (https://www.dfo-mpo.gc.ca/pnw-ppe/timing-periodes/yk-eng.html)~~
B	Do not allow direct disturbance to known sensitive over-wintering, rearing habitats for juveniles, as well as spawning habitats for freshwater fish.
C	Minimize surface and vegetation disturbance in riparian areas by maintaining riparian buffers/setbacks from development activities where possible.

Commented [A294]: The recommended management practices should be guided by the same principles as those in 5.2.1.3 - Salmon but should be adapted to focus on the habitat requirements of freshwater fish species which may differ from those of salmon.

Replaced content with the relevant management practices for freshwater fish.

5.2.1.3 F is moved to the start of the list, as timing windows affect any/all work in watercourses.

CDE are deleted as none of these types of projects would be approved. If they were, they would require Fisheries Act Authorizations and would not allow blocking migration, water withdrawals, or adverse effects.

5.2.1.3 A and B are included here, but these cases would also require authorizations or not be permitted.

Changed A to prohibit direct disturbance rather than avoid, as no disturbance would be allowed.

Commented [A295]: Large-scale industrial and/or infrastructure projects are undefined terms.

Proponents should not be held up waiting for the Parties to complete this action and could gather some of this information themselves as part of their assessment.

Recommendations to the Parties

35. Research Recommendation	The Parties should work collaboratively with DDRRC and ~~the Yukon Fish and Wildlife Management Board~~ YFWMB to define and map key aquatic habitat for resident fish species ~~prior to the assessment process for large-scale industrial and/or infrastructure projects~~ focusing specifically on spawning and over-wintering habitat within ISAs 3 & 4 and the LMU 3: Chu Kon Dëk (Yukon River Corridor). Data should be made publicly available.

5.2.2.2 Migratory Birds and Raptors

The planning Region includes many known key habitat ~~types~~ for migratory birds and raptors. The Tintina Trench flyway is a unique and important feature for migratory birds, especially during spring and fall migration periods. Key areas for raptors are located along river corridors and high alpine areas and wetlands are critical for waterfowl.

This Plan has recommended SMAs that contain high quality habitat for migratory birds and raptors, including areas of high elevation (greater than 1,000 metres), the Tintina Trench flyway, and wetland complexes.

Management Directions

The Government of Canada (Canadian Wildlife Service) is responsible for the conservation and protection of migratory birds, as populations and individuals, and their nests under the *Migratory Birds Convention Act*.

Planning Strategy**Objectives:**

1. Healthy populations of migratory and non-migratory birds and raptors, including the *Grizzly and Black Bears*.
2. Preservation of flyways and other key habitat.

Key planning issues and interests related to *Grizzly and Black Bears* migratory birds and raptors include:

- Land use activities within key habitat (e.g., river corridors, wetlands) may create adverse effects on birds, particularly during key periods (e.g., spring and fall migration).
- Information about migratory birds is not readily available to project proponents are not well represented in Yukon's Wildlife Key Areas database.

Recommended Management Practices

- a As per guidance from the Canadian Wildlife Service, project planning should consider avoidance of activities in migratory bird high concern areas (such as and the Tintina Trench flyway) and during key migratory periods (spring and fall). (See Map 4 – Selected Ecologically Important Areas).
- b Avoid or minimize disturbance in areas where elevation is greater than 1,000 metres to protect migratory bird specialist species that use high elevation habitats.

Recommendations to the Parties

36. Research Recommendation	The Parties should undertake research initiatives with the Canadian Wildlife Service, and other planning partners as appropriate, to build knowledge of the location of key staging and nesting areas in the planning Region to further build information available to project proponents Yukon's Wildlife Key Area database. This research should consider/monitor how projected climate change, such as shifts in freeze-thaw cycles, could alter accessibility, timing, and use of staging and nesting areas.

5.2.2.3 Species at Risk and Rare Endemic Species

The Planning Region contains many terrestrial and aquatic species that have been identified as at-risk by federal (*Species at Risk Act* (SARA)) or territorial (*Wildlife Act*) legislation. In addition, the Region is also home to globally rare endemic species that are not known to exist outside of the Region or territory. The planning region is home to many large and relatively healthy widespread populations of federally listed species at risk that have declined in other regions in Canada, such as, Bank Swallow (*Riparia*

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Commented [A296]: Population and habitat are two separate issues.

Commented [A297]: If the planning issue is that information is not readily available to project proponents, we recommend stating so rather than pointing to a particular platform. The Wildlife Key Area program is from YG and is not necessarily intended to reflect all migratory bird information that the Canadian Wildlife Service has.

Commented [A298]: Clarify if the only area of concern is the Tintina Trench. If only Tintina Trench, make SMD for LMU 10

Commented [A299]: Map 4 shows the Tintina Trench flyway and migratory bird high concern areas separately (according to the legend) but it is difficult to decipher where the migratory bird areas are.

Commented [A300]: This direction is overly broad and it is unclear why habitat over 1000m was chosen when wetlands and river corridors are identified as key habitat in the issues and interests. The *Migratory Birds Act* and *Species at Risk Act* provide protections for birds and prevent the destruction of habitat. If the Commission feels further direction is needed they should be specific

Commented [A301]: The Wildlife Key Area program is not necessarily the venue for information about migratory birds. It is maintained by the Government of Yukon, while the Canadian Wildlife Service is responsible for migratory birds.

Commented [A302]: Added specifics as to what species are found within the region and their status elsewhere.

Management Directions

riparia), Grizzly Bear (*Ursus arctos horribilis*), Transverse Lady Beetle (*Coccinella transversoguttata*), and Wolverine (*Gulo gulo*). This also includes two bumble bees listed or under consideration for listing under the SARA: the Gypsy Cuckoo Bumble Bee (*Bombus bohemicus*) and Suckley's Cuckoo Bumble Bee (*Bombus suckleyi*). The planning region's healthy population of native bumble bees are significant against a backdrop of widespread declines in bumble bee numbers across North America.

For many of the species at risk that occur in the planning region, their populations in the region represent the northern limit of their ranges. These populations are extremely important for adapting to threats such as climate change. Species such as the Little Brown Bat have experienced sudden and dramatic declines across the eastern portion of their range due to white nose syndrome. The Little Brown Bat population in the Dawson region is one of the northernmost populations in Canada. As climate warms, Little Brown Bats are expected to shift their ranges northward and this population will likely be a source of their range expansion. The planning region is also the northern limit of a number of native bees. Given their potential importance in future range shifts and adaptation to climate change, northern range edge populations should be high priority targets for conservation efforts.

During the Last Glacial Maximum (roughly 26,500 -15,000 years ago), plant populations were able to persist throughout the planning region in ice free areas referred to as Beringian refugium. As glaciers retreated during inter-glacial periods, populations from the Beringian refugium expanded into the newly available habitats. Many common North American species are thought to have their origins in the Beringian refugium but have subsequently spread across the continent. However, a suite of species have not expanded widely from these refugial areas resulting in the planning region being a hotspot for vascular plant endemism and an outsized contributor to the vascular plant diversity of Canada.

The planning region is home to several globally rare endemic species. These species have restricted distributions and some are found only in this part of the territory. These endemic species have unique ecological roles and contribute to the overall biodiversity of important ecosystems such as low elevation steppe meadows or alpine areas. Many of these species, such as Spiked Saxifrage, which is also a federally listed species at risk, are particularly vulnerable due to their limited geographic range, and specific habitat requirements.

Some of these species are managed under recovery strategies or management plans by the appropriate levels of government. More information about the status of species-at-risk can be found on the Yukon Conservation Data Centre which tracks **Species at Risk** species of conservation concern and rare species occurrences (<https://yukon.ca/en/species-data>). Recovery strategies and management plans for federal species at risk can be found at the species at risk public registry.

Planning Strategy**Objectives:**

Management Directions

1. Resilience of species at risk and rare endemic species.
2. Preservation of critical, rare, or unique ecosystems while considering that some ecosystems are likely to shift due to climate change.

Key planning issues and interests related to grizzly and black bear species at risk and rare endemic species include:

- The projected loss of habitat as a result of climate change and potential adverse impacts from mineral exploration and development are of particular concern for the following species: spiked saxifrage, and Yukon podistera, and the bank swallow.
- Honey bees and non-native insects introduced for agriculture can introduce diseases to native bees that have devastated their populations in southern Canada, and can out-compete native bees for floral resources.

Recommended Management Practices

a	Apply mitigations for known locations of species at risk or rare endemic species as provided by Canadian Wildlife Service and Government of Yukon.
b	~~Avoid activity that may cause disturbance or destruction of Bank Swallow residences whenever the burrow is occupied, which is typically during the nesting period that may extend from early May to late August in the Yukon, where found along clay/silt banks in river corridors, sandy banks along roads, and stockpiles and mining pits, as per Species at Risk Act.~~
b	Integrate species at risk recovery strategies (https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies.html).
ec	Continue to work with Government of Yukon and Canadian Wildlife Service and other planning partners to identify and document species at risk or rare endemic species in the project area in advance of submitting a project for review/assessment.
d	Avoid or minimize disturbance in rare habitats and ecosystems, for example, steppe, riparian old growth, saline flats, alpine wetlands.

Commented [A303]: Bank swallow habitat is not impacted by exploration or climate change and there is no critical habitat as defined by the Act in the region.

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Commented [A304]: Added a planning issue for native bees.

Commented [A305]: Could be removed, this is required under the *Migratory Birds Convention Act* and *Species at Risk Act*.

Commented [A306]: YG has some of this information

Recommendations to the Parties

37. Policy Recommendation	The Parties should implement recommended SMAs, some of which contain known occurrences of species at risk and ecosystem types that are likely to contain species at risk or rare endemic species based on best available information. The recommended SMAs also provide for landscape connectivity which will help to sustain healthy habitat for other species at risk (e.g., grizzly bears).
Policy Recommendation	The Parties should continue to advance research, knowledge sharing and action in the planning region in a manner that is consistent with this Plan. This work will increase awareness of the planning region's unique biodiversity, and advance proactive actions that will safeguard this unique biodiversity.

Commented [A307]: Added recommendations that will support the planning issues for species at risk and rare/endemic species.

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Commented [A308]: Don't need recommendations in the Plan to accept other parts of the Plan. Parties sign off on the Plan as a whole.

Research Recommendation	The Parties should continue to prioritize research that increases our understanding of rare species and ecosystems, in particular low elevation steppe meadows and alpine areas, and monitor changes to those species and ecosystems. This knowledge should be used to advance biodiversity impact mitigations for proposed activities.
Research Recommendation	The Parties, in partnership with the Canadian Wildlife Service and other agencies, should continue to monitor distribution of federally-listed species at risk, as defined by the Species At Risk Act, 2002, to ensure pro-active management and recovery actions can be undertaken to ensure these species continue to prosper within the Planning Region.
Research Recommendation	The Parties should work collaboratively to identify the species at risk, rare endemic species and the ecosystems in the planning region that face the highest risk from a changing climate to inform management of activities in those areas.

5.2.3 Water

Water is an important, and complex resource in the Rregion. It flows through the ground, creeks, and rivers of the Rregion, and sustains the Rregion's plants, animals, industries, and communities. The nature of water, in its ever-changing state, necessitates a holistic approach to first recognizing the importance of it, and second to guide the stewardship and use of it. The Plan addresses many of the issues and interests surrounding water in multiple sections. The following section on water is a synopsis of the various sections where water is addressed in the Plan. The purpose is not to provide a planning strategy pertaining to water specifically, but rather, to emphasize the interconnectedness of water and to direct Plan users to the sections that discuss this value.

Habitat

Water is habitat for the salmon and other fish species that live in and pass through the Rregion. Mitigating the potential effects of land uses on the quality and quantity of aquatic habitat is of critical importance to sustaining healthy populations of salmon and other fish species and this is reflected in the sections indicated below. In addition, the Plan recommends that the Parties examine the current water withdrawal tracking system to explore opportunities for improvement and to better understand the impact on aquatic habitat in the Rregion.

- **Section 5.2.1.3 – Salmon** (page 81)
- **Section 5.2.2 – Other Fish and Wildlife Habitat** (page 87)

Rivers and Watercourses

The many rivers of the Dawson Pplanning Rregion hold high ecological, economic, heritage, and cultural importance. Besides LMU 3: Chu Kon Dëk (Yukon River Corridor), the Plan has not identified major river corridors that require specific management direction as all rivers and watercourses are important. The main objective for rivers is to maintain and enhance their multi-use character by maintaining their ecological and

Commented [A309]: Does not follow the structure of these subsection. Need to align (overview, planning strategy, objectives)

Commented [A310]: Combine with 5.2.4 Rivers and Watercourse. See the readability/structure document.

Management Directions

cultural integrity and balancing their economic uses (i.e., transportation, tourism, etc.). General management directions along with the special management directions outlined in **specific LMUs the following sections** contribute to achieving this objective:-

- **Section 5.2.4 – Rivers and Watercourses** (page 93)
- **LMU 4: Tsey Dëk (Fifteenmile)** (page 180)
- **LMU 6: Tr’ondëk (Klondike)** (page 190)
- **LMU 11: Goldfields** (page 218)
- **LMU 12: Tr’ondëk Tāk’it (Klondike Valley)** (page 224)
- **LMU 14: Tāy Dëkdhāt (Top of the World)** (page 232)
- **LMU 16: Wëdzey Nāhuzhi (Matson Uplands)** (page 244)
- **LMU 19: Tādzan Dëk (White River)** (page 258)

LMU 3: Chu Kon Dëk (Yukon River Corridor)

The Yukon River Corridor has been assigned its own Land Management Unit, designated as a Future Planning Area. A phased approach to the stewardship of the Yukon River reflects the recognized value of the river to the territory and internationally. The Plan recommends temporary withdrawal from mineral staking until such a time that a sub-regional plan is complete. Please refer to **LMU 3: Chu Kon Dëk (Yukon River Corridor)** (page 174) for special management direction related to the Yukon River Corridor.

Community

Water for community consumption must be prioritized. The Klondike River Watershed is extremely important for the City of Dawson and surrounding communities’ drinking water. Swede Creek and the Fortymile River are also essential drinking water sources. **General management directions and special management directions outlined in the following sections speak to prioritizing water for community consumption:**

- **Section 5.3.5 – Community Growth** (page 117)
- **Section 5.3.6 – Recreation** (page 121)
- **LMU 12: Tr’ondëk Tāk’it (Klondike Valley)** (page 224)
- **LMU 14: Tāy Dëkdhāt (Top of the World)** (page 232)

Economy

Water is essential for a healthy economy. The main industries in the **R**region rely on water in one way or another. The day-to-day operations of the mining industry, specifically placer operations, require immense amounts of water to function.

Access by water is relied upon **in** areas where there is limited access, e.g., barges are used to transport machinery and supplies to worksites. Agriculture, though not as intense, relies on the availability of water for irrigation, and tourism and recreation opportunities are enhanced throughout the **R**region by the presence and use of the **R**region’s rivers. **The following sections speak to the use of water and the economy:**

- **Section 6 – Landscape Management Units** (page 160)
- **Section 5.4.1 – Mineral Exploration and Development** (page 124)
- **Section 5.4.3 – Transportation and Access** (page 129)

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Field Code Changed

Commented [A311]: YG does not support interim withdrawals, see letter for suggested approach for LMU 3

Commented [A312]: This list does not indicate what about these sections relates to water and community

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Field Code Changed

Management Directions

- **Section 5.4.4 – Agriculture** (page 145)
- **Section 5.4.5 – Tourism** (page 148)

5.2.4 Rivers and Watercourses

The many rivers and watercourses of the Dawson Planning Region hold high ecological, economic, heritage, and cultural importance.

Watercourses throughout the Region range from intermittent creeks to major international rivers such as the Yukon River, each with its own unique characteristics. At the same time, the riparian corridors along these rivers also hold important economic, ecological, heritage and cultural importance.

Watercourses form a major route of human access throughout the Region, either by boat in the summer or over ice in the winter. They are also fish highways migration corridors and spawning grounds as well as being important for other wildlife that utilize the river corridors.

For First Nations people, the rivers are part of who they are—part of their being. Along the rivers, there is a concentration along the rivers of traditional camps, archaeological sites, burial grounds, and gathering places. Traditionally, ceremonies take place along rivers, especially when greeting arriving visitors.

Humans have an existential connection to rivers, whether related to water for drinking, cleansing, access, or as a source of food.

There is increased recreational, tourism and other uses of the rivers of the Region. Currently, the Yukon River is the focus of such uses, but other rivers will potentially see increased traffic too.

Planning Strategy**Objectives:**

1. Clean and pristine water. Healthy aquatic ecosystems and watersheds.
2. Stewardship of rivers enhance salmon habitat and support salmon recovery.
3. Salmon migration routes allow for salmon recovery.
- 4-3. Support sustainable fish and wildlife populations including supporting salmon recovery supported by a healthy aquatic habitat.
- 5-4. Scenic viewscapes with limited visible human footprint.
- 6-5. Cultural appreciation for rivers.
- 7-6. Maintain sustainable access (see Section 5.4.3.5 – Water Access).

Key planning issues and interests related to rivers and watercourses include:

- Rivers, watercourses, and riparian areas are highly valued ecosystems.
- Watercourses hold high cultural and traditional value.
- Watercourses are important economically in terms of their use for tourism and access. Productive placer gold mining overlaps with riparian areas (e.g., Indian River and its tributaries).
- The cultural impacts of human-altered watercourses are:

Commented [A313]: This list does not indicate what about these sections relates water and the economy

Commented [A314]: See Suggested changes document for suggested consolidation of this and 5.2.3.

Commented [A315]: If “clean and pristine water” is meant to cover water for human consumption it should be a bullet separate from healthy aquatic ecosystems.

Commented [A316]: Support salmon recovery is ultimate goal, other pieces are actions that can achieve this that should be reflected in management directions. Added salmon with other fish and wildlife objective below.

Commented [A317]: Covered in 1st objective.

Management Directions

- The reduced use of an area (harvesting, recreational and/or traditional pursuits).
- Lost opportunities for Tr'ondëk Hwëch'in to pass along traditional knowledge and language.
- A reduced connection to the land.
- **Destruction of heritage resources.**
- There is increased garbage and waste accumulating along rivers. Much of this is related to human waste from recreational users and tourists. ~~This, but~~ also includes industrial waste fuel drums at barge landings.
- Human activity has the potential to negatively impact watercourses through water contamination, sedimentation, and changes to water regimes. Fish habitat may also be impacted or lost. Activities of most concern in the Dawson ~~R~~region include:
 - Placer mining
 - Barges and river crossings
 - Quartz mining (e.g., Coffee Project, Victoria Gold)
 - Jet boat use
 - Recreational and tourism use.
- Climate change is having impacts, including water level changes, shifting shorelines, increased run-off, stream bank erosion, ice conditions and temperature changes. These jeopardize water quality, public safety, transportation use, heritage sites, and traditional uses. A potential impact of this is increased infrastructure costs and capacity needs.
- Rivers and other waterways fall under ~~various the~~ jurisdictions, ~~including of~~ Government of Canada, Government of Yukon, and Tr'ondëk Hwëch'in Government.

Commented [A318]: Many heritage resources along rivers and watercourses

Recommended Management Practices

a	Conduct activities in a way that minimizes the runoff of sediment into water courses.
b	~~Monitor the use of rivers, watercourses, and riparian zones. Use an integrated approach considering cumulative impacts and include the full range of users, from industry to recreational use.~~ ~~There needs to be better monitoring and enforcement related to barge landings. When a permit/licence changes hands, clean-up is recommended.~~

Commented [A319]: These are three separate issues.
The first (monitoring of rivers) is beyond the ability of proponents.
The second (monitoring and enforcement) is also beyond proponents but does not provide specific direction.
The third (clean-up) is likely not desired if operations are intended to continue. YG recommends ongoing reclamation work during the course of a permit/license.

Recommendations to the Parties

38. Policy Recommendation	~~Promote "leave no trace" approaches to recreation and tourism activities along the rivers.~~
39. Policy Recommendation	~~Monitor water ways for potential adverse impacts of industrial development, in keeping with Yukon Water Board recommendations and support local participation in water monitoring. The Parties to allocate resources to develop capacity for monitoring and guardianship. Capacity includes expertise/local knowledge/ training.~~
40. Policy	~~As part of reconciliation, allocate funding to help~~ Promote and

Commented [A320]: Captured in 5.4.5 a. If this needs to be repeated, make it specific to **1.1.1 Rivers and Watercourses**

Commented [A321]: Recommendation was too broad and did not relate to rivers and watercourses.

Management Directions

Recommendation	<u>support</u> First Nations citizens' reconnection to the rivers.
41. Recommended Action	Parties to work together to explore opportunities for users to educate themselves about respectful use of rivers (e.g., pamphlets, online materials, and signs).
42. Recommended Action	<u>Parties to</u> undertake clean-up initiatives along the rivers to address recreational and industrial waste. <u>Government of Yukon Tourism Branch should take responsibility for this, with participation from Tr'ondëk Hwëch'in Government.</u> Special attention be given to LMU 3: Chu Kon Dëk (Yukon River Corridor) (page 174).
43. Recommended Action	Re-establish traditional ceremonies along the rivers.
Research Recommendation	<u>Expand continuous monitoring of hydrologic, water quality and climate variables throughout the planning region to support detection and attribution of climate change impacts on rivers and water courses.</u>

Commented [A322]: Methods to be determined by Parties

Commented [A323]: Beyond mandate of Tourism Branch

5.2.5 Wetlands

Wetlands in the Rregion hold immense socio-cultural and environmental importance. They are also known to be the site of land-use conflict within the Rregion due to the overlap of potential high mineral value that exists within and near some wetland areas.

Wetlands are land where the water table is at, near, or above the surface or which is saturated for a long enough period to promote such features as wet-altered soils, water tolerant vegetation, and biological activities which are adapted to a wet environment (National Wetlands Working Group, 1997). The wetland classes in the Yukon (as per the Canadian Wetland Classification System) are bogs, fens, swamps, marshes, and shallow open water. Bogs, fens, and some swamps are characterized by having peat, which is an accumulation of partially decayed vegetation or organic matter. Peat takes a very long time to form and is difficult, if not impossible to restore once it is removed.

There are numerous hydrological, biophysical, chemical, and socio-cultural ecological benefits to wetlands including (but not limited to) fish and wildlife habitat, water storage and regulation, carbon storage, erosion control, cultural wellbeing, etc. Wetlands sequester and store carbon, regulate water flows and provide the critical function of flood mitigation. Wetlands are important to the Tr'ondëk Hwëch'in and other First Nations as they are places of immense historic and cultural value where they can exercise their rights and traditional pursuits. Communities rely on intact wetlands to mitigate flood risk and reduce threats to infrastructure (roads and buildings).

Wetlands cover only about 10-12 percent of the Pplanning Rregion (Bond, 2019); (Ducks Unlimited Canada, 2021). Swamps are the most common wetland type (5.7 percent), followed by fens (5.5 percent), bogs (0.4 percent) and marshes (<0.1 percent)

Commented [A324]: Does not follow the structure of these subsection. Need to align (overview, planning strategy, objectives)

Commented [A325]: Changed to align with Wetland policy

Commented [A326]: Brought up from Climate Change section below.

Management Directions

(Ducks Unlimited Canada, 2021). Permafrost plays a major role in the development of wetlands in the Rregion and the loss of permafrost (due to climate change or human activity) is predicted to have significant impacts on wetlands in the future.

The only area that has undergone an extensive wetland inventory is the Indian River Valley (McKenna, 2018). Ducks Unlimited Canada, in collaboration with Tr'ondëk Hwëch'in, have completed a wetland classification mapping project in the Dawson Pplanning Rregion to be used at the watershed level. Work is underway to produce further wetland mapping for the Rregion that should help to identify the extent, location, and classification of the Rregion's wetlands.

Planning Strategy**Objectives:**

1. **Maintain F**functioning wetland ecosystems that support **ecological and socio-wetland benefits and** cultural values.

Key planning issues and interests related to Wetlands include:

- Wetlands are highly valued ecosystems.
- **Wetland complexes in the Pplanning Rregion hold high cultural and traditional value.** The impact of wetlands altered by human activity may result in the reduced use of an area (harvesting, recreational and/or traditional pursuits); the sense that Tr'ondëk Hwëch'in have not upheld traditional laws pertaining to stewardship; and a reduced connection to the land.
- Disturbance in wetlands from development may be considered permanent. For instance, the reestablishment of peatlands (fens and bogs) under the right conditions could take hundreds of years.
- Wetlands are vulnerable to the potential effects of climate change and this risk may be exacerbated by human activity.
- When reclamation of wetland **habitat ecosystems** is completed post-mining, original class and function is not often restored.
- The extent of the impact resulting from the thawing of permafrost ground beneath wetlands is not fully known.
- Wetlands have the potential to support rare flora and fauna in the Rregion.
- **Industrial D**Development has the potential to negatively impact wetland areas indirectly through increased access, contamination, and changes to water regimes and directly through loss of wetlands.
- There are known areas of overlap of high potential mineral value and high ecological and cultural value in wetland complexes in the Rregion.
- The extent and type of wetlands present in the whole Rregion is not fully understood.

Commented [A327]: Already stated in the Overview and in objective before this more broadly.

Recommended Management Practices

The Government of Yukon has **released A Policy for the stewardship of Yukon's wetlands on January 10, 2023. The policy is intended to guide the management and**

Commented [A328]: Information presented here does not follow the same format as other General Management Direction sections. Some information could move up to description of the region or into specific LMUs

Management Directions

~~protection of wetlands in the territory, committed to producing a wetland policy for the Yukon. When work on this policy is complete, it~~

~~The wetland stewardship policy~~ should only supersede the management direction in the Plan if it meets or exceeds the ~~se~~ directions ~~s-set by the Commission.~~

Wetland management in the ~~R~~region should be guided by the best available information. It is understood that new information regarding location of wetlands, ~~quantification of~~ wetland ~~functions and~~ benefits ~~and function~~, cultural importance and traditional use, ~~impacts of~~ climate change, and ~~effectiveness of~~ reclamation ~~activities~~ will continually become available as the breadth of knowledge in these areas grows.

Mitigation Hierarchy

The Mitigation Hierarchy, a widely used concept in natural resource management, is a set of sequential steps that should be followed to minimize the loss and degradation of wetlands. The avoidance of wetlands should be the first approach for any development project.

1. Avoid impacting wetlands,
2. Minimize unavoidable impacts,
3. Reclaim impacted wetlands,
4. Offsetting: In specific circumstances, it may be appropriate to offset residual wetland impacts.

In areas where development is permitted in wetlands, the mitigation hierarchy should apply in sequential order, with the first and most important step being avoidance of wetlands. In circumstances where the ~~original~~ wetland ~~benefits~~ cannot be fully ~~recovered-restored~~ through reclamation (for example reclaiming fens to a different wetland type), further offsetting could occur. This offsetting can for example be (but not limited to) reclamation of historic mining activity or a contribution to the Land Stewardship Trust and should be included in the preparation of a reclamation plan for a project.

Wetland Thresholds

Development in some wetland types should be limited due to their rarity in the ~~R~~region, long ~~recovery restoration~~ times and their ability to sequester carbon. Any development in ~~fens peatlands~~ will result in the change of the wetland type, ~~in general to likely be restored~~ to a 'mineral wetland' (i.e., ~~an open water wetland a marsh or swamp~~). ~~and o~~Over longer timeframes this reclaimed wetland ~~it~~ may revert to a peat wetland. This will have implications on the wetland's ability to store carbon, will affect the hydrology of the wetland ecosystem, the type of species the wetland supports, and the cultural use values of an area.

In areas where there is overlapping mineral and wetland interest, the decision to allow some limited development in wetlands is acceptable and the allowable disturbance allocated is measured at the scale of a permit area or claim block. This decision was made with the reality of the regulatory and reporting system that is currently in place, and the Plan makes recommendations for the adaptation of these

Commented [A329]: Section updated to reflect release of policy

Commented [A330]: If following the hierarchy is a management direction it should follow the same formatting as other management directions to ensure it is not missed by plan users. While the Plan should be read as a whole, management directions should be organized in the same manner across sections to avoid confusion.

Commented [A331]: Changed to be more consistent with other uses of these terms in the Plan.

Commented [A332]: If following wetland thresholds is a management direction it should follow the same formatting as other management directions to ensure it is not missed by plan users. While the Plan should be read as a whole, management directions should be organized in the same manner across sections to avoid confusion.

Commented [A333]: Changed to be more consistent with other uses of these terms in the Plan.

Management Directions

systems in the future through the cumulative effects framework, the creation of a publicly available wetland inventory, and a reporting and monitoring system.

Climate Change and Wetlands

The Government of Yukon and Yukon First Nations declared a climate change emergency in 2019 and 2020 respectively. This Plan acknowledges the role that wetlands play in the mitigation and adaptation of the effects of climate change. These functions include, but are not limited to, the sequestration and storage of carbon and the critical function of flood mitigation. It should also be noted that much is unknown in the north regarding the implications of climate change and the effects that this will have on the Region's wetlands, especially those with underlying permafrost. The guidance set out in this Plan for the protection, careful management, and restoration of wetlands was guided by the reality of the climate change emergency that currently exists in the Yukon.

Wetlands of Special Importance

The Plan includes three areas which should be identified as Wetlands of Special Importance (see **Section 3.2.4.2 Wetlands of Special Importance** for further information):

- Flat Creek Wetlands
- Ladue Wetlands; and
- Scottie Creek Wetlands.

The designation as a Wetland of Special Importance does not require the withdrawal of the area from land disposition or a prohibition of mineral staking, exploration, and mining. However, to receive a new authorization, proponents should describe how they will achieve no loss or reduction of wetland benefits during assessment and regulatory stages. Human activities which impact wetland benefits, but where wetland benefits could be reclaimed or restored post-disturbance, are not consistent with the commitment to no loss or reduction of wetland benefits.

Where human activities overlap with a Wetland of Special Importance, proponents are encouraged to include details on potential wetland impacts and mitigations during the assessment process. If sufficient information on wetland impacts and mitigations is not provided during an assessment, or for human activities that did not trigger an assessment, the Government of Yukon can require information during the regulatory stage prior to considering authorization. This information is required so that the Government of Yukon can assess potential impacts to wetland benefits.

In addition to specific mitigation measures to ensure no loss of benefits within Wetlands of Special Importance, conditions on human activities include, but are not limited to:

- Human activities proposed within a Wetland of Special Importance may not

Commented [A334]: Unrelated to management practices, wetland functions brought up into overview of topic.

Commented [A335]: Further information on what a WSI is, could be combined with earlier information in plan concepts section but should be captured somewhere in the Plan.

Management Directions

alter or convert a wetland from one class to another.

- Human activities may not alter the hydrology or water connectivity within the boundaries of a Wetland of Special Importance. This includes construction of infrastructure, such as semi-permanent or permanent structures, roads or other earthworks.
- Construction of permanent structures is not allowed within the wetland area of a Wetland of Special Importance. Note: construction within the buffer area surrounding the wetland area would be considered based on an evaluation of impacts to wetland benefits.

Recommendations to the Parties

44. Policy Recommendation	No development ~~is to be permitted⁴~~ in undisturbed bogs and marshes throughout the ~~R~~ region.
45. Policy Recommendation	No development ~~is to be permitted⁵~~ in undisturbed fens in: • Special Management Areas; and • ~~LMU 19: Tădzan Dêk (White River) (page 258)~~ Wetlands of Special Importance.
46. Policy Recommendation	Fen Thresholds • In LMU 17: Năn Dhòhdāl (Upper Indian River Wetlands) (page 248) development is ~~permitted~~ allowed in up to 50 percent of fens on a claim block or permit area basis. • For the purposes of measuring fen thresholds, the definition of surface disturbance is as per the glossary, consistent with cumulative effects indicator measurement. • Thresholds should be established with the baseline state of wetlands as of 2022, not based on the amount of fens existing at the time of application. • Proponents should, for each development proposal, identify and verify wetlands, submit a wetland mitigation plan outlining the steps of the mitigation hierarchy when wetlands are identified, and create a wetland reclamation plan for approval before work commences. • Disturbance of wetlands at the LMU scale should be monitored, reported, and tabulated annually.

Commented [A336]: Undisturbed should be the opposite of surface disturbance definition - no disturbance by human activities, those disturbed by natural events should be considered "undisturbed" for the purpose of this direction. YG's ability to determine disturbance of wetlands is similarly limited as our ability to determine surface disturbance to what is visible from satellite imagery.

Commented [A337]: Change to management direction rather than recommendation to the Parties.

Commented [A338]: LMU 19 changed to WSIs as LMU 21 also contains a portion of the a WSI. Change to special management direction for SMAs and WSIs, remove as recommendation to the Parties.

Commented [A339]: As this only applies to LMU 17, it should be changed to a special management direction (combine with 6.17 3b) and removed from recommendations to the Parties.

Commented [A340]: Disturbance itself is not defined in the glossary, surface disturbance is

Commented [A341]: Separate from fen threshold recommendations and change to management practice

Administrative burden would be too high for proponents and regulators to require wetland mitigation and reclamation plan for all projects rather than just those with identified wetlands.

⁴Does not apply to existing permits

⁵Does not apply to existing permits

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47. Policy Recommendation	Wetlands of Special Importance: The Yukon Government of Yukon Draft Wetland Policy proposes 'Wetlands of Special Importance' which can be nominated through the regional planning process. Currently, this designation would mean no loss of wetlands in these areas. Subject to approval of a Yukon Wetland Policy, Scottie Creek, Flat Creek, and Ladue Wetlands are to be designated as Wetlands of Special Importance, under the condition that the provisions in the final Wetland Policy meet or exceed the standard for conserving wetland values management of this Plan.
48. Policy Recommendation	Prioritization of completion of policy documents and wetland guidance The completion of the following wetland-related government initiatives and policies should be prioritized: The Yukon Wetland Policy and the Yukon Water Board Wetland Plan Guidelines. The Commission also supports the prioritized completion of the Government of Yukon and Tr'ondëk Hwëch'in Government's co-developed study on wetlands and guidelines for the reclamation of naturally occurring wetlands affected by placer mining in the Indian River Watershed.
49. Policy Recommendation	Public Awareness Appreciation for wetlands should be promoted through public education, focusing on understanding the values and function of wetlands with the goal of creating stewardship opportunities to further the connection to wetlands in the area.

Commented [A342]: No longer needed, recommendations for these WSIs made in s. 3.2.4.3 and in special management directions for applicable LMUs.

Commented [A343]: Wetland Policy completed. Plan cannot direct the YWB to finish its guidelines.

Management Directions

50. Policy Recommendation	Buffers																
	<u>The following buffers shall should be applied around protected fen wetlands.</u>																
	<table><tr><td><u>Wetland Size (ha)</u></td><td><u>Reserve Zone Width (m)</u></td><td><u>Management Zone (m)</u></td><td><u>Riparian Management Area Width (m)</u></td></tr><tr><td><u><1</u></td><td><u>5</u></td><td><u>60</u></td><td><u>65</u></td></tr><tr><td><u>1-5</u></td><td><u>60</u></td><td><u>40</u></td><td><u>100</u></td></tr><tr><td><u>>5</u></td><td><u>60</u></td><td><u>140</u></td><td><u>200</u></td></tr></table>	<u>Wetland Size (ha)</u>	<u>Reserve Zone Width (m)</u>	<u>Management Zone (m)</u>	<u>Riparian Management Area Width (m)</u>	<u><1</u>	<u>5</u>	<u>60</u>	<u>65</u>	<u>1-5</u>	<u>60</u>	<u>40</u>	<u>100</u>	<u>>5</u>	<u>60</u>	<u>140</u>	<u>200</u>
	<u>Wetland Size (ha)</u>	<u>Reserve Zone Width (m)</u>	<u>Management Zone (m)</u>	<u>Riparian Management Area Width (m)</u>													
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<u>1-5</u>	<u>60</u>	<u>40</u>	<u>100</u>														
<u>>5</u>	<u>60</u>	<u>140</u>	<u>200</u>														
<u>No development should occur within the reserve zone (measured from the edge of the wetland), and only activities that do not harm the integrity of the wetland and reserve zone should occur within the management zone (measured from the outer edge of the reserve zone).</u>																	
<u>The purpose of creating buffers is to protect wetland functions and benefits in areas where development is allowed. Recognizing that the recommended buffer may not be sufficient to protect certain wetland functions or benefits, an adaptive management approach may be used to increase the recommended buffer when site-specific assessment or research is conducted and the revised buffers are agreed upon by the Parties.</u> <u>A buffer of 20 meters around undisturbed bogs/marshes/protected fens wetlands where no development should occur, until such a time that the research can inform a buffer size (undertaken by the Parties as stated in the research recommendations) is conducted.</u>																	
51. Research Recommendation	Buffers The purpose of creating buffers is to protect wetland features and functions in areas where development is permitted. Recognizing that the recommended buffer of 20 meters may not be sufficient to protect intact wetland values an adaptive management approach should be used to alter the recommended buffer when research is conducted and agreed upon by the Parties. The Parties should consider the best available data and literature on wetland buffers to determine a solution based on the characteristics of the watershed, wetland type, and the intensity of associated land activities.																

Commented [A344]: Change to management direction for proponents rather than a recommendation to the Parties.

Buffers taken from existing guidance used for forestry.

Commented [A345]: Incorporated into 50 above

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52. Research Recommendation	Wetland Inventory The Parties are to ensure that wetland classification mapping and hydrological models are done to support implementation of wetland disturbance thresholds. These should be completed using a scale that works for 'on the ground' implementation of the Plan. The mapping already completed by Ducks Unlimited Canada and Tr'ondëk Hwëch'in can be expanded on for the wetland inventory. Parties should prioritize ~~use~~ detailed wetland inventories in areas with concentrations of wetlands and development interest (e.g., LMU 17: Nän Dhòhdäl (Upper Indian River Wetlands) (page 248) and these should be made publicly available for use by regulators and proponents.
53. Research Recommendation	Wetland Research Initiatives The Parties should undertake and promote research projects and initiatives that align with the Plan objectives. These could focus on the following areas: • Effective wetland reclamation strategies to restore wetland functions. • Impacts of a changing climate on wetlands. • ~~Cumulative impact thresholds and wetland ecosystem resilience.~~ • ~~Measurable indicators of wetland health.~~ Collaboration and partnerships with industry, non-profit, academic, and local and international sources of knowledge are needed to create a more complete understanding of the ~~R~~ region's wetlands.
54. Recommended Action	Wetland Development Index ~~The Parties should consider an adaptive management approach to assessing wetland disturbances in areas where development is permitted in wetlands.~~ ~~The DFO Fish Habitat Management System for Placer Mining should be considered as a model for such an approach.~~

Commented [A346]: Include in recommendation 6

Commented [A347]: Removed, as wetland policy now outlines (YG) approach to assessing wetland disturbance. The policy's approach will evolve as the policy implementation progresses, but serves as suitable guidance at this time.

5.2.6 Climate Change

Land use planning in the north must consider the reality of a changing climate and the resulting impacts, of which several are already being experienced in the Dawson ~~P~~lanning ~~R~~region, including permafrost thaw, ~~damage to infrastructure and heritage resources, infrastructure damages~~, as well as variable and inconsistent stream flows.

Climate change ~~has the potential to continue significantly~~is changing the existing biophysical conditions of the Dawson ~~P~~lanning ~~R~~region, as most of the planning ~~R~~region is underlain by permafrost and is therefore susceptible to degradation and thaw ~~from the projected average annual temperature increase by 4.7°C to 5.3°C by the end of 2100 (DRPC, 2020c). Modelling demonstrates that annual average precipitation amounts are expected to increase by 10-40 percent in the Dawson area.~~

Commented [A348]: Text box: write out United Nations Framework Convention on Climate Change rather than using the acronym (it's only used once). Remove "(GHG)" the acronym is not used again.

Commented [A349]: Section 2.7 provides more information on specific anticipated changes, don't need to repeat here.

For this Plan, the Commission considered potential future land uses and their implications for a time horizon no less than of at least 20 years.

Given uncertainty surrounding the magnitude of climate change impacts, we need to enhance our understanding and awareness of climate change in the Planning Region through research, monitoring, and education. Additionally, we must develop and implement climate change resilience, adaptation, and mitigation strategies now and into the future. For these reasons, the Plan relies heavily on the need to consider the potential impacts of climate change through the principle of adaptive management, and how it will be incorporated in Plan updates and reviews.

The scope of this Plan is also limited to what activities and impacts it can consider. A robust approach to climate change must consider both **adaptation** as well as **mitigation** strategies. The Plan focuses on land use adjustments based on the shifts anticipated by a changing climate, as well as ways carbon sinks can be enhanced.

What is the difference between climate change *adaptation* and *mitigation*?

Climate change **adaptation** means adjustment in natural or human systems in response to actual or expected climate change effects, which moderates harm or exploits beneficial opportunities. By contrast, **mitigation** is intervention or policies to reduce the emissions or enhance the sinks of greenhouse gases (GHGs) which contribute to climate change.
(UNFCCC, 2021)

Planning Strategy

Objectives:

The objectives for Climate Change in the Dawson Region are consistent with taken from the Government of Yukon's *Our Clean Future* (2020d):

1. Less greenhouse gas emissions.
2. Access to reliable and affordable renewable energy.
3. Adapt to impacts of climate change.
4. Green economy.

Some targets in Our Clean Future are supported by the *Clean Energy Act* which came into force in November 2022. The *Clean Energy Act* legislates Yukon's greenhouse gas emissions targets, reporting requirements on the Government of Yukon's climate actions, and establishes the authority to set sector-specific targets, but does not include measures for adaptation, renewable energy, or green economy.

Key planning issues and interests related to Climate Change include:

- Changes in climate and permafrost may induce changes in habitat quality, distribution, abundance, and introduce new terrain hazard and geotechnical issues.
- Thawing permafrost and changes to precipitation can lead to changes in overall water quality and availability in the Planning Region, as well as changes to soil

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moisture, runoff regimes, and drainage patterns.

- The way habitats are distributed on the landscape could change over time as a result of climate change. This can compromise the health and productivity of aquatic and terrestrial ecosystems and resulting ecosystem services.
- Consideration of food security issues and climate change adaptation in the Region's agricultural sector (see **Section 5.4.4 – Agriculture**, page 145).
- Climate change can result in the introduction of harmful invasive species to native ecosystems.
- Impacts of forest diseases, insects, and invasive species, as well as changes in forest regeneration and succession.
- Changes to animal species' diversity, ranges, and distribution across the landscape (see **Section 5.2.1 – Key Species Habitat**, page 73 and **Section 5.2.2 – Other Fish and Wildlife Habitat**, page 87).
- Impacts to First Nations culture and heritage, traditional economy, capacity, and rights due to changes to traditional land use, subsistence harvesting success, and gathering (see also **Section 5.3.3 – Harvesting Rights and Activities**, page 113) and **Section 5.4.9 – Traditional Economy**, page 157).
- Permafrost thaw, floods, and soil instability can negatively impact transportation infrastructure and increase maintenance costs as well as lessen the feasibility of winter roads (see **Section 5.4.3 – Transportation and Access**, page 129).
- Climate change can impact economic activities. Altered growing seasons and water flow can impact agriculture practices, changing river conditions can impact water availability for placer mining, and infrastructure hazards could impact various projects.
- There are multiple climate change impacts that affect human health, wellbeing, and subsistence activities in the Rregion.
- Impacts to community growth (e.g., access to water).
- Impacts to heritage and paleontological resources.

Recommended Management Practices

a	Ensure resilience when designing, developing, and maintaining transportation infrastructure (see Section 5.4.3 – Transportation and Access , page 129).
b	Climate change considerations, including <u>information from climate risk assessments and other climate data</u> , potential variability in environmental conditions and adaptation/resilience, should be assessed and addressed in the design and adaptive management of major resource development and infrastructure projects, <u>including transportation infrastructure</u> . <u>Build in resilience to transportation and other infrastructure that may be impacted by slow-onset events such as permafrost thaw, increases in precipitation and temperature and other risks.</u>
c	Apply mitigations to minimize the risk of introducing invasive species related to development activities. Priority should be in previously undisturbed areas and areas of high ecological or socio-cultural value.
d	~~Proponents, land users, and project assessors should apply information from climate risk assessments and other climate data to land management decisions. This includes~~

Commented [A350]: Combined with b

Commented [A351]: Recommendation does not fit in the climate change section but is still an important consideration. Monitoring and controlling for invasive species should also be considered. This may be better suited to the s.5.2.2.3 species at risk and rare endemic species

Management Directions

~~taking steps to ensure infrastructure is resilient to climate change impacts such as permafrost thaw and precipitation changes.~~

Commented [A352]: Parties are the ones making land management decisions not these groups, b otherwise covers proponents/assessors roles.

Recommendations to the Parties

Additional background to Plan Recommendations as follows:

Commented [A353]: Does not follow the structure. Need to align. See Suggested changes document.

5.2.6.1 Special Management Areas

Ensuring ecological integrity is maintained across a broad range of environments provides the greatest opportunity for wildlife to adapt to climate change.

Connected areas will allow wild species to move, adapt, and survive in the face of climate change. Aquatic ecosystems, including waterways, wetlands, and riparian zones, also provide important ecological functions and can provide resilience to climate change. The boreal forest provides essential habitat and can mitigate the impacts of climate change. Aligning with Government of Yukon's *Our Clean Future* (2020d) (Action P5) and with the *Yukon Parks Strategy 2020-2030* (Government of Yukon, 2020a) (Strategic Action 4.2: Develop a Parks System Plan), the **Commission Plan** recommends the establishment of special management areas ~~and the subsequent protection of large intact landscapes.~~

Commented [A354]: Include action text as a footnote to avoid need to cross-reference a separate document.

Commented [A355]: SMAs as currently written (allowing industrial land uses) may not offer this protection.

5.2.6.2 Wetlands

Wetlands are a globally significant carbon reservoir, as long as they are not altered, disturbed, or thawed. While wetlands do emit both methane and carbon dioxide (greenhouse gases) as the vegetation within the wetland decomposes, long-term perspectives (thousands of years) indicate that the amount of carbon they store significantly outweighs the quantity of greenhouse gases they emit (Ducks Unlimited Canada, 2018). The removal of wetland ~~habitat ecosystems~~ and the thawing of permafrost in wetlands will accelerate the changes that come from a warming climate.

This Plan includes thresholds and directions for preserving wetland ~~habitat and ecosystems throughout the planning region, as well as additional wetland protections through~~ the designation of ~~wetlands of special importance~~ a Wetland Stewardship Area in **LMU 17: Nän Dhòhdäl (Upper Indian River Wetlands)** (page 248), ~~LMU 19: Tädzan Dëk (White River)~~ (page 258) and ~~LMU 20: Luk Tthe K'ät (Scottie Creek Wetlands)~~ (page 262) and Wetlands of Special Importance Flat Creek, Ladue River and Scottie Creek Wetlands (see **Section 3.2.4.3 Wetland of Special Importance**).

Commented [A356]: Don't need justification in recommendation

Commented [A357]: All caribou herds should be considered

55. Policy**Recommendation****Fortymile Caribou**

~~Given that caribou habitat is less resilient than other habitat,~~ The Parties should consider climate driven shifts in habitat requirements for the ~~Fortymile Caribou Herd caribou~~ at Plan review to ensure the Plan remains true to the caribou objectives. See also **Section 5.2.1.1 – Caribou** (page 74).

Management Directions

56. Policy Recommendation	Food Security Parties should implement policy and research recommendations in Section 5.4.4 – Agriculture (page 145) to improve self-sufficiency through sustainable and reliable food networks in the Dawson Region, such as making more agricultural lands available.
57. Policy Recommendation	Energy Production The Parties should support the development of alternative green energy sources within the planning Region, including advances in hydroelectricity, biomass, geothermal, wind, and solar.
58. Research Recommendation	Wildlife and Land Use The Parties should continue to support and fund initiatives to better understand the impacts of climate change in the Dawson planning Region. This includes the full consideration of traditional knowledge, which is particularly important for informing our understanding of climate change impacts in northern ecosystems. - Research initiatives may include but are not limited to: - Wildlife species-specific or multi-species vulnerability assessment, and climate-induced shifts in species distribution. - How climate driven shifts impact land use patterns and the pursuit of traditional economic activities. - Identification of refugia areas for plants, fish and wildlife for species at risk.
59. Research Recommendation	Permafrost The Parties should continue to develop specific research initiatives in the planning Region that align with the Goals and Objectives of the Plan: - The identification of high-risk areas for permafrost thaw locations. - The impacts of permafrost thaw on local biophysical conditions, including water quality and availability, flow, and wetlands. - Greenhouse gas emissions resulting from melting permafrost thaw. - Appropriate and effective mitigation measures for minimizing permafrost thaw from resource and road development projects. - Explore techniques for encouraging re-establishment of permafrost. - Geohazard mapping and permafrost studies along major transportation routes, including the Dempster and Top of the World Highway highway corridors.
60. Recommended Action	Consider potential climate change threats and take proactive measures to improve resilience and mitigate the impacts.

Commented [A358]: Don't need recommendations in the Plan to accept other parts of the Plan. Parties sign off on the Plan as a whole.

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Commented [A359]: Recommendation is too broad, unclear how it is different from other recommendations and management practices

61. Recommended Action	Adaptive Management The Parties should follow and implement adaptive management recommendations in the Cumulative Effects (see Section 3 – Plan Concepts (page 41) and Implementation and Review (see Section 6 – Landscape Management Units (page 160) with a particular emphasis on climate change considerations.
62. Recommended Action	Build in resilience to transportation and other infrastructure that may be impacted by floods, permafrost thaw, increases in precipitation and temperature, and other risks.
63. Recommended Action	Build capacity for flood forecasting, preparedness, and response disaster risk reduction, with particular attention to reducing the risk and impact of natural disasters resulting from flooding, landslide and wildfire.
Research Recommendation	Expand collection, and improve accessibility of basic meteorological monitoring data throughout the planning region, with a target of having one monitoring station per LMU.

Commented [A360]: Don't need recommendations in the Plan to accept other parts of the Plan. Parties sign off on the Plan as a whole.

Commented [A361]: Combined with management direction 5.2.6 b

Commented [A362]: Added other risks resulting from climate change

5.3 CULTURE, HERITAGE RESOURCES AND COMMUNITY

The Dawson Region has a rich cultural legacy closely tied to the history and stories of the Tr'ondëk Hwëch'in, other First Nations, early traders and missionaries, the Klondike Gold Rush, and the unique contemporary socio-cultural setting of the area. Maintaining and enhancing cultural and heritage values for all is central to sustainable development.

For the Tr'ondëk Hwëch'in, heritage and culture are a way of life reflected in the beliefs, values, knowledge, and practices passed on from generation to generation. The THFA recognizes and protects this way of life which is based on an economic and spiritual relationship between Tr'ondëk Hwëch'in and the land. Preserving the important history of events like the Klondike Gold Rush also helps contribute to our understanding and interpretation of historical events, while other cultural values, such as placer mining, farming, art, and music, are equally valuable to residents' quality of life.

"Important value for Yukoners to maintain our culture. Especially crucial for First Nations to keep their culture strong."

Survey response, 2019

"[Mining and mineral exploration] are a very important part of our culture, our community, our customs, economy and ability to have the variety of businesses and supplies available in our community. The culture of the mining community, some of which are now 6th generation should also be included in your considerations"

Survey response, 2019

"As a resident of Yukon Territory, we are signatories to the Umbrella Final Agreement and expect all government processes to uphold the full spirit and intent of those Agreements on our behalf. The Final Agreements and the provisions in it ensure Tr'ondëk

Commented [A363]: In other parts, second theme is Culture and Heritage. Should be consistent.

Management Directions

Hwëch'in rights to continue to uphold their cultural practices - throughout their traditional territory."

Individual Draft Plan Response, 2021

"Every and all land is sacred its important to not make a big imprint/footprint on the land."

Survey response, 2021

"[H]umans are walking creatures. Trails are some of our oldest artifacts, etched on our landscapes as the reach of humanity expanded to cover much of the planet. Some say that the history of our species on this planet is written in our trails."

KATTS Draft Plan Submission, 2021

"I regard myself as a responsible placer miner with 30 years of ongoing reclamation behind me that I am proud of. In my spare time, I do a lot of hiking, fishing, hunting, and exploring and enjoying the Yukon wilderness."

Survey Response, 2021

It is important that the management practices and recommendations for the conservation of heritage and cultural values are not read in isolation. These values are addressed throughout the Plan's General Management Directions and are closely tied to the land. As such, they are tied to activities that occur on the land and the habitat that the land provides.

This section of the Plan describes objectives and strategies designed to achieve the goals related to culture, heritage, and stewardship [\(see Section 1.3.2 Plan Goals\)](#).

Socio-cultural Goals

- ~~Land stewardship through application of cultural and heritage values by the Tr'ondëk Hwëch'in, other First Nations, and other residents of the Dawson planning Region.~~
- ~~Land-based activities that strengthen connections to the land in order to promote health and well-being.~~
- ~~Traditional harvesting rights and activities are respected and sustained.~~
- ~~Strengthen and support cultural knowledge and values.~~

5.3.1 Heritage Resources and Sites

Conservation and management of cultural and heritage resources⁶ received careful consideration in the development of this Plan.

First Nations and non-First Nations heritage resources in the planning ~~R~~region include, but are not limited to:

- Harvestable resources (e.g., wildlife, medicines, raw materials)

⁶ in accordance with the Terms of Reference agreed to by the Parties, this Plan does not apply to Klondike National Historic Sites.

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- Traditional knowledge (e.g., oral histories, place names, songs)
- Trap lines, camps and caches
- Trails and travel routes
- Burial and sacred sites
- Archaeological and palaeontological resources
- Historic sites
- The connected, intact landscape and unencumbered waterways.

Defining cultural and heritage resources is complicated, and the above list is by no means exhaustive.

~~The~~ Chapter 13 of the THFA lists heritage routes and sites that are important to the Tr'ondëk Hwëch'in ~~and the THFA includes management principles for heritage resources in the planning region~~. Regional Planning Commissions must account for these routes and sites when developing a regional land use plan (THFA 13.4.6.4, Schedule A and Schedule C). Some routes and sites are within ISAs while others are located within SMAs.

Additionally, in 2019 a Memorandum of Understanding Regarding Collaboration in Heritage Management was signed at the Yukon Forum and establishes the formal process for collaboration on heritage management between representatives from 11 Self-Governing Yukon First Nations, the Council of Yukon First Nations, and the Government of Yukon. This lays the foundations for all Parties to collaboratively achieve a clear and constructive process for heritage matters throughout the territory, including archaeological and palaeontological discoveries, cultural artifacts, and the stewardship of heritage and historic sites.

The ~~Commission has made~~ Plan makes best efforts to recognize and uphold both Tr'ondëk Hwëch'in and Government of Yukon definitions, perspectives, and laws related to heritage resources ~~in this Plan~~. Heritage and historic resources in the planning ~~R~~region are regulated primarily by the THFA, the *Tr'ondëk Hwëch'in Heritage Act* and ~~Yukon~~ *Historic Resources Act (Yukon)*. Definitions of heritage resources, historic sites and objects are not reproduced in this section and readers are encouraged to review the THFA and legislation for further detail in this regard.

Such differing viewpoints can conflict with each other, and proponents and users of this Plan will need be aware of the multiple worldviews regarding heritage and cultural resources. Respect and understanding for non-western approaches to heritage and culture preservation is something the Plan strives for.

“The oral, cultural, experience-on-the-land basis of our heritage makes it flexible, adaptive and evolving. It is a dynamic, living heritage and culture based on traditions which are shaped by our history in a harsh environment.

Balancing tradition and adaptability has ensured our survival. In our way, change and adaptation are aspects of our laws, practices, and values, that have guided and protected us for millennia.”

“The land is central our identity; it is the source of life, we understand ourselves as part of

Commented [A364]: Refer to Chapter 13 of the THFA more broadly as it defines accepted management principles for heritage in the planning region.

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the land, related to the entire natural environment and to everything in it. In our way, we see the interconnectedness of all aspects of life. Everything is imbued with spirit.

Our law requires us to respect and honour our heritage, practices, and protocols, including respect for the land and acceptance of our stewardship responsibilities towards it. Our heritage is our way of life as part of the land.

In our way we do not divide heritage into separate categories. What we consider directly related to our history and culture is not affected by western classification.”

Tr’ondëk Hwëch’in Heritage Act, 2016

Some of the known heritage resources and culturally important areas for the Tr’ondëk Hwëch’in and other First Nations are shown on Map 6 – First Nations Land Use, Heritage, and Cultural Resources. These areas were identified and mapped based on information provided by Tr’ondëk Hwëch’in, Government of Yukon, and local and traditional knowledge of Commission members and others.

However, not all heritage resources or their locations have been identified and documented. Therefore, a ~~cautious-precautionary~~ approach to land use and resource development is required. As land use and development in the Planning Rregion increases, potential impacts to heritage resources also increase.

Planning Strategy**Objectives:**

1. Historic sites, burials ~~sites~~, heritage routes, camps, and other cultural and heritage resources are preserved, including the preservation of healthy, connected landscapes.

Key planning issues and interests related to heritage resources and sites include:

- Conservation of heritage and cultural resources and sites are important ~~to for~~ maintain~~ing~~ First Nations traditional economies, culture, and stewardship. ~~Some of these resources and sites are also important in maintaining a sense of place for Yukoners as a whole, as well as visitors to the region where cultural heritage is such an important contributor to the experience/ understanding of place.~~
- The location of all heritage and cultural resources is not known. New resources and sites are discovered regularly ~~and~~, in many cases, as a result of land development or ~~extraction-mineral exploration or development~~ activities.
- Land use conflicts may arise between conservation of heritage and cultural resources and land use activities in areas of high development activity (for example, when mining or exploration activity occurs in an ISA or along highway and river corridors.)
- For Tr’ondëk Hwëch’in, areas of significant heritage and culture may not have known artifacts in the Western or colonial sense. The nomadic history of the Hän people in the Rregion means that many areas have intrinsic value and

Commented [A365]: Clarify what this means in the context of heritage resources and sites or remove.

If it means to also preserve the landscape in proximity to the resources, change to:
....are preserved within their contextual healthy landscapes .

If it is implying that all healthy and connected landscapes are heritage resources, we disagree, and request removing.

Commented [A366]: Protection of cultural and heritage sites is also important in maintaining a sense of place for Yukoners as a whole, as well as visitors to the region where cultural heritage is such an important contributor to the experience/ understanding of place.

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must be respected. This is not something well understood by Western approaches to heritage and culture, including in legislation and assessment where often 'proof' of something is required before value is ascertained.

- The impacts of climate change to the heritage and cultural resources and sites in the ~~R~~region are yet unknown. There is significant risk that these resources may be lost and connections to the land irreversibly altered.

Recommended Management Practices

a	~~Where required by the Parties, ensure that adequate heritage and historic resource assessments are completed as part of the review and assessment of projects.~~
b	Avoid or reduce the level of land use activities in the vicinity of heritage and historic resources. ~~This may include areas that have not been formally identified but are important for Tr'ondëk Hwëch'in or other First Nations.~~ The assessment process should consider oral traditions and testimony as equal to other forms of evidence and criteria.
c	Avoid or reduce the level of land use activities in cultural and heritage use areas during important seasonal use periods (e.g., use timing windows).
d	Report the discovery of any heritage and/or historic resource within an affected First Nation's traditional territory to their applicable heritage departments, in addition to the Government of Yukon.
e	~~Where impacts to identified heritage and cultural sites and resources may occur, ensure follow appropriate mitigations. are in place using best practices~~ as determined by the Parties and YESAB.
f	Implement monitoring of known cultural and heritage resources and sites with regard to climate change impacts.

Commented [A367]: Redundant, if required by the Parties proponents would have to do this anyways.

Commented [A368]: This is too vague to follow- the *Historic Resources Act* already regulates activities in proximity to heritage resources, and requires mitigations if development activities are to occur.

In order to implement these mitigations, heritage resources have to be identified- asserting that mitigations need to happen where heritage resources are 'not formally identified' could mean everywhere. This seems impractical as a management practice.

Commented [A369]: Include that these are defined during the assessment/regulatory phase

Commented [A370]: Include that these are as defined during the assessment/regulatory phase

Commented [A371]: Mitigations will be tailored to specific circumstances rather than rely on best practices

Commented [A372]: Redundant- already required by *Heritage Resources Act*, this direction could be removed.

Commented [A373]: Change to recommendation to the Parties rather than management direction for proponents.

Commented [A374]: Recommendation 64 uses term "ancestral trails" if this is meant to have the same meaning only one term should be used.

Commented [A375]: Recommendation 71 covers this more comprehensively.

Recommendations to the Parties

64. Policy Recommendation	Avoid the promotion of ancestral trails as recreational trails for use by the public to preserve their heritage and cultural value.
65. Research Recommendation	The Parties should continue to support and fund research to better understand ~~heritage resources including ancestral~~ ~~ancient~~ trails and travel routes within the ~~P~~ planning ~~R~~ region to ensure their cultural and heritage values are appropriately managed and protected, while minimizing potential land use conflicts.
66. Research Recommendation	~~The Parties should continue to research and use traditional Hän names wherever possible on mapping and other products developed through Plan implementation and monitoring.~~
67. Research Recommendation	The Parties should undertake an assessment of the potential impacts of climate change to heritage and cultural resources.
68. Recommended Action	The Parties should jointly develop management guidelines for identified heritage routes and sites within the Integrated Stewardship Area (ISA). Routes and sites within SMAs should be considered as part of each SMA's respective management plan.

5.3.2 Stewardship

Commented [A376]: Remove as this is not an identified value or resource and is repetitive of section 1.9.2.

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As outlined in Section 1, stewardship is a guiding principle of this Plan. The need for and importance of community or land stewardship has been a common sentiment expressed from industry partners, non-profits, the Parties, and members of the public. Respecting that there is a fundamental difference between ancestral stewardship as practiced by Tr'ondëk Hwëch'in and community stewardship as applied more generally, ~~the hope is that~~ this Plan ~~will~~ encourages all people to act as stewards of the ~~R~~region to ensure the land, water, and wildlife are healthy for future generations.

Stewardship has been promoted in this Plan in a variety of ways, including initiatives and direction stemming from Plan general management directions, recommendations to the Parties, the land designation system, and LMU special management directions.

Recommendations to the Parties**69. Recommended Action****Dawson Land Stewardship Trust**

~~The Parties should create and fund a Land Stewardship Trust for the Dawson Region with the mandate to fund projects to promote the ongoing practice of stewardship of the land beyond Plan approval.~~

~~The purpose of the Land Stewardship Trust will be to invite people to think differently about their relationship to the land and to encourage stewardship in the Region. It is not intended to be a regulatory body.~~

~~The Trust should be governed by the Commission, a model demonstrated by the Yukon Fish and Wildlife Enhancement Trust as per Chapter 27 of the FNFA.~~

~~Appendix 4: Dawson Land Stewardship Trust outlines the Commission's vision and intent for the Land Stewardship Trust.~~

Commented [A377]: This is beyond the scope of the Plan

5.3.3 Harvesting Rights and Activities

First Nation and non-First Nation harvesting were carefully considered in this Plan. This Plan strives to respect and consider all types of resource harvesting and subsistence activities in the planning ~~R~~region. The Plan recognizes that harvesting activities such as hunting, fishing, gathering of plants for food and medicine, and trading in goods and services associated with these activities, are important for both Tr'ondëk Hwëch'in and other residents of the Dawson ~~R~~region.

First Nations and other residents of the ~~R~~region spend a considerable amount of time on the land participating in various harvesting activities. Tr'ondëk Hwëch'in continue to exercise their culture through traditional economic activities (see also **Section 5.4.9 – Traditional Economy**, page 157) including, but not limited to, hunting, fishing, trapping, and harvesting plants for medicine and food.

“For First Nations individuals and communities, traditional activities are a time for re-connecting with the land and its environment, bonding with family, and sharing teachings through oral knowledge and history. We pass on and sustain our culture and tradition by being on the land with our children.”

Management Directions***Ninānkāk hq̓q̓ wēk'ātr'ēnōhcha - We Take Good Care of Our Land (2020b)***

The recognition and protection of this way of life is mandated and upheld by the **FNFAIHEA**, including the right to access public lands for harvesting or traditional pursuits, in particular Chapter 6 – Access, Chapter 11 – Land Use Planning and Chapter 16 – Fish and Wildlife. This Plan ~~will~~ **does** not impact First Nations harvesting and subsistence rights ~~established~~ **enshrined** by land claim agreements and **recognized by** constitutional law.

Resource harvesting by non-First Nations people is also an important aspect of residents' identity and attachment to the **Rregion**. Harvesting activities are important for maintaining and building connections to the land, as well as for food security and a sense of community stewardship.

Climate change impacts may affect the **Rregion's** land, water, wildlife, and fish, and thus presents a significant risk to Tr'ondëk Hwëch'in and other First Nation harvesting rights, as well as to non-citizen harvesters. Climate change can affect fish and wildlife habits, changing growth and ripening patterns for medicinal plants.

Additionally, altered winter conditions make travel to harvesting areas potentially inaccessible or dangerous. Food security may be compromised. The potentially harmful effects of climate change on the mental and physical wellbeing of First Nations citizens cannot be overstated.

Planning Strategy**Objectives:**

1. ~~Key areas for harvesting in the planning Region are maintained and protected to support both~~ **Maintain** First Nations and non-First Nations use ~~of key areas for harvesting in the planning region.~~
2. First Nation constitutionally protected rights for harvesting and subsistence activities are upheld.

Key planning issues and interests related to Harvesting Rights and Activities include:

- Conflicts may arise between harvesting and subsistence activities, and other land uses, particularly in multi-use areas such as:
 - Along the Dempster Highway and Top of the World Highway Corridors (see **Section 5.4.3 – Transportation and Access**, page 129)
 - Along rivers (see **Section 5.2.4 – Rivers and Watercourses**, page 93)
 - Certain LMUs, but in particular:
 - **LMU 3: Chu Kon Dëk (Yukon River Corridor)** (page 174)
 - **LMU 11: Goldfields** (page 218)
 - **LMU 12: Tr'ondëk Tāk'it (Klondike Valley)** (page 224)
 - **LMU 14: Tay Dëkdhāt (Top of the World)** (page 232).

Commented [A378]: For the purposes of this section the objective is to maintain the use for these purposes, protection of these areas may maintain the use but other actions could also support this. Actions to achieve the objective should be included as management directions.

Commented [A379]: Upholding FN rights should also be an overall goal of the Plan rather than just an objective for one section. Add to Plan goals.

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Field Code Changed

⁷ See also **Section 5.2.4 – Rivers and Watercourses** (page 94), **Section 5.2.6 – Climate Change** (page 102), **Section 5.4.3 – Transportation and Access** (page 130), and **Section 5.4.9 Traditional Economy** (page 164) for additional planning strategies relevant to Harvesting Rights and Activities.

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- First Nations' opportunities to exercise their harvesting and subsistence rights depend on the continued availability of— and access to—healthy fish and wildlife populations and intact ecological landscapes, heritage, and cultural areas.
- Access to areas used for harvesting may change over time depending on the availability of resources, animal migration patterns, travel conditions, and climate change.
- ~~The impacts of climate change are not yet known, but already c~~Changes to wildlife habits and movements, as well as plant growth and availability, have been observed ~~in response to climate change.~~

Recommended Management Practices

a	Avoid or reduce the level of land use activities in important harvesting, cultural and traditional use areas ~~(See Map 6—First Nations Land Use, Heritage, and Cultural Resources).~~
b	Adhere to appropriate buffers zones ~~(which may be permanent or temporary)~~ as determined by ~~Regional biologists or assessors during assessment or regulatory processes (which may be permanent or temporary)~~ around culturally and traditional important harvesting areas (see LMU 10: Tintina Trench (page 212) and LMU 14: Tay Dëkdhāt (Top of the World) (page 232).
c	Ensure land use activities do not compromise First Nations harvesting and subsistence rights as established by land claim agreements and constitutional law.

Commented [A380]: Map 6 shows most of the region as having some identified features but does not classify them by importance. Remove this reference or create a map that includes a hierarchy of importance.

Commented [A381]: Regional biologists are likely not an appropriate resource for determining buffers around culturally and traditionally important sites. Plan should identify buffers.

Commented [A382]: Clarify if this management practice only applies to these LMUs. If so, make this a special management direction for these LMUs. If not, remove to avoid confusion.

Commented [A383]: This is an objective not a management practice. Move to objectives section

Commented [A384]: Specifies who not what should be collected.

Recommendations to the Parties

70. Policy Recommendation	Working with the DDRRC, the Parties should commit to the continued collection of community-based input related to harvesting activities (e.g., hunters, Tr'ondëk Hwëch'in citizens, ~~affected First Nations' citizens,~~ other local land users) to support community land stewardship and inform the monitoring program for this Plan (see Section 7 – Plan Implementation , page 274). As part of this, new metrics and additional data collection may need to be required.

Commented [A385]: Does not follow the structure of these subsection. See Proposed Changes for Effective Document Writing document.

5.3.4 Hän Language

Incorporating Hän language in the Plan is an expression of the traditional knowledge that is held by Tr'ondëk Hwëch'in and other First Nations. Language is often the link between culture, history, and the land. Recognizing Hän place names and phrases throughout the Plan is an important step in reconciliation and language revitalization.

"We recognize our lands by naming our places and by hanging our stories on them. We practice ceremony when we acknowledge what we value, when we conduct ourselves well, when we sustain each other and when we celebrate our identity as Dënezhu."

We are Dënezhu, Tr'ondëk Hwëch'in Government, 2019

~~Best efforts have been made to incorporate Hän language and other First Nation languages into this Plan by using Tr'ondëk Hwëch'in place names on mapping, when~~

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~~available, for important places, rivers, mountains, and other landscape features. provides a detailed summary of how LMU names were determined for the Plan.~~

Commented [A386]: Don't need to state twice, included in bullet list below.

The Plan has ~~made best efforts to~~ incorporate ~~d the~~ First Nation languages ~~into this Plan~~ by:

- Working with Tr'ondëk Hwëch'in government representatives to identify and provide a Hän name for as many LMUs as possible at this time;
- Working with affected First Nations to identify and provide names of important places;
- Using Tr'ondëk Hwëch'in place names on mapping, when available, for important places, rivers, mountains and other landscape features.

Appendix 2: LMU Names provides a summary of the meaning behind LMU names in the Plan.

Objectives:

1. Promote, utilize, and preserve the language and traditions of the Tr'ondëk Hwëch'in (Source: Tr'ondëk Hwëch'in Constitution) and other affected First Nations.

Recommendations to the Parties

71. Policy Recommendation	Recognizing that the process of language revitalization is ~~an~~ ongoing, Hän phrasing, and place names should continue to be incorporated into the Plan and subsequent planning documents as deemed appropriate. Parties should explore tools and platforms (~~e.g., i.e.,~~ digital, audio files etc.) to promote language as related to the Plan.

5.3.5 Community Growth

The Dawson ~~P~~lanning ~~R~~egion contains significant opportunities for residential, commercial, and industrial development. The City of Dawson, West Dawson and Sunnydale are outside of the Plan's scope, but what happens in the ~~R~~egion will affect all residents and as such, the Plan has made consideration of the community's future and its anticipated needs.

"Community Growth to me means promoting and developing a healthy, strong community that can live sustainably with other species, both plant and animal, in the north. A healthy community promotes families. Families mean the school is thriving. A school is often the soul of the community..."

Survey Response, 2019

"The way Dawson's residential area open up into several hiking path entrances is a beautiful combination of modern life and wanting to maintain close relationships with the earth."

Youth Survey response, 2020

The City of Dawson is the main population centre in the area and provides support for several satellite communities ~~including several satellite communities~~ in the Klondike

Management Directions

Valley, West Dawson and Sunnysdale. Additionally, the Tr'ondëk Hwëch'in Central Land Management Area has been established by the Tr'ondëk Hwëch'in Government for future commercial and residential land use and new government facilities (Tr'ondëk Hwëch'in, 2016). Several of the parcels are within the planning Rregion. Land for new development activities of all kinds is not readily available, and spot land development and residential use of mineral claims is a persistent phenomenon.

Continued availability of potable water ~~for human consumption~~ is a priority ~~for the Commission~~, particularly the catchment areas of the Klondike River, Swede Creek and Fortymile River (**Subsection 5.3.5.1 – Community Water** addresses this).

Additionally, the potential impacts of climate change present significant risk to the community's future prosperity. These impacts include permafrost ~~slumping~~ ~~thaw and ground displacements~~, increased risk ~~from~~ of flooding and ~~increased~~ wildfire activity.

The Parties will need to jointly consider how to support community growth while limiting land use conflict to ensure the Rregion's population is able to grow and thrive in a sustainable way. These considerations should include future ~~sub-regional~~ planning for the Klondike Valley, the area anticipated to experience the most community growth. Notably, this area contains the vast majority of existing residential development ~~in the region and potential areas of growth~~, as well as key areas for recreational use (see **Section 5.3.6 – Recreation**, page 121).

5.3.5.1 – Community Water

The importance of community access to potable water was identified as a key concern by Plan Partners, especially the City of Dawson. The ~~Commission wants~~ ~~Plan intends~~ to ensure the continued availability of potable water in the Dawson Rregion, both within the municipal area and in surrounding development nodes and community use areas. This includes the important Tr'ondëk Hwëch'in heritage sites of Tr'ochëk, Moosehide, and Forty ~~m~~Mile as well as traditional hunting and fishing camps. Potable water is also essential for agricultural development.

Important known community water sources include:

- Wolf Creek – **LMU 6: Tr'ondëk (Klondike)** (page 190);
- The Klondike River – **LMU 12: Tr'ondëk Tāk'it (Klondike Valley)** (page 224)
- The Fortymile River and Swede Creek – **LMU 14: Tāy Dëkdhāt (Top of the World)** (page 232).

Planning Strategy**Objectives:**

1. Community growth ~~is able to~~ occurs in a sustainable way, while respecting ecological, social, and cultural values.
2. Availability of potable water is maintained.

Key planning issues and interests related to Community Growth include:

- The demand for land suitable for residential, commercial, and industrial development and services is growing in the areas surrounding the City of

Commented [A387]: Could include ground subsidence/settling, landslides etc, not just slumping

Commented [A388]: Deleted as sub-regional planning implies a ch.11 process

Commented [A389]: Don't need separate heading for this as it is still related and subsequent planning strategy speaks to community growth more broadly.

Management Directions

Dawson, particularly the Klondike Valley.

- Additional planning is necessary to manage growth and guide development outside of municipal boundaries. Future growth areas for rural residential, commercial, and industrial land uses that cannot be accommodated within municipal and local area plan boundaries should be identified in the Planning Region.
- Climate change presents a significant risk to the Region's future prosperity and community growth should be planned with consideration of this.
- The water source for the municipality of Dawson is located within the Klondike River water catchment area and safety of this catchment is a concern. Wolf Creek, Fortymile River, and Swede Creek are important water sources for the supply of drinking water for residents. Other drinking water sources used by the community are not well known by all land users.

Recommended Management Practices

a	Future community growth should be concentrated in existing development nodes to ensure ecological disturbance is minimized.
b	New residential growth outside of the City of Dawson should consider: • Additional pressure to municipal services and City of Dawson residents • Access to water • Agricultural value (see Section 5.4.4 – Agriculture (page 145)) • Future commercial and industrial growth needs • Recreation access • Active transportation Resource and infrastructure access and demand • Needs for other land uses which may have limited available suitable growth areas
c	Reclamation of mineral development sites in the Klondike Valley should consider the intended future use, particularly residential development.
d	Land users working in proximity to streams that are known sources of potable water should be made aware follow appropriate mitigations must be implemented to ensure contamination does not occur.
e	Integrate climate change assessment into planning processes for development nodes by: • identifying areas subject to risk of increased hazards due to a changing climate (e.g., flooding, geohazards, permafrost thaw, and wildfire); • limiting new development in these areas; and • following best practices to mitigate risk of hazardous impacts to areas of existing or future development or suitable high agricultural value. This includes planning for and mitigating climate change impacts, particularly flood risk and protection of areas of suitable high agricultural value.

Commented [A390]: Unclear what the safety issue is here: Safety of water quality from contaminants? Security of water i.e. water levels? Safety of people in the water bodies? Protection of the water catchment environment from other land uses? Unless this can be clarified of what the safety issue is, remove the issue.

Commented [A391]: Explain why this is an issue.

If it is that there is increased use of the aforementioned sources, then suggest: The reliance on these water sources is enhanced as other drinking water sources are not well known by all land users.

Commented [A392]: Better suited to recommendation to the Parties, covered by 72

Commented [A393]: Parties and the municipality have control over zoning/land release. Therefore, this is better suited to recommendation to the Parties, covered by 72

Commented [A394]: This list is not exhaustive, which could be mis-interpreted. Replaced bullets with broad categories.

Commented [A395]: If this only applies in LMU 12 it should be a special management direction for this LMU.

Commented [A396]: Direction already states that these are known, therefore do not need to make users aware.

Modified to be more applicable to proponents.

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Commented [A397]: The policy did not include how to plan for and mitigate climate change hazards. Added direction to identify areas of hazards, limit development in areas of increased hazard, and follow best practices to mitigate areas that pose a risk to development or areas of high agricultural value.

Recommendations to the Parties

Management Directions

72. Policy Recommendation	New spot land applications for permanent dispositions ~~should only be considered~~ within or in proximity to existing development nodes, ~~subject to LMU Management Intent and Special Management Directions.~~
73. Research Recommendation	The Parties should identify all water sources used by the community ~~and affected First Nations~~ , including for traditional pursuits, to enable land users to plan accordingly. This includes water sources used at important Tr'ondëk Hwëch'in heritage sites including Tr'ochëk, Moosehide, and Forty Mile as well as traditional hunting and fishing camps.
74. Research Recommendation	The Parties should assess flood vulnerability, ~~land stability and wildfire risk~~ and develop appropriate adaptation recommendations to protect development nodes and community assets, similar to the research undertaken for the City of Dawson (~~Flooding in Dawson City: exposure analysis and risk reduction recommendations. Furcotte and Saat, 2022.~~).
75. Recommended Action	~~A sub-regional plan for the Klondike Valley LMU should be jointly developed by the Parties under Chapter 11 of the UFA in collaboration with other planning partners as appropriate. Considerations for the sub-regional plan can be found in LMU 12: Tr'ondëk Tàk'it (Klondike Valley) (page 224).~~

Commented [A398]: Replace “a” above with this, everything is subject to management intent and SMDs so this can be removed, change to management direction.

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Commented [A399]: Recommendation 63 speaks to disaster risk reduction, combine.

Commented [A400]: Covered by special management directions for LMU 12.

5.3.6 Recreation

The Dawson planning ~~R~~region contains significant opportunities for recreational activities. Recreational activities, including hiking, skiing, camping, ~~off-road vehicle (ORV)~~ use and biking, have important ~~mental~~, physical, social, ~~creative, intellectual~~, and spiritual benefits to residents of the planning ~~R~~region. Areas with high recreational value for community use should be acknowledge and maintained. The recreational values that exist within the ~~R~~region also benefit tourism (see **Section 5.4.5 – Tourism**, page 148).

The extensive trail network ~~that exists~~ is an important value within the ~~R~~region. Residents and visitors want access to trails and to maintain the wilderness character of trails and recreational areas. Water is also an important recreational value, with river tours, paddling and jet boats all being popular activities.

Tr'ondëk Hwëch'in citizens are also heavily involved with outdoor activities in the ~~R~~region, including boating, fishing, and hunting. They have a unique perspective regarding areas of high recreational value, with particular focus on the cultural and heritage values within their community (DRPC, 2020c). Trails and travel routes are important for connection with the land and water, which hold immense value in relation to traditional activities such as fishing. There is concern that some recreational users do not fully appreciate the importance of caring for the land and the damage they may cause.

Management Directions**Planning Strategy^a****Objectives:**

1. A diverse range of sustainable recreational opportunities exist in the Rregion.
2. Recreation activities are carried out in a manner consistent with the principles of stewardship and sustainability.
3. New trails and/or the revival of historic trails are developed in a manner consistent with stewardship and sustainability.

Key planning issues and interests related to recreation include:

- Use of recreational areas and trails is growing-increasing outside of municipal boundaries and can conflict with other land uses.
- Residents and visitorsUsers may not be aware of potential damage they may cause when out on the land for recreational pursuits.

Recommended Management Practices

a	<u>In areas of suitable high agricultural value that are being developed for other temporary purposes, land should be reclaimed such that it is left in a natural state that will not degrade the high agricultural value of the land.</u>
b	<u>Maintain access to new and existing recreational trails by delineating their location in proponent's application package, identifying any potential land use conflicts and recommending appropriate mitigation measures (e.g., buffers) as part of the application and review process for new land use tenure.</u>
c	<u>Recreational activities should follow 'leave no trace' principles: (https://yukon.ca/en/travel-safely-yukon-wilderness)</u>

Commented [A401]: Unrelated to recreation and duplicates management direction 5.4.4 a

Commented [A402]: As written this direction partially applies to Parties rather than proponents, should be broken out into management practice and recommendation to the Parties. Separated the policy into sections that relate to Parties.

Commented [A403]: Captured in 5.4.5 a

Recommendations to the Parties

76. Recommended Action	Develop a trails master plan for the Dawson <u>R</u>region, in collaboration with planning partners (e.g., KATTS) that identifies existing trails, historic trails, and potential future trail development opportunities. <u>In areas overlapping with trails, provide this information to applicants with recommended mitigation measures (e.g., buffers) to avoid land use conflicts.</u> <u>Consider projected climate change impacts on safety and accessibility of trail systems.</u>
77. Recommended Action	<u>Implement interim measures as described in LMU 3: Chu-Kon-Dek (Yukon River Corridor) (page 174) and guidance set out in Section 5.2.4 – Rivers and Watercourses (page 93) for the management of the Yukon River Corridor, until such a time that a sub-regional plan can be developed.</u>

Commented [A404]: As written this direction partially applies to Parties rather than proponents, should be broken out into management practice and recommendation to the Parties

Commented [A405]: YG proposes changing LMU 3 from a future planning area into an SMA and an ISA 1.

Otherwise, don't need recommendations in the Plan to accept other parts of the Plan. Parties sign off on the Plan as a whole.

Duplicates recommendation 120

^a See also **Section 5.4.3 – Transportation and Access** (page 130), **Section 5.2.4 – Rivers and Watercourses** (page 94), and **Section 5.4.5 – Tourism** (page 151) for additional planning strategies relevant to Recreation.

5.4 SUSTAINABLE ECONOMY

The Dawson planning Region contains significant economic interests. The Plan considers a range of renewable and non-renewable land uses and sectors, including mineral exploration and development, access and infrastructure, community growth and recreation, agriculture, forestry, and tourism. ~~The Plan prioritized a strong Regional economy that will sustain future generations was a priority for the Commission.~~

Commented [A406]: Add subsection speaking to critical minerals, either as its own section or within s.5.4.1 Mineral Exploration and Development.

Perspectives on Sustainable Economy

The world is going green, and this means sourcing rare earth metals to build batteries, computers and other things the green economy depends on. We believe that placer mined gold from the Yukon is the best and most responsible source of gold in the world.

(Klondike Placer Miners' Association Draft Plan Submission, 2021)

Economies should not be separate from health, we must reimagine how economies function so they reinforce our stewardship relationship with the land, rather than fight against it.

(Individual Draft Plan Submission, 2021)

When exploration and mining is done responsibly and in stewardship and partnership, the economic benefits for the community are substantial

Yukon Chamber of Mines Draft Plan Submission, 2021

Economic growth that supports healthy societies and ecosystems should be supported.

Individual Draft Plan Submission, 2021

Sustainable development, as defined in the THFA, is a key guiding principle in this Plan. To ensure that development occurs with the intention of providing future generations with the wealth and abundance that the land currently provides, the Plan will need to balance economic interests with ecological, cultural, or social values.

This section of the Plan describes objectives and planning strategies designed to achieve the goals related to a sustainable economy (see **Section 1.3.2 Plan Goals**).:

Socio-economic Goals

- ~~• Sustainable development opportunities and activities (both monetary-based and traditional) that result in socio-economic benefits to First Nations, the community of Dawson, and Yukon as a whole.~~
- ~~• Land use certainty and reduced land use conflicts throughout the planning Region.~~
- ~~• Access infrastructure to renewable and non-renewable resources is established, maintained, and remediated in a way that minimizes conflicts and cumulative effects.~~

Commented [A407]: This could be added as a goal.

Commented [A408]: This is written as a goal statement and should be moved to goals or guiding principles.

Management Directions

5.4.1 Mineral Exploration and Development

Mining and mineral prospecting/exploration is a major contributor to Yukon's economy, with mineral production estimated at \$460 million per year. The Dawson Planning Region has tremendous-high mineral potential and contains extensive opportunities for mineral exploration and development for both hard rock and placer mining. The Dawson Goldfields have been a significant producer of gold in the Yukon for over a century. The mining industry, and in particular placer mining, is strongly tied to the socio-economic culture of the community of Dawson, and the history of the Klondike Gold Rush continues to bring visitors to the area from all over the world. As was indicated through public comments:

"The geology of the Klondike has sustained the Yukon through thick and thin for generations and every effort needs to be made to ensure a continuation of a robust mineral and exploration economy which is the heart of the Yukon culture"

Survey response, 2019

"As a placer miner, I value being able to work on the land. My son and his wife work with me, and a third generation is coming."

Survey response, 2021

The conflict between existing and future mineral exploration and mining, and conservation of ecological and socio-cultural values, was a significant challenge in the planning process. Overwhelmingly, mineral exploration and development was identified through public engagement as a planning issue and an interest for the Dawson Region. The need to prioritise some areas for conservation over other interests, including mineral staking, exploration, and potential mining, is key to achieving balance and sustainable development in the planning Region. Considering and incorporating the needs of existing and future mineral exploration and mining, ecological values, and the socio-cultural values attached to both, was a significant challenge in the planning process. Mineral exploration and development were identified through public engagement as a planning issue and an interest for the Dawson region and the Plan strives to allow this activity to occur in a sustainable manner. Sustainable development can be achieved using a variety of methods and tools including following the Plan's recommended management directions, which may mean setting aside areas specifically for conservation purposes.

"Critical Minerals are a major concern for the Government of Yukon as they provide much needed resources as we shift to a renewable energy economy, supported in the Government of Yukon's 'Our Clean Future'"

Government of Yukon Draft Plan Submission, 2021

"The goal of stewardship is to maintain the integrity of ourselves and of the land. We expect justice from the land – that when we do not act with integrity on the land and with each other, there are consequences, and we must rehabilitate the relationship with the land and with each other in order to undo the harm."

Tr'ondëk Hwëch'in Draft Plan Submission, 2021

Mining is an important industry in the Dawson Planning Region. The plan presents a

Commented [A409]: The term "development" used in this section has the same meaning as is commonly used in the quartz exploration and mining industry (i.e. taking a project from exploration to production). However, the term is used elsewhere in the Plan consistent with the glossary definition. To avoid confusion, a clarification note should be added to this section and the glossary to clarify this second meaning and when it applies.

Commented [A410]: Changes proposed to emphasize that Plan does want mineral activity to occur in some areas if completed in a sustainable manner and that separation of conservation and development areas is not the only way to achieve this.

Management Directions

balanced approach for continued exploration and mining, while conserving priority ecological and socio-cultural values, ~~will be accomplished through its implementation of the~~ land designation system and ~~recommended management directions/practices; which are included in the applicable sections of this Plan.~~ In addition to the ~~recommendations outlined in the~~ planning strategy, support for the mining industry has been provided in the following ways:

- Reduction in land use conflicts between different land-based rights holders, through ~~the general and special management directions outlined in the Plan~~ recommendations of best use of land and general directions for multi-use areas.
- Added clarity and certainty on what lands ~~are accessible~~ allow for mineral exploration and development within the Dawson Planning Region, and what conditions are necessary to achieve sustainable development within those areas.

Planning Strategy**Objectives:**

1. Mineral exploration and development contribute to local employment, economic stimulus, and long-term socio-economic benefits.
2. Placer and quartz mine exploration and development are carried out in a sustainable way and contribute to a growing diversified economy.

Key planning issues and interests related to Mineral Exploration and Development include:

- ~~A mineral-prospective land base~~ Land must remain available for placer and hard rock exploration and mining to continue as key economic development activities.
- Early-stage mineral exploration can take place with limited surface or air access; however, mineral development ~~may then require the establishment of all-season roads and related infrastructure beyond grassroots exploration, generally has greater impacts on the land (e.g. linear and surface disturbance, infrastructure development, etc.).~~
- ~~Uncertainty on best use of land has~~ Divergent interests have resulted in land use conflicts ~~between users~~ and delays in the development assessment process.
- Climate change has the potential to ~~increase risks related to~~ impact mining access and infrastructure.

Recommended Management Practices

a	~~Continued~~ Ensure operations on the ground contribute toward the objectives of the region by Adhering to industry best management practices and guidance documents. For example, <i>Yukon Mineral Exploration Best Management Practices for Heritage Resources</i> (Yukon Government, 2010a).
b	Development is guided by cumulative effects indicators for surface disturbance and linear feature density, as set out by this Plan, to reduce overall landscape disturbance.
c	Mining is conducted responsibly and due diligence is exercised by operators to ensure that reclamation requirements are completed.

Commented [A411]: Wording changes to cover more of the impacts of development.

Commented [A412]: Add practices related to reclamation

Commented [A413]: Without context, this could be misinterpreted to apply to internal organizational management practices - e.g., running a business

Commented [A414]: Redundant, all development must follow other sections of the Plan. Does not add additional considerations.

Commented [A415]: Redundant, if its required, it already must be completed. Does not add additional considerations. Additionally, this is an objective, not a management practice and could be moved to objectives or removed.

Management Directions

- d Efforts to educate and support the mining industry in ~~land~~ reclamation and compliance should be encouraged. As the collective knowledge of mining reclamation improves over time, new techniques and strategies should be incorporated into existing regulatory processes and Plan reviews. This strategy supports the principle of adaptive management.

Commented [A416]: This is a recommendation to the Parties not proponents, move to next section.

Recommendations to the Parties

The Plan ~~includes allowance of~~ allows for continued mineral staking, exploration, and development within areas designated as ISA 1 to -4 and mineral exploration and development on existing mineral tenure within SMAs, subject to existing regulatory processes, ~~the and the recommendations general and special management directions of this Plan, and including the~~ cumulative effects guidelines thresholds.

Commented [A417]: There is no section with this title, assumed to be referring instead to thresholds. If not please correct and ensure it is clear what this refers to.

Planning partners in the mining industry have advised that a more consistent, streamlined, and effective assessment and permitting process is necessary to ensure continued success of the industry. To this end, the *Yukon Mineral Development Strategy and Recommendations (2021)* has put forth a series of recommendations which will ~~not be duplicated in this section but should be supported in this section in efforts~~ to continuously improve the mineral exploration and development process ~~by which mineral exploration and development projects are realized~~.

78. Policy Recommendation	~~Allowance of continued mineral exploration and development on existing mineral tenure in SMAs, subject to existing regulatory processes and the recommendations of this Plan, including the cumulative effects guidelines. Development of claims within SMAs must carefully manage activities that may impact the values identified in each SMA (see Section 6 – Landscape Management Units (page 160)).~~
79. Policy Recommendation	~~Allowance of continued mineral staking, exploration, and development within ISA 1-4, subject to existing regulatory processes and the recommendations of this Plan, including the cumulative effects guidelines in Section 4 – Cumulative Effects Framework (page 58). This includes established mining areas including Goldfields, Sixty Mile, Fortymile, and Clear Creek as part of the continued working landscape.~~
80. Policy Recommendation	~~The Plan supports advanced exploration projects currently proceeding in the Pplanning Rregion, subject to the regulatory process and recommendations of this Plan.~~
81. Policy Recommendation	The Parties should consider implementation of the recommendations of the <i>Yukon Mineral Development Strategy</i> related to Strategic Priority #3 to establish effective, efficient, and transparent environmental and regulatory processes.
82. Policy Recommendation	With the aim of fostering relationships built on trust, understanding, and respect, Tr'ondëk Hwëch'in and industry organizations should seek to provide joint educational opportunities for Tr'ondëk Hwëch'in citizens and employees of the mineral industry. Examples include:

Commented [A418]: Nothing in the Plan would otherwise limit this, other uses do not include similar provisions.

Commented [A419]: Nothing in the Plan would otherwise limit this, other uses do not include similar provisions.

Commented [A420]: Remove, not a policy recommendation

Management Directions

	• Participation in TH 101 to educate non-citizens on Tr'ondëk Hwëch'in culture and values • Tours of placer operations for citizens
83. Policy Recommendation	The Parties should encourage ~~the continued work of~~ industry organizations who are implementing industry-led programs such as the KPMA ⁹ 101 ~~to continue this work~~ as a means of promoting excellence and innovation in mining reclamation, strengthening partnerships, and building confidence in the placer mining industry.

5.4.2 Resource Development and Impacts to MMIWG2S+

The Yukon Advisory Committee on Missing and Murdered Indigenous Women, Girls, and Two-Spirited People (MMIWG2S+) developed a Yukon Strategy on MMIWG2S+ (Government of Yukon, 2020b) in response to *Reclaiming Power and Place: The Final Report on the National Inquiry into Missing and Murdered Indigenous Women and Girls*. Yukon's MMIWG2S+ Strategy (2020) includes ~~The strategy provides for~~ four pathways to end violence and 31 action items. ~~that include the cooperation of The Strategy requires~~ all governments, partners, and contributors to join efforts to end violence against Indigenous women and children.

The ~~s~~Strategy identifies the following goals related to resource extraction and major infrastructure projects and the Yukon impact assessment process:

- Eliminate violence related to development projects in both workplaces and communities. Increase the workforce capacity, mitigate negative impacts, and improve the positive benefits for Indigenous women and Yukon communities (3.4).
- Implement culturally relevant, gender-balanced analysis in the YESAA processes (4.4)

The Yukon Advisory Committee on MMIWG2S+ Implementation Plan (2023) is the management tool that guides the Yukon's MMIWG2S+ Strategy's signatories, contributors, and partners towards making the Strategy's vision real.

Recommendations to the Parties

This Plan supports the calls to action within the Yukon strategy for the resource extraction industry, as well as recent efforts by YESAB to consider gender-based violence within the assessment process for applicable resource extraction projects (e.g., YESAB 2017-0211). ~~To further support these important initiatives the Commission recommends the following:~~

84. Policy Recommendation	Proponents should partner with the signatories of the Yukon Strategy on MMIWG2S+ to implement the important actions that have been identified in the strategy. (Government of Yukon,

Commented [A421]: This subsection does not follow the structure of section 5. See Proposed Changes for Effective Document Writing document.

Commented [A422]: Reference/ incorporate the MMIWG2S+ Implementation Plan, found here: <https://yukon.ca/en/implementation-plan-changing-story-upholding-dignity-and-justice-yukons-missing-and-murdered>

Additional guidance has been released since the recommended plan was completed. Add in most recent information below.

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⁹ Klondike Placer Miners' Association

Management Directions

	2020b).
85. Research Recommendation	The Parties should take steps to increase understanding on the relationship between resource and development projects and violence against Indigenous women and girls in the Dawson Pplanning Rregion. YESAB is currently undertaking an evaluation of the effects of industrial activities on the personal safety of Indigenous and non-Indigenous women and girls and LGBTQ2S+ persons in Yukon. The Parties should consider the work that is currently being done by YESAB on this subject to satisfy this recommendation.
86. Recommended Action	~~The Parties shall implement requirements for p~~ Projects that include ~~a~~ camp(s) ~~for accommodation located in remote areas~~ in the Dawson Pplanning Rregion ~~to should implement best practices to increase safety, including but not limited to anti-violence policies, appropriate housing, access to mental wellness support, mentorship programs, and access to adequate cell phone and Internet availability on site~~ prepare gender-based socio-economic and impact assessments.

Commented [A423]: Directed to proponents not Parties. If there are particular action items that proponents should complete, these should be highlighted.

Commented [A424]: YESAB has completed this work (<https://yesab.ca/resources>), clarify if this recommendation has been satisfied. If so, remove, if not, clarify what further work is needed.

Commented [A425]: Term was undefined, broadened for simplicity

Commented [A426]: Change to management direction for proponents.

Commented [A427]: Simplify subsections. See suggested restructuring in Proposed Changes for Effective Document Writing document.

5.4.3 Transportation and Access

Access in the Rregion refers to travel by land, water, and air. Economic development in the Dawson Pplanning Rregion is linked to access ~~to resources, whether for to~~ mineral exploration and development, trapping and harvesting, forestry, tourism, recreation, oil and gas extraction or other activities.

"In order to accomplish anything from tourism, big game outfitting, day to day enjoyment of the country to mining (be it placer, quartz or grass root exploration) access is a must."

Survey response, 2019

"Additional roads and trails mean I am able to access farther on the land for harvesting, however more roads and trails also undermines the things I am going out to harvest, whether that is for berries or a moose. So, it is a balancing act that must be carefully managed. At the moment, the greater issue is that there is no system to track where all the roads are, and there is no regulatory system to reduce public road use, so we have a wild west of access roads in much of the southern Dawson region..."

Survey Response, 2021

"The potential development of roads is a key threat to wildlife and fish populations. Roads provide access to otherwise isolated populations which may not currently be exploited heavily."

Survey response, 2019

Industrial land use, including construction and/or use of aerial, aquatic, or land routes, can ~~have an impact on fish and wildlife populations many values~~. The importance of, and impacts from, access development and use in the Dawson Pplanning Rregion

Management Directions

means all aspects of access must be carefully managed. As such, the management approaches advocated in this Plan are intended to provide opportunities to create overall access management strategies for the Region as well as more specific management directions in areas experiencing increased pressure. ~~The intent is not to inhibit industrial development by restricting access, rather, it is to ensure access development can occur in the Region in a responsible and sustainable, manner.~~

This section first outlines the objectives for access in the Planning Region generally, then summarizes issues and recommendations for five distinct aspects of access:

- **Section 5.4.3.1 – Existing Highway Access** (page 130)
- **Section 5.4.3.2 – New All-Season Surface Access and Winter Roads** (page 136)
- **Section 5.4.3.3 – Off-Road Vehicle Access** (page 141)
- **Section 5.4.3.4 – Air Access** (page 142)
- **Section 5.4.3.5 – Water Access** (page 143)

Please see the **Glossary** for definitions pertaining to access including **all-season access** and **winter roads**.

Overall Objectives:

1. ~~Access infrastructure to renewable and non-renewable resources is established, maintained, and remediated in a way that minimizes conflicts between land users, and~~
- 1.2. ~~Reduce cumulative effects of access infrastructure. (Also Plan Goal).~~
- 2.3. ~~People can access the land, water, and resources in a way that acknowledges and supports the values in each LMU and minimizes conflicts and cumulative effects.~~

Commented [A428]: Recommend keeping to what things are rather than what they aren't.

Commented [A429]: This is an action that achieves the objective. There should be management directions that further detail this.

Commented [A430]: Captured above.

5.4.3.1 Existing Highway Access**5.4.3.1.1 Dempster Highway Corridor**

The Dempster Highway is an important corridor for many activities, including transportation, recreation and tourism, subsistence harvesting, and communications. The highway is a unique and well-known touring route with an international reputation as a 'wilderness highway' and it is Canada's only highway to the Arctic.

There are land uses and interests that overlap along the Dempster Highway. It is promoted as a scenic tourist route and as an industrial/transportation corridor for both the Yukon and Northwest Territories. Infrastructure along the highway includes the construction of an 800-km fiber optic line from the City of Dawson, Yukon to the Northwest Territory border within the highway right-of-way (ROW).

As a multi-use corridor, the highway must be maintained to support land use activities, now and into the future, without undermining the heritage, social, and ecological values around it.

Planning Strategy

Key planning issues and interests related to the Dempster Highway include:

Management Directions

- TH has identified this area as a Cultural Integrity Area due to the high density of heritage resources
- Visitation rates at Tombstone Park are steadily increasing, as is the use of the Dempster Highway to access it. Increased tourism in the area may impact the ecological and cultural setting of the Dempster Highway.
- Increased traffic along the Dempster Highway can impact the stability of the road and result in increased maintenance needs.
- Oil and gas exploration and development activity in the Eagle Plain basin.
- Gravel extraction to support Dempster Highway maintenance and future development can cause disturbances to wildlife, fish habitat and heritage resources.
- Wildlife viewing and highway maintenance activities may be affecting use of key wildlife habitats (e.g., mineral licks, nesting sites).
- Wildlife managers, First Nation governments, and boards are concerned that the high level of hunting along the Dempster Highway is affecting the Porcupine Caribou Herd, and possibly the Hart River Herd.
- Sections of the Dempster Highway underlain by permafrost are vulnerable to climate change, as permafrost thaw can damage highway infrastructure. In addition, river crossings and sections that run parallel to the highway may be at risk from flooding and erosion. Further consideration of how this affects planning and management for the Rregion may be required.
- A portion of the Dempster Highway is designated under the Dempster Highway Development Area Regulations (CO 1979/064) from Km 68 to the NWT border for 8 kilometers on each side of the centreline.

Commented [A431]: Specify which boards or remove if they are captured by “wildlife managers”

Recommended Management Practices

~~Additional~~ management practices related to the Dempster Highway Corridor are not recommended at this time.

Recommendations to the Parties

87. Recommended Action	A sub-regional plan for the Dempster Highway Corridor should be jointly <u>defined and</u> -developed by the Government of Yukon, Tr’ondëk Hwëch’in, <u>affected First Nations</u> (First Nation of Na-Cho Nyäk Dun and Vuntut Gwitchin) and the Gwich’in Tribal Council. The sub-regional plan should consider the following: • <u>The corridor planning area should be defined jointly by the Yukon Government of Yukon, affected First Nations and the Gwich’in Tribal Council.</u> • First Nations’ values, knowledge, Issues and Interests (e.g., Tr’ondëk Hwëch’in Cultural Integrity Area Resolution (CIA)). • Direction and values as set out in this plan for all LMUs that are adjacent to <u>the Dempster H</u>highway, in addition to <u>relevant</u> direction and values ~~as~~ set out in <u>the</u> Peel Watershed and North Yukon Regional Land Use Plans. • Coordinated access management off highway for potential oil and gas development in Eagle Plains basin (<u>North Yukon</u>

Commented [A432]: To simplify this, the Dempster Highway Corridor should be its own LMU with a sub-regional planning designation and the following recommendations as special management directions.

Commented [A433]: The list below is a mix of actions and non-actions – perhaps separate actual recommendations out of the list for consideration or reword for consistency

Commented [A434]: Incorporated into opening paragraph to improve readability.

	Regional Land Use Plan LMU 9: Eagle Plains and LMU 2: Horseshoe, page 170). • Harvesting and traditional economic activities and concerns. • Porcupine Caribou Herd — effects of access to health of the herd and impact to harvest. • Commercial and unguided wildlife viewing activities and concerns. • The visual scenic integrity of views of natural features, from the highway, the entire highway corridor should be maintained. • The impacts of climate change on the highway infrastructure and surrounding area within the corridor (including geohazard mapping and targeted permafrost study). • Unregulated backcountry access (i.e., not authorized under the in areas not controlled through the Dempster Highway Development Area Regulation,) particularly for off-road vehicles (ORV), should not be allowed. • As with all human-caused disturbances, high standards of reclamation/decommissioning should apply to all new surface disturbances within the corridor (e.g., gravel pits and telecommunications infrastructure, bridges etc.).

Commented [A435]: Incorrect acronym

Commented [A436]: This is written to be limited to 300 metres either side of the centreline. If the intent is to maintain views beyond this, specify it.

Commented [A437]: Rather than within the access section, there should be a general management direction to reclaim all disturbances.

5.4.3.1.2 Top of the World Highway Corridor

The Top of the World Highway is a vital travel route **between Yukon and Alaska from May to September**, and traverses through vast landscapes of immense ecological and cultural importance. **The highway provides residents and travellers alike a direct connection to First Nations and Yukon history and culture.** It is an important route between Tr'ondëk Hwëch'in families in Yukon and Alaska. It is **also** an essential transportation route in the summer months for **tourism**, mineral exploration and development and offers year-round opportunities for subsistence harvesting, traditional economic activities, and forestry.

As per **Section 3.2.5 – Corridor Areas** (page 44), the Top of the World Highway Corridor is defined as a **six-hundred=600** metre **wide** area (300 meters from each side of **the** highway centreline).

Local and traditional knowledge suggests that the number of vehicles on the highway is experiencing increased usage and traffic during the summer months **increased from 2014 to 2019**. **Impacts from increased traffic along this important route may can lead to increased litter and disturbance to wildlife. This impact can** result in reduced use for, or effectiveness of, traditional harvesting pursuits of this important area.

Tr'ondëk Hwëch'in and Government of Yukon signed **thea** co-developed **the Top of the World Highway Interpretive Plan** in August 2019. The purpose of the Plan is to enhance the experience for travellers by presenting stories and information about the highway and the stories of local people from the past through present day (Tr'ondëk Hwëch'in & Government of Yukon 2019b). It provides for a framework for the

Commented [A438]: Should mention that this border crossing and the highway are only open between May and September

Commented [A439]: The highway does not directly connect to history or culture

Commented [A440]: Use traffic counts from visitor exit surveys/ferry counts/stats can border crossing data to verify.

E.g. StatCan Table 24-100-520-1
<https://www150.statcan.gc.ca/t1/tbl1/en/cv/recreate.action?pid=2410005201&selectedNodeIds=1D240&checkedLevels=1D1,1D2,2D1&refPeriods=20140501,20240501&dimensionLayouts=layout2,layout2,layout2,layout3&vectorDisplay=false>

Commented [A441]: Explain link between traffic and reduced use/effectiveness

Management Directions

phased implementation of interpretive features, including signage and media representations of the highway.

Planning Strategy**Key planning issues and interests related to the Top of the World Highway include:**

- Increased traffic and human use along the highway can lead to increased litter and disturbance to wildlife.
- Uninhibited use of ORVs can affect wildlife within and adjacent to the corridor.
- Maintaining an environment conducive to carrying out traditional and recreational pursuits is important in this area.
- The impacts of climate change on the highway infrastructure and surrounding area within the corridor
- The proximity and overlap with the Fortymile Caribou Herd along this highway can lead to increased hunting pressure and wildlife-vehicle collisions.

Recommended Management Practices

a	~~Fravelters and users of this area must t~~ Take care not to disturb the unique biophysical and socio-cultural setting of the corridor, in particular with the use of ORVs within key ungulate, ecologically important, and cultural areas. (See Map 4 – Selected Ecologically Important Areas, Map 5 – Ungulates, and Map 6 – First Nations Land Use, Heritage, and Cultural Resources). ~~The use of ORVs should not undermine cultural and wildlife values.~~
b	~~The use of ORVs should not undermine the cultural and wildlife values – see~~ ~~LMU 15: Khel Dëk (Sixty Mile) (page 238) for LMU values.~~
c	The ~~visualscenic~~ integrity and natural aesthetic viewscape ~~of from~~ the highway corridor should be maintained.
d	~~As with all human-caused disturbances, high standards of~~ ~~reclamation/decommissioning should apply to all new surface disturbances within the~~ ~~corridor (e.g., gravel pits, roads, and telecommunications infrastructure).~~

Commented [A442]: Since these management practices only apply to LMU 14, 15, and 21 these would be better suited as special management directions for these LMUs rather than general management directions that are referred back to in these sections.

Commented [A443]: If this is meant to only apply to LMU 15 it should be a Special Management Direction for that LMU, 14 and 21 also overlap the highway.

Commented [A444]: Clarify whether the Viewscape applies to all views from the highway, and what it means to maintain the integrity of the viewscape (e.g., no trail or road access? No surface disturbance?).

As it is currently written, the viewscape only applies to the 300m either side of the highway. If this is not intended, requote to consider views 'from' the highway itself.

Commented [A445]: Rather than within the access section, there should be a general management direction to reclaim all disturbances.

Commented [A446]: Management direction 5.3.3 c (Ensure land use activities do not compromise First Nations harvesting and subsistence rights as established by land claim agreements and constitutional law.) covers this more comprehensively. However, both are objectives not management directions.

Commented [A447]: LMU 16 is not within or adjacent to the TOTW highway corridor.

Recommendations to the Parties

88. Policy Recommendation	~~The integrity of this area must be maintained to ensure harvesting and traditional economic activities can continue.~~
89. Policy Recommendation	Opportunities to promote education and mitigation of wildlife-vehicle collisions along the highway should be explored.
90. Research Recommendation	In collaboration with the Dawson District Renewable Resource Council, the use of off-road vehicles (ORVs) within the Top of the World Highway Corridor should be monitored for: • Impacts to key values. Key values are described in adjacent LMU tables in Section Landscape Management Units. Specifically, refer to LMU 14: Tay Dëkdhāt (Top of the World) (page 232), LMU 15: Khel Dëk (Sixty Mile) (page 238), ~~LMU 16: Wëdzey Nāhuzhi (Matson Uplands) (page 244)~~ and LMU 21: Wëdzey Tay (Fortymile Caribou Corridor) (page 268). • Identification of areas ~~for to create potential~~ ORV management ~~areas, through as per~~ ORV Management Area

Management Directions

	Regulation (OIC 2021/11)
91. Recommended Action	Implement the Top of the World Highway Interpretive Plan (Tr'ondëk Hwëch'in & Government of Yukon, 2019b).
Recommended Action	Monitor and address impacts of climate change on the highway infrastructure and surrounding area within the corridor (including geohazard mapping and targeted permafrost study).

Commented [A448]: Include a recommended action to create an ORV management area should research demonstrate the need/ define an area(s) where this should be done.

5.4.3.1.3 North Klondike Highway Corridor

As per **Section 3.2.5 – Corridor Areas** (page 44), the North Klondike Highway Corridor is defined as a ~~six hundred~~600 meter ~~wide~~ area (300 meters on each side from the highway centreline), that ~~extends~~ expands from the City of Dawson municipal boundary ~~northsoutheast~~ to the ~~end-of-the~~ planning ~~region~~ boundary.

The North Klondike Highway is the only ~~year-round road multi-use transportation corridor~~ connecting the ~~P~~planning ~~R~~region to southern Yukon. It is the critical route for transporting goods and people to the ~~community~~City of Dawson and further north to the Northwest Territories via the Dempster Highway.

The North Klondike Highway is also a key tourism route to the City of Dawson and further west to Alaska via the Top of the World Highway. However, much like the Dempster and Top of the World Highway Corridors, the North Klondike Highway ~~Corridor~~ is challenged by a number of overlapping land uses in some locations. Balancing potential land use conflicts between residential use, agriculture, tourism, industry, infrastructure needs and traditional activities, while conserving key wildlife habitat should be the key focus in this corridor.

Planning Strategy

Key planning issues and interests related to the North Klondike Highway ~~Corridor~~ include:

- Access to aggregate materials near the highway for ongoing maintenance and major future construction projects.
- The corridor is heavily used by First Nations people for traditional economic and subsistence harvesting activities and these rights must be maintained.
- Multiple land uses within the corridor are most prevalent between the ~~community~~City of Dawson and the Dempster Corner.
- A portion of the North Klondike Highway runs through Special Management Area **LMU 10: Tintina Trench** (page 212)

~~Recommended~~ Management Practices

a	~~As with all human-caused disturbances, high standards of restoration should apply to all new surface disturbances within the corridor (e.g., gravel pits, roads, and telecommunications infrastructure)~~
b	~~The integrity of this area must be maintained to ensure harvesting and traditional economic activities can continue.~~

Commented [A449]: Rather than within the access section, there should be a general management direction to reclaim all disturbances.

Commented [A450]: Management direction 5.3.3 c (Ensure land use activities do not compromise First Nations harvesting and subsistence rights as established by land claim agreements and constitutional law.) covers this more comprehensively. However, both are objectives and neither is a management direction

Recommendations to the Parties

As a result of the overlapping land uses and issues concentrated along the North Klondike Highway Corridor, this area of the Dawson Planning Region may require additional consideration.

92. Policy Recommendation	The Parties and affected First Nations should work together to update the <i>North Klondike Highway Interpretive Plan</i> (1996) or alternatively co-create a new North Klondike Highway Interpretive Plan as created for the Top of the World Highway. The interpretive plan should consider: • Tourism and recreational opportunities along the highway • First Nation history, language, culture, stories, and values • Yukon history and stories • Opportunities for education (through appropriate signage)
93. Policy Recommendation	~~The integrity of this area must be maintained to ensure harvesting and traditional economic activities can continue.~~
94. Policy Recommendation	~~New spot land applications for residential development should be discouraged outside of existing development nodes.~~
95. Policy Recommendation	Opportunities to promote education and mitigation of vehicle-wildlife collisions along the North Klondike Highway should be explored and supported within areas of high concern.
Recommended Action	~~Monitor and address impacts of climate change on the highway infrastructure and surrounding area within the corridor (including geohazard mapping and targeted permafrost study).~~

Commented [A451]: Covered by recommendation 72 (New spot land applications for permanent dispositions should only be considered within or in proximity to existing development nodes, subject to LMU Management Intent and Special Management Directions)

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

The creation of new roads and trails opens the land to potential renewable and non-renewable economic opportunities. However, the construction of roads and trails can degrade the environment of an area through vegetation clearing, soil erosion, sedimentation of nearby watercourses, and the destruction and fragmentation of wildlife habitat. Ecological impacts from surface access development are directly linked to socio-cultural use of an area or resources. There is concern in the Dawson Planning Region that the increase in access over time has resulted in increased and potentially unsustainable moose harvest in some areas and an indirect impact to local subsistence harvesting.

~~In this Plan, winter roads are roads or routes constructed and used in the winter without the use of gravel or other soil materials. They are typically made of compacted snow or ice ploughed over a frozen waterway or ground impassable in the summer.~~ Some access routes in the Region may be comprised of several access types including trails, all-season and winter roads, and river or stream crossings by bridges or barge.

5.4.3.2.1 Northern Access Route

Commented [A452]: Simplified

Commented [A453]: Roads also impact cultural and heritage resources.

Commented [A454]: Already defined in the glossary, not needed here.

Commented [A455]: Planning strategy and recommendations are mostly related to new access generally not the NAR, move this section to after these.

Management Directions

The Coffee Gold Mine Project (YESAB file No. 2017-0211) has undergone an executive committee screening process and a decision document has been issued by the Government of Yukon and the federal government to allow the project to proceed, subject to specified terms and conditions.

The establishment and use of an all-season road to access this mine site was proposed, including the upgrading of existing roads and trails, and the construction of new road, for a total of 214 km (37 km of new construction). The proposed Northern Access Route (NAR) originates close to the City of Dawson and travels along existing access roads through the Goldfields (LMU 11: Goldfields, page 218) and ends at the proposed Coffee Gold mine site, which is located approximately 130 km south of Dawson in the lower south of the planning region (LMU 18: Therian Dëk (Coffee Creek), page 254). ~~The NAR presents significant concerns to wildlife along its route, namely from the increased accessibility to areas for moose harvesting and to a lesser degree impacts to excellent winter range. Through assessment, it was determined that the Northern Access Route presents significant adverse effects on moose mortality rates (e.g. increased access for harvesting and collisions) and to a lesser extent impact to winter range habitat for the Fortymile Caribou Herd.~~

Commented [A456]: Changed to align with the Coffee Final Screening Report and Decision Document.

Planning Strategy

Key planning issues and interests related to the new all-season surface access and winter roads include:

- Roads and other linear features reduce the wilderness character of an area.
- New all-season access creates the potential for increased economic activity and opportunities in the region.
- Roads and other linear features result in a direct loss and fragmentation of wildlife habitat and cause indirect impacts on wildlife through ~~a reduction in functional habitat, habitat fragmentation,~~ reduced use, increased harvest pressures, and/or increased levels of predation.
- Road and trail development over permafrost areas results in road instability and erosion which may be exacerbated by climate change and rising temperatures.
- Road development along ridgetops or within valley bottoms of rivers and watercourses can disproportionately impact important ecological or socio-cultural values (see also **Section 5.2.4 – Rivers and Watercourses**, page 93).
- Inadequate ~~management~~ tenure ~~management~~ and/or ineffective reclamation of resource roads leads to the creation of unmaintained highways under the Highways Act.
- Approaches to access management on new resource roads may be ineffective and unenforceable in preventing access to the backcountry. ~~For instance, gates can be easily bypassed or removed, as well as not maintained in working condition.~~
- Current regulations cannot adequately regulate the entire lifecycle of a resource road from construction to reclamation. This has led to ~~many~~

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~~temporary and intended to be privately used~~ resource roads becoming permanent and unmanaged public roads, ~~even when intended to be temporary or for private use only.~~

Recommended Management Practices

~~This Plan recommends the following management strategies for proponents, assessors, and regulatory bodies when considering access development activities.~~ For the purposes of this section, access development includes the construction of any all-season access both on and off mineral claims.

The ~~perceived~~ most significant impact from increased ~~linear feature disturbance~~ access in the Dawson planning Rregion is ~~perceived to be~~ an increased harvesting pressure on moose. As such, in addition to the management strategies below, there are supplemental recommendations specific to moose and surface access included in **Section 5.2.1.2 – Moose**, page 78.

a	Access road and trail routes should take into consideration the avoidance of permafrost areas, ~~areas of high flood risk~~ and wetlands while ~~also noting that south-facing slopes are often home to many rare and endemic species in the Rregion.~~
b	~~The creation of looped access roads or trails should be discouraged.~~ ~~Avoid creating looped access roads or trails.~~
c	~~Opportunities for shared, multi-party use of roads or trails should be explored whenever possible and practical.~~ ~~Where practicably possible, rRoad planning should prioritize efficiency and consider existing roads and all possible users to limit the necessity for multiple roads accessing similar areas.~~
d	Reclamation ~~and decommissioning~~ should occur as soon as roads and trails are no longer needed for resource development activities.
e	Proponents should indicate the access requirements of their projects, including the location, construction process, and reclamation details of all access roads and trails prior to entering the assessment and permitting process of their project.
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 ~~with clear closure objectives.~~

Commented [A457]: Management practices apply. This sentence is unnecessary.

Commented [A458]: Linear features are not always access, terms should not be used interchangeably

Commented [A459]: Is this the same as taking into consideration? Do not use different terms/ phrases to mean the same thing. Are these management practices suggesting a different level of consideration for rare and endemic species? If so, be clear. Make this management practices. If not, remove the ambiguity.

Commented [A460]: Reworded to direct to proponents.

Commented [A461]: Access management plans are discussed in multiple forms in the Plan, in this case for proponents related to a single project and in other instances as an exercise for the Parties to complete on an LMU-scale. The Plan should further differentiate these two to avoid confusion.

Commented [A462]: Specify the LMUs.

Commented [A463]: This would be better suited to be a special management direction for LMUs where this is the case.

Recommendations to the Parties

96. Policy Recommendation	Special Management Areas
	New surface access (all-season or winter roads) must be jointly agreed upon by ~~both the~~ Parties within Special Management Areas. Existing access in Special Management Areas is ~~supported in this Plan allowed to continue.~~ ~~See Section 6 – Landscape Management Units (page 160) for additional access-related special management directions for Special Management Areas.~~

Commented [A464]: Change to special management directions for SMAs, remove from recommendations to the Parties.

Management Directions

97. Policy Recommendation	New surface access (all-season or winter roads) into LMU 7: Wehtr'e (Antimony) (page 196) for Special Management Directions should not be permitted until an Access Management Plan for that LMU is completed jointly by both Parties.
98. Policy Recommendation	The Northern Access Route (NAR) should take into consideration the direction for access and values outlined in this Plan. See LMU 11: Goldfields (page 218) and LMU 18: Therian Dëk (Coffee Creek) (page 254) for Special Management Directions.
99. Policy Recommendation	Due to the environmental impact of all-season access, when access is deemed necessary by Parties and / or accounted for in Access Management Plans, the feasibility of winter access should always be considered first as an option ahead of new all-season roads/trails.
100. Policy Recommendation	The Government of Yukon is currently developing a Resource Roads Regulation that will include regulations for the entire lifecycle of resource roads, from construction to reclamation. The Plan supports the prioritized completion of the Resource Roads Regulation to better inform future land use decision-making in the Planning Region.
101. Recommended Action	The Parties should develop and implement an appropriate framework for the tracking and monitoring of access development and reclamation activities within the Dawson Planning Region. This tracking system should include: • Location and details (i.e., width, length, and surface material) of any newly constructed roads and trails • Information on the status of roads and trails (i.e., active or inactive) • Any on-going/completed reclamation activities.

Commented [A465]: YG does not support limiting access until an access management plan is completed.

This recommendation otherwise conflicts with special management direction 6.7.4 e (In the absence of an access management plan, Parties should jointly determine whether new surface access be permitted, with consideration of the above.)

Commented [A466]: Change to management practice for proponents rather than recommendation to the Parties.

Commented [A467]: Remove, no recommendation

5.4.3.2.2 Access Management Planning Recommendations

Recommended Management Practice 5.4.3.2 f has been included to address an individual project level concern for access development. This strategy should ensure smaller scale access development requirements are planned for and managed appropriately to minimize their impact. However, this strategy does not address the need to look at access development more holistically or cumulatively, which should be the responsibility of the Parties. As such, the Commission recognizes the need for additional recommendations for a higher level of The Parties need to complete more detailed access management planning in areas experiencing higher occurrences of more development. These LMUs have been identified as **LMU 1: Tthetäwndëk (Tatonduk)** and **LMU 7: Wehtr'e (Antimony)**, **LMU 9: Clear Creek** (page 208), **LMU 11: Goldfields** (page 218), **LMU 15: Khet Dëk (Sixty Mile)** (page 238) and **LMU 18: Therian Dëk (Coffee Creek)** (page 254). Furthermore, the Commission acknowledges that there is a limited understanding of the current level of linear disturbance within the Planning Region.

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Commented [A468]: YG does not believe Access Management Plans for LMU 9, 11, 15 and 18 are required, primarily on the basis that they already have existing access routes.

Commented [A469]: Contradicts 3.6.3.1 where linear disturbance is included as an indicator because data is available.
Could say instead, "The Commission acknowledges that there is a limited understanding of changes in linear disturbance levels within the Planning Region since it was last mapped in 2019-2020."

Management Directions

Following the collection of this information, the Parties should explore better access management and planning for those key areas LMUs. The recommendation below is intended to foster a coordinated approach to new road and access route development in areas where significant exploration and development activities are occurring and likely to continue.

102. Recommended Action	In consideration of the baseline linear disturbance data and results, the Parties should develop overarching access management plans for the Planning Region, with the priority for development as follows: 1. LMU 1: Tthetäwndök (Tatonduk) 2. LMU 7: Wehtr'e (Antimony) (page 196) 3. LMU 11: Goldfields (page 218) 4. LMU 15: Khet Dök (Sixty Mile) (page 238) 5. LMU 9: Gtear Creek (page 208) 6. LMU 18: Therian Dök (Coffee Creek) (page 254) At a minimum, Access Management Plans should consider¹⁰: 1. Impacts to key ecological values with an emphasis on moose and caribou from increased access development. 2. Impacts to other land users, including the use of the land for traditional economic activities, subsistence harvesting, and trapping. 3. Impacts to heritage values, cultural landscapes, heritage resources etc. • New transportation routes to areas of significant to high economic value for minerals, tourism, etc. <u>We are supportive of the Parties working to reach consensus on joint access management plans for LMUs 1 and 7, however, in the absence of an approved access management plan, each government reserves the right to develop and approve a plan for its area of jurisdiction, as per the existing regulatory review process.</u>

This recommendation is meant to also address various values potentially impacted by access development, in particular moose, caribou, and the ability to harvest, hunt, or gather. To reduce redundancy, this section will not be repeated in each applicable section throughout the Plan. Rather, reference will be made back to these recommendations where necessary.

5.4.3.3 Off-Road Vehicle Access

An Off-road Vehicle (ORV) is any motorized vehicle that can be driven off paved or

¹⁰ The timing and scope of this recommendation will be at the discretion of the Parties and will be addressed by the Parties as part of implementation planning. Specific strategies and best management practices related to road and access route siting may be included as part of this future access management planning.

Commented [A470]: Clarify which information is required

Commented [A472]: The data used to define baseline levels of linear and areal surface disturbance have not been described. This document must indicate that linear features and surface disturbance were mapped from 2019-2020 imagery and this dataset will serve as a baseline levels for the purposes of the Plan, particularly considering that previous mapping projects have been carried out in this area, prior to the most recent mapping initiative.

Commented [A471]: Assumed that because first list is not in LMU numerical order it is listed in priority, numbering added for clarity. Second list switched to bullets as it is assumed to not be based on priority.

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Commented [A473]: YG does not believe Access Management Plans for LMU 9, 11, 15 and 18 are required, primarily on the basis that they already have existing access routes.

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Commented [A474]: Add to special management directions for the identified LMUs rather than a recommendation to Parties.

Commented [A475]: Access management plans are important tools that should be developed, where appropriate, but YG has concerns that their development may take significant time due to financial and human capacity constraints and sees this as a risk to economic development in the region if withdrawals or the limiting of permits were tied to their completion.

Commented [A476]: The recommendation is included in several sections. It can be included a single time and referenced by number in other sections to avoid repetition.

This paragraph could be reworked and added at the beginning of section 5 as a disclaimer that directions may apply to multiple values but will not be repeated in each section and that a full list of management practices and recommendations to the Parties is available as an appendix.

Commented [A477]: Subsection does not follow the same structure as others in Section 5. See Proposed Changes for Effective Document Writing document.

Management Directions

gravel surfaces. People use several types of ORVs in the **P**lanning **R**egion, including snowmobiles, all-terrain vehicles (wheeled ATVs – quads or Argos-like vehicles), and motor bikes.

Yukon's new *Off-road Vehicle Management Area* (ORVMA) Regulations took effect on January 28, 2021. The regulations have been designed to protect designated environmentally sensitive areas and to manage the use of ORVs in those areas. The regulations support the establishment of ORVMAs in specific areas of Yukon that will have restrictions or limitations for access. Currently, **off-trail** ORV use is allowed in most backcountry areas **except alpine areas**.

The new regulations establish three ORVMAs in Yukon; **only** one of which is applicable in the planning **R**egion: alpine areas 1,400 metres or higher. This habitat type exists within and adjacent to several LMUs within the **P**lanning **R**egion. The regulation recognizes **R**egional land use planning as a primary mechanism to identify and establish additional ORVMAs, as well as through the Dawson District Renewable Resource Council (DDRRC).

Planning Strategy**Key planning issues and interests related to the Off-Road Vehicle Access include:**

- ORV activity can have impacts on wildlife and wildlife habitat.
- ORVs can cause significant damage to soil stability and vegetation.
- ORV activity can result in disturbances to other land users.

Recommended Management Practices

None are recommended at this time.

Recommendations to the Parties

103. Research Recommendation	The Plan supports the ability of the DDRRC to specifically seek public input to identify areas that may require consideration under the <i>Off-Road Vehicle Management Area Regulations</i> .

Commented [A478]: Not a recommendation to the Parties, the Plan can propose areas for ORVMAs separate from the DDRRC.

5.4.3.4 Air Access

The use of aircraft (helicopter or fixed wing airplane) is a primary mode of transportation for most hard rock exploration activities in the **P**lanning **R**egion. It is also used for some placer mine operations inaccessible by road as well as for backcountry tourism and outfitting. This mode of transportation requires the construction and maintenance of associated infrastructure, including airstrips and helicopter pads. These structures are scattered throughout the southern part of the **R**egion, and less numerous in the northern parts to support various land-based activities (e.g., outfitting, exploration).

Planning Strategy**Key planning issues and interests related to air access include:**

Management Directions

- Aerial access (by helicopters or fixed wing airplane) in key areas can result in impacts to key ecological or socio-cultural values.
- Frequent overhead air traffic can lead to changes in habitat use by wildlife and affect outfitting and other wilderness tourism activities.
- Fuel caches can contaminate surrounding soil and/or water quality if not properly managed.
- Clearing of vegetation for airstrips and helicopter pads results in surface disturbance, reduced wildlife habitat, and alteration to wilderness character of an area.

Recommended Management Practices

The below are in addition to all applicable strategies in **Section 5.4.5 – Tourism**, page 148.

a	Aerial flights should follow all applicable best management guidelines on how to minimize impacts to disturbance to wildlife (see <i>Flying in Caribou Country</i> (Government of Yukon, 2010b) and <i>Flying in Sheep Country</i> (Government of Yukon, 2006).
b	Opportunities for shared, multi-party use of airstrips and helicopter landings should be explored whenever possible.
c	Fuel caches should be well maintained, inaccessible by wildlife, and kept at a safe distance from watercourses

Recommendations to the Parties

104. Policy Recommendation	Within SMAs: • existing permitted airstrips and landing locations can continue to be used. • New airstrips should only be permitted in outside of existing dispositions; new airstrips should not be allowed. Existing airstrips and landing locations can continue to be used.

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Commented [A479]: Change to special management direction for SMAs rather than recommendation to the Parties.

Restructured to clarify that both statements apply in SMAs.

5.4.3.5 Water Access

River travel is an important economic and socio-cultural mode of transportation in the **Pp**lanning **Rr**egion. The Yukon River offers robust opportunities for recreational, tourism, traditional economic, cultural, and industrial access to key sites and resources along its main stem and within adjacent areas. Many placer and hard- rock exploration operators use barging as a means to transport equipment, supplies, personnel, and fuel into sites without adequate surface access. Other water access routes exist along the Klondike, Stewart, White, and Fortymile Rivers, however access on these smaller rivers is predominantly via motorboat, jetboat, or canoe.

Stream crossings, which in this Plan are considered to include bridges, culverts, and “fording” (the direct crossing of a watercourse from bank to bank using equipment or vehicles) are prevalent in the **Pp**lanning **Rr**egion. For placer mining, where many sites include watercourses of various widths, stream crossings are necessary activities and

Management Directions

can involve the construction and relocation of bridges, culverts, and fords within the duration of a license timeframe.

Planning Strategy**Key planning issues and interests related to water access include:**

- Transportation routes along all river corridors that involve barging, motor boating, or recreational canoeing can impact important terrestrial and aquatic wildlife habitat and cultural values.
- Improperly constructed stream crossings or barge landings can cause impacts to fish through increased sedimentation or by creating blockages to fish passage.
- Fording or the construction of fords can result in habitat degradation, including sedimentation, channel compaction, infilling, rutting, and the creation of barriers to fish passage or migration. Fording can also result in the destruction of fish, fish eggs or fish food (e.g., insects).
- Tourism and recreation on the Yukon River have caused an increase in human pressures. The Yukon Canoe and Kayak Club and the Wilderness Tourism Association of Yukon have received a Government of Yukon Environmental Awareness Fund application to assess human-caused pollution on the river.

Recommended Management Practices

a	Stream crossings should be constructed to minimize impacts to fish and fish habitat, including a hierarchical approach to construction with the least invasive type being applied first. <u>Proponents should follow Fisheries and Oceans Canada's Interim code of practice: temporary stream crossings.</u>
b	No construction of stream crossings should occur during sensitive time periods for fish (e.g., during spawning or egg incubation). Time periods will depend on species and location as determined <u>on a at a project level assessment by Fisheries and Oceans Canada's Freshwater Timing Windows Identified for the Yukon.</u>
	<u>Ensure that future climate, hydrological conditions, and water quality are considered in design of infrastructure that supports stream crossings.</u>

Recommendations to the Parties

While river travel remains a valuable mode of transportation for various industrial and recreational pursuits, there are unknowns about the impacts of certain watercrafts on the unique ecological and social-cultural setting of the **P**lanning **R**egion. To facilitate the continued and sustainable use of river travel, the following research is recommended:

105. Research Recommendation	Access by water can be an energy-efficient means of transport and can also help reduce the impacts of climate change of overland routes. Parties should research the potential of river corridors as a transportation route considering: • Different watercraft types. • <u>Thresholds for use if this form of access is to be promoted.</u>

Commented [A480]: This is an existing resource that will help accomplish this direction.

Commented [A481]: Covered by management practice 5.2.1.3 f, can therefore be removed. If kept, modify as proposed.

Commented [A482]: Stream crossings should be designed with future climate and hydrological conditions in mind to ensure that this infrastructure continues to support the values of the plan.

- Climate projections predict a significant rise in total precipitation across the region, with projected changes greatest in spring and fall. Climate projections indicate that average annual temperatures for the planning area will also increase, with greatest increases in winter.

- These changing temperature and precipitation patterns can in turn impact freshet levels, seasonal flooding risk and extreme precipitation events (see climate change section 2.7 of recommended plan for more details) all of which could lead to greater risk of damage to stream crossing infrastructure, particularly if these are not designed or maintained with these projected changes in mind.

- This infrastructure damage in turn could impact the water access value identified in this plan, where stream crossings provide recreational, tourism, traditional economic, cultural, and industrial access to key sites and resources along its main stem and within adjacent areas.

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Management Directions

	Comparison made with overland access from a climate change and or cumulative effects perspective.
106. Research Recommendation	The Parties should design and conduct a study into the ecological and social impacts of barging along the Yukon River. The study should consider, at a minimum, the impacts to fish and fish habitat and traditional land use within LMU 3: Chu Kon Dëk (Yukon River Corridor) (page 174). The results of the study should ~~inform development of best management practices and guidelines by the Parties for barging within this LMU~~ be considered during Plan review.
107. Research Recommendation	The impacts to key values in the White, Fortymile, Stewart, Klondike, and Fifteenmile ~~R~~ivers from jet boats are not well understood. Further research into the potential for this activity to affect ~~affecting~~ water quality and salmon habitat should be conducted in these areas, and this information should be ~~used to develop guidance to better manage this activity~~ considered during Plan review.

Commented [A484]: Beyond authority of the Parties, Transport Canada manages navigable waters and watercraft.

Commented [A485]: Beyond authority of the Parties, Transport Canada manages navigable waters and watercraft.

5.4.4 Agriculture

The ~~R~~egion contains some of the most productive agricultural land in the Yukon. Suitable land includes arable land, land for the construction of related infrastructure and accessory uses, and land located within proximity to the community for market purposes. For these reasons, the Klondike Valley has been identified as containing high agricultural potential ~~for the Pplanning Rregion.~~

As of 2018, there were approximately 40 titled lots derived from agricultural land programs as well as several Settlement Land parcels that have been identified as suitable for agriculture by Tr'ondëk Hwëch'in. Of note is the Tr'ondëk Hwëch'in Teaching and Working Farm that is a valued cultural and economic resource.

The importance of, and the desire for continued growth within, the agricultural industry in the Dawson ~~P~~lanning ~~R~~egion was expressed by both Parties and through public engagement. Furthermore, the impacts of a changing climate and calls to increase local food production and security are important considerations.

Public comments on agriculture advised:

"The growth of contemporary agriculture confirms the possibilities for low carbon vegetables."

Survey response, 2019

"Think multi-use. Could we connect natural resource development projects? Start with forestry, move to placer mining, and then go on to agriculture"

Workshop participant, 2021

Overall, local food production is a growing economic input in the ~~P~~lanning ~~R~~egion with significant contributions to the community. The growing trend of culinary tourism can thrive in the ~~R~~egion with increased access to locally produced food. Fostering

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Management Directions

responsible and sustainable growth of the agricultural industry within the region is important to provide an opportunity to increase food security in the region.

Planning Strategy**Objectives:**

1. As indicated in the Government of Yukon Cultivating Our Future 2020: Yukon Agriculture Policy: Increased local food production that improves food security through: (Government of Yukon, 2020e)
 - a. Growth of the local Support the agricultural economy.
 - b. Create and protect Agricultural land availability.
 - c. Promote Resilient and sustainable agriculture.
 - d. Foster Growth through partnerships and community.
2. Ecological integrity is maintained in areas adjacent to agricultural development.

Key planning issues and interests related to agriculture include:

- Suitable land that is both usable for agricultural use and close to the community (for market purposes) is limited and contains competing land-based rights and interests.
- Opportunities for different land uses to co-exist with agriculture in the Planning Rregion should be explored.
- Consideration of food security issues and climate change resilience in the Rregion's agricultural sector (See also **Section 5.2.6 – Climate Change** (page 102).
- Continued access to water for agricultural purposes may be a barrier to the sector's growth in the Rregion. The availability of water will impact the type and amount of agricultural use and may affect existing operations.

Recommended Management Practices

- a In areas of suitable high agricultural value that are being developed for other temporary purposes, land should be reclaimed such that it is left in a natural state that will not degrade the high agricultural value of the land.

Commented [A487]: Consider adding management practices for proponents of agricultural developments

Recommendations to the Parties

The Commission understands that The Klondike Farmers Forum is currently conducting a feasibility study for the location and procurement of an abattoir (slaughterhouse). While agricultural livestock producers in the Dawson Rregion are currently serviced by a mobile abattoir, the growth of the industry in this Rregion may require more consistent and permanent infrastructure.

Furthermore, initiatives to support the multi-purpose use of land for agriculture and mining should be encouraged. The Yukon Government of Yukon has begun to explore this concept, with the development of a seasonal lease agreement between a placer miner and a local producer in the Dawson area in 2020. The Parties should continue to

Commented [A488]: Update based on results of this study if available.

Management Directions

foster collaborative arrangements in the Dawson **P**lanning **R**egion that support the sustainable growth of the agricultural industry.

To support the growing agricultural industry in the Dawson **P**lanning **R**egion, the following research and policy recommendations are proposed:

108. Policy Recommendation	The Parties should support implementation of the Yukon Agriculture Policy (2020), specifically related to Objective #2 (G create and P protect A gricultural L and) scale up local food production and increase self-sufficiency in local food production in the Dawson planning R egion.
109. Policy Recommendation	~~Suitable land for agricultural use that is close to the City of Dawson should be prioritized for agricultural use where practical (e.g., LMU 12: Tr'ondëk Tàk'it (Klondike Valley) (page 224)).~~
110. Research Recommendation	Areas of "high" (class 3 to 5) agricultural potential within the planning R egion (within LMU 12: Tr'ondëk Tàk'it (Klondike Valley) ~~the Klondike Valley~~ at a minimum) should be identified and prioritized for this use ~~with consideration of other values.~~
111. Research Recommendation	The Parties should consider the location of future agricultural development (including type and amount) in relation to future availability and access to water, ~~flood risks – informed by climate change projections, and in consideration of other values within the area.~~
112. Recommended Action	~~The Parties should continue to explore and implement collaborative efforts where multiple interests and rights exist, such as through the development of formal multi-use arrangements between mineral rights holders, forestry, and agricultural producers.~~
113. Recommended Action	The Parties should continue to support research into the feasibility of procuring an abattoir for the Dawson R egion, including the identification of a suitable location for such infrastructure.

Commented [A489]: Duplicates special management direction 6.12 1.6 and covered by recommendation 110.

Commented [A490]: Duplicates recommendations 125 and 130, only need once

5.4.5 **Tourism**

The Dawson **P**lanning **R**egion offers considerable opportunities for tourism, and the ~~community~~-**C**ity of Dawson includes well established tourism services, attractions, accommodations, and businesses. Tourism offers an excellent opportunity for sustainable economic activities in the **R**egion. Tourism in this **R**egion is a significant contributor to the local and territorial economies. While the Yukon is marketed primarily as a wilderness destination, the Dawson **R**egion uniquely represents other tourism values, including the rich cultural history of the Tr'ondëk Hwëch'in, the place of the Klondike Gold Rush, and contemporary placer mining.

In 2023 the World Heritage Committee inscribed Tr'ondëk-Klondike on the World Heritage List on the basis of criterion (iv) "to be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history".

Commented [A491]: Include Tr'ondëk - Klondike World Heritage Designation

Management Directions

Perspectives on the tourism industry in the **P**lanning **R**egion include:

“Dawson’s tourism industry is vital to the continued benefit of the community.”

Survey response, 2019

“Tourism is an important economic driver for the Dawson region, the gold rush history has been the primary theme visitors are looking for. The visitor profile is now including the adventurer and cultural experience type.

Dawson has much to offer in this area and can certainly expand as well.

Visitors are looking for natural habitat, wildlife and on the land experiences.”

Survey response, 2019

Tombstone Territorial Park offers significant opportunities for both guided and unguided tourism activities. Data provided by Yukon Parks indicates a considerable increase in visitation rates at the Interpretive Centre, Tombstone Mountain Campground, and the backcountry camp sites, with a 176 percent increase in visitation to the interpretive centre from 2008 to 2018 (Government of Yukon, 2020a). While the management of the park itself is excluded from the scope of this Draft Plan, it is important to consider how this growing tourism pressure will impact the important ecological and cultural setting of the Dempster Highway area, as well as how this increase will impact the overall visitor experience in the Dawson **R**egion in general.

Other important areas for tourism in the **R**egion include the Top of the World Highway and the Klondike Valley, as well as major river corridors including the Yukon, Klondike, and Fortymile rivers. Impacts to the visual integrity of river and highway views, and high levels of overhead air traffic, affect the quality of wilderness travel through these areas. Conversely, high levels of tourism traffic in these areas can have adverse impacts on wildlife, fish and their habitats, and lead to conflicts with other land users. Tourism attributes are identified on Map 7 – Renewable Economic Development: Potential and Interests.

There is interest in the continued sustainable growth of the tourism industry in the **R**egion, however growth must be carefully managed. Specifically, there is potential for growth in wilderness/ecotourism and Indigenous tourism as well as in the arts.

Planning Strategy¹¹

For LMU specific Special Management Directions related to Tourism, see:

- **LMU 3: Chu Kon Dëk (Yukon River Corridor)** (page 174)
- **LMU 4: Tsey Dëk (Fifteenmile)** (page 180)
- **LMU 5: Ddhäl Ch’ël (Tombstone)** (page 186)
- **LMU 11: Goldfields** (page 218)
- **LMU 14: Tay Dëkdhät (Top of the World)** (page 232)

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¹¹ See also **Section 5.4.3 – Transportation and Access** (page 130), **Section 5.2.4 – Rivers and Watercourses** (page 94), and **Section 5.3.6 – Recreation** (page 122) for additional planning strategies relevant to Tourism.

Management Directions

- **LMU 15: Khel Dëk (Sixty Mile) (page 238)**

Objectives:

1. Tourism activities are carried out in a manner consistent with the principles of stewardship and sustainability.
2. Tourism and recreational experiences include scenic views, wildlife viewing, culture appreciation, and heritage education within appropriate areas of the Pplanning Rregion.
3. Increased opportunities for tourism experiences contribute to a growing and diversified economy, ~~and as well as opportunities for local employment, and economic stimulus.~~

Commented [A492]: Redundant.

Key planning issues and interests related to Tourism include:

- There is an interest to enhance tourism experiences in the Pplanning Rregion while ensuring compatibility with other economic and socio-cultural values.
- Development activities that impact wilderness, wildlife and wildlife habitat, water quality, aesthetics, and heritage sites also impact tourism values.
- High levels of overhead air traffic, noise, dust and industrial activity diminish the wilderness experience of backcountry visitors or river travelers.
- Tourism can be a sustainable economic industry.
- Based on limited access and desired future state of certain LMUs, the promotion of backcountry tourism experiences may not be suitable in all areas of the Pplanning Rregion (e.g., **LMU 1: Tthetäwndëk (Tatonduk)**, page 164).
- Tourism in the Dawson Pplanning Rregion was significantly impacted by the COVID-19 pandemic, highlighting the sector's vulnerability to economic shocks.

Recommended Management Practices

a	Tourism and recreational activities should follow the 'leave no trace' principles (https://yukon.ca/en/travel-safely-yukon-wilderness)

Recommendations to the Parties

114. Policy Recommendation	The natural scenic views within corridor areas, with an emphasis on the Yukon River Corridor, the Dempster Highway, and the Top of the World Highway should be considered in development applications and preserved where possible.
115. Policy Recommendation	Tr'ondëk Hwëch'in cultural history and contemporary use should be incorporated into tourism management strategies and signage for the ~~Klondike Goldfields~~ planning region. Signage in the planning region should incorporate local artistry, Tr'ondëk Hwëch'in history, and the Hän language.
116. Policy Recommendation	The Parties should support implementation of the Yukon Tourism Development Strategy (Government of Yukon, 2018), specifically pertaining to Goal #2 for Sustainable Tourism Development for the Dawson Pplanning Rregion.

Commented [A493]: Change to SMD for proponents for specific LMUs rather than direction to the Parties. Already included in 5.4.3.1.2 c, 6.7.4 b., 6.8.1.

117. Policy Recommendation	In areas of high conflict between aerial flights and tourism pursuits the following should be considered: - Setting limits to the number of allowable landings in specific areas during peak visitation times - Providing Provide educational information to aircraft users (e.g., local pilots companies that operate aircraft, tourism operators, mineral exploration companies, etc.) about areas of concern and to encourage avoidance of key wildlife areas and heritage resource areas wherever possible. (see Map 4 – Selected Ecologically Important Areas and Map 5 – Ungulates).
118. Recommended Action	Management guidelines for commercial wilderness tourism and commercial wildlife viewing along the Dempster Highway, Top of the World Highway, and Yukon River Corridor should be developed as part of corridor management plans (see Section 5.4.3.1.1 – Dempster Highway Corridor (page 130), Section 5.4.3.1.2 – Top of the World Highway Corridor (page 132), and LMU 3: Chu-Kon-Deh (Yukon River Corridor) (page 174)).
119. Recommended Action	Develop and publish best management practices for tourism industries, including wilderness tourism.
120. Recommended Action	Implement interim measures as described in LMU 3: Chu-Kon-Deh (Yukon River Corridor) (page 174) and guidance set out in Section 5.2.4 – Rivers and Watercourses (page 93) for the management of the Yukon River Corridor until such a time that a sub-Regional plan can be developed.
121. Recommended Action	Continued use of signage in the planning Region that incorporates local artistry, Tr'ondëk Hwëch' in history, and the Hän language, should be explored.

Commented [A494]: Move recommendation to 5.4.3.4 Air Access

Commented [A495]: YG does not have jurisdiction over airspace - including where aircraft can fly. We also have limited ability to regulate the number of landings.

Commented [A496]: YG does not support creating additional “corridor management plans” which are not defined elsewhere in the Plan. YG supports sub-regional planning for the Dempster highway corridor and proposes that LMU 3 be split into an SMA (northern portion) and an ISA 1 (southern portion) following direction as otherwise provided in this Plan.

Commented [A497]: Don't need recommendations in the Plan to accept other parts of the Plan. Parties sign off on the Plan as a whole.

Duplicates recommendation 77

Commented [A498]: Incorporated into 115

5.4.6 Outfitting

The Dawson Planning Region includes many high-quality opportunities for big game outfitting. Outfitting takes place in the northern half of the Region where there are four established outfitting concessions (see Map 7 –Renewable Economic Development: Potential and Interests). These concessions have associated camps and airstrips, and in some cases, titled property.

Outfitting consists of guided hunting trips for Dall's sheep, grizzly bear, wolf, caribou, and moose. Most trips are undertaken by airplane and ground transportation, such as by ORV, horseback or on foot. In the Planning Region, high quality outfitting experiences rely heavily on the maintenance of large, roadless wilderness areas.

Planning Strategy

Objectives:

1. Outfitting operations are conducted in a way that is consistent with the

Management Directions

principles of stewardship, sustainability, and with wildlife objectives of the Plan.

Key planning issues and interests related to Outfitting include:

- Maintenance of functioning ecosystems that support wild populations is vital to the outfitting industry.
- Outfitting generally relies on a wilderness experience where other human activity is relatively minimal. This experience can be affected by:
 - Development of industrial activities, including new roads and associated infrastructure.
 - Improperly located resource exploration camps.
 - Excessive use of motorized ORVs and aircraft.
 - Excessive numbers of wilderness tourists and recreational users.
- The location of outfitting camps and trails is not well documented, making it difficult to consider outfitting values during project assessments and planning.

Recommended Management Practices

~~Additional~~ Management Practices related to outfitting are not recommended at this time.

Recommendations to the Parties

Most of the northern part of the ~~P~~lanning ~~R~~egion, where outfitting concessions are located, is recommended for conservation through the SMA designation. This designation is sufficient to maintain the wilderness character of the area to support high quality outfitting experiences. ~~Outfitting activities are allowed in all land use designations in this Plan.~~

122. Policy Recommendation	~~Status quo should be maintained. Existing outfitting concessions should continue, and outfitting activities should be allowed in all land use designations in this Plan, subject to legislation, regulations and the THFA.~~
123. Research Recommendation	Land use patterns associated with outfitting, including but not limited to the location of camps and trails, should be documented to facilitate improved project assessment and future resource planning.

Commented [A499]: Brought into text above, given that outfitting is allowed in SMAs, this use should be included in threshold calculations.

5.4.7 Forestry

The ~~R~~egion's forested areas are important from environmental, economic and socio-cultural perspectives.

With careful management and planning, ~~Dawson's the region's~~ forests can sustain a vibrant, small-scale forestry industry that provides timber for local markets ~~and a source of; energy; . These activities can contribute to~~ economic ~~stimulus growth;~~ and ~~local employment opportunities~~ for the area's residents. Forests in the Dawson ~~R~~egion also provide opportunity for the local harvest and processing of other forest products, such as birch syrup, chaga, and morel mushrooms.

Management Directions

Maintenance of traditional and non-timber uses of forest resources is an important component of forest management and the traditional economy. Hunting, fishing, ~~and trapping~~ and gathering (e.g. medicinal plants, mushrooms, berries etc.) are important traditional uses of forest resources.

The forested areas in the ~~P~~lanning ~~R~~egion are an extension of the boreal forest zone that spans the continent from ~~the~~ Yukon to the Atlantic coast in Labrador. Of the 26,223 km² of the ~~P~~lanning ~~R~~egion that lies within the Boreal ecozone, approximately 75% ~~percent~~ is covered by either coniferous (60% ~~percent~~) or mixed (15% ~~percent~~) forest. Most of the ~~P~~lanning ~~R~~egion north of the Ogilvie Mountains lies within the un-forested Taiga Cordillera ecozone.

The forest industry in Dawson includes commercial fuelwood (fire-killed spruce and green birch), biomass (wood chips), ~~and~~ lumber, and non-commercial harvest of personal fuelwood for personal use. Dawson is home to the largest sawmill in the Yukon ~~which produces green sawlogs (i.e., lumber) and supports a diverse and stable economy.~~ Information provided by the Yukon Wood Products Association indicates that the current harvest in Dawson is relatively small and stable at around 2,500 m³ to 3,000 m³ per year (Yukon Wood Products Association YWPA, 2019). ~~Fuelwood is also harvested for personal use.~~

In 2021, the annual allowable cut for this region was set at 28,000 m³ per year of green timber on public land. An annual allowable cut is the maximum amount of timber that may be sustainably harvested from a particular area. This determination was supported through collaborative work between the governments of Tr'ondëk Hwëch'in and Yukon and the Dawson District Renewable Resources Council. The Steering Committee, who oversees and provides direction for Dawson Forest Resources Management Plan implementation activities, agreed that a 28,000 m³ annual allowable cut meets and accommodates objectives for forest resources for the next 10 years. This decision reflects current management practices as well as the socio-economic objectives of the Dawson Forest Resources Management Plan.

~~Government of Yukon's Forest Management Branch (FMB) is responsible for forest tenure and management on public lands.~~ The *Dawson Forest Resources Management Plan* (FRMP) provides a framework for the sustainable management of a forest-based economy as outlined in Chapter 17 of the ~~FNFA~~ THFA. ~~The Forest Resources Act provides a planning, tenure, compliance, and enforcement regime to support the management of forests in the Yukon.~~

Planning Strategy**Objectives:**

1. ~~Opportunity for~~ Sustainable forestry that contributes to a growing diversified economy, and local employment, and economic stimulus.
2. A healthy and sustainable forest industry (guided by the Dawson ~~FR~~MP goals):
 - a. Conserve biological diversity.
 - b. Maintain forest ecosystem health and productivity:

Management Directions

- c. Conserve and maintain soil and water resources.
- d. Maintain and enhance multiple socio-economic benefits.
- e. Maintain and enhance community sustainability.

Key planning issues and interests related to forestry include:

- A viable forestry industry and fuelwood harvesting opportunities require an adequate and accessible long-term wood supply, in all seasons, and near the community City of Dawson.
- Forest resources remain an important part of many traditional economic activities (e.g., hunting, trapping, berry gathering).
- There has recently been a shortage of access to fuel wood across Yukon, including in Dawson. The primary issue in this region has been the limited ability to access fire-killed timber in the Goldfields area in winter due to excessive ice formation on resource roads.
- Dawson is fairly self-sufficient in supplying firewood, however it can also be impacted by broader fuelwood shortages, as the community relies on some firewood that is brought in from other communities.
- The Draft Dawson City Community Wildfire Protection Plan
 - identifies Wildfires as a risk to the Dawson community, are an issue in this Region, and there have been some suggestions that
 - suggests using fuel abatement, among other mitigation measures, be used to mitigate the risk of fires impacting key vulnerabilities, and
 - recommends that active wildfire response be considered in some areas of the Region.
- Maintaining riparian buffer zones around on-land activity is important for protection and function of aquatic ecosystems.
- Climate change has the potential to impact the Dawson Region's forest health through both environmental drivers and forest pest outbreaks.

Commented [A500]: Suggested additional issues from Forest Management Branch.

Commented [A501]: Clarify who is suggesting this.

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Recommended Management Practices

The Plan supports the *Dawson Forest Resources Management Plan (2013)*. As such, additional Management Practices related to forestry are not recommended at this time.

Recommendations to the Parties

124. Policy Recommendation	Allowance of continued forest resource development within ISA 1-4 designations and within some SMAs as per Special Management Direction in Section 6 – Landscape Management Units (page 160). Development is subject to the cumulative effects thresholds of this Plan, the Dawson FRMP, and existing regulatory processes.

Commented [A502]: Not a recommendation to the Parties, otherwise also redundant as all development must follow other sections of the Plan. Does not add additional considerations.

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125. Policy Recommendation	The Parties should continue to explore and implement collaborative efforts where multiple interests and rights exist, such as through the development of formal multi-use arrangements between mineral rights holders, forestry, ~~aggregates,~~ and agricultural producers. Explore options for harvesting timber and fuelwood from placer and quartz claims. ~~develop a framework for use of timber for sawlogs and fuelwood within existing mineral tenure.~~
126. Research Recommendation	The Parties should continue to explore the feasibility of advancing the use of biomass energy in the Dawson ~~P~~ lanning ~~R~~ egion. Climate change should be considered as part of this research in terms of climate change mitigation, availability of forest resources, and assessing net benefit of biomass.
127. Recommended Action	Implement the Dawson FRMP; In cases where management direction in this Regional Plan conflicts with the Dawson FRMP, the FRMP should be brought into conformity, as per Chapter 17 of the ~~FNTHFA.~~
128. Recommended Action	Continue developing Timber Harvest Plans (THPs) within ISA designations. ~~The Goldfields THP should include development of a more effective framework for use of timber for saw logs and fuelwood within existing mineral tenure.~~

Commented [A503]: Duplicates recommendation 112 and 130, only needed once.

Commented [A504]: Incorporated in recommendation 125 above as such a framework would be broadly applied rather than done within a single THP.

5.4.8 Aggregate Resources

Aggregate resources (*i.e.* sand, gravel, and crushed stone) are critical materials for development and maintenance of transportation, municipal and industrial infrastructure. These resources are heavy materials and expensive to transport. Therefore, it is important that these resources are obtained near areas where they are intended to be used.

Currently, there are approximately 40 gravel reserves and three quarry leases in the planning ~~R~~egion. All these land dispositions are located along the three major highway corridors (North Klondike, Top of the World, Dempster).

Planning Strategy**Objectives:**

1. Aggregate extraction is carried out under the principles of stewardship and sustainability, respectful of ecological and cultural values.
2. Increased opportunities for new aggregate to support sustainable development.

Key planning issues and interests related to aggregate resources include:

- Extracting large volumes of aggregate material to support infrastructure development disturbs large areas of land, which may create visual impacts, habitat disturbance and other adverse effects on ecological and/or sociocultural values.

Management Directions

- Aggregate resources may be located on existing land use tenure (e.g., mineral claims) which has the potential to create land use conflicts and regulatory ambiguity.

Recommended Management Practices

a	Aggregate resource extraction should be planned to avoid sensitive fish habitats and other ecologically important areas, and areas of cultural importance or containing heritage resources.
b	Minimize gravel requirements for necessary infrastructure through coordinated access and geotechnical engineering. This could be accomplished by collaboration between those responsible for aggregate extraction, mining, and road development.

Commented [A505]: This should likely apply to industrial land uses more broadly than just aggregate resource extraction. Fish concerns covered by management directions 5.2.1.3 a-e, others may need new management directions added to applicable sections (key species, other fish and wildlife habitat, and heritage resources and sites sections). If done can remove from this section.

Recommendations to the Parties

129. Policy Recommendation	When proposing and reviewing aggregate resource projects, priority should be given to extraction of materials from existing quarries, near to highways and other existing all-season roads.
130. Policy Recommendation	The Parties should continue to explore and implement collaborative efforts where multiple interests and rights exist, such as through the development of formal multi-use arrangements between mineral rights holders, aggregate, forestry, and agricultural producers.
131. Recommended Action	Within Integrated Stewardship Areas, the identification of potential sources of aggregate resources should be undertaken in advance of the assessment process for industrial and/or infrastructure projects. Prioritize extraction from existing quarries, near to highways and other existing all-season roads.
132. Recommended Action	The Parties should seek to develop and communicate clear guidelines with respect to the process for reviewing, assessing, and enforcing quarry permits to ensure consistency in the regulatory processes between private and government proponents.
133. Recommended Action	Aggregate assessments should be undertaken to identify areas of high potential for aggregate resource development within the North Klondike Highway, Top of the World Highway, and Dempster Highway Corridors, as well as secondary roads to support ongoing construction and maintenance activities.

Commented [A506]: Combined with recommendation 131

Commented [A507]: Duplicates recommendations 112 and 125, only need once

Commented [A508]: Change to direction for proponents rather than recommendation to the Parties.

5.4.9 Traditional Economy

The traditional economy includes economic inputs and gains that are not completely monetary. The term "traditional" is not synonymous with an old way of doing things, rather it is suggestive of long-established practices which contribute to the modernized economy. It is a cultural or land-based economy that is rooted in activities such as fishing, hunting, trapping, gathering, and wildcrafting. As defined by Tr'ondëk Hwëch'in, a traditional economy is based on the harvest of natural resources, providing direct value (such as meat harvested, fuelwood and income from sale of

Management Directions

cultural products) and non-consumptive values (such as the cultural and social well-being of its members and traditional ecological knowledge).

Participation in traditional economic activities is required for First Nations culture and community well-being. Subsistence harvesting and traditional economic activities are also important means of offsetting the high cost of food in northern communities and reducing the consumption of carbon intensive agricultural products and travel. The THFAFNFA for Tr'ondëk Hwëch'in and other affected First Nations Final Agreements provide for continued harvesting rights in the Planning Region.

The opening recital of the THFA states that the Parties “wish to recognize and protect a way of life that is based on an economic and spiritual relationship between Tr'ondëk Huch'in and the land”.

As time goes on it is becoming increasingly more difficult for Tr'ondëk Hwëch'in citizens to make a living on the land. A healthy environment and wildlife are essential for the ongoing practice of traditional economic activities.

Traditional economy is closely linked to heritage, kinship and culture, and in particular harvesting rights and activities in **Section 5.3.3 – Harvesting Rights and Activities**, page 113)

“Not only does the traditional economy provide a lifestyle and economic benefit to those who are involved, the activity is rooted in stewardship which is a key concept of the Draft Plan. The traditional economy also provides a necessary tool to facilitate the teaching and passing on of traditional knowledge to the younger generations of all Yukoners.”

DDRRC Draft Plan submission, to DRPG 2021

Planning Strategy**Objectives:**

1. “Recognize and protect a way of life that is based on an economic and spiritual relationship between Tr'ondëk Huch'in and the land.” (THFA preamble)
2. First Nations citizens are benefitting from the land.
3. Continued and successful traditional land use and traditional economic activities.
4. Key use areas, infrastructure, and resources that support traditional economy are preserved.
5. First Nation constitutionally protected rights for harvesting and subsistence activities are protected.

Key planning issues and interests related to the Traditional Economy include:

- Providing opportunities and landscapes to participate in traditional economic activities is vital to maintaining First Nations' culture, community well-being, and ties to the land.
- Opportunities to participate in traditional economic activities strongly correlates to the availability of access. However, increased road access can

Management Directions

also negatively impact the ability for residents to participate in these activities through increased harvesting pressure, reduced harvesting success, and disturbances on the land.

- There is limited information available on the impacts of development on traditional economic pursuits in the Planning Region, in particular moose harvesting and overall use and enjoyment on the land.

Recommended Management Practices

a	~~During the Environmental and Socio-Economic Assessment process, land use activities that overlap with where traditional economic activities are practiced, the Parties or the evaluator (YESAB) should utilize a communication and engagement protocol to share information and minimize conflict. The protocol should ensure activities likely to cause disturbances to other land users (trappers, outfitters, etc.) are communicated and consulted on prior to approval. Communicate with other land users when planning activities in areas used for traditional economic activities, including trapping.~~
b	Where important sites for traditional economic activities have been identified, it is important that the route/access to the site <u>should</u> be treated with a higher standard of care and consideration.

Commented [A509]: Modified to be more applicable to proponents.

Recommendations to the Parties

~~135-134.~~ Policy Recommendation	The Parties should support the ongoing local resource knowledge project being conducted annually by the Dawson District Renewable Resource Council and Tr'ondëk Hwëch'in harvest data. The general purpose of this study is to better understand and document changes that are taking place in the environment, with a focus on hunting access, harvested species, trapped species, moose, caribou, berries, edible plants, and fish. A mechanism should be developed to feed the results of this project into the current management regime. This information should also be considered in Plan review (Section 7 – Plan Implementation , page 274).
~~136-135.~~ Policy Recommendation	~~The Parties shall implement requirements for p~~ Proponents of class 4 advanced exploration and mining in the Dawson Planning Region ~~should~~ to prepare traditional use impact studies.
~~137-136.~~ Research Recommendation	Tr'ondëk Hwëch'in have identified areas of high traditional economy value in their Ninānkāk hōzq wëk'ātr'ënōhcha 'We Take Good Care of Our Land' submission (2020b). Further work needs to be done by the Parties to identify appropriate development buffers.
~~138-137.~~ Research Recommendation	Land use patterns associated with trapping, including but not limited to the location of cabins and trails, should be documented to facilitate improved project assessment and future resource planning.

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Commented [A510]: Skipped recommendation 134

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Commented [A511]: Better suited to make this a requirement in the management practices section.

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6 LANDSCAPE MANAGEMENT UNITS

This section describes the Intent Statement, Tr'ëhudè (Our Way of Life) and Stewardship perspective, Special Management Directions, Priority Objectives and Values for each of the 21 Land~~scape~~ Management Units (LMU) in the Dawson P~~l~~anning R~~e~~gion.

The section also establishes the designation for each LMU, the rationale for the designation, a map, and area (km² and percent of Region). Table 6-1 shows the total area for each land ~~use~~-~~designation~~ category and Figure 6-1 shows the overall Dawson R~~e~~gion LMU D~~e~~signations.

~~Special Management Directions apply only within the specified LMU and are in addition to the~~ general management directions described in **Section 5 – General Management Directions** ~~which~~ apply to the entire P~~l~~anning R~~e~~gion ~~but are most applicable to activities permitted in ISAs as well as in some SMAs where some development is permitted to occur.~~

Table 6-1 Overall Land~~scape~~ Management Unit Designation Area and Planning Region Percentage

Land Designation	Area (km ²)	Region %
Special Management Area	13,598	34.1
ISA 1	6,276	15.7
ISA 2	5,232	13.1
ISA 3	4,843	12.1
ISA 4	6,613	16.6
Sub-Regional Planning	1,124	2.8
Tombstone Territorial Park	2,107	5.3
Community Area	81	0.2
Total	39,875	100

Commented [A512]: Add surface disturbance and linear feature density thresholds to this section for ease of use. For greater clarity this should include the surface disturbance percentage and linear feature density and what that means in km² and km for the individual LMU.

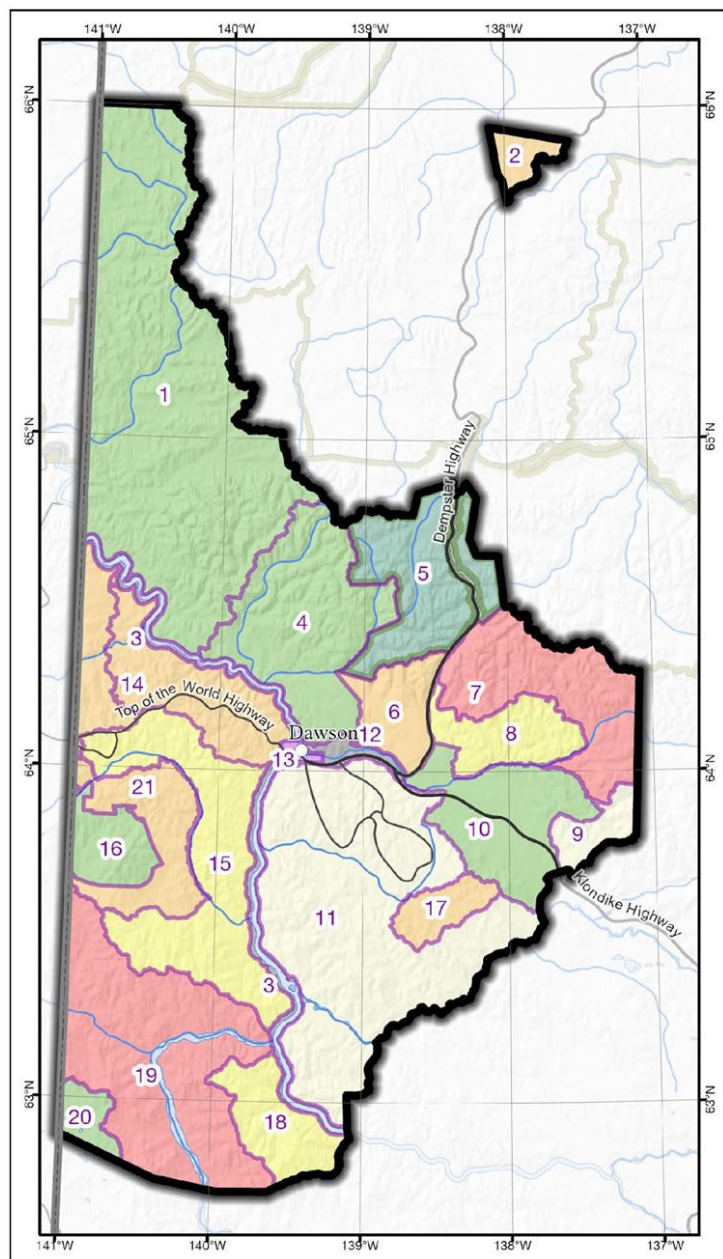


Figure 6-1 Dawson Region Land Designation Map

HOW TO READ TABLES IN SECTION 6

Land Use Designation:	Each LMU is designated as either a Special Management Area, Integrated Stewardship Area, Sub-regional Planning Area, Community Area (not designated as they are outside of the scope of the plan (i.e., City of Dawson)).		
Land Status:	Non-Settlement Land and list or count of Tr'ondëk Hwëch'in ~~s~~ Settlement <u>Land</u> parcels		
Area:	Area in km ²	Planning Region %	LMU % of total planning area

Walking on the Land Together (Intent Statement)

The purpose of this section is to outline the overall intent for the Land scape Management Unit. ~~Each Intent Statement includes a statement about and~~ the vision ~~and description~~ of the LMU.

Tr'ëhudë (Our Way of Life) & Stewardship

This section considers each LMU through the lens of the Tr'ondëk Hwëch'in Land Vision (Tr'ëhudë). ~~It is a space where stories~~ Stories or traditional knowledge of the area, or the values that are held within the area, ~~can be are~~ shared. This emphasizes the importance of the land to Tr'ondëk Hwëch'in citizens and respects and upholds their relationship with the land, which is fundamental to their identity, way of life and their ancestral responsibility as caretakers.

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable general management directions, each LMU has area-specific Special Management Directions that should apply, and these are stated here. These directions are often related to specific land uses or activities that may occur in the area.

Priority Objectives

- ✓ ~~The Dawson Regional Plan is guided by Environmental, Socio-cultural, and economic goals and these goals are achieved by stated objectives that reflect the desired outcome for a specific value.~~
- ✓ ~~The priority objectives are listed here for each LMU.~~
- ✓ These objectives are consistent with those listed in **Section 5 – General Management Directions** ~~but only those that are a priority for the LMU are included here.~~

Rationale for Designation

- Rationale ~~is provided for each LMU. It is intended to provide~~s context for the ~~decisions that were made and to support the~~ chosen designation and Special Management Directions ~~provided in the plan.~~
- The rationale ~~does not only reflect the how~~ current and potential future land uses were considered, conflicts that are occurring on the land, but also takes into consideration future potential land uses and their associated conflicts with the needs of identified values and the plan's ability to achieve the objectives for each

Commented [A513]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

Changes have been made to this section for each LMU to reflect this.

Commented [A514]: Repetitive of information elsewhere in the Plan.

Commented [A515]: Incorporated below

Commented [A516]: It should not be necessary to include rationale for each LMU, it should be evident based on intent and values why a given designation was chosen. Rationale could be moved to a methodology report that provides a more fulsome analysis of how decisions were made based on what information.

LMU.
Values Tables Considered
This section provides a listing and brief description of values that have been identified in the LMU. This list table is reflective of priority values and values of concern identified to date for the planning process. These values were considered when determining the LMU designations, objectives, and directions. Where a value is left blank, the value may not exist within a LMU or may not yet have any information on it identified. New values and updated information on existing values may be identified and considered during project assessment to account for site-specific variations and as new information becomes available. not exhaustive and should not be read as such. If a value is not listed in this section, it should not diminish the importance of the value nor imply that it does not exist in the LMU. Rather, it is intended to be a listing of priority values, or values of concern in the LMU. Values categories correspond to Plan Goals and General Management Directions are categorized in the following themes: • Ecological Integrity and Conservation Values • Culture, Heritage Resources, and Community Value • Sustainable Economyic Values

Commented [A517]: Reworded to remove “conflict”, not all uses conflict with values

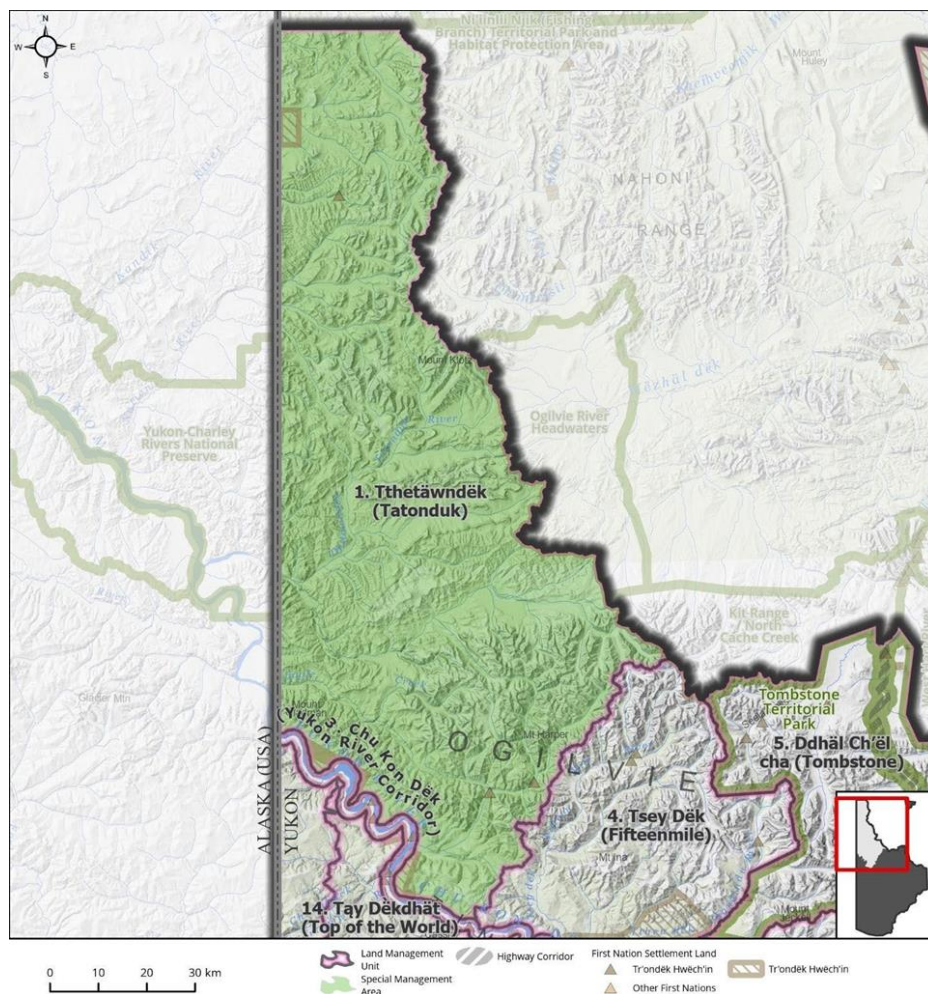
Commented [A518]: Edits have been made to the values table for each LMU to correct inaccurate or incomplete information.

Commented [A519]: Recommended rewording as the values should be an exhaustive list of what was considered to create the Plan. However, assessors and regulators can consider additional values as information becomes available.

Commented [A520]: Values categories do not correspond with either of these, changed to reflect themes identified in s.5. To carry themes through the Plan better these should be the headings used to organize planning issues in s. 1.3.1, goals in s.1.3.2 and s.5 and the values in s.6.

6.1 LMU 1: TTHETÄWNDEK (TATONDUK)

Land Use Designation:	Special Management Area		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land TH R-48A, TH R-4A, TH R-5A, TH R-76A, TH R-77B, TH S- 133B1, TH S- 134B1, TH S-6B1		
Area:	7959 km ²	Planning Region %	20%



Walking on the Land Together (Intent Statement)

The vision for this area is to focus on conservation with limited use.

~~This area contains some of the most undisturbed and wilderness landscapes of the planning region, and it is rich in intact ecosystems and Tr'ondëk Hwëch'in history. Existing access infrastructure is limited, as is mineral exploration and development.~~

~~The area contains an active outfitting concession, traplines and associated infrastructure.~~

The conservation priorities for this LMU are rooted in stewardship, landscape connectivity, ecosystem representation, Tr'ondëk Hwëch'in and affected First Nations' cultural values, and wildlife habitat.

Future management of this area should maintain its wilderness character, emphasize its landscape connectivity with adjacent regions, and provide opportunities for cultural connectivity. Access, and continued exploration activities should be carefully planned and monitored in relation to existing mineral claims.

Commented [A521]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

Tr'ëhudë (Our Way of Life) & Stewardship

The area has long been used by Tr'ondëk Hwëch'in ancestors as a travel route and Elders have shared that this is a place of importance for wildlife. The protection of this land is essential to honor the past and provide opportunities for cultural continuity and the passing down of traditional knowledge and opportunity to youth and future generations.

It is a place of healing:

"We will go back to these lands, it's who we are, that is our story."

Debbie Nagano, Dawson Regional Planning Commission Chair

"I flew up there and I was in awe. I could picture the old trail where people used to travel from Blackstone to Moosehide. I got so excited when I saw the Tthetäwndëk"

Angie Joseph-Rear, Dawson Regional Planning Commission Member

The name Tthetäwndëk is known to mean "Broken Stone River".

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. ~~Surface disturbance threshold of 19.8975km² (0.25% of LMU area).~~
2. ~~Linear feature density threshold of 1989.75km (0.25km/km² of LMU area).~~
- ~~3.~~ 3. Mineral development ~~allowed~~ permitted only within existing mineral tenure.
- ~~2.~~ 4. Industrial land use ~~allowed~~ permitted, within ISA 1 cumulative effects thresholds.
- ~~3.~~ 5. Withdrawal of all ~~other~~ lands from quartz and placer mineral staking and oil and gas dispositions.
- ~~4.~~ 6. ~~If existing mineral claims are proven viable by a proponent, the Parties shall jointly consider permitting new surface access and access route. An access management plan for this Landscape Management Unit should be jointly created by the Parties. If existing mineral claims are proven viable prior to completion of the access management plan, details of where and how access is provided to these claims will be dealt with at the project level, and in accordance with existing processes.~~
- 5-7. Activities on existing mineral tenure that overlap with sheep habitat must consider and mitigate potential impacts to sheep habitat. Specifically, timing

Commented [A522]: The following list is not all things the area is subject to, some are permitted uses, some are conditions, some are recommendations to the Parties. Reword this sentence or write SMDs to follow this heading. This comment applies for all LMUs.

Commented [A523]: Removed "ISA 1" and instead listed specific disturbance allowed by thresholds to avoid confusion as this is an SMA.

Nothing in s.3.6 limits thresholds to industrial land uses, clarify if other uses are permitted up to the thresholds specified.

Commented [A524]: Recommend changing to allowed as while they are an acceptable use per the Plan they will still need assessment (depending on scope of activities) and approval before they can be permitted. Permit(ted) should only be used when discussing regulatory approval.

Commented [A525]: Clarify what types (e.g forestry, agriculture etc.) and where these are permitted. If no other industrial land uses beyond mineral development in existing tenure are permitted, specify this.

Commented [A526]: Modification proposed to add intent to complete access management planning and to clarify what would happen in its absence.

windows may apply in winter habitat and lambing areas.

6-8. Limitations to air landings may be required to reduce impacts to key wildlife values.

7-9. This area is not to be promoted as a tourism destination, as extensive use may have a negative impact on sensitive wilderness values.

Priority Objectives

- ✓ Connectivity between areas of key wildlife habitat, while considering climate driven shifts in habitat. (Plan Goal)
- ✓ Preserve ecologically representative areas and important ecosystem services. (Plan Goal)
- ✓ Resilience of species at risk and rare endemic species.
- ✓ Preservation of critical, rare, or unique ecosystems while considering that some ecosystems are likely to shift due to climate change.
- ✓ Sustainable fish and wildlife populations supported by healthy aquatic and terrestrial habitats.

Rationale for Designation

- Biodiversity-rich area containing endemic meadow habitats, species of conservation concern, and the Tatonduk River Watershed, which is an ecologically intact area with permanent freshwater springs.
- Area contains underrepresented or absent ecoregions within Yukon's protected areas: the North Ogilvie Mountains and the McQuesten Highlands.
- Area overlaps with three caribou herd ranges and extensive habitat for sheep. Both caribou and sheep are species of cultural, ecological, and economic importance in Yukon.
- Area contains important waterways that provide for salmon habitat.
- Establishing a Special Management Area will protect landscape connectivity between Yukon-Charley National Preserve in Alaska, Kit Range/North Cache Creek and Ogilvie River headwaters in Peel River Watershed, and Fishing Branch Ni'iinlii Njik Territorial Park.
- Area contains traditional trails, routes, and sites, as well as high cultural importance and use for Tr'ondëk Hwëch'in. The area is critical for cultural continuity and maintaining cultural ties to the land for Tr'ondëk Hwëch'in citizens.
- Some existing mineral exploration and critical mineral potential.
- Surface access infrastructure is currently limited.

Ecological Integrity and Conservation Values

Birds	High value waterbird habitat in riparian areas, key nesting habitat for raptors. Much of the area consists of high elevation (>1000 m) habitat crucial for migratory bird specialist species. Contains the Tintina Trench Flyway, a major migration corridor and contains stop over sites used by migratory birds during migration.

Caribou	Fortymile Caribou Herd: Historic summer range, fall/spring migration and winter habitat. Porcupine Caribou Herd: Fall/spring migration and winter habitat. Hart River Herd: Important habitat (Map 5 Ungulates). ~~Updated Caribou range mapping will be available Spring 2022.~~
Ecosystem Representation	Part of North Yukon Ogilvie Mountains Ecoregion which is currently underrepresented in the protected areas system for Yukon. Ogilvie Mountains have also been identified as one of three Yukon hotspots for nationally endemic species. Area also a small portion of the McQuesten Highlands, which is not currently included within Yukon's protected areas.
Furbearers	
Grizzly Bear	Contains high quality habitat for grizzly bears.
Landscape Connectivity	West: Yukon-Charley National Preserve in Alaska; East: Kit Range / North Cache Creek and Ogilvie River Headquarters in Peel River Watershed; North: ~~Fishing Branch~~ Ni'iinlii Njik (~~Fishing Branch~~) Territorial Park ~~and Habitat Protected Area~~ in North Yukon ~~P~~ lanning ~~R~~ egion; South-East: Chandindu (Tthen Dëk) Dawson ~~P~~ lanning ~~R~~ egion.
Moose	Year-round including some key wildlife areas for moose in late winter along major watercourses (Tatonduk River, Eagle Creek, Miner Creek).
Salmon and other Fish	Important habitat for salmon migration/spawning and freshwater fish. Coal Creek provides for ~~e~~ Chinook salmon spawning habitat.
Sheep	Extensive year-round Dall (thinhorn) sheep habitat coverage within the entire area (Map 5 – Ungulates).
Species at Risk	~~Known to occur: Collared Pika, Yukon Podistera, Wolverine, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Short-eared Owl, Peregrine Falcon~~ ~~Expected in low numbers: Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Barn Swallow, Common Nighthawk, Transverse Lady Beetle, Horned Grebe~~ ~~Presence of Yukon Podistera (SARA Special Concern), Yukon Wild Buckwheat (SARA Special Concern), Murray's Draba (COSEWIC assessment candidate), and Peregrine Falcon (SARA Special Concern).~~

Commented [A527]: Missing information added & updated for accuracy (same with all the following LMUs)

Vegetation and Unique Features	<u>Important ecosystems include low elevation steppe meadows which have endemic species (Murray's Draba, Dawson Wallflower, William's Catchfly, Matted starwort). Unglaciaded alpine which has endemics species (Ogilvie Mountains Spring Beauty, Walpole's Poppy (in particular Dolomite regions), this includes Mount Klotz, which contains unique assemblages of plants and insects. This region contains intact old growth forests (>140 years old), and several known mineral licks. Contains endemic/rare species, and intact forests (>140 years old), and several known mineral licks. Also includes Mount Klotz, which contains unique assemblages of plants and insects.</u>
Water	Several important and undeveloped watercourses. Presence of freshwater springs.
Wetlands	Available wetland mapping indicates considerable wetland coverage within much of the area lowlands, including bogs, fens, and marshes, which provide for important wildlife habitat and ecosystem services.
Culture, Heritage Resources and Community Values	
Community Value	Limited recreational hiking opportunities, fly-in access only. Intrinsic value of landscape and providing remote wilderness habitat for sensitive species.
Heritage Resources and Sites	Traditional trails and travel between important cultural areas (identified routes along Tatonduk River, Eagle Creek, Mount Klotz, and the Yukon River), ~~S~~ several Tr'ondëk Hwëch'in Settlement Land Parcels chosen for their traditional and cultural significance. Identified heritage resources in addition to a high likelihood of undocumented archeological sites throughout the LMU.
Traditional Economy/ Traditional Uses	Important area for harvesting and gathering, especially in areas with high ecological integrity. Important for maintaining cultural ties to the land for Tr'ondëk Hwëch'in citizens, including engaging youth, and upholding stewardship duties.
Socio-economic Values	
Agriculture	
Energy	Contains portions of two sedimentary basins with identified potential for oil and natural gas resources: Eagle Plains and Kandik Basins. Northern boundary is adjacent to North Yukon Land Use Plan LMU 13 Kandik River with moderate potential for oil and gas development and moderate to high mineral resources potential and LMU 12 Ni'iinlii'njik (Fishing Branch) SMA (North Yukon Land Use Plan, 2009).
Forestry	Overlaps with the Yukon River North and Tatunduk Landscape Units of the Dawson Forest Resources Management Plan. Both units are designated for high ~~to higher~~ conservation focus with low potential for forestry activities.

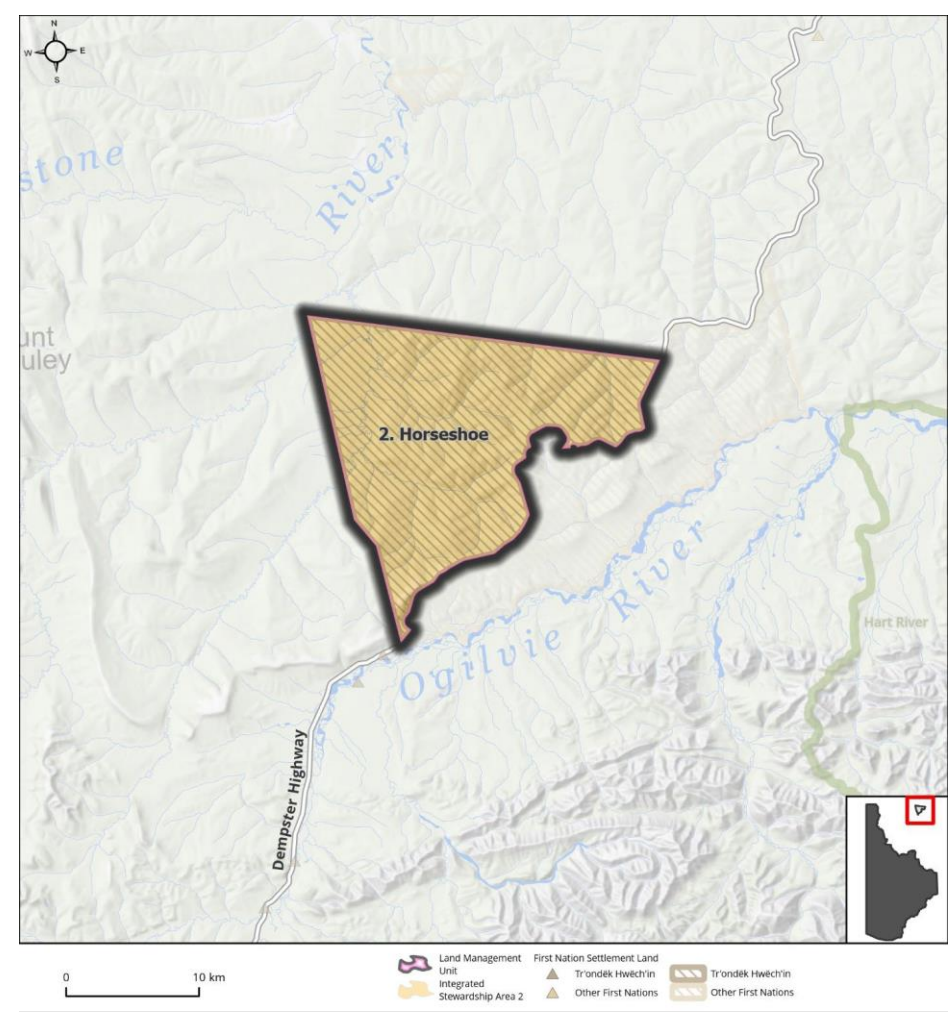
Mineral Resources	Active quartz claims present. Mineral potential ranges from highly prospective, through significantly prospective to moderately prospective (Map 8 Non-Renewable Economic Development: Potential and Interests). Area contains ~~G~~ critical ~~M~~ mineral ~~O~~ ccurrences as per Yukon Geological Survey.
Outfitting and Trapping	Area contains an active outfitting concession and trapping with associated infrastructure.
Tourism	Limited activities and limited access. Mount Klotz identified as a high value hiking area.
Transportation and Access	No major access roads or trails into the area, some airstrips. Mineral exploration is currently conducted by air access.

Commented [A528]: Canada's 'Canadian Critical Minerals Strategy' does not capitalize: **The Canadian Critical Minerals Strategy - Canada.ca**

YGS refers to Canada's critical minerals list in their 'Yukon critical minerals inventory' publication (2021) **MR_23.pdf (gov.yk.ca)**

6.2 LMU 2: HORSESHOE

Land Use Designation:	Integrated Stewardship Area 2		
Land Status:	Tr'ondëk Hwëch'in Settlement Land R-49A		
Area:	329 km ²	Planning Region %	0.8%



Walking on the Land Together (Intent Statement)

The vision for this area is to ensure habitat requirements for the Porcupine caribou herd are well understood and protected.

~~This area also offers important opportunities for First Nation subsistence hunting and harvesting along the Dempster Highway. The name of this LMU refers to the distinctive bend in the road or 'horseshoe', that serves as an identifier for people who harvest in the area. This LMU exists exclusively on Tr'ondëk Hwëch'in's Settlement Land parcel R-49A. North Yukon Planning Region LMU-9 surrounds the LMU to the North and East.~~

Future management of this area must preserve Tr'ondëk Hwëch'in's ability to sustainably develop their settlement land and ensure that the unique ecological value and cultural use of this area remains intact.

Tr'ëhudè (Our Way of Life) & Stewardship

The Hän word for caribou is wëdzey. This area is important for the Tr'ondëk Hwëch'in and their relationship with the Porcupine Caribou herd.

"The relationship between wëdzey and Tr'ondëk Hwëch'in extends back to a time without boundaries between people and wëdzey. The belief that people are wëdzey and wëdzey are people is literal. Tr'ondëk Hwëch'in have not only relied on wëdzey for survival, but wëdzey are also part of the community, with a shared history and kinship bonds."

(Tr'ondëk Hwëch'in Caribou (Wëdzey) Traditional Knowledge Summary, 2021)

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. The Parties should collaborate with the Porcupine Caribou Management Board to determine the availability and suitability of habitat within this LMU. If required, special management directions for any future development in this area should be developed as appropriate.
2. ~~Dempster Highway corridor sub-regional plan directions will affect apply to portions of this LMU and thus interim measures and future sub-regional planning direction in once the sub-regional plan is approved, see Section 5.4.3.1.1 – Dempster Highway Corridor (page 130) should be considered.~~

3. Access:

- a.3. Coordinated access management off highway for potential oil and gas development ~~in Eagle Plains basin (NYRP LMU-9 and DRPC LMU-2)~~ should be considered.

Priority Objectives

- ✓ ~~Habitat and migration pathways are sufficient to support historic population levels.~~
- ✓ Recognize and protect a way of life that is based on an economic and spiritual relationship between Tr'ondëk Hwëch'in and the land. (THFA preamble).
- ✓ Continued and successful traditional land use and traditional economic activities.
- ✓ Preserve future opportunities/options for oil and gas development.

Rationale for Designation

- This area has been identified as culturally important by Tr'ondëk Hwëch'in, and it

Commented [A529]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

Commented [A530]: Section 5.4.3.1.1 does not detail any interim measures for this area. If there are any interim measures or other directions related to the sub-regional planning area (similar to bullet 3 below), they should be added to this section rather than referring to an earlier section.

Text change recommended to inform reader that further directions could be added in this LMU once sub-regional plan is complete.

Commented [A531]: Assumed that this direction intends to coordinate access rather than coordinate management of access.

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Commented [A533]: Clarify if this is meant to be for caribou or if not, which species.

supports subsistence use and traditional economic activities including trapping and harvesting.

- ~~Area contains some of the most significant~~ Area for harvesting ~~habitat for of~~ Porcupine caribou ~~user communities.~~
- Within an identified sedimentary basin with identified potential for oil and natural gas resources. An ISA 2 designation allows for Tr'ondëk Hwëch'in to determine further direction for development in this area while preserving caribou habitat.

Commented [A534]: Reworded for clarity, harvesting area is not habitat.

Ecological Integrity and Conservation Values

Birds	Habitat for migratory birds.
Caribou	Within the range of the Porcupine caribou herd and contains important habitat and critical migration routes for the herd.
Ecosystem Representation	Eagle Plains Ecoregion of Taiga Cordillera Ecozone.
Furbearers	Presence of low to no habitat suitability for muskrat, moderate potential for pond dwelling beaver habitat.
Grizzly Bear	Eagle Plains Ecoregion has approximately 9 bears per 1,000 km ² .
Landscape Connectivity	
Moose	
Salmon and other Fish	
Sheep	
Species at Risk	<u>Known to occur: Dolly Varden (Western Arctic population), Olive-sided Flycatcher, Rusty Blackbird, Short-eared Owl</u> <u>Expected in low numbers: Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Transverse Lady Beetle, Barn Swallow, Common Nighthawk, Horned Grebe, Wolverine, Bank Swallow, Lesser Yellowlegs</u>
Vegetation and Unique Features	
Water	Part of the headwaters of the Porcupine River watershed.
Wetlands	
Culture, Heritage Resources and Community Values	
Community Value	Accessible off the Dempster <u>Highway</u> for recreational activities.
Heritage Resources and Sites	Potential for undiscovered archaeological sites and infrastructure relates to historic First Nation harvest activities.

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Traditional Economy/ Traditional Uses	First Nation land-based connections to this area; very active harvest area (trapping, gathering, and harvesting), especially along the "horseshoe bend" along the Dempster Highway and adjacent lands.
Socio-economic Values	
Agriculture	
Energy	Within an identified sedimentary basin with identified potential for oil and natural gas resources, and some presence of exploration wells within the general area and presence of previous seismic lines. There is an active permit for oil and gas adjacent to the LMU.
Forestry	
Mineral Resources	Moderately prospective mineral potential with medium to high confidence.
Outfitting and Trapping	Part of a group trapping concession and an outfitting concession.
Tourism	Adjacent to Dempster highway, an increasingly popular tourist driving route.
Transportation and Access	Accessible off the Dempster Highway and near an airstrip.

6.3 LMU 3: CHU KON DĚK (YUKON RIVER CORRIDOR)

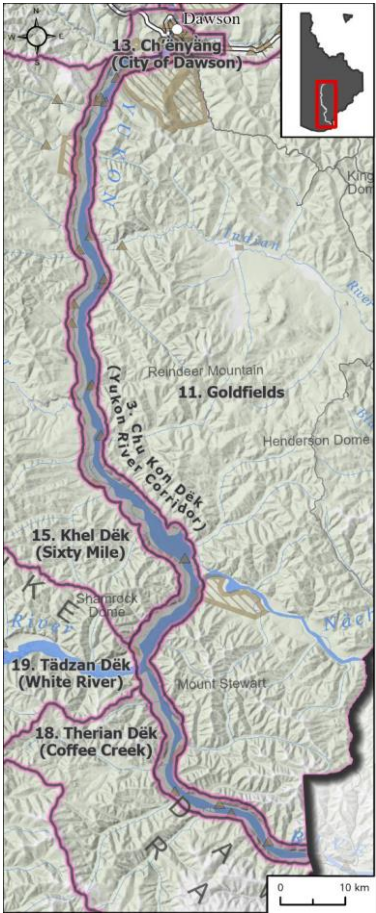
Land Use Designation:	Sub-regional Planning Area		
Land Status:	Non-Settlement Land and Settlement Land, including 52 Tr'ondëk Hwëch'in Settlement Land Parcels		
Area:	926 km²	Planning Region %	2.3%

Commented [A535]: See memo for proposed designation changes for LMU 3. If YG recommended approach is not followed and this LMU is kept as sub-regional planning area, include edits proposed below.

Northern Portion



Southern Portion



Walking on the Land Together (Intent Statement)

The vision for this area is for future planning that will focus on protecting and enhancing water quality and salmon habitat; protecting the scenic values that attract tourism opportunities; preserving important cultural sites; and managing important industrial access points.

The Yukon River Corridor represents a significant multi-use area and transportation corridor for the Dawson Region. The significance of this area is demonstrated by the abundance of identified heritage and cultural sites along this historic route, and it continues to be an area of immense cultural value to Tr'ondëk Hwëch'in. The corridor provides rich habitat for key species in the region including salmon, moose, raptors, and species at risk, and it is important for facilitating a diverse range of economic development activities including mining, tourism, agriculture, and recreation. Different pressures and land uses exist to the north and south of the corridor.

Although the scope of the Dawson Regional Plan is bound by the extent of the planning region, the Yukon River is a single ecological feature and should ultimately be managed as such. The long-term vision for the future of the Yukon River is to encourage the management of the river in its entirety to honour its many functions, and its importance to the people of the Yukon. This Plan proposes sub-regional planning be completed for this LMU under Chapter 11 of the THFA and for interim measures to be in place until sub-regional planning is completed.

Commented [A536]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

Commented [A537]: Beyond scope of the Plan

Tr'ëhudè (Our Way of Life) & Stewardship

"Throughout the stories...you will hear of Smart Man, Beaver Man, and Tsà' Wëzhè. This is the Traveller, known by many names up and down the Yukon River and across the north. Tsà' Wëzhè went into the world and made it safe for us, the Dënezhu. He made agreements with the land and animals that ensured our survival: the land and animals would provide for us for as long as we lived by those agreements, for as long as we lived Tr'ëhudè. The stories of Tsà' Wëzhè, Beaver Man, Smart Man, the Traveller, teach us that Tr'ëhudè means to live in integrity, justice/balance, interdependence, and respect, and we must adhere to these values if we want the land, our culture, and our community, to survive."

Tr'ondëk Hwëch'in Tr'ëhudè Land Vision, 2021

There are many places along the Yukon River Corridor where the interrelationship between cultural education and connection to the land take place. This is a value that is held strongly by Tr'ondëk Hwëch'in and it is important that these spaces are protected to ensure these opportunities can be preserved for the youth. The River is central to the Tr'ondëk Hwëch'in cultural landscape.

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to: A phased approach to management of LMU 3: Chu Kon Dëk (Yukon River Corridor):

1. Interim measures – applied upon Plan approval until sub-regional plan approved

1. Withdrawal of lands from placer and quartz mineral staking until the completion and approval of a sub-regional plan or such a time as both Parties agree to

~~remove withdrawal.~~ ~~2. When a claim expires it should be withdrawn from further staking while interim withdrawal is in place.~~ ~~3. Mineral development permitted within existing mineral tenure.~~ ~~• Industrial land use permitted within ISA 2 cumulative effects thresholds.~~ ~~1. Surface disturbance threshold of 9.26 km² (1.0% of LMU area).~~ ~~• Linear feature density threshold of 463 km (0.5 km/km² of LMU area).~~ ~~4.2. A scoping exercise for Yukon River sub-regional planning issues and interests to include a DRPC-hosted Yukon River Summit/gathering with affected First Nations, community, and stakeholders.~~ ~~5.3. A buffer near the Forty Mile Heritage Site should be implemented to protect the cultural significance and multi-use nature of the site.~~ • Sub-Regional Planning ~~To be conducted by the DRPC and initiated/Initiate within 6 months of Dawson Regional Land Use Plan approval.~~ 1. Consideration should be given to the differences in activities and activity levels to the north and to the south of the City of Dawson for the management of the corridor. ~~• Sub-Regional planning should specifically plan for the management of activities along the Yukon River Corridor within the Dawson Planning Region.~~ 2. Recreation management, and access management (roads, barges, etc.) should be key focus areas of sub-regional planning. 3. Maintaining wilderness characteristics of river for valued recreational, traditional, and economic (tourism) purposes should be considered. 4. A buffer near the Forty Mile Camp/Heritage Site should be implemented to protect the cultural significance and multi-use nature of the site. ~~3. Comprehensive Yukon River Management (Future Vision)~~ ~~1. A Yukon-wide plan for the health and vitality of the Socio-cultural, economic, and environmental values of the entire Yukon River should be developed.~~ ~~2. Consideration of legal personhood for the Yukon River (precedent exists for Magpie River in Quebec).~~ ~~3.1. Explore the possibility of developing a Yukon River Management Plan with all affected First Nations, territorial, and municipal governments to gauge interest in the concept to determine its feasibility.~~	Commented [A538]: YG does not support the use of interim withdrawals. Commented [A539]: Removed "ISA 2" and instead listed specific disturbance allowed by thresholds to avoid confusion as this is a SRPA. Nothing in s.3.6 limits thresholds to industrial land uses, clarify if other uses are acceptable up to the thresholds specified or if only industrial uses are acceptable in this LMU. Commented [A540]: Specify distance and what activities (if any) can occur within the buffer. Commented [A541]: As per our overarching comments on LMU 3, Government of Yukon proposes splitting this LMU, with the North section becoming an SMA and the South section a ISA1. We do not believe that regional sub-regional planning is necessary for this redefined LMU and instead propose that any elements that would be addressed in a sub-regional plan instead are included in the Final Recommended Plan, avoiding the issue of "planning to plan" Commented [A542]: Chapter 11 details who will conduct sub-regional planning. Commented [A543]: Redundant, this is the area specified. Commented [A544]: Beyond the scope of the regional plan
Priority Objectives ✓ People can access the land, water, and resources in a way that acknowledges and supports the values and minimizes conflicts and cumulative effects. ✓ Healthy aquatic ecosystems and watersheds. ✓ Sustainable fish and wildlife populations supported by healthy aquatic and terrestrial habitats. ✓ Stewardship of rivers to enhance salmon habitat and support salmon recovery. ✓ Salmon migration routes that allow for salmon recovery. ✓ Healthy populations of migratory and non-migratory birds and raptors, including the preservation of flyways and other key habitat.	

- ✓ Tourism activities are carried out in a manner consistent with the principles of stewardship and sustainability.
- ✓ Tourism and recreational experiences include scenic views, wildlife viewing, culture appreciation, and heritage education within appropriate areas of the Planning Region.
- ✓ Increased opportunities for tourism experiences that contribute to a growing diversified economy, local employment, and economic stimulus.
- **Maintain and enhance cultural heritage sites**

Rationale for Designation

- Important multi-purpose area that represents a valuable transportation route, numerous habitat qualities for terrestrial and aquatic species, and immense cultural value to the Tr'ondëk Hwëch'in.
- Represents high, year-round recreational, industrial, historical, trapping, and educational value and provides opportunities for angling and wildlife viewing as well as the aesthetic qualities of a northern wilderness river.
- Provides for salmon habitat for adults and juveniles, tributaries to the river also offer important spawning habitat.
- Opportunities for land-based learning and cultural education opportunities for Tr'ondëk Hwëch'in youth are located along the river.
- Numerous Tr'ondëk Hwëch'in Settlement Lands exist along the river.

Ecological Integrity and Conservation Values

Birds	High value waterbird habitat along riparian areas, and raptor key areas have been identified along the Yukon River.
Caribou	This area overlaps with two caribou herd ranges: the Fortymile and Nelchina caribou herds and includes migration corridors and winter habitat for the Fortymile caribou.
Ecosystem Representation	Part of Boreal Cordillera ecozone, Klondike Plateau ecoregion.
Furbearers	Important salmon habitat/migratory corridor as well as home to several resident fish species.
Grizzly Bear	
Landscape Connectivity	
Moose	Extensive area considered good habitat for moose.
Salmon and other Fish	Important habitat for salmon migration/spawning and freshwater fish.
Sheep	<u>Areas of known presence within the river corridor are mapped in the Wildlife Key Areas database.</u>
Species at Risk	<u>Known to occur: Spiked Saxifrage, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Short-eared Owl, Wolverine, Peregrine Falcon</u>

Commented [A545]: Added as values mention sites and conditions speak to protecting Forty Mile.

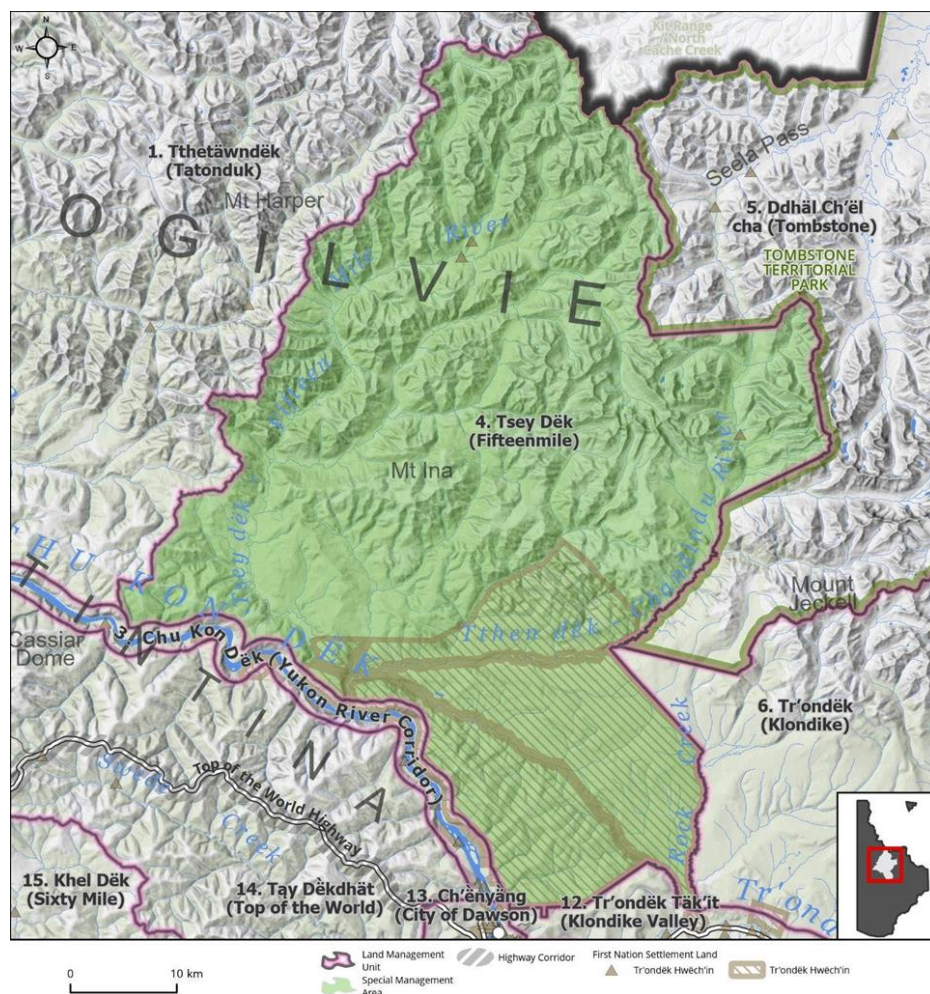
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	~~Expected in low numbers: Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Barn Swallow, Common Nighthawk, Transverse Lady Beetle, Horned Grebe Presence of Yukon Podistera (SARA Special Concern), Peregrine Falcon (SARA Special Concern), and known Spiked Saxifrage populations.~~
Vegetation and Unique Features	Occurrence of ~~low elevation steppe meadows which have endemic species (Dawson Wallflower, William's Catchfly). River sand bar/ dune systems contain endemic species (Alaskan Bugseed). This region has known occurrences of mineral licks within the river corridor and old growth (>140 years old) riparian ecosystems.~~ ~~known mineral licks within Corridor and rare plant species.~~
Water	The Yukon River and its tributaries are a major hydrological feature in the ~~R~~ region and the ~~T~~ territory.
Wetlands	Wetland and riparian habitat along major watercourse.
Culture, Heritage Resources and Community Values	
Community Value	Areas of high recreational significance. The river is highly valued and used by the community and visitors year-round: harvest, hiking, paddling, boating, dog sledding, skiing, snowmobile, transportation, access to trapping, etc. Also used for annual events such as Yukon River Quest and Yukon Quest Dog Sledding.
Heritage Resources and Sites	Location of traditional routes, historic sites, Tr'ondëk Hwëch'in land use sites, heritage reserves, historic resources, and archaeological sites.
Traditional Economy/ Traditional Uses	Important area for harvesting, gathering, trapping, fishing, and travel that facilitates other land use within this important river corridor.
Socio-economic Values	
Agriculture	Yukon River Corridor may offer suitable land for agricultural purposes.
Energy	
Forestry	To continue as guided by forest management plans.
Mineral Resources	Claims along mainstem and along several tributaries near or within the corridor. Infrastructure for mineral development, such as barge landings, trail heads, docks, along mainstem.
Outfitting and Trapping	Areas overlap with trapping concessions.
Tourism	Various landing sites and docks provide water access and there are connecting trails off some areas of the mainstem. River traffic consists of barging and recreational boating. River crossing to access

	communities.
Transportation and Access	Yukon River Corridor offers ample opportunities for wilderness tourism including canoeing, fishing, hiking, and camping, dog sledding, snowmobile tours, boat tours, wildlife viewing, and increased indigenous tourism opportunities. Hosts many annual events that attract tourists to the area.
Other	Thriving subsistence and commercial salmon fishery once existed on the river.

6.4 LMU 4: TSEY DĚK (FIFTEENMILE)

Land Use Designation:	Special Management Area		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land TH R-1A, TH R-3A, TH R-64B, TH R-70B, TH R-83A, TH S- 135B1, TH S-136B1, TH S-137B1, TH S-27B1		
Area:	2761 km ²	Planning Region %	6.9%



Walking on the Land Together (Intent Statement)

The management intent for this area is to focus on conservation with limited use, and to establish shared management responsibilities between Tr'ondëk Hwëch'in and Government of Yukon.

~~The Tsey Dëk (Fifteenmile) area contains intact ecosystems, and our intent is to ensure landscape connectivity, ecosystem representation, and key areas for wildlife, stewardship, and heritage are protected. This area contains important habitat for the Fortymile, Hart River, and Porcupine Garibou Herds, grizzly bears, and sheep, and is important for trapping and traditional economic activities.~~

The future management for this area sees Tr'ondëk Hwëch'in have the primary role in the management of the SMA in this culturally significant area. Careful management of access and sustainable tourism opportunities should respect the ecological and cultural significance of the area.

Commented [A546]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

Tr'ëhudë (Our Way of Life) & Stewardship

This area is rich in Tr'ondëk Hwëch'in cultural history and contains important traditional routes and trails. ~~Much of this~~ About a third of this LMU is covered by Settlement Lands which speaks to the importance of this area for maintaining cultural connectivity. The family ties to the land are shared in stories of living memory:

"Growing up fishing with drying racks along the beaches along the Chandindu and taking salmon up to Old Crow. We learned not to camp at Fifteenmile because the grizzlies would come down."

John Flynn, Dawson Regional Planning Commission Member

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. Tr'ondëk Hwëch'in should have the primary responsibility of managing this area through the establishment of an Indigenous Protected and Conserved Area (IPCA).
2. ~~Surface disturbance threshold of 6.9025km² (0.25% of LMU area).~~
3. ~~Linear feature density threshold of 690.25km (0.25km/km² of LMU area).~~
- 2-4. ~~The following industrial land uses allowed:~~
 - a. Mineral development, ~~only allowed is permitted~~ within existing mineral tenure.
 - b. ~~Withdrawal of all other lands from placer and quartz mineral staking.~~
 - c-b. ~~Industrial land use allowed permitted within ISA 1 cumulative effects thresholds.~~
5. ~~Withdrawal of all lands from placer and quartz mineral staking.~~
- 3-6. In the absence of an SMA management plan, surface access should be considered jointly by the Parties on a project-by-project basis:
 - a. Carefully managed surface access should be considered jointly by the Parties to support sustainable tourism activities, forestry, Tr'ondëk Hwëch'in cultural activities, and access to ~~a mineral deposit existing mineral tenure~~ that has been proven viable by a proponent.
- 4-7. Activities that overlap with sheep habitat (Map 5 – Ungulates) will need to

Commented [A547]: Removed "ISA 1" and instead listed specific disturbance allowed by thresholds to avoid confusion as this is an SMA.

Nothing in s.3.6 limits thresholds to industrial land uses, clarify if other uses are permitted up to the thresholds specified.

Commented [A548]: Clarify if this is different from update 2a, if so list permitted uses, if not remove.

Commented [A549]: Specify which industrial land uses are allowed (changed from permitted as this term should only be used when talking about permits), bullet 5a below speaks to access for forestry but forestry is not explicitly mentioned here as an allowable use.

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consider impacts to sheep habitat, ~~particularly impacts~~ to late winter habitat, and timing windows may apply.

5.8. The SMA Management plan should consider a long-term sustainable tourism framework. ~~Due to the high concentration of settlement lands this framework should be led by Tr'ondëk Hwëch'in.~~

Priority Objectives

- ✓ Recognize and protect a way of life that is based on an economic and spiritual relationship between Tr'ondëk Hwëch'in and the land. (THFA preamble).
- ✓ First Nations citizens are benefitting from the land.
- ✓ Continued and successful traditional land use and traditional economic activities.
- ✓ Key use areas, infrastructure, and resources that support traditional economy are preserved.
- ✓ Promote, ~~utilize~~utilize, and preserve the language and traditions of the Tr'ondëk Hwëch'in (Source: Tr'ondëk Hwëch'in Constitution) and other affected First Nations.
- Historic sites, burials, trails, camps, and other heritage resources, including the cultural landscape, are preserved.
- ✓ Connectivity between areas of key wildlife habitat, while considering climate driven shifts in habitat. (Plan Goal)
- ✓ Stewardship principles are consistently applied by land, water, and resource users.
- ✓ Tourism activities are carried out in a manner consistent with the principles of stewardship and sustainability.

Rationale for Designation

- An Indigenous focused stewardship approach of this area will enable Tr'ondëk Hwëch'in to exercise their stewardship obligations for this important place.
- Contains traditional routes, sites, as well as areas with high cultural importance and use for Tr'ondëk Hwëch'in, and is critical for cultural continuity, maintaining cultural ties to the land for Tr'ondëk Hwëch'in citizens and providing opportunities to the youth and future generations.
- Active recreation and tourism area including outfitting, hiking, packrafting, snowmobiling, etc.
- Future potential for sustainable tourism economy due to its proximity to Tombstone Park, the City of Dawson, the Yukon Ditch, and its relative accessibility.
- Biodiversity-rich area containing intact ecosystems and species of conservation concern.
- Majority of area located within McQuesten Highlands ecoregion, which is currently absent within Yukon's protected area system.
- Area overlaps with three caribou herd ranges and extensive habitat for sheep, moose, and grizzly bears, all species of considerable cultural, ecological, and/or economic importance in Yukon.
- Area contains important waterways that provide for salmon habitat.

Commented [A550]: Map does not distinguish between habitat types.

Sentence modified as its intent previously was unclear (impacts to late winter habitat may apply), if misinterpreted please clarify.

Commented [A551]: Management will be determined during implementation, this is beyond the scope of the Plan.

- Establishing a conservation area will enable landscape connectivity between Kit Range/North Cache Creek in Peel River Watershed and Tombstone Territorial Park.
- Contains some existing mineral dispositions with limited spatial distribution and disturbance.
- Surface access infrastructure is limited. Maintaining this status will ensure the wilderness character of the area remains intact.

Ecological Integrity and Conservation Values

Birds	High value waterbird habitat in riparian areas, key nesting habitat for raptors. Majority of area consists of high elevation (>1,000 m) habitat crucial for migratory bird specialist species. Contains the Tintina Trench Flyway, a major migration corridor and contains stop over sites used by migratory birds during migration.
Caribou	Fortymile, Porcupine, and Hart River Caribou Herd ranges. Contains critical summer and winter habitat as well as spring/fall and summer corridors for migrating caribou, and important habitat for the Hart River herd.
Ecosystem Representation	Majority of the area is part of the McQuesten Highlands, which is not currently included within Yukon's protected areas system.
Furbearers	
Grizzly Bear	Contains good habitat for grizzly bears.
Landscape Connectivity	Adjacent to protected areas Kit Range / North Cache Creek in Peel River Watershed, Tthetäwndëk, and Tombstone Territorial Park.
Moose	Considered good moose habitat. Wildlife key areas for moose along river corridors (Chandindu, Fifteenmile, and Yukon River north) for late winter (February–April) upland habitat.
Salmon and other Fish	Important habitat for salmon migration/spawning and freshwater fish. Chandindu and Fifteenmile Rivers provide for eChinook salmon spawning habitat. Assumed to be important for all life stages of multiple freshwater fish species.
Sheep	Large numbers of Dall's sheep present and extensive sheep habitat throughout the majority of the area (winter range, lambing, and rutting areas).

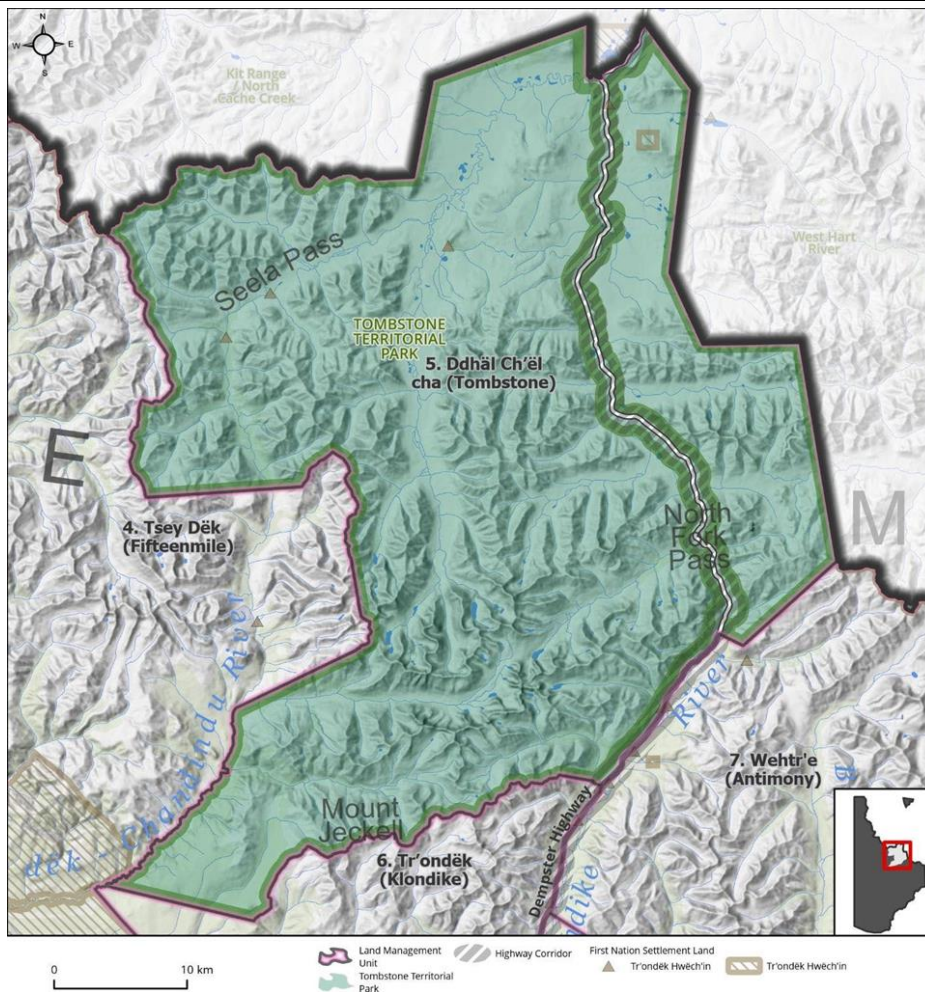
Species at Risk	<u>Known to occur: Yukon Podistera, Collared Pika, Wolverine, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Short-eared Owl, Peregrine Falcon</u> <u>Expected in low numbers: Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Barn Swallow, Common Nighthawk, Transverse Lady Beetle, Horned Grebe</u> <u>Presence of Yukon Podistera (SARA Special Concern), Peregrine Falcon (SARA Special Concern).</u>
Vegetation and Unique Features	<u>Contains low elevation steppe meadows which have endemic species. Unglaciaded alpine which has endemics species (Ogilvie Mountains Collared Lemming (in particular dry heath ridges). This region contains intact old growth forests (>140 years old), and several known mineral licks. Contains endemic/rare species, some intact forests (>140 years old), and several known mineral licks.</u>
Water	Several important undeveloped watercourses and headwaters.
Wetlands	Available wetland mapping indicates some wetland <u>habitat ecosystems</u> within area lowlands, including bogs, fens, and marshes, which provide for important wildlife habitat and ecosystem services.
Culture, Heritage Resources and Community Values	
Community Value	Active year-round recreation opportunities (incl. hiking, snowmobiling, fishing, packrafting, etc.) Southern portion is reasonably accessible for community use and cultural activities.
Heritage Resources and Sites	Presence of traditional routes along Chandindu, Fifteenmile, and Yukon Rivers. Concentration of archeological sites and a number of historic sites are associated with the Yukon Ditch system.
Traditional Economy/ Traditional Uses	Fall and winter traditional use areas; presence of Tr'ondëk Hwëch'in settlement land parcels in proximity to community (R-3A, R-64B, R- 1A, R-70B, R-83A). Important area for family and community connections to the land and ability to exercise Traditional Economic activities.
Socio-economic Values	
Agriculture	
Energy	

Forestry	Overlaps with the Chandindu Landscape Unit of the Dawson Forest Resources Management Plan. Unit is designated as a forest resource management zone with a medium priority for planning and a higher conservation focus.
Mineral Resources	Minimal upland active quartz claims, majority of area significantly to moderately prospective, some highly prospective areas. Low to moderate probability for placer potential.
Outfitting and Trapping	Area contains an active outfitting concession and an active trapping concession.
Tourism	Current and future tourism potential including wilderness tourism, camping, hiking, packrafting, snowmobiling, skiing, close proximity to Tombstone and the City of Dawson, the Yukon Ditch, etc.
Transportation and Access	Existing overland access routes in the winter/fall. No major access roads or trails into the area. There is some existing access in and around Yukon River, Chandindu, Tombstone Park and the City of Dawson. Access will need to be monitored and managed.

6.5 LMU 5: DDHĀL CH'ĒL (TOMBSTONE)

Land Use Designation:	Special Management Area		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land: TH R-19B, TH R-34B, TH S-138B1, TH S-145B1, TH S- 28B1, TH S-29B1, TH S-26B1/D, TH S-208B1/D		
Area:	2,107 km ²	Planning Region %	5.3%

Commented [A552]: Tombstone Park should not be included in the Plan as set out in the terms of reference. If kept in the Plan, this section should follow the model of LMU 13: City of Dawson.

**Walking on the Land Together (Intent Statement)**

The vision for this area is to maintain it as a Special Management Area as per its

current designation and as established in the THFA:

Tombstone Territorial Park is a protected area established pursuant to Schedule A of Chapter 10 of the THFA and designated as a Natural Environment Park under the *Parks and Lands Certainty Act*. This regional land use plan will not include planning for the park itself, but it is physically located within the Dawson Planning Region.

As indicated in the THFA, in developing a land use plan that includes all or parts of the park, a Regional Land Use Planning Commission shall consider the Tombstone

Territorial Park Management Plan (2009). The management plan states:

“Tr’ondëk Hwëch’in Settlement Lands are not part of Tombstone Territorial Park and as such are not subject to the Tombstone Territorial Park Management Plan or the Yukon Parks and Land Certainty Act. The Tr’ondëk Hwëch’in may develop legislation under its Self-Government Agreement to regulate activities on its Settlement Land.”

Government of Yukon, 2009

Tombstone Territorial Park supports excellent caribou, grizzly and black bear, moose, and sheep populations. These species have been sustainably harvested by subsistence, resident, and non-resident hunters for thousands of years. The location of Tombstone Park is also of significant First Nation cultural history and value, as well as an exceptional attraction for contemporary recreation and tourism.

The Tombstone Territorial Park Management Plan Review should carefully consider tourism and increased traffic along the Dempster Highway, and the impacts these activities may have on the values held strongly by Tr’ondëk Hwëch’in and the Dawson community.

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1.—Existing Plans and Regulations:

- a.—Tombstone Territorial Park Management Plan (2009);
- b.—Dempster Highway Development Area Regulations (C.O. 1979/064);

2.—Access:

- a.—Tombstone Corridor: Generally, 500m on either side of the centre line of the Dempster Highway, see park management plan for details of corridor (Tr’ondëk Hwëch’in & Government of Yukon, 2009). Managed under the Area Development Act;
- b.—Activities managed within the Corridor may include continued highway maintenance activities, a possible future pipeline, transmission line or other public visitor infrastructure (i.e., fibre optic line);
- c.—Carefully managed surface access should be considered jointly by the Parties to support sustainable tourism activities, forestry, Tr’ondëk Hwëch’in cultural activities, and access to a mineral deposit that has been proven viable by a proponent;

3.—Tombstone Territorial Park Management Plan Review:**4.—Industrial Land Use:**

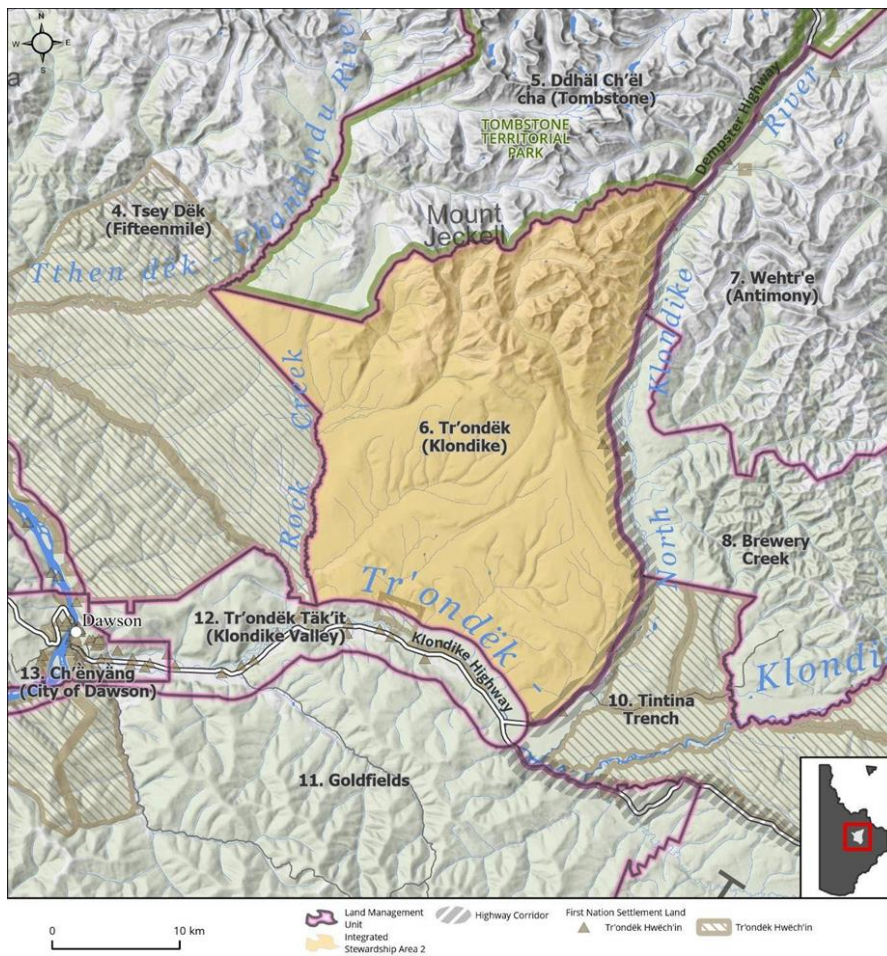
- a.—Mineral development is permitted within existing mineral tenure;
- b.—Industrial land use permitted within ISA 1 cumulative effects thresholds;

Commented [A553]: Keep this similar to LMU 13, delete the rest of this section as the Plan does not apply to Tombstone.

- ~~5.—Withdrawal of all other lands from placer and quartz mineral staking.~~
- ~~6.—See Tombstone Territorial Park Management Plan (2009) for a comprehensive description of the area and values, and allowable activities and management direction.~~
- ~~7.—Dempster Highway corridor sub-regional plan will affect this LMU and thus interim measures and future sub-regional planning direction should be considered (see **Section 5.4.3.1.1—Dempster Highway Corridor**, page 130).~~

6.6 LMU 6: TR'ONDĖK (KLONDIKE)

Land Use Designation:	Integrated Stewardship Area 2		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land TH R-38A, TH S-112B1, TH S-142B1, TH S-176B1, TH S-205B1, TH S-206B1, TH S-24B1, TH S-25B1, TH S-26B1/D, TH S-47B1, TH S-71B1, TH S-72B1, TH S-73B1		
Area:	824 km ²	Planning Region %	2.1%



Walking on the Land Together (Intent Statement)

The vision for this area is to allow for limited sustainable development while ensuring the high ecological value and socio-cultural use remains intact. ~~Located within the Tintina Trench flyway as well as along the North Klondike River, this area offers important habitat for migratory birds, raptors, furbearers, moose, freshwater fish, and salmon.~~

~~Industrial interests in this area are limited, except for forestry along the Dempster Highway.~~ The use of this area for forestry pursuits as well as continued traditional economic activities, trapping and harvesting, should be maintained.

Tr'èhudè (Our Way of Life) & Stewardship

There is a long history of Tr'ondëk Hwëch'in connections to this area. It is an area filled with history and a place of cultural continuity for Tr'ondëk Hwëch'in. There is a valley in this LMU where you can see the caribou coming down. People say that it would have been a natural place for ancestors to have camps. Arrowheads have been found in this area.

Dawson Regional Planning & Commission Members

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

- ~~1. Activities that have the potential to disturb salmon spawning habitat should be suspended during the spawning season (July 1 to August 15).~~
- ~~2-1. Area is considered to contain critically important habitat for regional lynx populations.~~ Development in this area should ensure impacts to lynx and their key habitat requirements are minimized or avoided.
- ~~3. Activities that have the potential to disturb migratory bird nesting should proceed as guided by the Migratory Birds Convention Act and its regulations to minimize and/or avoid impacts to migratory birds.~~
- ~~4-2. Area represents important headwaters for drinking water catchment for City of Dawson and surrounding residential neighbourhoods.~~ Development in this area should not impact ~~the headwaters for drinking water catchment for the City of Dawson~~ this important water source (see **Section 5.3.5.1 – Community Water**, page 118).
- The North Fork Hydro site as identified in the THFA should be considered ~~at the discretion of both Parties~~ by the Parties at their discretion and within their respective jurisdictions.
- ~~5-3. Dempster Highway Corridor sub-regional plan directions will affect this LMU and thus interim measures and future sub-regional planning direction should be considered apply to portions of this LMU once the sub-regional plan is approved.~~ (see **Section 5.4.3.1.1 – Dempster Highway Corridor**, page 130).

Priority Objectives

- ✓ Healthy populations of migratory and non-migratory birds and raptors, including the preservation of flyways and other key habitat.
- ✓ Continued and successful traditional land use and traditional economic activities.
- ✓ Key use areas, infrastructure, and resources that support traditional economy

Commented [A554]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

Commented [A555]: The proposed timing window is incorrect, this area is in the Yukon drainage (Yukon downstream per **DFO's timing windows**). Timing windows indicate the time during which work **can** occur based on fish presence, for Chinook salmon this is between June 10 and July 5. A requirement to follow timing windows is included as general management direction 5.2.1.3 f so this direction should be removed entirely as it is incorrect and redundant.

Commented [A556]: Context. Already in the Values table below. (this comments apply to other special management directions in all LMUs)

Commented [A557]: Redundant - already must meet legislated requirements

Commented [A558]: The North Fork Hydro Site would not require a TH authorization so it's not discretionary for TH.

Commented [A559]: No interim measures identified.

are preserved.	
✓ Opportunity for sustainable forestry that contributes to a growing diversified economy, local employment, and economic stimulus.	
Rationale for Designation	
- Heavy multi-use area with conflicting land uses, and important areas for commercial fuelwood harvesting. - An ISA 2 designation with the special management directions recommended above should allow for continued sustainable growth of the important industrial aspects of this area without undermining ecological and socio-cultural values.	
Ecological Integrity and Conservation Values	
Birds	Presence of raptor nests along North Klondike River and within the Tintina Trench Flyway, important for migratory birds. Contains high concern habitat for migratory birds, and watercourses and ponds offer important habitat for waterfowl, including swans, cranes, ducks, geese, and shorebirds. Presence of key sharp tailed grouse habitat areas and some high elevation habitat (<1,000 m) which is important for some migratory bird species.
Caribou	Within the range of the Fortymile caribou herd and contains some key winter habitat and spring/fall migration corridor areas.
Ecosystem Representation	Part of the McQuesten Highlands ecoregion.
Furbearers	Beaver and muskrat areas, lesser occurrence of wolverine, ermine, and river otter. Considered to be a regionally important lynx refugium, in which when lynx populations in surrounding areas decline, lynx populations in the Klondike valley and surroundings do not. As such this area can be considered a significant seed source for regional lynx habitats.
Grizzly Bear	
Landscape Connectivity	
Moose	Considered extensive good moose habitat and contains key wildlife area for moose mostly for late winter (February to April) range for calving.
Salmon and other Fish	The Klondike River watershed offers critical habitat requirements for eChinook salmon (spawning, rearing) and important habitat for resident fish species including Arctic grayling.
Sheep	<u>A small section of Winter habitat identified on Mt. MacLennan, also lambing habitat identified North of Scoutcar creek. Both areas identified from anecdotal sources.</u>

Commented [A560]: Other LMUs with sharp-tailed grouse habitat have special management directions related to them, clarify why this LMU does not or add directions.

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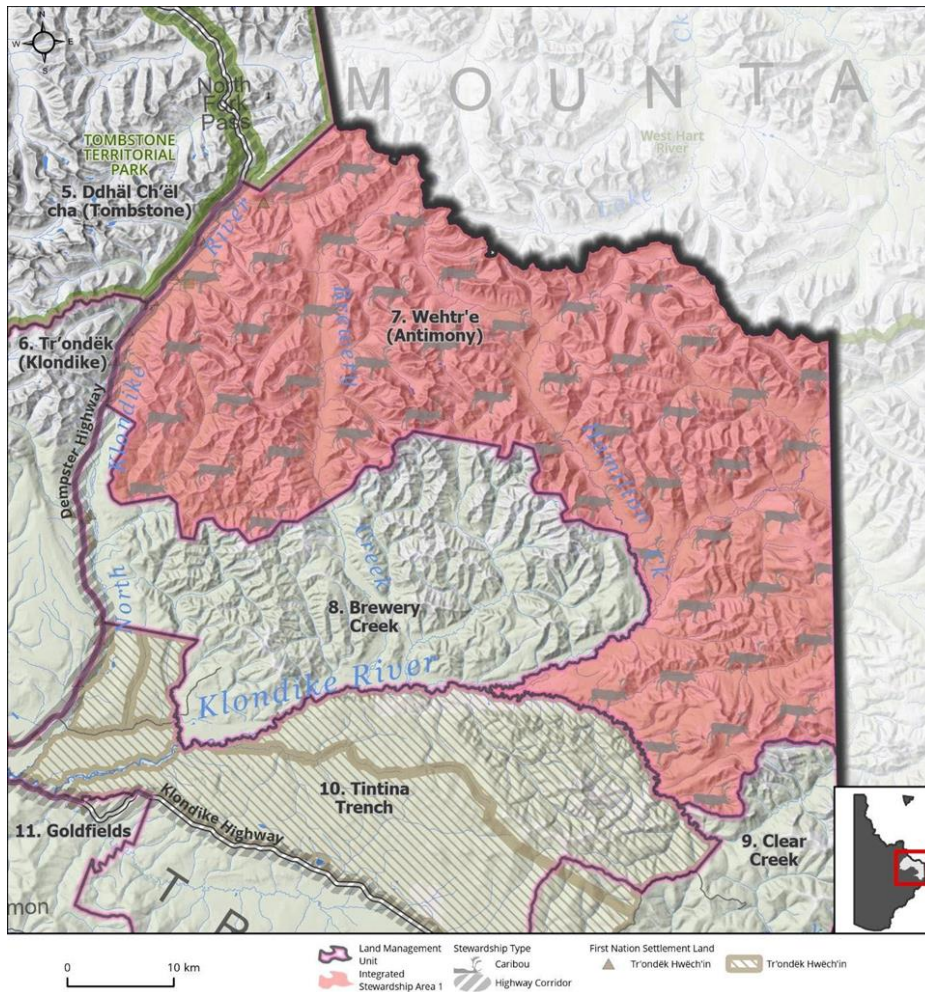
Species at Risk	<u>Expected to occur: Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Short-eared Owl, Horned Grebe, Barn Swallow, Common Nighthawk, Wolverine, Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Transverse Lady Beetle.</u>
Vegetation and Unique Features	Considered to contain important mineral licks for wildlife.
Water	Klondike River watershed offers important aquatic habitat values for key wildlife in the <u>Rregion</u> as well as an important drinking water source for residents of the <u>Rregion</u> .
Wetlands	Presence of some wetland <u>habitatecosystems</u> , including bog, fen, and swamp.
Culture, Heritage Resources and Community Values	
Community Value	Given proximity to Dawson and adjacency to main highways, there is potential for recreational pursuits in area, however access into the area remains relatively absent. There are several hiking opportunities along the Yukon Ditch and within Tombstone Mountains south of the park. Snowmobiling occurs along existing trails. <u>Area represents important headwaters for drinking water catchment for City of Dawson and surrounding residential neighbourhoods.</u>
Heritage Resources and Sites	Occurrence of traditional trails and archaeological sites. Area contains a portion of the Yukon Ditch and associated sites.
Traditional Economy/ Traditional Uses	Important areas for connecting to the land through the practice of land use/economic activities, including trapping, gathering, and harvesting. High cultural value and contemporary use for traditional economic activities.
Socio-economic Values	
Agriculture	
Energy	Presence of historical infrastructure and location of future potential use for hydroelectricity (North Fork Hydro-electric proposal) - see also LMU 10: Tintina Trench (page 212), and Section 5.2.6 – Climate Change (page 102).
Forestry	High commercial forestry harvesting value. This LMU overlaps the FRMP 'Klondike River' Landscape Unit which is high priority planning short-term. Two active <u>Timber Harvest Plans</u> : Dempster Highway and Five Mile Dempster Highway.

Mineral Resources	High to moderate mineral potential in area, some isolated placer leases, and claims, but area is generally low interest for mineral exploration and development. Presence of a past mine site at colliery for coal.
Outfitting and Trapping	Presence of active trapping and outfitting concession and associated infrastructure.
Tourism	Limited hiking opportunities, air access only. Located directly adjacent to Tombstone Territorial Park. Potential for Indigenous tourism and interpretation along the Dempster Highway (i.e., Wolf Creek). Opportunities for wildlife viewing and scenic views along highway.
Transportation and Access	Low accessibility, but adjacent to both the North Klondike Highway and Dempster Highway.

6.7 LMU 7: WEHTR'E (ANTIMONY)

Land Use Designation:	Integrated Stewardship Area 1		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land TH R-41B, TH S-123B1, TH S-143B1, TH S-144B1, TH S-88B1		
Area:	2144 km ²	Planning Region %	5.4%

Commented [A561]: See letter for further information on proposed designation change for LMU 7. If YG's recommended approach is not followed and this LMU is kept as an ISA 1, include edits below.



Walking on the Land Together (Intent Statement)

The vision for this area is to protect key wildlife habitat and aesthetic attributes along the Dempster Highway while allowing for limited mineral development within existing tenure and carefully managed surface access. This area has a high conservation focus due to the important habitat of the Hart River and Clear Creek Caribou Herds.

~~This area contains important wildlife habitat for species at risk, including calving, summer and rut habitat for northern mountain woodland caribou and high elevation areas for migratory birds. This area is also located adjacent to two protected areas (Tombstone Territorial Park and the West Hart River Wilderness Area), and thus offers important opportunities for landscape connectivity.~~

The future of this area looks much the same as it is today, recognizing that some mineral development and forestry may still occur. Any development should be accompanied by management and reclamation standards that protect key caribou habitat.

Commented [A562]: This statement is appropriate for an SMA designation as suggested by YG. If keeping as an ISA, this should be changed to reflect the intent of ISAs.

Tr'ëhudè (Our Way of Life) & Stewardship

This is an important area for connecting to the land and taking part in Traditional Economic activities including trapping, fishing, gathering, and hunting. There is a Tr'ondëk Hwëch'in camp near here where there is concern about the quality of drinking water from past mining activities. This concern has affected people who use the camp as many will not drink from the creek.

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. Caribou Stewardship overlay area (see **Section 3.2.4.1 – Caribou Stewardship Area**, page 44).
2. ~~Industrial Land Use:~~
 - a. ~~Mineral development is permitted within existing mineral tenure.~~
 - b. ~~Industrial land use is permitted within ISA 1 cumulative effects thresholds.~~
3. ~~Interim withdrawal of all other lands from placer and quartz mineral staking to be in place until the Access Management plan is completed or Regional Plan 10-year Review or until such a time that both Parties agree to remove.~~
2. An access management plan / agreement to be jointly created by the Parties which should consider the following:
 - a. ~~Impacts to key ecological values with an emphasis moose and caribou from increased access development.~~
 - b. ~~Impacts to other land users, including the use of the land for traditional economic activities, subsistence harvesting, and trapping.~~
 - c. ~~Impacts to heritage values, cultural landscapes, heritage resources etc.~~
 - a.c. ~~New transportation routes to areas of significant to high economic value for minerals, tourism, etc.~~
 - b.d. ~~New all season surface access:~~ When new access is required, coordinated access routes for industrial activities should be encouraged to reduce linear footprint.
 - c.e. ~~The viewscape from the Dempster Highway should be maintained.~~

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Commented [A563]: Include directions related to the overlay in this section rather than referring elsewhere.

Commented [A564]: Removed as YG does not support interim withdrawals. Without withdrawals development is not limited to existing tenure and as an ISA 1 the thresholds do not need to be restated.

Commented [A565]: Should define what joint means in this context

Commented [A566]: Clarify if this is a consideration for inclusion in the access management plan or whether this should be a special management direction of its own.

If its own direction, already covered by 5.4.3.2.1 c and can be removed.

d.f.	The sensitivity of caribou to cumulative effects.
e.g.	See also Section 5.4.3.2 – Access Management Planning Recommendations (page 140) and Recommended Action 102 for additional guidance on Access Management Plans.
4.3.	In the absence of an access management plan, Parties should jointly determine whether new surface access be ~~permitted~~ allowed, with consideration of the above ~~and in accordance with existing approval processes.~~
5.4.	Dempster Highway Corridor sub-regional plan ~~directions will affect this LMU and thus interim measures and future sub-regional planning direction should be considered apply to portions of this LMU once the sub-regional plan is approved~~ (see Section 5.4.3.1.1 – Dempster Highway Corridor (page 130)).
Priority Objectives	
✓ Maintain connectivity between areas of key wildlife habitat, while considering climate driven shifts in habitat. (Plan Goal) ✓ Healthy and resilient caribou herd populations that grow towards historic levels. ✓ Habitat and migration pathways are sufficient to support historic population levels. ✓ A society that respects and is connected to caribou. ✓ Sustainable fish and wildlife populations supported by healthy aquatic and terrestrial habitats. ✓ People can access the land, water, and resources in a way that acknowledges and supports the values in each LMU and minimizes conflicts and cumulative effects. ✓ Preservation of critical, rare, or unique ecosystems throughout the ~~P~~planning ~~R~~region, while considering that some ecosystems are likely to shift due to climate change. ✓ Tourism and recreational experiences include scenic views, wildlife viewing, culture appreciation, and heritage education within appropriate areas of the ~~P~~planning ~~R~~region.	
Rationale for Designation	

Commented [A567]: Considerations from recommendation 102 brought into this section rather than referred back to. (2a-d above)

Commented [A568]: Provides greater certainty for approval process

Commented [A569]: No interim measures provided. Changed to inform reader that additional directions may be added in this area once sub-regional plan is approved.

- Area contains important calving, post-calving, summer, and rut habitat for the Clear Creek and Hart River Caribou Herds, which are included under the Northern Mountain population of woodland caribou that has been designated a species of Special Concern under SARA. Caribou are a species of considerable cultural, ecological, and economic importance in Yukon.
- Area is located entirely within McQuesten Highlands ecoregion, an ecoregion currently absent within Yukon's protected areas.
- Establishing a conservation area will preserve landscape connectivity between West Hart River Wilderness Area of the Peel River Watershed and the Tombstone Territorial Park.
- Entirety of upland areas are high elevation (>1,000 m), which provides crucial habitat for migratory bird specialist species.
- Area contains existing mineral dispositions for exploration, including critical mineral occurrences.
- The viewscape from the Dempster Highway should be maintained for its aesthetic, economic (tourism), and intrinsic value.

Commented [A570]: This LMU is not currently designated as a conservation area, but YG would like to see it become designated as an SMA with an amended boundary.

Ecological Integrity and Conservation Values

Birds	Extensive inclusion of high elevation (>1,000 m) habitat crucial for some migratory bird species.
Caribou	Overlap with Fortymile, Clear Creek, and Hart River Caribou Herd ranges. Contains key calving, post-calving and summer and winter habitat for mountain caribou, including habitat for calving, post-calving, ~~summer~~ , and rutting.
Ecosystem Representation	Located within McQuesten Highlands ecoregion which is not represented in Yukon's protected areas system.
Furbearers	
Grizzly Bear	
Landscape Connectivity	Includes intact areas adjacent to West Hart River Wilderness Area in Peel River Watershed and Tombstone Territorial Park and opportunities for connectivity.
Moose	Extensive good moose habitat, wildlife key areas for moose later winter (February to April) habitat along Hamilton and Brewery Creeks.
Salmon and other Fish	Important habitat for salmon migration/spawning and freshwater fish.
Sheep	Extensive Dall's sheep habitat throughout the area.

Species at Risk	<u>Known to occur: Yukon Podistera, Collared Pika, Wolverine, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Short-eared Owl, Horned Grebe, Common Nighthawk, Hart River Caribou herd (Northern Mountain Caribou)</u> <u>Expected in low numbers: Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Barn Swallow, Transverse Lady Beetle, Hart River caribou are a Northern Mountain Woodland ecotype, which is listed as a species of Special Concern under SARA.</u>
Vegetation and Unique Features	<u>Unglaciaded alpine with late snow melt habitat for endemic plants (Ogilvie Mountains Spring Beauty), and unglaciaded alpine with dry heath ridges is home to Ogilvie Mountains Collared Lemming. A few known occurrences of rare plant species.</u>
Water	The North Klondike River and its tributaries are an important ecological value.
Wetlands	Some limited wetland ~~habitats ecosystems~~ within lowlands including bogs, fens, and marshes, which provide for important wildlife habitat and ecosystem services.
Culture, Heritage Resources and Community Values	
Community Value	Some limited off-road recreation opportunities for hiking and sightseeing from the Dempster Highway and canoeing on North Klondike River. Valued viewsapes. Licensed hunting opportunities.
Heritage Resources and Sites	Several archeological sites, and Settlement Lands of heritage and cultural significance.
Traditional Economy/ Traditional Uses	Supports important <u>Northern Mountain woodland</u> caribou; maintaining viewsapes and ecological health and connectivity will protect, enhance, and support traditional economic values and endeavours.
Socio-economic Values	
Agriculture	
Energy	
Forestry	Located within North and South Klondike River Landscape Units of <u>the Dawson</u> Forest Resource Management Plan. North Klondike River identified as a high conservation focus area, and South Klondike River identified with a forest resource development focus <u>with potentially high timber values. Specific area of upper Brewery/Hamilton does not overlap with identified leading forestry species.</u>

Commented [A571]: Intent of this statement unclear, revise or remove.

Mineral Resources	Area mostly highly prospective and contains active quartz claims, an active Class 1 operation near Antimony Creek, and a placer prospecting lease on a tributary to Brewery Creek. Area identified as having a strong future in placer potential (see Map 8 – Non- Renewable Economic Development: Potential and Interests). Area contains Critical Mineral Occurrences as per Yukon Geological Survey.
Outfitting and Trapping	Overlap with several trapping concessions and one active outfitting concession.
Tourism	No identified high use areas for tourism, located directly adjacent to Tombstone Territorial Park and the Dempster Highway, opportunities for scenic views and wildlife viewing. Dempster Highway is an attraction for motorized tourists.
Transportation and Access	No major roads or trails into the area, some winter access. Adjacent to Dempster ~~h~~ Highway ~~corridor~~ .

6.8 LMU 8: BREWERY CREEK

Land Use Designation:	Integrated Stewardship Area 43		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land TH R-63A, TH S-159B1, TH S-203B, TH S-204B1, TH S- 80B1		
Area:	948 km ²	Planning Region %	2.4%

Commented [A572]: Added missing section number, renumbered subsequent sections.

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Commented [A573]: YG proposes modifying the boundary between Landscape Management Units 7 and 8 (see Proposed LMU Boundary Map attached with submission). We further propose designating the modified Landscape Management Unit 8 as an ISA 4. This recommendation is based on our consultation with Tr'ondëk Hwëch'in and is proposed to balance protecting important habitat for the Northern Mountain Caribou herds (Clear Creek and Hart River) while allowing economic interests and values in the area including critical minerals to be developed.



Walking on the Land Together (Intent Statement)

The vision for this area is sustainable development by means of cumulative effects management, access management, and the preservation of key values.

~~This area contains a past-producing heap-leach mine and associated infrastructure which has the potential to re-open. Forestry is an important value in this area. It is also the location of considerable habitat for key wildlife species and socio-cultural use.~~ It is important that this area remain open for current and future mineral interests without undermining its important environmental and cultural attributes.

Tr'ëhudè (Our Way of Life) & Stewardship

As you drive up the Dempster you can see that this is a special place. There are lots of creeks running through the area that are crystal clear. There are beavers who have called this place home for generations. Keeping the water clean is very important as this is a place where citizens fish – the water and fish must remain healthy.

Dawson Regional Planning Commission Members

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. The viewscape off the Dempster Highway should be maintained for its aesthetic and natural value.
2. Except for winter access, new surface access infrastructure off the Dempster Highway should be considered jointly by the Parties.
3. ~~Heap-leach mining involves the use of chemicals, normally a cyanide solution, to extract precious metals from ore.~~ Use of heap-leach mining practices in this area should take every precaution to not harm the surrounding aquatic environment. The collection of accurate and robust baseline data collection on groundwater and surface water quality parameters as well as continued monitoring for impacts will be important considerations for development in this area.
4. ~~This area contains important habitat for sharp-tailed grouse, which are a species of management concern.~~ Development in this area should be planned to minimize impacts of key habitat for sharp-tailed grouse.
5. If the mine becomes active again traffic may need to be managed to ensure the continued peaceful enjoyment of the adjacent settlement land in **LMU 10: Tintina Trench** (page 212).
6. Dempster Highway Corridor sub-regional plan ~~directions will affect this LMU and thus interim measures and future sub-regional planning direction should be considered apply to portions of this LMU once the sub-regional plan is approved.~~ (see **Section 5.4.3.1.1 – Dempster Highway Corridor**, page 130).

Priority Objectives

- ✓ Mineral exploration and development contribute to local employment, economic stimulus, and long-term socio-economic benefits. Opportunity for sustainable forestry that contributes to a growing diversified economy, local employment, and economic stimulus.
- ✓ Tourism and recreational experiences include scenic views, wildlife viewing, culture appreciation, and heritage education within appropriate areas

Commented [A574]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

Commented [A575]: Add direction for a new Off-Road Vehicle Management Area that aligns with the Clear Creek and Hart River caribou herd ranges in this LMU to restrict off-trail use for recreational users as a further protection for these herds.

Commented [A576]: What does this look like? What is the process for "joint"? What if there is disagreement, who makes final call?

Commented [A577]: Moved to the Values table (Species at Risk) below

Commented [A578]: No interim measures identified, if there are any other considerations they should be brought forward as directions here rather than referring back to another section.

of the Pplanning Rregion. ✓ A diverse range of sustainable recreational opportunities in the Rregion. Stewardship principles are consistently applied by land, water, and resource users. ✓ Functioning wetlands ecosystems that support ecological and socio-cultural values. ✓ Healthy aquatic ecosystems and watersheds. ✓ Key areas for harvesting in the Pplanning Rregion are maintained and protected to support both First Nations and non-First Nations use.	
Rationale for Designation	
• Area contains advanced hard rock exploration, and potential future re-processing of the ore heap at Brewery Creek • LMU contains wildlife key areas and wetlands, and is adjacent to high use areas for subsistence, cultural, and traditional economic activities. • ~~An ISA 3 designation will To~~ allow for continued mineral exploration and development and forestry to occur without undermining the ecological and socio-cultural value of the surrounding area.	
Ecological Integrity and Conservation Values	
Birds	Includes high elevation (>1,000 m) habitat crucial for some migratory bird species and part of the Tintina Trench flyway. Contains key wildlife areas for sharp tailed grouse.
Caribou	Overlap with Fortymile, Clear Creek and Hart River Caribou Herd ranges. Contains critical summer and winter habitat for mountain caribou, including habitat for calving, post-calving, summer, and rutting.
Ecosystem Representation	Located within McQuesten Highlands ecoregion which is not represented in Yukon's protected areas system.
Furbearers	Contains well established key habitat for beavers.
Grizzly Bear	
Landscape Connectivity	Located within the Tintina Trench Flyway.
Moose	Extensive good moose habitat, wildlife key areas for moose later winter (February to April) habitat along Hamilton and Brewery Creeks.
Salmon and other Fish	The Klondike River provides important eChinook salmon spawning habitat and salmon have been documented in the upper reaches of the river near Hamilton Creek. The Klondike River is also home to resident fish species, including Arctic grayling.
Sheep	~~No recorded sheep presence however, sheep may be occasional visitors from populations to the North.~~

Commented [A579]: YG proposes a change to an ISA 4 designation. Regardless, don't need to restate designation in "Rationale for designation".

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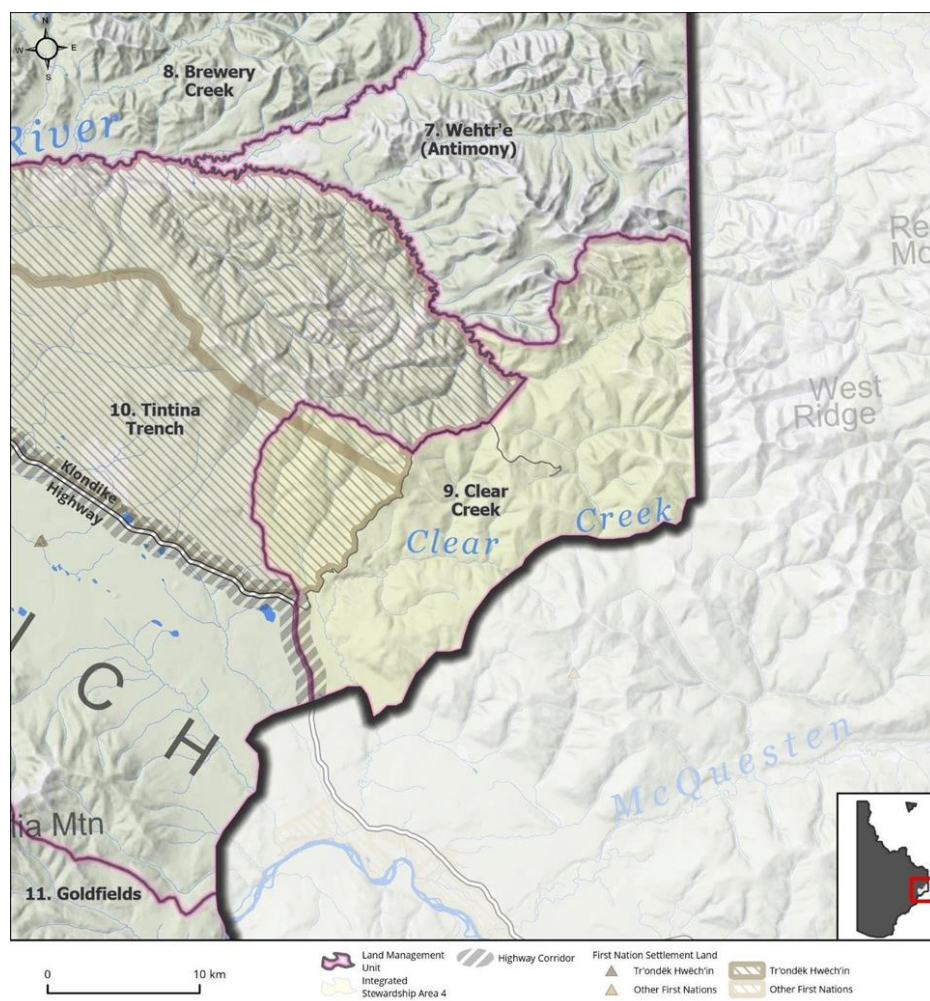
Species at Risk	<u>Known to occur: Collared Pika, Wolverine, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Short-eared Owl, Horned Grebe, Common Nighthawk.</u> <u>Expected in low numbers: Yukon Podistera, Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Barn Swallow, Transverse Lady Beetle.</u> <u>Contains important habitat for sharp-tailed grouse, which are a Yukon species of conservation concern</u>
Vegetation and Unique Features	<u>Unglaciaded alpine with late snow melt habitat for endemic plants (Ogilvie Mountains Spring Beauty). This region contains several known mineral licks. One identified location for Yukon Podistera, some occurrences of rare or endemic plant species, and presence of mineral licks.</u>
Water	
Wetlands	Some limited wetland ~~habitats~~ <u>ecosystems</u> within lowlands including bogs, fens, and marshes, which provide for important wildlife habitat and ecosystem services.
Culture, Heritage Resources and Community Values	
Community Value	Recreational opportunities exist off the Dempster Highway Corridor and Brewery Creek access roads. Canoeing/packrafting the North- Klondike. Off-road opportunities for hiking and sightseeing off Dempster Highway or Brewery Creek access road, opportunities for fishing, harvesting, and camping on North Klondike River.
Heritage Resources and Sites	Several archeological resources are documented in this LMU. Area contains numerous historic resources related to the Yukon North Fork Ditch.
Traditional Economy/ Traditional Uses	Year-round traditional use area; important area for moose and caribou harvesting and fishing. Also, small game, birds, and berries. Wood cutting and other traditional pursuits.
Socio-economic Values	
Agriculture	
Energy	

Commented [A580]: Corrected terminology

Forestry	Overlap with the South Klondike River landscape unit of the Dawson Forest Resources Management Plan, which is designated as a medium priority for forest resource development in the short-term. This landscape unit is considered to have high timber values, and there is a completed Timber Harvest Plan for North Fork, and areas for personal as well as commercial fuel use.
Mineral Resources	Active quartz exploration and location of a past gold producing mine at Brewery Creek, which may reopen in the future. <u>Heap-leach mining involves the use of chemicals, normally a cyanide solution, to extract precious metals from ore.</u>
Outfitting and Trapping	Overlap with several trapping concessions and one active outfitting concession.
Tourism	No identified high use areas for tourism, located directly adjacent to the Dempster Highway corridor, opportunities for scenic views and wildlife viewing.
Transportation and Access	Adjacent to Dempster highway corridor, contains a portion of Brewery Creek access road, and secondary trails.

6-86.9 LMU 9: CLEAR CREEK

Land Use Designation:	Integrated Stewardship Area 4		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land TH R-2A and TH R-79B		
Area:	466 km ²	Planning Region %	1.2%



Walking on the Land Together (Intent Statement)

The vision for this area is to conserve key habitat for ~~woodland-Northern Mountain~~ caribou while allowing for sustainable development.

~~This area offers important habitat requirements for the Clear Creek caribou and Fortymile herds including habitat for calving, post-calving, summer, and rutting. This area also contains considerable mineral interests and development, and it has been identified as having high to significant mineral potential. Other activities in this area include active trapping and harvesting. Access into the LMU is relatively limited and there has been a long history of mining in the area.~~

Commented [A581]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

Tr'ëhudë (Our Way of Life) & Stewardship

This LMU is the gateway to the Dawson ~~R~~region. There is a sign that tells people who are driving on the Klondike Highway that they are entering the Traditional Territory of the Tr'ondëk Hwëch'in, for some it is a new experience, and for others it is a welcome home. There is overlap of Traditional Territory here with the First Nation of Na-Cho Nyäk Dun and they have identified the area as being an important place for fishing, traditional camps, and the Clear Creek caribou herd.

~~Dawson Regional Planning~~ Commission Members

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. Industrial activities within caribou fall breeding (rut) habitat should be suspended during the key rutting period, ~~(or as advised by a Regional Biologist)~~ each year.
2. Any access development (roads and trails) within caribou fall breeding (rut) habitat should be avoided.
3. ~~North Klondike Highway Corridor: Direction set out in Section 5.4.3.1.3 – North Klondike Highway Corridor (page 135) should apply.~~

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Priority Objectives

- ✓ People can access the land, water, and resources in a way that acknowledges and supports the values in each LMU and minimizes conflicts and cumulative effects.
- ✓ Placer and quartz mine exploration and development is carried out in a sustainable way and contributes to a growing diversified economy.
- ✓ Habitat and migration pathways are sufficient to support historic population levels of caribou.
- ✓ Healthy populations of migratory and non-migratory birds and raptors, including the preservation of flyways and other key habitat.

Commented [A582]: Directions were not specific to this area (duplicated other sections of the plan) so were recommended to be removed, if rewritten they should be included here rather than referring to section 5.4.3.1.3.

Rationale for Designation

- This area is located within important caribou herd ranges (Clear Creek) and moose habitat.
- It is imperative to minimize disturbance to key (summer and winter) caribou habitat areas and to address impacts to moose through overharvesting while allowing for development.
- Due to the area (km²) of the LMU and the existing surface disturbance and linear feature density, an ISA 4 designation allows for some additional development to

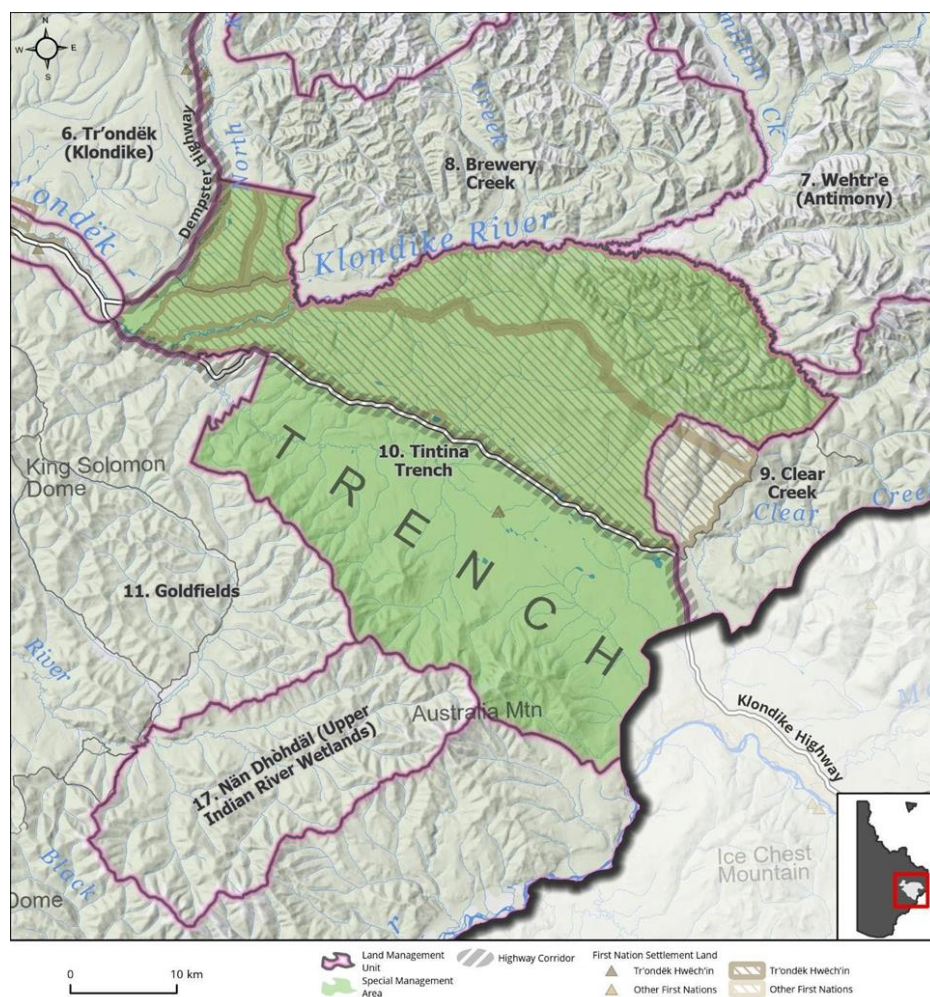
occur in this LMU.	
Ecological Integrity and Conservation Values	
Birds	Within the Tintina Trench Flyway, which offers an important migration route for migratory birds, there is some presence of high elevation (>1,000 m) habitat important for some migratory bird species.
Caribou	Overlap with Fortymile and Clear Creek caribou herd ranges. Contains key summer and winter habitat for mountain caribou, including habitat for calving, post-calving, summer, and rutting and key wildlife areas for the Clear Creek Caribou Herd.
Ecosystem Representation	
Furbearers	
Grizzly Bear	
Landscape Connectivity	Within the Tintina Trench Flyway.
Moose	Moose movement corridor.
Salmon and other Fish	
Sheep	Overlap with a wildlife key area for Thinhorn sheep.
Species at Risk	<u>Known to occur: Wolverine, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Horned Grebe, Common Nighthawk, Short-eared Owl, Barn Swallow.</u> <u>Expected in low numbers: Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Transverse Lady Beetle.</u>
Vegetation and Unique Features	Presence of some intact forest (>140 years old) and isolated occurrences of rare or endemic species.
Water	Contains Little South Klondike River channel and Left Clear Creek.
Wetlands	Some wetlands.
Culture, Heritage Resources and Community Values	
Community Value	Limited opportunities for recreation.
Heritage Resources and Sites	Several identified archeological sites clustered on the ridge above McQuesten, and along the Klondike Hwy on the north-east side of the LMU.
Traditional Economy/ Traditional Uses	Area used for traditional economy activities especially harvesting, fishing, and gathering. Particularly in areas transected by the Klondike Highway and Clear Creek Road. Important areas for connecting to the land through the practice of land use/economic activities, including trapping, gathering, and harvesting.
Socio-economic Values	

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Agriculture	Identified agricultural land disposition in the area along Clear Creek.
Energy	
Forestry	Overlap with the South Klondike River and Flat Creek landscape units of the Dawson Forest Resources Management Plan. No active timber harvest plans in the area.
Mineral Resources	Area contains active mineral exploration and development for both placer and hard rock interests and is of high mineral potential.
Outfitting and Trapping	Overlap with trapping concessions and one active outfitting concession.
Tourism	Limited opportunities for tourism, identified potential for horseback riding activities in the area.
Transportation and Access	Portion of LMU is adjacent to the North Klondike Highway and contains a secondary access road along Clear Creek and associated off roads.

6.96.10 LMU 10: TINTINA TRENCH

Land Use Designation:	Special Management Area		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land TH R-2A, R-7A, R-21B, R-22B, R-79B, R-80B, S-19 B1/D, S- 68 B1, S-184 B1		
Area:	1,814 km ²	Planning Region %	4.5%



Walking on the Land Together (Intent Statement)

The vision for this area is ~~the to protection of these~~ important wetland ~~ecological values ecosystems~~ and to recognize and protect Tr'ondëk Hwëch'in cultural values and traditional use areas.

~~This area contains Tr'ondëk Hwëch'in Settlement Land parcels, including R-22B, also known as Nänkāk Chëhōlay (Land of Plenty), which hosts year-round culture camps for Tr'ondëk Hwëch'in. The area is valued highly by the community of Dawson for recreation, as there is easy access off the Dempster for activities such as hunting, fishing, hiking and camping. The Flat Creek wetlands provide important ecosystem services and are essential to the ecological and socio-cultural value of the Klondike River, an important habitat for spawning salmon and the source of Dawson's drinking water. There are also areas of high agricultural value. The Tintina Trench Flyway provides valuable habitat for migratory birds. The area is also important to the First Nation of Nacho Nyäk Dun.~~

Future management of this area should ensure First Nations' traditional use is able to continue unimpeded and to ensure this valuable landscape is protected for future generations.

Tr'ëhudë (Our Way of Life) & Stewardship

"Nänkāk Chëhōlay (The Land of Plenty) is a place where the land can provide for you and you could live forever, it is a place of healing."

Debbie Nagano, Dawson Regional Planning Commission Chair

Residential school survivors chose this place for Tr'ondëk Hwëch'in citizens. It is close to town which makes it an accessible place for citizens to reconnect with the land and with each other. It is a place of importance to Elders where stories can be shared, and people can engage in cultural activities.

Continued peaceful use and enjoyment of this area by Tr'ondëk Hwëch'in for traditional activities including harvesting, recreational pursuits and forestry opportunities is a priority.

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

- ~~1. Surface disturbance threshold of 18.14km² (1.0% of LMU area).~~
- ~~2. Linear feature density threshold of 907km (0.5km/km² of LMU area).~~
- ~~4.3. The following industrial land uses are allowed:~~
 - ~~a. Industrial land use permitted within ISA 2 cumulative effects thresholds.~~
 - b. Forestry and fuel wood harvest as guided by the Dawson Forest Resources Management Plan.
 - ~~c. 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.~~
- ~~2.c. The North Fork Hydro site as identified in the THFA would be considered at the discretion of both Parties.~~
- ~~3.d. Agricultural Corridor Area: Agricultural leases only allowed permitted within a 2km buffer on either side of the North Klondike Highway (Agricultural Corridor) (see Section 3.2.5 – Corridor Areas, page 44).~~

Commented [A583]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

Commented [A584]: Removed "ISA 2" and instead listed specific disturbance allowed by thresholds to avoid confusion as this is an SMA.

Nothing in s.3.6 limits thresholds to industrial land uses, clarify if other uses are permitted up to the thresholds specified.

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Commented [A585]: Specify if any other industrial land uses are allowable, there is existing mineral tenure within the LMU that should be allowed to be developed.

Commented [A586]: Removed as this is not an industrial land use and any activities must consider the rest of the Plan.

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Commented [A587]: The THFA does not have discretion here. It would be within YG's authority to authorize (with consultation). THFA doesn't have to support but I think that is different than "discretion" for THFA. Recommend clarification of the language and or jurisdictions.

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Commented [A588]: Section 3.2.5 provides no further information about the purpose or requirements for these areas and may instead cause confusion for the reader. Suggest removing from Plan and modifying this recommendation as suggested. Suggest keeping label of agricultural corridor as this area is excluded from WSI but it does not need another section in the Plan.

4. Withdrawal of all lands from placer and quartz mineral staking.
5. In the absence of an SMA management plan, surface access ~~should be managed jointly by the Parties~~ in consideration of sustainable development and cultural activities, including tourism, agriculture, and forestry.
6. Designation is not intended to limit Tr'ondëk Hwëch'in's ability to access the land and develop infrastructure for traditional land use activities.
7. ~~This area contains important habitat for sharp-tailed grouse, which are a species of immediate management concern.~~ Development in this area should be planned to minimize impacts to key habitat for sharp-tailed grouse.
8. Dempster Corridor sub-regional plan will ~~affect apply to portions of this LMU and thus interim measures and future sub-regional planning direction should be considered once the sub-regional plan is approved.~~ (see Section 5.4.3.1.1 – Dempster Highway Corridor , page 130).
9. Wetlands: a. ~~Consideration/identification of all wetlands found within the Klondike River drainage within this LMU and outside of the Agricultural Corridor Flat Creek Wetlands~~ as a Wetland of Special Importance. b. As per wetland direction in Section 3.2.4.35-2-5 – Wetland of Special Importance (page 96), no development ~~should occur in bogs, fens, or marshes in an SMA that could result in a loss or reduction of wetland benefits should be allowed within the Wetland of Special Importance.~~
Priority Objectives
✓ Recognize and protect a way of life that is based on an economic and spiritual relationship between Tr'ondëk Hwëch'in and the land (THFA preamble). ✓ First Nations citizens are benefitting from the land. ✓ Continued and successful traditional land use and traditional economic activities. ✓ Key use areas, infrastructure, and resources that support traditional economy are preserved. ✓ Healthy populations of migratory and non-migratory birds and raptors, including the preservation of flyways and other key habitat. ✓ Stewardship of rivers enhance salmon habitat and support salmon recovery. ✓ Salmon migration routes allow for salmon recovery. ✓ Functioning wetlands ecosystems support ecological and socio-cultural values. ✓ Opportunity for sustainable forestry that contributes to a growing diversified economy, local employment, and economic stimulus.
Rationale for Designation
• R-22 is important for traditional economic activities and is used by Tr'ondëk Hwëch'in both for everyday use ~~and~~ as a host site for year-round culture camps and events. • The Klondike River (North and South channels) provide important salmon spawning habitat. • Few mineral claims and minimal surface access. • The Klondike River is an important drinking water source for the City of Dawson.

Commented [A589]: What does “joint” mean in the absence of a management plan. The “joint” part of SMA management is the development and approval of plans. Legal implementation still falls to the parties and decisions would have to be made by the relevant authority (after consultation) not jointly. Recommend clarifying language and/or process to be clear what specifically is “joint”.

Commented [A590]: Clarify if linear features created to access traditional use activities or if disturbance created by traditional land use activities are exempt from surface disturbance and linear feature density thresholds and if this applies only within this LMU or more broadly.

Exemptions from the surface disturbance and linear disturbance thresholds would prove problematic for implementation as mapping to track these thresholds considers all human-caused disturbance, and does not differentiate between types.

Commented [A591]: Moved to Species at Risk row in Values table below.

Commented [A592]: No interim measures in s.5.4.3.1.1, if there are other considerations they should be brought forward to this section not referred back to.

Commented [A593]: Updated to reflect recommendations re: wetlands of special importance.

• High community recreation value, such as hiking. • Tintina Trench flyway, an important spring and fall migration pathway for birds, as well as areas of habitat concerns.	
Ecological Integrity and Conservation Values	
Birds	Contains waterfowl staging and breeding areas. Contains a portion of the Tintina Trench Flyway. Contains areas of sharp-tailed grouse key habitat.
Caribou	Overlaps with the Clear Creek and Fortymile Caribou Herd ranges and contains important summer and winter habitat.
Ecosystem Representation	Located within McQuesten Highlands ecoregion, which is not represented in Yukon's protected areas.
Furbearers	Beaver key habitat (year-round) otter, and lynx.
Grizzly Bear	Area is accessible and as such, is an area of higher bear-human conflict.
Landscape Connectivity	Tintina Trench flyway is a migratory bird pathway.
Moose	Extensive good moose habitat, moderate moose populations.
Salmon and other Fish	Important habitat for salmon migration/spawning and freshwater fish. Klondike River is a known salmon spawning and grayling habitat.
Sheep	
Species at Risk	<u>Known to occur: Wolverine, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Horned Grebe, Common Nighthawk, Short-eared Owl, Barn Swallow.</u> <u>Expected in low numbers: Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Transverse Lady Beetle.</u> <u>~~Sharp-tailed grouse and Clear Creek Caribou Herd.~~</u> <u>This area contains important habitat for sharp-tailed grouse, which are a Yukon species of conservation concern.</u>
Vegetation and Unique Features	<u>This region contains extensive wetland complexes and rare mineral wetlands which are important for waterfowl and moose. This region also contains several known mineral licks.</u> <u>~~Presence of known mineral licks and occurrences of rare plant species.~~</u>
Water	Klondike River is an important drinking water and salmon spawning drainage, and contains few small lakes, which are rare in the ~~R~~ region.

Commented [A594]: Corrected terminology

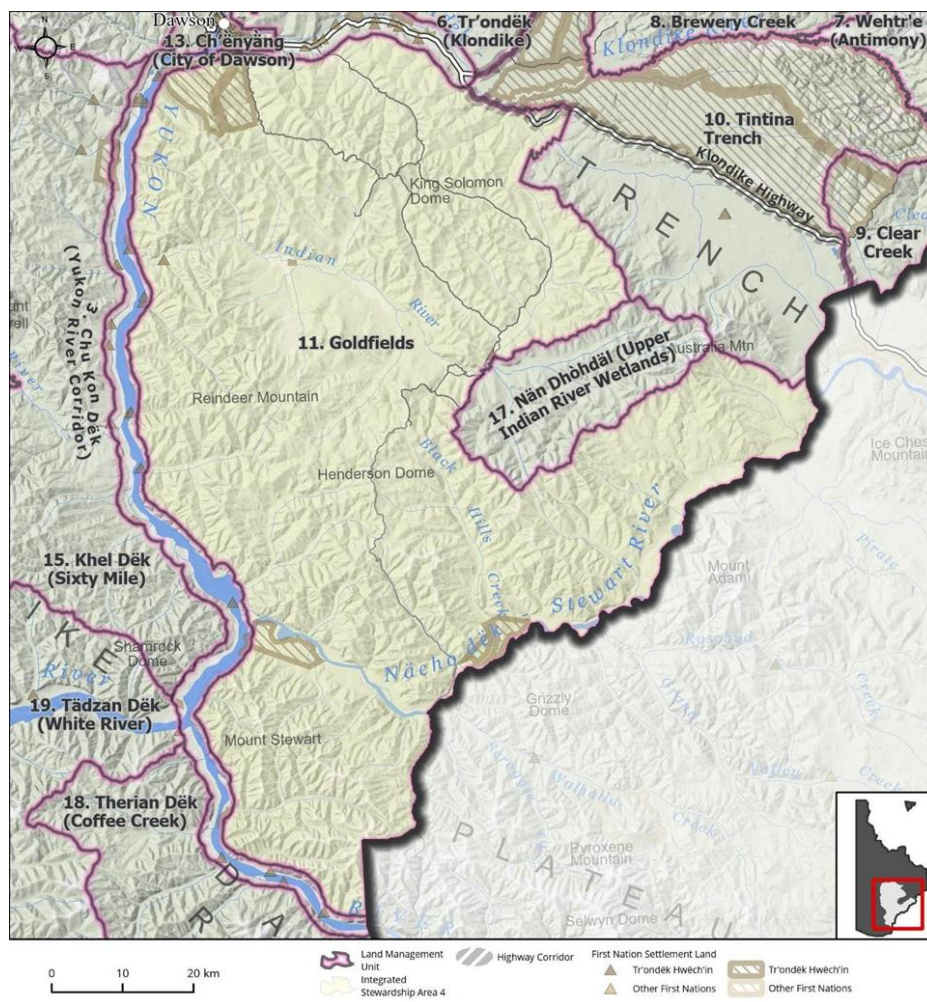
Wetlands	Southern section contains wetlands within lowlands including bogs, fens, and marshes. The Flat Creek Wetlands are a significant staging area for migratory waterfowl.
Culture, Heritage Resources and Community Values	
Community Value	Recreational activities include fishing, hiking, activities on Klondike River, and camping. Presence of some residential properties and land dispositions adjacent to the North Klondike Highway. Seasonal harvesting. It is a place of cross-cultural connection and reconciliation amongst First Nation and non-First Nation people.
Heritage Resources and Sites	Contains known First Nation land use sites and identified features, as well as archaeological and palaeontological sites. Historic sites associated with Yukon the South Fork Ditch.
Traditional Economy/ Traditional Uses	Land of Plenty (Nānkāk Chèhōlay) hosts year-round cultural activities. Contains known First Nation land use sites and identified features; is an important area for harvesting, fishing, trapping and forestry provisions, along with inter-generational transference of knowledge.
Socio-economic Values	
Agriculture	Titled agricultural land in LMU (Flat Creek Hill).
Energy	North Fork Hydroelectricity potential.
Forestry	Forestry activities conducted on Settlement Land Blocks as managed by Tr'ondëk Hwëch'in. Overlap with the Flat Creek landscape unit of the Dawson Forest Resources Management Plan, medium planning priority. Could be a high priority were a fire to occur in the southern portion of this LMU.
Mineral Resources	Mineral potential in the area is moderate to significantly prospective (Map 8 – Non-Renewable Economic Development: Potential and Interests).
Outfitting and Trapping	Overlap with one outfitting concession and several trapping concessions with associated infrastructure.
Tourism	Sightseeing off highway and an active rafting company operates here.
Transportation and Access	North Klondike Highway runs through this LMU. Secondary road access through Tr'ondëk Hwëch'in Settlement ~~U~~ Lands and access to the Brewery Creek mining area to the north.

6-106.11 LMU 11: GOLDFIELDS

Land Use Designation:	Integrated Stewardship Area 4		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land 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-82A, TH S-18B1, TH S-93B <u>Overlaps with WRFN asserted territory</u>		
Area:	6,148 km ²	Planning Region %	15.4%

Commented [A595]: LMUs overlapping White River First Nation's asserted Territory should explicitly reference WRFN.

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Walking on the Land Together (Intent Statement)

The vision for this area will focus on sustainable development by means of cumulative effects management, access management, and the identification and preservation of key areas.

The rich Tr'ondëk Hwëch'in cultural significance of this area should be enhanced and promoted. ~~The mining industry remains a significant economic activity for the Region, and the Dawson Placer Mining District is by far the most productive placer mining district in the territory. This area also offers ample opportunity for hunting, harvesting, gathering, and contains areas of ecological, historical, and cultural significance and offers high tourism, forestry, and recreational value. The people in the Dawson community have a very close connection with this area in many ways.~~

Tr'ëhudë (Our Way of Life) & Stewardship

The gold rush that began in the late 1890s brought enormous changes to the Tr'ondëk Hwëch'in way of life and the search for gold continues to this day in the Goldfields. While this area is known to the outside world as an active gold mining landscape, more importantly it is where Tr'ondëk Hwëch'in have travelled, gathered, and harvested for generations. It is a place of recreation, community, and harvest.

This area is strongly connected to Chu Kon Dëk (the Yukon River) which makes it culturally important.

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. Opportunities to promote awareness of Tr'ondëk Hwëch'in cultural history and contemporary land use in this area should be explored.
2. ~~This area contains important habitat for sharp-tailed grouse, which are a species of immediate management concern.~~ Development in this area should be planned to minimize impacts to key habitat for sharp-tailed grouse.
3. ~~Contains the highest concentration of historic sites (outside of the City of Dawson) within the planning region, including the Ridge Road Heritage Trail, Discovery Claim, and Dredge #4 which represents significant tourism and recreational potential.~~ Efforts to enhance the recreational aspects of this area should be explored.
4. ~~This LMU is listed in Section 5.4.3 – Transportation and Access (page 129), as being a priority area for an access management plan. The proposed Northern Access Route modifications and extension will likely have a significant impact to this LMU and its values.~~

Priority Objectives

- ✓ Mineral exploration and development contribute to local employment, economic stimulus, and long-term socio-economic benefits.
- ✓ People can access the land, water, and resources in a way that acknowledges and supports the values in each LMU and minimizes conflicts and cumulative effects.
- ✓ Traditional land use activities.

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Commented [A597]: Deleted text should be captured in values table rather than in SMDs.

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Commented [A598]: YG does not support the requirement of an access management plan for this area as this LMU already has existing access routes. YG believes access management planning is a process intended to plan for potential new major access routes. The application for access routes to the Coffee Project have already been accepted and reviewed under existing legislation. YG cannot amend the review process for an existing application.

✓ New trails and/or the revival of historic trails in a manner consistent with stewardship and sustainability. ✓ Tourism and recreational experiences include scenic views, wildlife viewing, culture appreciation, and heritage education within appropriate areas of the Planning Region. ✓ Increased opportunities for tourism experiences contribute to a growing diversified economy, local employment, and economic stimulus. ✓ A diverse range of sustainable recreational opportunities in the Region. ✓ Opportunity for sustainable forestry that contributes to a growing diversified economy, local employment, and economic stimulus.	
Rationale for Designation	
• Area should remain open for mineral exploration and development, which is a significant contributor to the Region's economic and socio-cultural environment. • This area is particularly important for subsistence and licensed harvesting (moose) and the pursuit of traditional economic activities. The ability for residents to continue using the land in this way must be maintained. • General management directions and the special management directions above should ensure adequate protection of wildlife habitat and that the multi-industrial nature of this area can co-exist with recreational and traditional pursuits. • Taking into consideration the current level of activity as well as continued growth and importance of the area for industry warrants a high threshold for development, i.e., an ISA 4 designation.	
Ecological Integrity and Conservation Values	
Birds	Key areas for sharp-tailed grouse and raptors, and within the general range of migratory birds.
Caribou	Area overlaps with the Fortymile Caribou Herd ranges, and there are important ridgetop migration routes and overwintering habitat within this area.
Ecosystem Representation	
Furbearers	Watercourses of good to excellent quality for stream dwelling beaver habitat suitability, and key habitat areas for beaver. Low to moderate habitat suitability for muskrat.
Grizzly Bear	
Landscape Connectivity	
Moose	Considered extensive good moose habitat, and important grounds for moose harvesting.
Salmon and other Fish	Important habitat for salmon migration/spawning and freshwater fish. Contains several known resident fish bearing streams and rivers.

Sheep	
Species at Risk	<u>Known to occur: Wolverine, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Horned Grebe, Common Nighthawk, Short-eared Owl, Barn Swallow.</u> <u>Expected in low numbers: Little Brown Myotis, Red-necked Phalarope, Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Transverse Lady Beetle.</u> <u>This area contains important habitat for sharp-tailed grouse, which are a Yukon species of conservation concern.</u>
Vegetation and Unique Features	Presence of some scattered occurrences of intact forest (>140 years old). <u>Bluffs and steppe habitat along Indian and Stewart River. Known mineral licks.</u>
Water	Large area with numerous watersheds. Major watercourses and tributaries include Hunker, Bonanza, Dominion, and Sulphur Creeks, as well as the Indian and Stewart Rivers and various smaller streams that enter the Yukon River.
Wetlands	Wetlands prevalent along Indian River and Stewart River.
Culture, Heritage Resources and Community Values	
Community Value	Presence of a well travelled route (Hunker-Bonanza Loop) for recreational pursuits, as well as hiking and biking, especially along the Ridge Road Heritage Trail. The area is of high community importance for recreation, harvesting, and working.
Heritage Resources and Sites	High volume of historic sites and resources within this area related to ~~Klondike Gold Rush~~ <u>historical mining in the area</u>. Several National Historic Sites in this area including the Discovery Claim and Dredge No. 4. Significant area for paleontological resources in particular given the nature of disturbance in the area as well as archaeological sites and recorded historic resources. <u>Contains the highest concentration of historic sites (outside of the City of Dawson) within the planning region, including the Ridge Road Heritage Trail, Discovery Claim, and Dredge #4 which represents significant tourism and recreational potential.</u>

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Commented [A599]: Corrected terminology

Commented [A600]: Was in the management direction. Should be combined with the above.

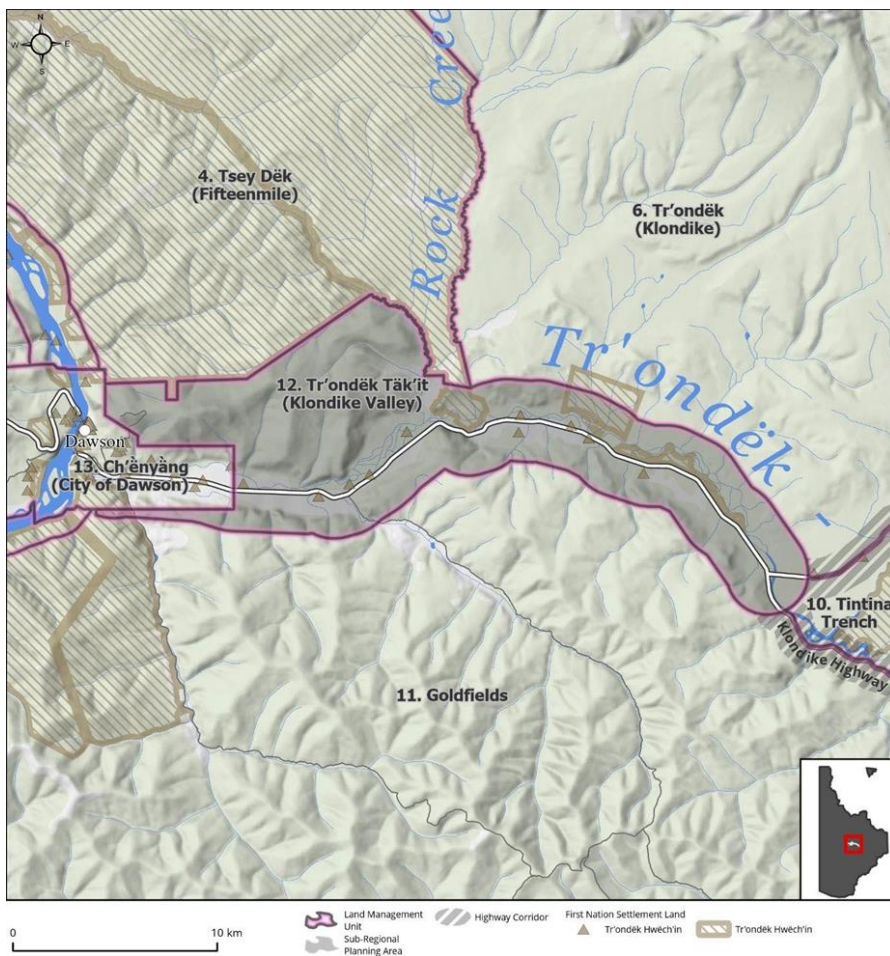
Traditional Economy/ Traditional Uses	Important areas for connecting to the land through the practice of land use/economic activities, including trapping, gathering, and harvesting. Ensuring wetland ~~habitatecosystems~~ remains intact has been noted as an important stewardship duty for Tr'ondëk Hwëch'in.
Socio-economic Values	
Agriculture	Potential for growth in areas of high suitability for agriculture, including suitable soil conditions close to the City of Dawson, as well as areas for grazing and farm related infrastructure.
Energy	
Forestry	Goldfields is a landscape unit of high priority for planning in the short-term under the Dawson Forest Resources Management Plan. ~~There are forestry interests throughout the Goldfields landscape unit.~~ Active Timber Harvest Plans include Dominion, French Gulch, Bonanza I, Bonanza II, Mummie Pup, ~~Goldfields~~ , and Flat Creek, and there are areas of personal and commercial fuel use. ~~Additional THPs will be developed in the region as required.~~ Several associated access roads attributed to forest resources in the area.
Mineral Resources	Area of significant value for mineral resources for both placer and hard rock mining. Presence of numerous active mineral tenure and permits and associated infrastructure, including roads, drill pads, staging areas, camps, cutlines, helicopter pads, airstrips etc.
Outfitting and Trapping	Active trapping concessions and associated infrastructure, including trapping routes and cabins.
Tourism	High tourism value in areas related to Klondike Gold Rush history and contemporary mining, including television programs on placer mining.
Transportation and Access	Significant transportation route offered by Hunker-Bonanza loop and off roads.

Commented [A601]: Approved in summer 2022

6.116.12 LMU 12: TR'ONDĖK TÄK'IT (KLONDIKE VALLEY)

Land Use Designation:	Sub-regional Future Planning Area		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land TH C-14B, TH C-16B, TH C-7B, TH R-14A, TH R-20A, TH R38A, TH R-64B, TH S-106B1, TH S-113B1, TH S-122B1, TH S126B1, TH S-153B1, TH S-165B, TH S-166B1, TH S-41B		
Area:	198 km ²	Planning Region %	0.5%

Commented [A602]: YG agrees that further planning is needed for this area. The process used will be determined at a future date.



Walking on the Land Together (Intent Statement)

The vision for Tr'ondëk Tāk'it (Klondike Valley) is a balance of residential use, trapping, agriculture, tourism, industry, infrastructure needs, traditional activities, and other activities, while conserving key wildlife habitat, a healthy watershed and clean drinking water.

~~This area of the planning region contains multiple and extensive competing land interests, including residential, mining, industrial, tourism, recreational, and agricultural, as well as various wildlife and socio-cultural values. The North Klondike Highway is a critical route for transporting goods and people to the community of Dawson and further north and is thus a significant transportation corridor in the planning region.~~

Due to the character of this area and the number of competing interests, sub-regional planning as per Chapter 11 of the FNFA is recommended.

Tr'ëhùdè (Our Way of Life) & Stewardship

Tr'o, the first part of the Hän word Tr'ondëk and Tr'ochëk refers to the rocks or 'hammerstones' that were used to hammer stakes for fish weirs to catch salmon in the river. The namesake of the Klondike (Tr'ondëk) river demonstrates the importance of salmon to the Tr'ondëk Hwëch'in (Dobrowolsky, 2014).

Commission members recalled stories of the Tr'ondëk being full of big king salmon which were a bright ruby red colour and in numbers so great that it seemed as though you could walk across the river on them.

"These things are all connected and when you learn language you start digging into the past."

Angie Joseph-Rear, Dawson Regional Planning Commission Member

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. A plan for the Klondike Valley LMU should be jointly developed by the Parties

1-2. Interim measures – applied upon Plan approval until sub-regional future plan approved

1. This LMU is exempt from ~~surface disturbance~~ and linear ~~feature density thresholds~~ ~~disturbance tracking~~ as the appropriate indicators will be selected during the sub-regional planning process.
2. New ~~spot land~~ applications for permanent dispositions should be discouraged.
 - a. If a land disposition is ~~allowed~~ ~~permitted~~ to proceed, development should first be considered within or close to existing settlement areas (i.e., the City of Dawson, Bear Creek, Rock Creek, and Henderson Corner).
 - b. New residential development in areas of high potential for agriculture, forestry and/or mineral exploration should be discouraged.
 - c. Access to existing recreational trails should be maintained and where land use conflicts occur, appropriate mitigations put in place.
 - d. Impacts to fish in the Klondike River, in particular salmon, should be mitigated.

~~3.~~ Ensure Tr'ondëk Hwëch'in citizens have continued use and peaceful enjoyment of Settlement Land, as per the THFA. Particular attention should be

Commented [A603]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

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Commented [A605]: Subsequent bullets are not related to spot land applications. Land dispositions are broader than spot land applications.

given to Settlement Lands that intersect with other LMUs, such as R64B, R38A, S11B1 and C14B.

4.3. City of Dawson expansion may occur before ~~future~~sub-regional planning is completed. The Parties should work with the City of Dawson to ensure LMU values are not negatively impacted.

5.4. ~~Development in this area should not impact~~ Mitigate potential harmful impacts to the Klondike River watershed and City of Dawson municipal water supply catchment area (see **Section 5.3.5.1 – Community Water**, page 118).

6.5. ~~Areas of "high" (class 3 to 5) agricultural potential should be identified and prioritized for this use with consideration of other values. High value agricultural land should be prioritized for agricultural purposes.~~

2. ~~Sub-regional Planning~~

1. ~~To be conducted jointly by the Parties as per Chapter 11 of the THFA and initiated within 3 years of Plan approval:~~

- a. ~~Sub-regional planning should be undertaken by the existing DRPG or a new specific sub-regional planning commission which should be comprised of residents from the planning area and the Dawson community.~~
- b. ~~Collaboration with other planning partners is encouraged, and this includes the City of Dawson, the Klondike Development Organisation, and the Tr'ondëk Hwëch'in Community Development Corporation.~~

2. ~~Establishment of new Klondike Valley zoning guidelines to regulate future land use activities and help ensure land use conflicts are avoided:~~

- a. ~~Identify areas suitable for new residential development, including expansion of existing residential areas e.g., City of Dawson, Bear Creek, Rock Creek, Henderson's Corner.~~
- b. ~~Ensure areas of "high" (Class 3 to 5) agricultural potential are prioritized for agricultural and accessory uses to enhance food security in the Region.~~
- c. ~~Determine the need for future commercial and industrial land uses and identify appropriate areas.~~
- d. ~~Identify areas that have potential for mixed or multiple land uses, such as agriculture and mineral development. Identify new and preserve existing recreation areas. This includes walking/biking trails and outdoor aquatic amenities.~~
- e. ~~Identify areas that are appropriate for renewable energy generation.~~

3. ~~Complement planning and development of the City of Dawson municipality.~~

4. ~~Complement planning and development of the Central Tr'ondëk Land Management Area.~~

5. ~~Ensure Tr'ondëk Hwëch'in citizens have continued use and peaceful enjoyment of Settlement Land, as per the THFA. Particular attention should be given to Settlement Lands that intersect with other LMUs, such as R64B, R38A, S11B1 and C14B.~~

6. ~~Consider the potential impacts of climate change, particularly regarding flooding around residential areas, wildlife habitats, and permafrost thaw/stumping.~~

Commented [A606]: Redundant if required under THFA however could keep as it highlights sites of particular interest

Commented [A607]: Reworded to be closer to similar direction for LMU 6.

Commented [A608]: To improve readability for non-technical users, identify what these classes mean/ where this information can be found.

Commented [A609]: Reworded to clarify what these areas are and to account for other values.

Commented [A610]: Propose removing directions related to sub-regional planning as Parties will determine method, process and considerations when this planning is initiated.

Commented [A611]: Covered by 9a below.

- ~~7. Ensure City of Dawson municipal water supply is protected, and land uses that could lead to contamination be discouraged within the catchment area.~~
- ~~8. Consider how residential growth may impact services offered within the City of Dawson and municipal tax ratepayers.~~
- ~~9. Climate Change mitigations and adaptations:~~
- ~~a. Consideration of the potential effects of climate change in the area including (but not limited to) flooding, landslide potential, slumping, and permafrost degradation.~~
- ~~b. Proposed renewable energy projects must consider LMU values, interim measures as outlined in this section, and adjacent LMUs.~~

Commented [A612]: Slumping is included in landslides

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Priority Objectives

- ✓ A diverse range of sustainable recreational opportunities in the Rregion.
- ✓ A broad understanding by land and resource users of different concepts of stewardship.
- ✓ Availability of potable water.
- ✓ Community growth can occur in a sustainable way, while respecting ecological, social and cultural values.
- ✓ Consistent with Our Clean Future (2020d):
 - Less greenhouse gas emissions.
 - Access to reliable and affordable renewable energy.
 - Adapt to impacts of climate change.
 - Green economy.

Rationale for Designation

A sub-regional plan under Chapter 11 is an appropriate avenue for planning for this multi-purpose area. Until then, adherence to the recommended special management directions above will ensure the overall management intent of the area is met.

Ecological Integrity and Conservation Values

Birds	Presence of raptor nests along Klondike River and watercourses and ponds offer important habitat for waterfowl, including swans, cranes, ducks, geese, and shorebirds.
Caribou	Within the range of the Fortymile Caribou Herd but the area is unlikely to offer habitat values for caribou.
Ecosystem Representation	
Furbearers	Beaver and muskrat areas, lesser occurrence of wolverine, ermine, and river otter. Considered to be a regionally important lynx refugium, in which when lynx populations in surrounding areas decline, lynx populations in the Klondike valley and surroundings do not. As such, this area can be considered a significant seed source for regional lynx habitats.
Grizzly Bear	

Landscape Connectivity	
Moose	Area represents important habitat and corridor for moose and vehicle collisions are frequent.
Salmon and other Fish	The Klondike River watershed offers critical habitat requirements for ~~e~~ C chinook salmon (spawning, rearing) and important habitat for resident fish species including Arctic grayling.
Sheep	
Species at Risk	<u>Known to occur: Little Brown Myotis, Wolverine, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Horned Grebe, Common Nighthawk, Short-eared Owl, Barn Swallow.</u> <u>Expected in low numbers: Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Transverse Lady Beetle.</u>
Vegetation and Unique Features	
Water	Klondike River watershed offers important aquatic habitat values for key wildlife in the ~~R~~ region as well an important drinking water source for residents of the ~~R~~ region.
Wetlands	Presence of some wetland ~~habitat ecosystems~~ near North Klondike Highway.
Culture, Heritage Resources and Community Values	
Community Value	Residential: Area of highest priority for current and future residential development. Recreation: Area of high priority for recreational pursuits given high residential use, proximity to the North Klondike Highway, and City of Dawson. Recreation in this area includes walking, biking, hiking, swimming, fishing, ORV use, etc.
Heritage Resources and Sites	Occurrence of recorded historic resources, archaeological sites, and parts of traditional trails. Includes dredge piles of historical significance as well as sites associated with ~~mining~~ , agricultural history and ~~the Yukon and North Fork Ditches~~ .
Traditional Economy/ Traditional Uses	High cultural value and contemporary use for traditional economic activities, includes important Tr'ondëk Hwëch'in community sites. Due to its proximity to the City of Dawson, it is an important traditional use area for connecting to the land and maintaining Tr'ondëk Hwëch'in way of life.
Socio-economic Values	

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Agriculture	High agricultural potential in the area given proximity to the City of Dawson as well as suitable land for growing.
Energy	Potential for renewable energy infrastructure.
Forestry	High commercial fuelwood harvesting value. Overlaps with Dome Road Timber Harvest Plan.
Mineral Resources	Highly to significantly prospective, presence of mineral claims and of significant interest to both placer and hard rock operators.
Outfitting and Trapping	Presence of active trapping concession and associated infrastructure.
Tourism	High tourism value given proximity to the North Klondike Highway and to the City of Dawson for hiking, gold rush history viewing, etc.
Transportation and Access	The North Klondike Highway is the major transportation route in the R region.

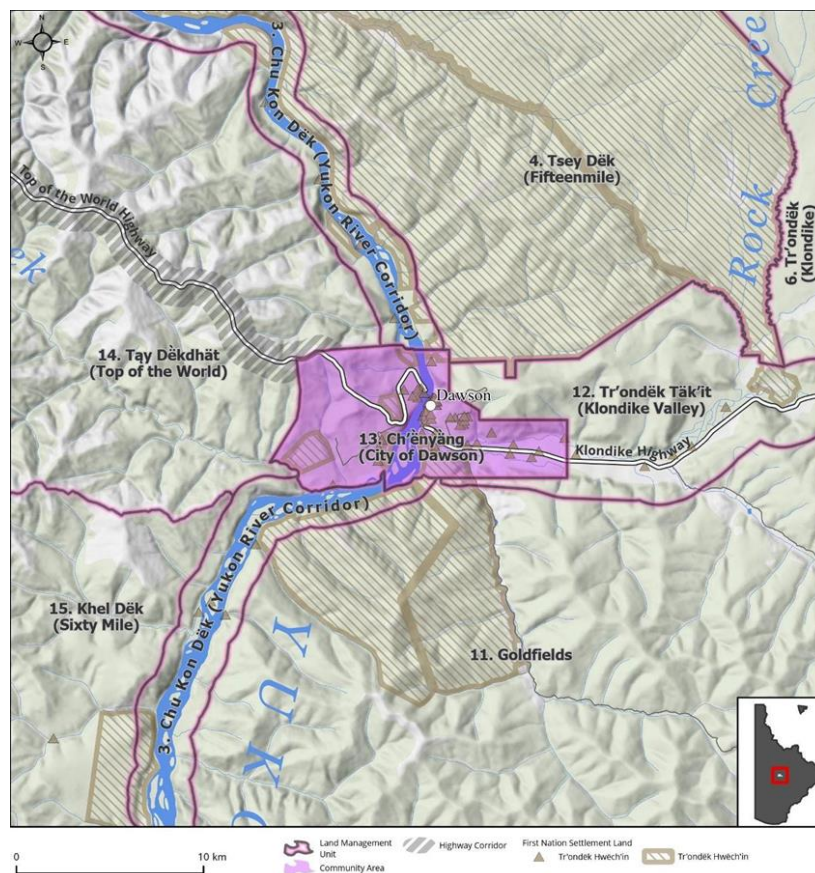
6.126.13 LMU 13: CH'ÈNYÀNG (CITY OF DAWSON)

Land Use Designation:	Community Area		
Land Status:	Non-Settlement Land and 75 Tr'ondëk Hwëch'in Settlement Land parcels		
Area:	81 km ²	Planning Region %	0.2%

The Regional Land Use Plan will not apply to land within the City of Dawson and areas subject to subdivision planning or local area planning outside of a **municipal Community Boundary as per the THFA (including West Dawson and Sunnydale)**. However, the **Dawson Regional Planning Commission** is to consider adjacent areas, their designations, and land uses, in the development of their Plan. See also: **LMU 12: Tr'ondëk Tāk'it (Klondike Valley)**, page 224.

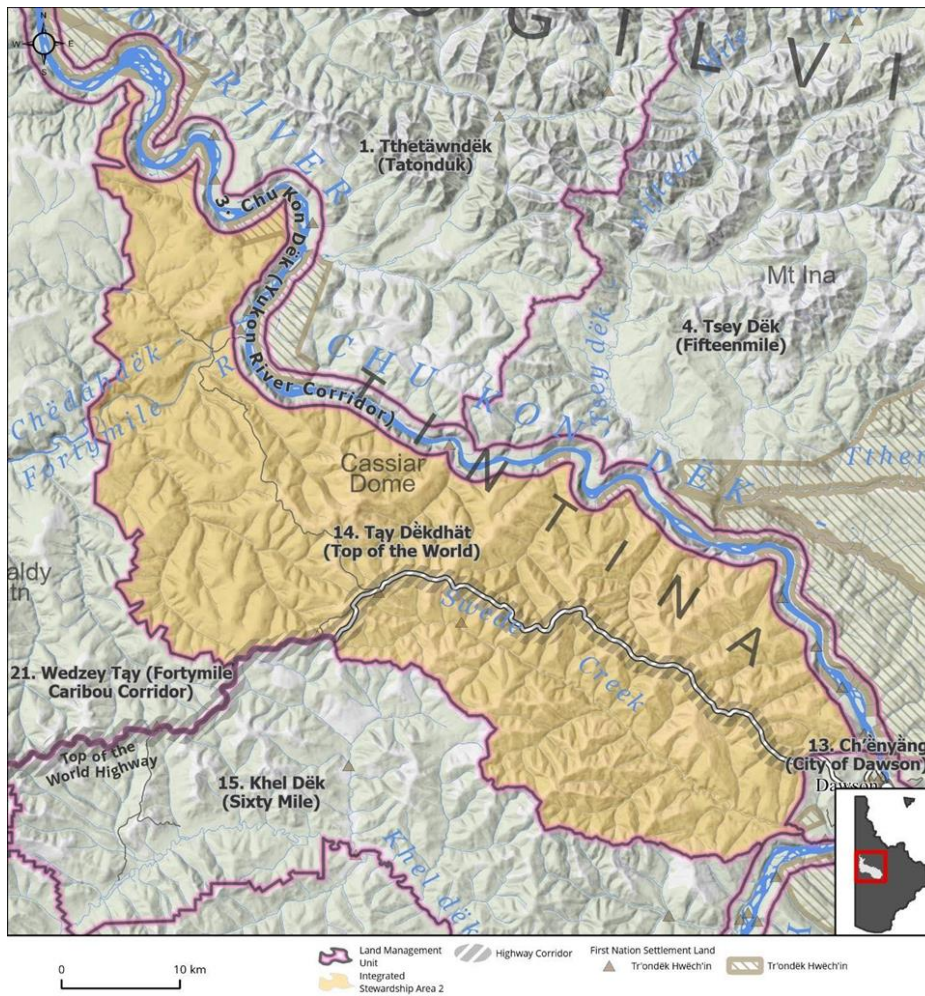
Commented [A614]: To be consistent with Chapter 11 of THFA.

Commented [A615]: Redundant.



6.136.14 LMU 14: TAY DÈKDHÄT (TOP OF THE WORLD)

Land Use Designation:	Integrated Stewardship Area 2		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land Parcels TH S-90B1, TH S186B1, TH S-12B1, TH R-23A, TH R-9A, TH R-71A, TH R-24A, TH R125A		
Area:	1,574 km ²	Planning Region %	3.9%



Walking on the Land Together (Intent Statement)

The vision for this area is to maintain and enhance its cultural and community values while allowing for limited sustainable development to continue.

~~This LMU hosts active placer mining, forestry, tourism, traplines, harvesting, Fortymile caribou habitat, and all-season recreational pursuits along the Fortymile River and off the highway. The Top of the World Highway (TOW) runs through this LMU and thus it is highly accessible by the Highway and secondary roads and trails off the highway. The Top of the World is a major tourist route and is a route to a U.S.A border crossing. The LMU is also an area of cultural significance to Tr'ondëk Hwëch'in and continues to offer an important recreational gathering space for residents of the Planning Region and visitors alike.~~

Given LMU Tay Dëkdhät's (Top of the World) proximity to the City of Dawson, as well as the neighbourhoods of West Dawson and Sunnyside, this area represents important opportunities for community growth, connection, and wellness that must be considered alongside any industrial uses. ~~Chu Ttho Dëk (Swede Creek) particularly is an important source of drinking water for the community and in Hän means 'yellow water creek'.~~

Future management of this area will continue to focus on respectful tourism, mining, and opportunities for cultural connections. Continued enjoyment of the traditional and recreational pursuits that the area offers residents and visitors alike, with a relatively low development threshold.

Tr'ëhudë (Our Way of Life) & Stewardship

This area is important to Tr'ondëk Hwëch'in for many reasons, but particularly it is a space for reconnection. For many years, the Tr'ondëk Hwëch'in have not harvested the Fortymile caribou to help the herd to become healthy again. An entire generation of citizens have not harvested the caribou and the cultural impact of this can be felt.

The opportunity for knowledge transfer and reconnection to a traditional practice and way of life is important in Tay Dëkdhät (Top of The World).

The name Tay Dëkdhät means 'trail on top/high' and this route (the Top of the World Highway) is essential for connecting to families and communities in Alaska and access for community members to pursue on-the-land activities.

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

- ~~1. Activities that have the potential to disturb salmon and other fish spawning sites should be restricted during known species-dependent freshwater timing windows for the Yukon (as per DFO).~~
- ~~2.1. The operation of large, high-powered tourist watercraft on the Fortymile River should not result in appreciable mortality to juvenile or adult salmon, or disruption of their habitats.~~
- ~~3.2. Land users working in proximity to Mickey Creek and Swede Creek should be made aware of the stream's use for human consumption.~~ An appropriate buffer, ~~as determined during assessment and regulatory processes,~~ should be ~~explored and implemented where appropriate followed~~ to ensure no negative impacts to ~~these~~ important water sources ~~Mickey Creek and Swede Creek.~~

Commented [A616]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU. Comment applies to further text deletion in this section below.

Commented [A617]: Covered by management practice 5.2.1.3 f (Implement timing windows for lifecycle related habitat types (i.e., overwintering habitat and water withdrawals, spawning streams etc.) as per Freshwater Timing Windows Identified for the Yukon (<https://www.dfompo.gc.ca/pnw-ppe/timing-periodes/yk-eng.html>).)

Commented [A618]: Users in these areas must follow the Plan, therefore the Plan can provide this notice.

4. ~~The Clinton Creek asbestos mine was abandoned in 1978 and is now under the care and maintenance of Government of Yukon and Government of Canada. Remediation planning is underway in collaboration with Tr'ondëk Hwëch'in. Continued work on future reclamation and closure planning is a priority due to community concerns.~~
3. ~~Top of the World Highway Corridor: Direction set out in Section 5.4.3.1.2 – Top of the World Highway Corridor (page 132) should apply. Take care not to disturb the unique biophysical and socio-cultural setting of the Top of the World Highway corridor, in particular with the use of ORVs within key ungulate, ecologically important, and cultural areas. (See Map 4 – Selected Ecologically Important Areas, Map 5 – Ungulates, and Map 6 – First Nations Land Use, Heritage, and Cultural Resources). The use of ORVs should not undermine cultural and wildlife values.~~
- 5.4. ~~The visual integrity and natural aesthetic viewscape of the Top of the World Highway corridor should be maintained.~~

Commented [A619]: Removed, no recommendation or management direction. Context added to Values table below.

Commented [A620]: Directions from this section brought forward rather than referred back to.

Priority Objectives

- ✓ Tourism and recreational experiences include scenic viewsapes, wildlife viewing, culture appreciation, and heritage education within appropriate areas of the ~~P~~planning ~~R~~region.
- ✓ Community growth can occur in a sustainable way, while respecting ecological, social and cultural values.
- ✓ A diverse range of sustainable recreational opportunities in the ~~R~~region.
- ✓ Opportunity for sustainable forestry that contributes to a growing diversified economy, local employment, and economic stimulus.
- ✓ Recognize and protect a way of life that is based on an economic and spiritual relationship between Tr'ondëk Hwëch'in and the land (THFA preamble).
- ✓ Potable water for residents of the ~~R~~region.

Rationale for Designation

- The Fortymile River is an important salmon bearing stream, in particular for the movement of adult and juvenile ~~e~~C Chinook salmon, as well as contains identified salmon spawning habitat
- The Fortymile River watershed supports various recreational, cultural, residential, and industrial activities. Maintaining this area for its multiple purposes is important, but requires some additional direction for minimizing conflicts
- Allowing for disturbances to remain within an ISA 2 designation in combination with the special management directions above will meet the management intent of this area.
- The LMU hosts a highly active recreation and tourist area that needs to be carefully managed to retain the values that are held by the broader community and Tr'ondëk Hwëch'in.

Ecological Integrity and Conservation Values

Birds	Some presence of high elevation (>1000 m) habitat important for some migratory bird species. Wildlife key areas for raptors (golden eagle and peregrine falcon) near the mouth of Swede Creek where it enters the Yukon River.
Caribou	Overlap with the Fortymile and Nelchina Caribou Herds' ranges as well as important habitat areas for winter and spring/fall corridors.
Ecosystem Representation	
Furbearers	High to medium habitat suitability for muskrat and beaver, and active trapping concession.
Grizzly Bear	
Landscape Connectivity	
Moose	Considered extensive moose habitat and contains key wildlife areas for moose, including for late winter habitat. Several mineral licks occur in this area that are important for moose and harvesting activities.
Salmon and other Fish	Important habitat for salmon migration/spawning and freshwater fish. Chinook spawning habitat has been identified in the upper reaches of the Fortymile River near the Alaskan border.
Sheep	
Species at Risk	<u>Known to occur: Wolverine, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Horned Grebe, Common Nighthawk, Short-eared Owl, Barn Swallow.</u> <u>Expected in low numbers: Little Brown Myotis, Yukon Podistera, Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Transverse Lady Beetle.</u>
Vegetation and Unique Features	Presence of some intact forest (>140 years old). <u>Steppe ecosystems.</u>
Water	Important aquatic habitat for wildlife as well as drinking water for residents of the area. Swede Creek is defined as a watercourse that contains ecologically and culturally important fish and/or aquatic resources.
Wetlands	The Fortymile River contains identified wetland <u>habitat ecosystems</u> , including bogs, fens, and swamps, and some mapped wetland <u>habitat ecosystems (swamp)</u> on the lower portion of Swede Creek <u>(swamps)</u> .
Culture, Heritage Resources and Community Values	

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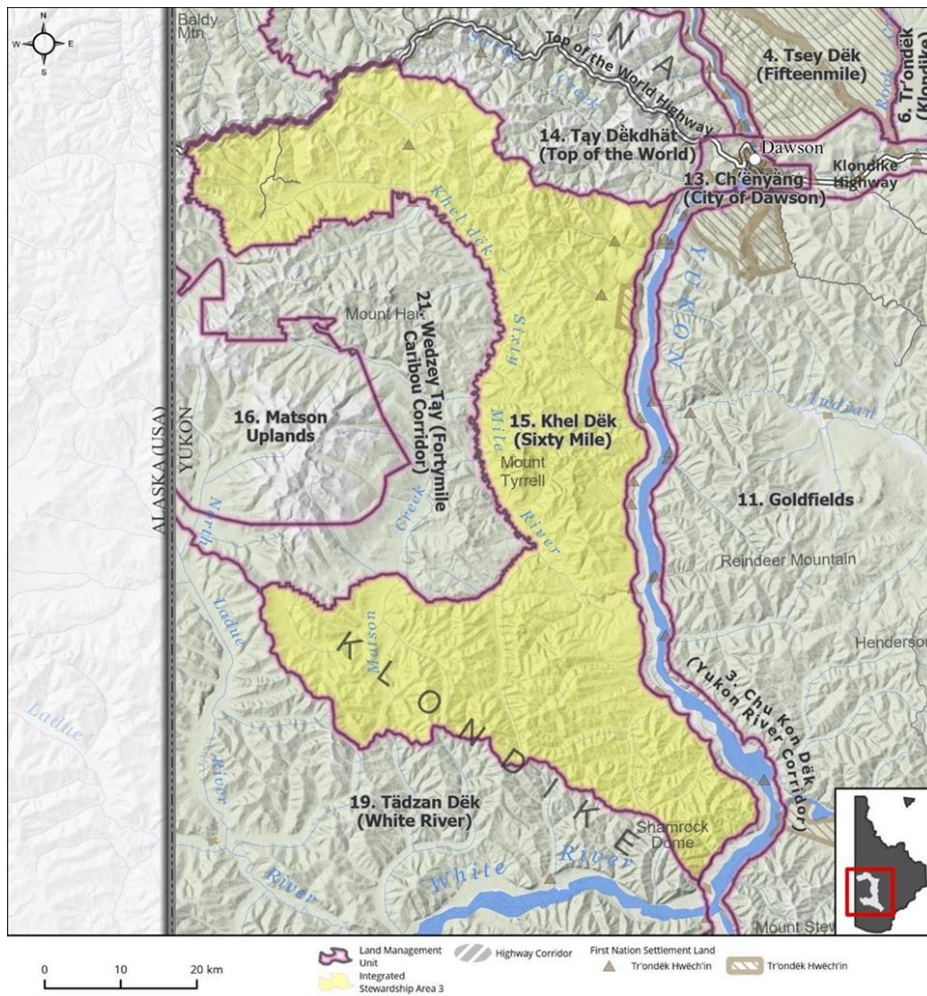
Community Value	Due to its proximity to the City of Dawson and communities and its accessibility, there is high recreational value for hiking, canoeing, motorists, boating, fishing, dog mushing, and snowmobiling. Residential properties in the area and drinking water source along Mickey Creek and Swede Creek.
Heritage Resources and Sites	Presence of historic resources related to ~~Klondike Gold Rush~~ historic mining and previous industrial mining activity at Clinton Creek. There are also documented precontact archeological sites and identified areas of high potential archeological sites.
Traditional Economy/ Traditional Uses	Year-round traditional use area; important area for moose and caribou harvesting, trapping, gathering of natural resources including foods, medicines, and forest resources. Adjacent to Forty Mile Heritage site/camp.
Socio-economic Values	
Agriculture	
Energy	
Forestry	Located within the Fortymile River landscape unit of the Dawson Forest Resources Management Plan, which is designated for a medium priority for planning in the short-term. Area is considered to have potential for high timber values, and there are active timber harvest plans along Bruin Creek that include both commercial- and personal-use fuelwood areas. Forest Management Branch is developing a timber harvest plan (THP) in this LMU (20 Pup THP). <u>Forest Management Branch has identified future development interest more broadly within LMU 14 for both sawlog and fuelwood harvesting (commercial & personal use).</u>
Mineral Resources	Highly to significantly prospective, active placer mining along tributaries to, and including, the Fortymile River. Active quartz claims and class 1 notifications. <u>Continued work on future reclamation and closure planning of Clinton Creek asbestos mine (abandoned in 1978) is a priority due to community concerns.</u>
Outfitting and Trapping	Active trapping concession and associated infrastructure.
Tourism	
Transportation and Access	

Commented [A621]: Fill in information on tourism and transportation and access values, key for this LMU.

6-146.15 LMU 15: KHEL DĚK (SIXTY MILE)

Land Use Designation:	Integrated Stewardship Area 3		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land TH R-11A, TH R-43A, TH S-107B1, TH S-14B1, TH S-169B1, TH S-75B1 <u>Overlaps with WRFN asserted territory</u>		
Area:	2897 km ²	Planning Region %	7.3%

Commented [A622]: LMUs overlapping White River First Nation's asserted Territory should explicitly reference WRFN.



Walking on the Land Together (Intent Statement)

The intent for this area is to adequately protect key caribou habitat and to ensure sustainable development, through strong access management recommendations.

~~This area is a large land mass containing major watersheds and multiple land uses, including mineral exploration and development, forestry, tourism, harvesting, and recreation.~~

~~Unique to this area is the Top of the World Highway, which represents an important seasonal multi-use access corridor.~~

~~Interest in this area is growing, which includes increased opportunities for access into previously remote areas.~~ It will be important that access infrastructure is planned for and managed to ensure preservation of important environmental and socio-cultural values.

Commented [A623]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

Tr'ëhudè (Our Way of Life) & Stewardship

Khel Dëk or the Sixty Mile River flows through this LMU. The Hän name 'Khel Dëk' means Packsack River. This is an important area for Tr'ondëk Hwëch'in, especially for harvesting activities. In the past there were camps at the mouth of the Sixty Mile River and traditional travel routes. The area is used for subsistence hunting of Fortymile caribou and there are ongoing efforts by Tr'ondëk Hwëch'in to reconnect with the herd through community hunts and educational camps.

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. ~~This area is located within important caribou herd ranges and considered extensive moose habitat. It is imperative to maintain key caribou migration pathways, and to minimize disturbance to key (summer and winter) habitat areas, and minimize that overharvesting impacts to moose through overharvesting are minimized by:~~
 - a. ~~Avoiding disturbance in key caribou migration pinch points along ridges as identified during assessment and regulatory processes by regional biologists.~~
 - b. ~~Avoiding where possible and otherwise limiting development within the large core patches of winter habitat found adjacent to the Top of the World Highway should be avoided where possible and limited otherwise.~~
 - c. ~~Applying timing windows that reduce industrial impacts to moose and caribou should be applied as guided by regional biologists determined during assessment and regulatory processes.~~
 - c.d. ~~While activities are underway, special care should be taken during the months of June through November to maintain caribou summer range habitat. Specific provisions related to this time period should be considered as part of the regulatory and assessment process for individual projects.~~
 - d. ~~Access management planning as per Section 5.4.3.2.2 – Access Management Planning Recommendations (page 140)~~
2. This area is particularly important for subsistence harvesting and the pursuit of traditional economic activities. The ability for residents to continue using the land in this way must be maintained.

Commented [A624]: YG does not support the requirement of an access management plan for this area as this LMU already has existing access routes. YG believes access management planning is a process intended to plan for potential new major access routes.

3. ~~Top of the World Highway Corridor: Direction set out in Section 5.4.3.1.2 – Top of the World Highway Corridor (page 132) should apply. Take care not to disturb the unique biophysical and socio-cultural setting of the Top of the World Highway corridor, in particular with the use of ORVs within key ungulate, ecologically important, and cultural areas. (See Map 4 – Selected Ecologically Important Areas, Map 5 – Ungulates, and Map 6 – First Nations Land Use, Heritage, and Cultural Resources). The use of ORVs should not undermine cultural and wildlife values.~~
4. ~~The visual integrity and natural aesthetic viewscape of the Top of the World Highway corridor should be maintained.~~

Commented [A625]: Management directions from this section brought here instead of referred back to.

Priority Objectives

- ✓ A resilient and growing moose population sufficient to support herd health, as well as current and future harvest levels.
- ✓ Placer and quartz mine exploration and development is carried out in a sustainable way and contributes to a growing diversified economy.
- ✓ People can access the land, water, and resources in a way that acknowledges and supports the values and minimizes conflicts and cumulative effects.
- ✓ Habitat and migration pathways are sufficient to support historic caribou population levels.
- ✓ Key areas for harvesting in the ~~P~~planning ~~R~~region are maintained and protected to support both First Nations and non-First Nations use.
- ✓ Continued and successful traditional land use and traditional economic activities.

Rationale for Designation

- Area should remain open for mineral exploration and development, which is a significant contributor to the ~~R~~region's economic and socio-cultural environment.
- General management directions in Section 5 and the special management directions above should ensure adequate protection of wildlife habitat and that the multi- industrial nature of this area can co-exist with recreational and traditional pursuits.
- An ISA 3 designation will allow for continued responsible and sustainable growth of industrial pursuits in this area without undermining its ecological integrity.

Ecological Integrity and Conservation Values

Birds	Area of high elevation habitat (>1,000 m) which is important for some migratory bird species, and areas adjacent to the Yukon River can contain raptor nests (incl. peregrine falcon and golden eagle). Isolated areas of high concern habitat for migratory birds along major rivers and watercourses (Matson Creek and Sixty Mile River).

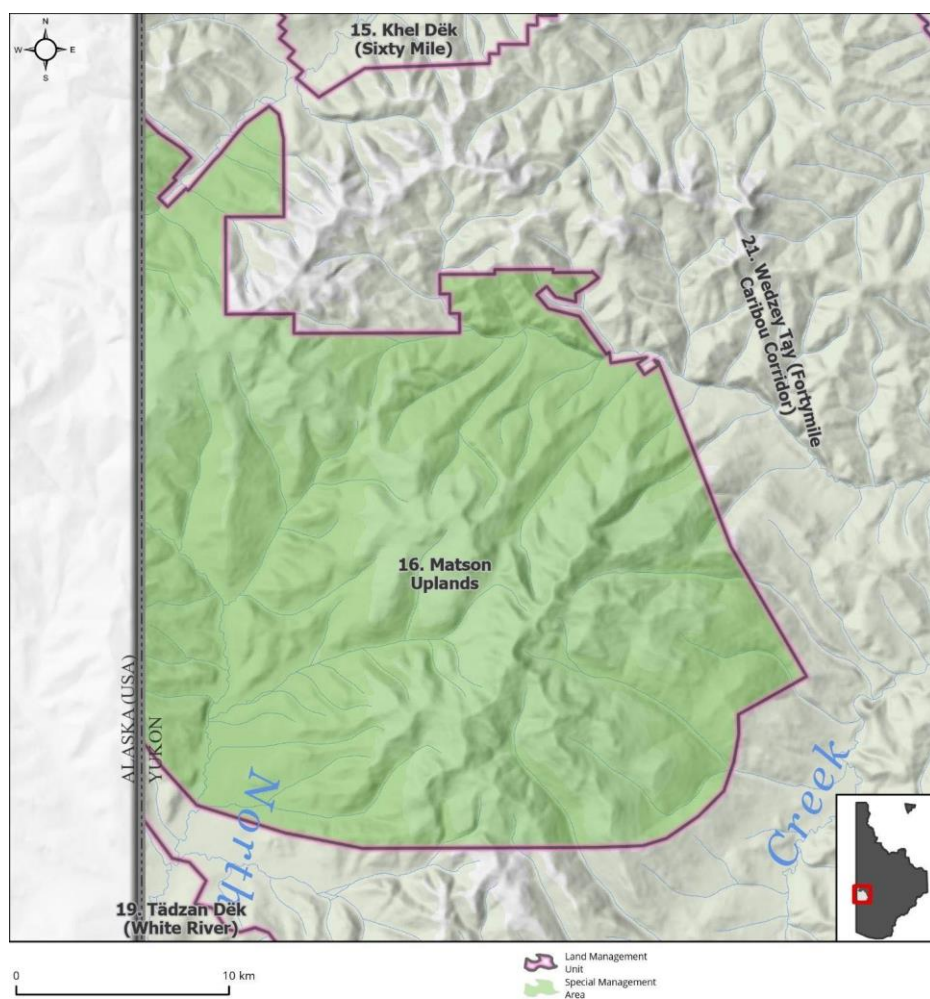
Caribou	Within the range of the Fortymile and Nelchina Caribou Herds and contains areas of important winter and summer habitat as well as within key migration corridors in the spring and fall.
Ecosystem Representation	Part of Klondike Plateau ecoregion of the Boreal Cordillera.
Furbearers	Areas of excellent suitability for stream dwelling beaver habitat and some good to fair suitability for pond dwelling habitat. Presence of isolated moderate to low muskrat habitat suitability.
Grizzly Bear	
Landscape Connectivity	
Moose	Extensive good moose habitat and contains several wildlife key areas for moose, predominantly for late winter (February to April).
Salmon and other Fish	No occurrence of mapped salmon spawning habitat, ~~known chinook habitat in the river and at several confluences and it can be predicted that several streams in this area are supportive of salmon and freshwater fish spawning/rearing habitat. likely some presence of resident fish species in various watercourses within the area.~~
Sheep	No identified sheep habitat, sheep are likely occasional visitors to parts of the LMU. Record of one harvested sheep on the Fortymile.
Species at Risk	~~Expected to occur: Little Brown Myotis, Spiked Saxifrage, Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Barn Swallow, Common Nighthawk, Transverse Lady Beetle, Horned Grebe, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Short-eared Owl, Wolverine.~~
Vegetation and Unique Features	~~Important ecosystems include low elevation steppe meadows and smaller riparian streams. This region also contains intact old growth forest (>140 years old) near Mount Tyrell and Matson Creek, and several known mineral licks. Presence of intact forest (>140 years old) near Mount Tyrell and Matson Creek. Occurrence of known mineral licks.~~
Water	
Wetlands	Wetland ~~habitat~~ ecosystems present along Sixty Mile River and Matson Creek, including bogs, fens, and swamps.
Culture, Heritage Resources and Community Values	

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Community Value	Harvest of non-timber forest products is important for the community, especially along the Top of the World Highway, but also down the Sixty Mile Road and other secondary roads. Adjacency to the Top of the World Highway and the presence of several secondary roads represents significant recreational opportunities in this area, predominantly from ORV use, hiking, berry picking, wildlife viewing.
Heritage Resources and Sites	Presence of traditional trails and several archaeological sites and historical mining sites on the Sixty Mile River and (i.e. Miller and Glacier Creeks).
Traditional Economy/ Traditional Uses	There are several settlement lands parcels identified as important harvesting and gathering sites including S-14B. First Nation land- based connections to this area; very active harvest area for all natural resources including moose and caribou, berries, etc. along the TOW Highway and adjacent lands. <u>This area is particularly important for subsistence harvesting and the pursuit of traditional economic activities.</u>
Socio-economic Values	
Agriculture	
Energy	
Forestry	Part of Sixty Mile River Landscape Unit of Dawson Forest Resources Management Plan. Area was designated for forest resource management with a medium priority for planning in the short-term. Considered to include potential for high timber values. No active timber harvest plans in the area.
Mineral Resources	Predominantly highly to significantly prospective for minerals. Placer exploration and mining is prevalent in areas as well as areas of active quartz exploration.
Outfitting and Trapping	Active trapping concessions and presence of associated infrastructure.
Tourism	Top of the World Highway adjacent, which is an important area for tourism in the Region. Most tourism activity would occur within proximity to the highway or accessed off the Yukon River.
Transportation and Access	Area is accessible via the Top of the World Highway and several secondary roads.

6-156.16 LMU 16: WĒDZEY NĀHUZHĪ (MATSON UPLANDS)

Land Use Designation:	Special Management Area		
Land Status:	Non-Settlement Land		
Area:	708 km ²	Planning Region %	1.8%



Walking on the Land Together (Intent Statement)

The intent for this area is the preservation of core summer habitat required for the continued growth and survival of the Fortymile Caribou Herd within its Yukon range.

~~The Fortymile Caribou Herd is of significant cultural importance to Tr'ondëk Hwëch'in and offers important opportunities for subsistence harvesting and stewardship. While much of the herd's Yukon range overlaps with land use disturbance, parts of the Matson Uplands remain relatively undeveloped. It is~~ important that habitat requirements for the herd be prioritized in this area.

Commented [A626]: Move to Values table.

Tr'ëhudë (Our Way of Life) & Stewardship

Caribou have provided food, traditional supplies/tools, and clothing for the Tr'ondëk Hwëch'in people for thousands of years, and it is critical that this connection remain for future generations. As stewards of this land, it is crucial that the Tr'ondëk Hwëch'in protect caribou and their habitat as it is a part of cultural continuity and a way of life. Tr'ondëk Hwëch'in did not harvest the Fortymile Caribou herd for decades due to the depletion of the herd. In recent years the herd has rebounded to some extent and the Tr'ondëk Hwëch'in have recently started to rebuild a cultural connection through subsistence harvesting activities.

(Adapted from Tr'ondëk Hwëch'in Review of the Dawson Regional Draft Plan, 2021)

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. ~~Withdrawal of all lands from placer and quartz mineral staking.~~
2. Access:
 - a. No new surface access.
 - b. Continued use of existing access.
3. ~~No new industrial land uses.~~
4. Wetlands:
 - a. Identification of all wetlands found within the North Ladue River drainage within the LMU as a Wetland of Special Importance (page 44).
 - a-b. As per wetland direction in Section 3.2.4.3 – Wetlands of Special Importance (page #), no development that could result in a loss or reduction of wetland benefits should be allowed within the Wetland of Special Importance.

Commented [A627]: There is one existing placer claim in the middle of this LMU. SMDs should speak to what development is permitted within this existing tenure. Yukon Government supports the rights of existing tenure holders as we have in other areas of the plan.

Commented [A628]: Are other uses permitted? Up to what thresholds?

Priority Objectives

- ✓ Protection of traditional land use/economic activities and harvesting.
- ✓ Healthy and resilient caribou herd populations that grow towards historic levels.
- ✓ Habitat and migration pathways are sufficient to support historic population levels.
- ✓ First Nation constitutionally protected rights for harvesting and subsistence activities as obligated in the FNFA are upheld.

Rationale for Designation

- Matson Uplands have been identified as containing critical summer habitat for Fortymile caribou herd, winter range for both Fortymile and Nelchina caribou,

and critical migration pathways for the herd during spring, summer, and fall. • The Fortymile Caribou Herd overlaps with areas of high human-caused disturbance, and the herd is at significant risk of experiencing a cumulative impact from further development, particularly of critical summer and migratory ranges. • Major issues facing the herd are barriers to movement and loss of habitat. It is important that the remaining critical habitat within this area be preserved, and migratory pathways of this herd not be impeded or bisected at critical pinch points.	
Ecological Integrity and Conservation Values	
Birds	Extensive inclusion of high elevation (>1,000 m) habitat crucial for some migratory bird species.
Caribou	This area overlaps with two caribou herd ranges—the Fortymile and Nelchina Caribou Herds—and includes migration corridors and winter and summer habitat for caribou. Identified as critical habitat for Fortymile Caribou Herd persistence.
Ecosystem Representation	Klondike Plateau ecoregion.
Furbearers	
Grizzly Bear	
Landscape Connectivity	Area provides landscapes connectivity from Alaska into Yukon necessary for caribou migration.
Moose	
Salmon and other Fish	
Sheep	
Species at Risk	<u>Known to occur: Collared Pika, Wolverine.</u> <u>Expected in low numbers: Yukon Podistera, Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Transverse Lady Beetle, Barn Swallow, Common Nighthawk, Horned Grebe, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Short-eared Owl.</u>
Vegetation and Unique Features	<u>Important ecosystems include low elevation steppe meadows which have endemic species (William's Catchfly). Unglaciated high elevation alpine (> 1,300 m) which has endemics species (Arctic Primrose). Unglaciated areas > 1,300 m in elevation, presence of rare endemic plant species.</u>
Water	Extensive inclusion of high elevation (>1,000 m) habitat crucial for some migratory bird species.

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Wetlands	~~This area overlaps with two caribou herd ranges—the Fortymile and Nelchina Caribou Herds—and includes migration corridors and winter and summer habitat for caribou. Identified as critical habitat for Fortymile Caribou Herd persistence. Ladue River drainage consists of primarily swamp, fen and bog wetland ecosystems.~~
Culture, Heritage Resources and Community Values	
Community Value	Some recreation activities on trails.
Heritage Resources and Sites	~~Potential for archeological resources associated with caribou harvesting activities. There is oral history of caribou fences in this area.~~
Traditional Economy/ Traditional Uses	Traditional use area important for trapping; high ecological importance for moose and caribou habitats that support subsistence harvest. Ongoing efforts by Tr'ondëk Hwëch'in to reconnect with the Fortymile herd through community hunts and educational camps.
Socio-economic Values	
Agriculture	
Energy	
Forestry	Overlaps with the Sixty Mile River Central Landscape Unit of the Dawson Forest Resources Management Plan. Unit is designated for medium priority for short-term forest resource development; however, the area is high elevation and limited in forest resource potential.
Mineral Resources	No active quartz claims or permits in this area but the area has high to medium mineral potential (see Map 8 – Non-Renewable Economic Development: Potential and Interests).
Outfitting and Trapping	Area overlaps with trapping concession.
Tourism	
Transportation and Access	Existing all-season access and some secondary access trails into the area, as well as air access (landing strips).

Commented [A629]: Typo- spoke to wrong value, added information on wetlands

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6-166.17 LMU 17: NĀN DHÒHDĀL (UPPER INDIAN RIVER WETLANDS)

Land Use Designation:	Integrated Stewardship Area 2		
Land Status:	Non-Settlement Land		
Area:	485 km ²	Planning Region %	1.2%



Walking on the Land Together (Intent Statement)

The intent for this area is to limit the scale of development within the upper drainage of the Indian River and to protect the function of much of the upper Indian River wetland complex to respect and protect cultural, ecological, and traditional economic values. Recognizing that some mineral development may still occur, it will be held to a high standard of excellence, guided by limits to surface and wetland disturbance, a higher standard of progressive reclamation practices, and community stewardship in partnership with industry organizations and individuals.

~~The Indian River valley is experiencing a conversion of its wetland landscape and widespread loss of peatlands. The upper drainage of the Indian River continues to experience exploration and mining; it remains relatively less developed.~~

The goal of limiting cumulative effects is to maintain the area in a state that it can continue to be utilized by Tr'ondëk Hwëch'in and other First Nation citizens to exercise their rights, and for all community members to utilize the area for enjoyment and licensed harvesting. This can be achieved by slowing the pace and scale of development in this area and focusing on a high standard of reclamation. There is an opportunity here to learn from the past and create a new way of doing things, a way that is more respectful to environmental and cultural values and reflects sustainable development in a meaningful way.

Tr'ëhudë (Our Way of Life) & Stewardship

The Indian River area is an incredibly important place for Tr'ondëk Hwëch'in citizens and this has been demonstrated by the ongoing and growing concern that was expressed throughout the planning process.

"The Indian River Valley that exists today is much different from the broad, sweeping wetland habitat it used to be. With the increase in activity levels and lack of reclamation and destroyed habitat, I don't feel as comfortable with harvesting down there anymore. I don't even want to drive down there for leisure...I find it depressing, because I see a loss from all the change, including the loss of my ability to have a successful harvest...The land provides, and we obviously rely on it."

Darren Taylor, Tr'ondëk Hwëch'in Citizen, Public Interest Hearing on Placer Mining in Wetlands (Government of Yukon, 2021)

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. ~~Wetland Stewardship Overlay area (see Section 3.2.4.2 – Wetland Stewardship Area, page 44).~~
2. ~~Industrial Land Use:~~
 - a. ~~Mineral development is permitted within existing mineral tenure.~~
 - b. ~~Industrial land use is permitted within ISA 2 cumulative effects thresholds.~~
3. ~~Development within undisturbed wetlands is subject to the following:~~
 - a. ~~No disturbance to field-verified marshes and bogs.~~
 1. Development in undisturbed fens is limited to (50 percent) by claim block or permit area as per wetland fen threshold direction in **Section 5.2.5 – Wetlands** (page 96).
 - For the purposes of measuring fen thresholds, the definition of surface

Commented [A630]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

Commented [A631]: Recommend removing overlay as it only applies to this LMU, any overlay conditions should be added as special management conditions within this LMU.

Commented [A632]: YG does not support the use of interim withdrawals in this LMU and therefore does not support limiting development to existing tenure.

Commented [A633]: Redundant, this is an ISA 2

Commented [A634]: Redundant, covered by recommendation 44

Commented [A635]: This is the only LMU for which these directions apply, bring them to this section rather than direct to earlier in the Plan.

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disturbance is as per the glossary, consistent with cumulative effects indicator measurement.

~~b. Thresholds should be established with the baseline state of wetlands as of 2022, not based on the amount of fens existing at the time of application.~~

~~c. Development of wetlands subject to general management directions.~~

~~4. When a claim expires, it should be withdrawn from further staking while the interim withdrawal is in place.~~

~~5. Interim withdrawal of all lands from placer and quartz staking. Withdrawal can be jointly reassessed by Parties upon completion of an Upper Indian River Stewardship Plan (see below), or at the 10-year Plan Review, or until such time as both Parties agree to remove.~~

6-2. Priority is given to this LMU for the development of socio-cultural indicators as a part of the cumulative effects framework led by Tr'ondëk Hwëch'in due to the cultural importance of this area.

Upper Indian River Stewardship Plan

An Upper Indian River Stewardship Plan must be jointly created by the Parties and should consider the following:

1. Stewardship as understood and practiced by Tr'ondëk Hwëch'in, and community stewardship as understood by the broader community should guide the development of this Plan.
2. When new access is required, coordinated access routes for industrial activities should be encouraged to reduce linear feature footprint density.
3. Traditional knowledge should inform and guide the development of the management plan.
4. Opportunities for partnerships and collaborations (industry partners, traditional knowledge holders, academic institutions, and environmental non-governmental organizations, etc.) where possible recognizing the expertise and on the ground experience that partners can bring to the body of knowledge surrounding new mining techniques, experiences from outside jurisdictions, monitoring and inspection, and wetland reclamation.
5. Consider opportunities for innovation (techniques/technology) in post-mining reclamation. Explore opportunities with the aforementioned collaborations to further research and techniques in restoration of wetlands in northern ecosystems (including peatland restoration).
6. Parties to jointly develop reclamation guidance and standards for placer operators.

Priority Objectives

- ✓ Functioning wetlands ecosystems that support ecological and socio-cultural values.
- ✓ First Nation constitutionally protected rights for harvesting and subsistence activities are upheld.
- ✓ Recognize and protect a way of life that is based on an economic and spiritual relationship between Tr'ondëk Hwëch'in and the land (THFA preamble).

Commented [A636]: Redundant, all development is subject to general management directions.

Commented [A637]: Removed as YG does not support interim withdrawals. Without withdrawals development is not limited to existing tenure and as an ISA 2 the thresholds do not need to be restated. YG supports the development of a Indian River Stewardship Plan.

Commented [A638]: Recommend clarifying what this "joint" process looks like.

Commented [A639]: Progressive reclamation may be occurring at the same time as mining.

✓ A broad understanding by land and resource users of different concepts of stewardship. ✓ Placer and quartz mine exploration and development are carried out in a sustainable way and contribute to a growing diversified economy.	
Rationale for Designation	
- Wetlands are relatively rare in the Dawson ~~Pp~~lanning ~~Rr~~egion covering approximately 10 percent of the landscape. - Wetlands provide specialized habitat for wildlife (including terrestrial animals, numerous species of birds, and aquatic species), provide important ecosystem services, and are one of the most significant terrestrial carbon sinks. - Wetlands offer numerous socio-cultural values, as expressed by Tr'ondëk Hwëch'in, in inherent value on the landscape, harvesting opportunities, preservation of social connections and cultural vitality, and stewardship. - Restoration of ~~bog/fen wetland habitat peatlands~~ is, currently, effectively impossible following disturbance. - The Indian River watershed has been identified as the most important placer gold producing watershed in Yukon and the upper reaches have been identified as high potential for future placer activity.	
Ecological Integrity and Conservation Values	
Birds	Wetlands are important staging and nesting habitat for songbirds and waterfowl and sharp-tailed grouse habitat.
Caribou	Overlaps with the Fortymile Caribou Herd range. Migration routes and winter habitat present on Wounded Moose Dome to Australia Mountain.
Ecosystem Representation	Wetlands represent roughly 10 percent of the ~~Pp~~ lanning ~~Rr~~ egion.
Furbearers	Wetlands offer important habitat for beaver and muskrat.
Grizzly Bear	
Landscape Connectivity	Wetlands are often considered at the wetland complex level given the nature of their interconnectedness and cumulative function. Isolated wetland ~~habitat is~~ ~~ecosystems are~~ less productive.
Moose	Area contains favourable year-round habitat for moose, and overlaps with wildlife key areas for moose for late winter (February to April).
Salmon and other Fish	
Sheep	

Species at Risk	<u>Known to occur: Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Horned Grebe, Common Nighthawk, Short-eared Owl, Barn Swallow, Wolverine..</u> <u>Expected in low numbers: Little Brown Myotis, Red-necked Phalarope, Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Transverse Lady Beetle.</u> <u>Wetland habitat may provide habitat for common species at risk found in the Planning Region.</u>
Vegetation and Unique Features	
Water	Wetlands are an important hydrological feature.
Wetlands	Upper Indian River drainage ~~majorly~~ consists of ~~primarily~~ swamp, fen, and bog wetland ~~habitat~~ ecosystems.
Culture, Heritage Resources and Community Values	
Community Value	Limited use for recreational purposes, likely focused on those living seasonally within the area.
Heritage Resources and Sites	Numerous occurrences of recorded historic resources, archaeological, and palaeontological sites.
Traditional Economy/ Traditional Uses	Opportunities for harvesting, gathering of foods and medicines and trapping areas.
Socio-economic Values	
Agriculture	
Energy	
Forestry	Located within the Goldfields Landscape Unit of Forest Resource Management Plan with a timber harvesting plan for the area.
Mineral Resources	The Indian River watershed has been identified as the most important placer gold producing watershed in Yukon and more than 50 percent of the Yukon's placer gold is derived from the watershed every year. Extensive coverage of active placer claims and permits overlapping with wetland ~~habitat~~ ecosystems within upper Indian river drainage along major existing or prospective areas including Wounded Moose, Melba Creek, and Australia Creek. Secondary tributaries are relatively absent of placer activity but highly prospective. Some quartz claims and active permits are directly adjacent to the area.
Outfitting and Trapping	Single trapping concession and potential for presence of associated trapping infrastructure.

Tourism	Accessible via secondary roads, may see limited tourism opportunities through gold mining interest and/or wildlife viewing.
Transportation and Access	Access into upper drainage exists but is limited to secondary mining roads.

6-176.18 LMU 18: THERIAN DĚK (COFFEE CREEK)

Land Use Designation:	Integrated Stewardship Area 43		
Land Status:	Non-Settlement Land <i>Overlaps with WRFN asserted territory</i>		
Area:	998 km ²	Planning Region %	2.5%

Commented [A640]: LMUs overlapping White River First Nation's asserted Territory should explicitly reference WRFN. Coffee Creek is an important ancestral area for WRFN.

Commented [A641]: YG proposes that the designation of LMU 18 be an ISA 4, not ISA 3. This will allow for the Coffee Gold Mine to be fully constructed within the proposed critical surface disturbance threshold for ISA 4.

If the Recommended Plan thresholds remain, Coffee Gold Mine would not be developed as proposed. Current and anticipated authorizations for the Coffee Gold Mine are likely to exceed ISA 3 surface disturbance thresholds. Further exploration through mining activities at Coffee Gold Mine may lead to extension of the mine, which should be accounted for in the Plan. Additionally, there are other quartz and placer activities currently underway in LMU 18, reducing the area available for development.



Walking on the Land Together (Intent Statement)

The vision for this area will focus on sustainable development by means of cumulative effects management, access management, and the preservation of key values. It is important that this area remain open for current and future mineral interests without undermining its important environmental and cultural attributes.

~~This area hosts an active advanced hard rock exploration program with associated infrastructure, and the site of a potential hard rock mine. It is also the location of important habitat and migration corridors for the Fortymile Caribou and Netchina Caribou Herds.~~

~~While existing access in this area remains relatively unconnected to the Goldfields LMU, the proposed Northern Access Route would create substantial opportunities for increased accessibility.~~

Tr'ëhudè (Our Way of Life) & Stewardship

In Hän, Ttthetryän Dëk means 'copper creek' and is named so because the Coffee Creek area was a source for copper. Copper was used for making copper knives and jewellery pre-contact.

"There are traditional routes and trails in this area that connected the people of Tr'ondëk Hwëch'in to the people of Alaska. The people of Alaska were the keepers of Tr'ondëk Hwëch'in songs and dances, 'The connection to Alaska is a connection to our language, traditions, and culture.'"

Angie Joseph-Rear, Dawson Regional Planning Commission Member

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

- ~~1. Area contains important caribou migration routes and ridgetops. Yukon Government of Yukon and Tr'ondëk Hwëch'in to identify appropriate conditions via assessment and regulatory processes to minimize impacts to these areas caribou migration routes and ridgetops from future development.~~
- ~~2. Adjacent to this LMU there are small, isolated sheep populations that are particularly sensitive to disturbance.~~ Access via land and air into this area should take every precaution to minimize disturbance to sheep.
- ~~3. Efforts to enhance the use of this area for traditional economic activities and cultural/educational pursuits should be explored.~~
- ~~4.3. Heap-leach mining involves the use of chemicals, normally a cyanide solution, to extract precious metals from ore.~~ Use of heap-leach mining practices in this area should take every precaution to not harm the surrounding aquatic environment. The collection of accurate and robust baseline data collection on groundwater and surface water quality parameters as well as continued monitoring for impacts will be important considerations for development in this area.

Priority Objectives

- ✓ Habitat and migration pathways are sufficient to support historic population levels.
- ✓ Placer and quartz mine exploration and development is carried out in a

Commented [A642]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

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sustainable way and contributes to a growing diversified economy.	
✓ Mineral exploration and development contribute to local employment, economic stimulus, and long-term socio-economic benefits. ✓ People are able to access the land, water, and resources in a way that acknowledges and supports the values in the LMU and minimizes conflicts and cumulative effects.	
Rationale for Designation	
• Area contains an active mineral exploration and potential mine site and ensuring that there is an adequate land base for mining to continue as a key economic development activity in the planning region is important. • The area also contains key habitat for caribou and sites of cultural history and significance to Tr'ondëk Hwëch'in. • ~~An ISA 3 designation with special management directions should meet the management intent for this area.~~	
Ecological Integrity and Conservation Values	
Birds	Presence of high elevation habitat (>1,000 m) important for some migratory bird species.
Caribou	Within the range of the Fortymile, Nelchina, and Klaza Caribou Herds. Contains important summer and winter habitat, as well as key ridges for migratory caribou in the spring and fall.
Ecosystem Representation	
Furbearers	
Grizzly Bear	
Landscape Connectivity	
Moose	Contains good habitat for moose.
Salmon and other Fish	Watercourses are likely to contain resident fish species.
Sheep	Considered to contain scattered sheep habitat generally and adjacent to isolated sheep populations along Yukon and White rivers. <u>Adjacent to this LMU there are small, isolated sheep populations that are particularly sensitive to disturbance.</u>
Species at Risk	<u>Known to occur: Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Horned Grebe, Common Nighthawk, Short-eared Owl, Barn Swallow, Wolverine.</u> <u>Expected in low numbers: Little Brown Myotis, Red-necked Phalarope, Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Transverse Lady Beetle.</u>

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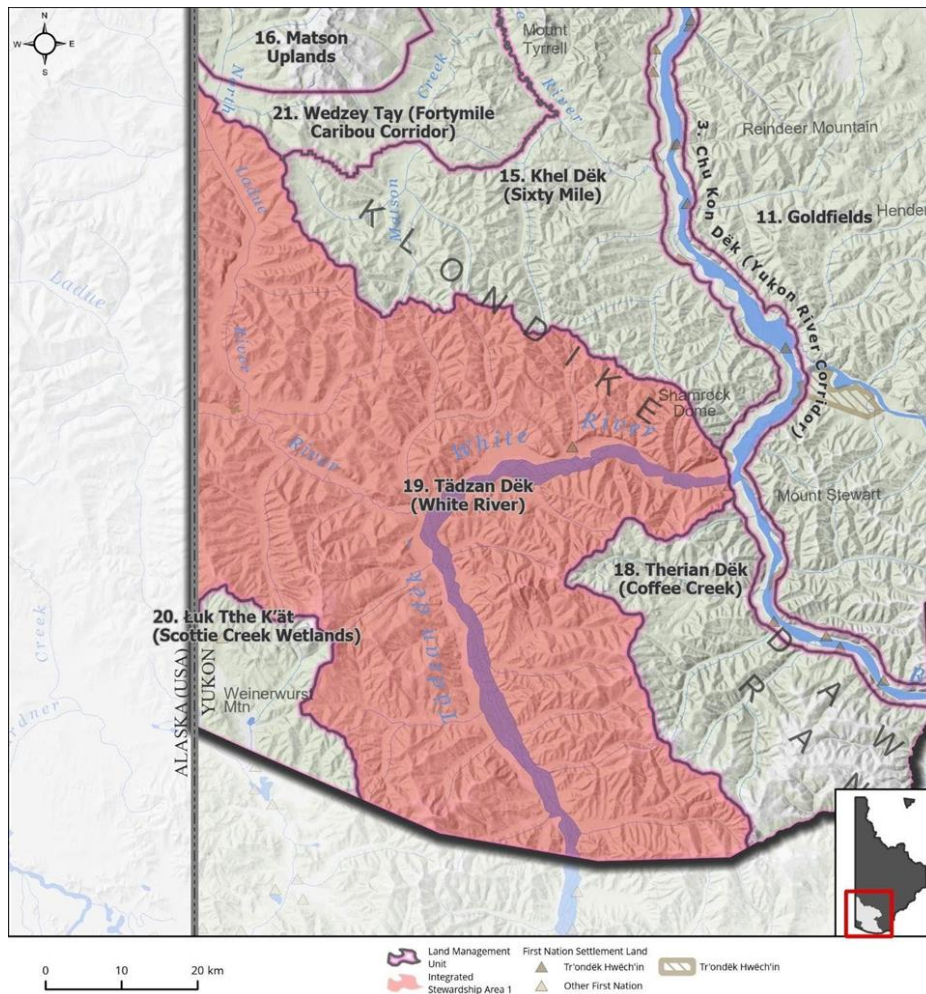
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Vegetation and Unique Features	<u>Important ecosystems include low elevation steppe meadows and unique riparian streams. This region contains Presence of some</u> intact forests (>140 years old). <u>Large population of Dawson Wallflower (<i>Erysimum angustatum</i>)</u> .
Water	Contains tributaries to Yukon River.
Wetlands	Some wetland <u>habitat ecosystems</u> identified on small tributaries to Yukon River, including swamp and fen.
Culture, Heritage Resources and Community Values	
Community Value	Low recreation potential except for limited use along the Yukon River.
Heritage Resources and Sites	Presence of archaeological sites and recorded historic resources near Yukon River and area contains cultural significance to Tr'ondëk Hwëch'in.
Traditional Economy/ Traditional Uses	This LMU has considerable historical value, along with present day use and future potential for harvesting, trapping, and hunting. Important areas for connecting to the land through the practice of land use activities. This area is important for maintaining Tr'ondëk Hwëch'in way of life and connections to the land.
Socio-economic Values	
Agriculture	
Energy	
Forestry	Within the Yukon River South landscape unit for the Dawson Forest Resource Management Plan, which has been designated for a medium priority for long-term planning, as the area has a higher conservation focus.
Mineral Resources	Highly prospective, and the <u>site</u> of significant mineral exploration and development. Area contains an advanced hard rock exploration project and potential future hard rock mine site.
Outfitting and Trapping	Overlapping trapping concessions.
Tourism	
Transportation and Access	Not currently accessible via land but contains considerable access from past and contemporary mineral exploration and development in area. Northern Access Road will result in increased access into this LMU.

6-186.19 LMU 19: TÄDZAN DĚK (WHITE RIVER)

Land Use Designation:	Integrated Stewardship Area 1		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land TH R-44A, TH R-45B, TH R-50A, TH S-17B1 <u>Overlaps with WRFN asserted territory.</u>		
Area:	4,132 km ²	Planning Region %	10.4%

Commented [A648]: LMUs overlapping White River First Nation's asserted Territory should explicitly reference WRFN.



Walking on the Land Together (Intent Statement)

The intent for this area is to focus on maintaining key values, including wetlands, caribou, sheep, and migratory birds, while allowing for continued sustainable development.

~~This area is relatively undeveloped and inaccessible, having some very localized mineral exploration and development. This area contains abundant intact wetland habitat, which holds strong intrinsic value and provides important ecosystem services to fish and wildlife.~~

Tr'èhùdè (Our Way of Life) & Stewardship

Along this river you can see white ash embedded in the cliffs from a volcano eruption thousands of years ago. The river is also white in colour from silt, if you are silent when you paddle the river, you can hear the silt hitting against the bottom of your canoe.

At the confluence of the White and the Yukon rivers, the distinct water from the White flowing into the Yukon is a breathtaking sight. The stories of this river and the events that occurred long ago tell a part of Tr'ondëk Hwëch'in's history.

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. Wetlands:

- a. Identification of all wetlands found within the Ladue and North Ladue river drainages within the LMU as a Wetland of Special Importance (page 44).
- b. As per wetland direction in **Section 3.2.4.3 – Wetlands of Special Importance** (page 44), no development that could result in a loss or reduction of wetland benefits should be allowed within the Wetland of Special Importance.

1. The Ladue River Wetlands are recommended as a Wetland of Special Importance.**2. Development within undisturbed wetlands is subject to the following:**

- a. No disturbance to field-verified marshes, fens, and bogs.
- b. Development in all other wetland types subject to general management directions for wetlands (see **Section 5.2.5 – Wetlands**, page 96).

3.2. Area contains isolated sheep population. Development in this area should take every precaution to minimize disturbance to sheep and sheep habitat along the White River.**4.3. The frequency of use and potential impacts from off-road vehicles in this area is not well understood. In line with **Section 4 – Cumulative Effects Framework**, page 58, if linear feature density thresholds exceed the cautionary level of 774.75 km, (see Table 3-2 on page 56 or Appendix 3: Cumulative Effects Framework Thresholds) appropriate avenues should be explored to manage off-road vehicle use.****Priority Objectives**

- ✓ Functioning wetlands ecosystems that support ecological and socio-cultural

Commented [A649]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

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values.	
✓ Healthy sheep populations are sustained through protection of sheep habitat and limiting disturbance during key times (lambing, over-winter).	
Rationale for Designation	
• ~~The Commission wishes to~~ recognize the ecological and socio-cultural value and contributions of wetland ~~habitat~~ ecosystems to the overall diversity of the planning region. • To meet the management intent for this area, a low level of development is allowed under an ISA 1 designation, in combination with the conditions on development in wetland ~~habitat~~ ecosystems.	
Ecological Integrity and Conservation Values	
Birds	Considered to contain areas of frequent use by migratory birds, including sandhill cranes. Also includes key areas for raptor nesting (golden eagle and peregrine falcon key habitat on White River). Area also contains wetlands that provide important habitat for birds. The North Ladue in particular is known to contain high concern habitat for migratory birds.
Caribou	Within the range of the Fortymile and Nelchina Caribou Herds and includes key migration routes and winter habitat.
Ecosystem Representation	Part of the Klondike Plateau ecoregion and the Boreal Cordillera ecozone. Includes remnant rare mammoth steppe ecosystem.
Furbearers	Key beaver habitat area along the North Ladue river year-round, as well as important stream and pond dwelling habitat.
Grizzly Bear	
Landscape Connectivity	Except for North Ladue, the area is mostly absent of any secondary access roads or trails. Some access does exist along North Ladue as part of mineral interests in the area.
Moose	Extensive good moose habitat and contains key wildlife areas for moose (late winter).
Salmon and other Fish	Important habitat for salmon migration/spawning and freshwater fish. Movement of adult and juvenile salmon along White River.
Sheep	Isolated populations at lower elevations along the White River and near the mouth of the White River.

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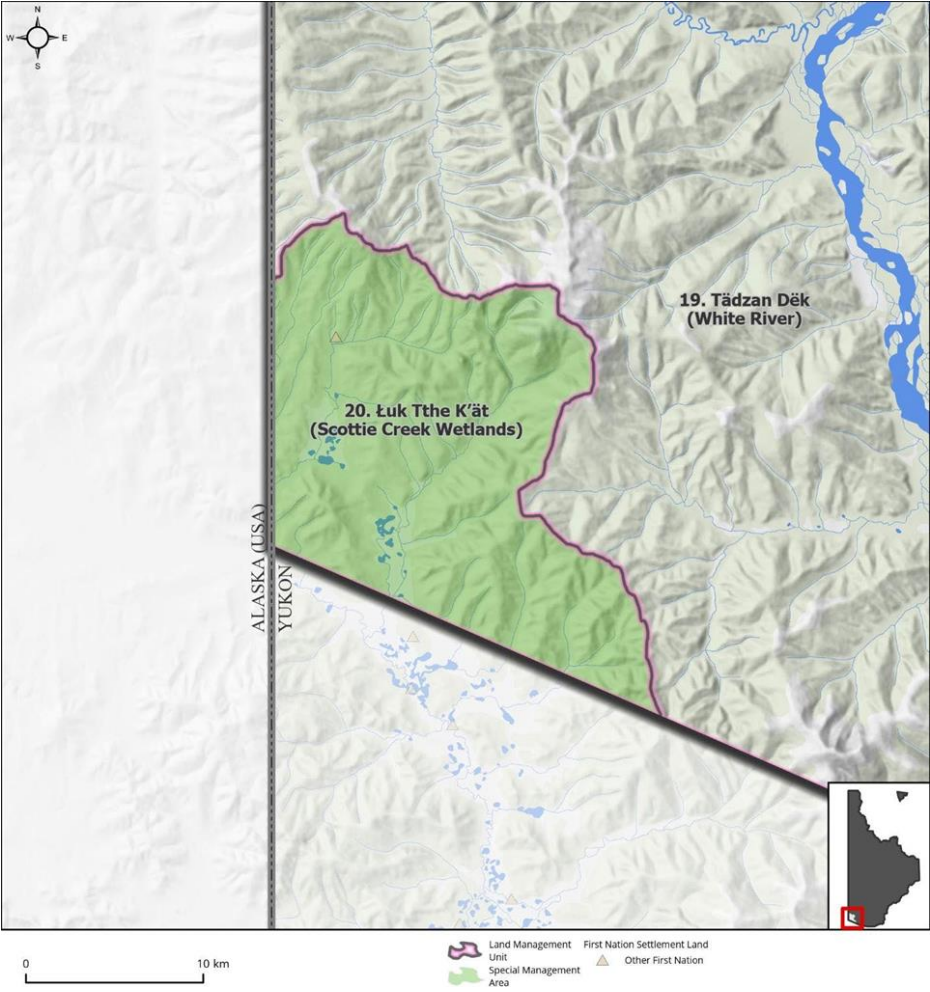
Species at Risk	<u>Expected to occur: Little Brown Myotis, Spiked Saxifrage, Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Barn Swallow, Common Nighthawk, Transverse Lady Beetle, Horned Grebe, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Short-eared Owl, Wolverine.</u>
Vegetation and Unique Features	Presence of known mineral licks. Also includes key areas for raptor nesting (golden eagle and peregrine falcon key habitat on White River). The North Ladue is known to contain high concern habitat for migratory birds. <u>Important ecosystems include low elevation steppe meadows and unique riparian streams.</u>
Water	A significant wetlands complex is located along the Ladue River.
Wetlands	Considered to contain areas of frequent use by migratory birds, including sandhill cranes. Area also contains wetlands that provide important habitat for birds.
Culture, Heritage Resources and Community Values	
Community Value	Recreational boating opportunities up White River, but the area remains quite inaccessible for recreational purposes.
Heritage Resources and Sites	Several archaeological resources and heritage sites, and a traditional trail along White River. The mouth of the White River is a traditional gathering place.
Traditional Economy/ Traditional Uses	This area is important for maintaining Tr'ondëk Hwëch'in way of life and connections to the land. It includes important areas for harvesting and hunting. Ensuring wetland <u>habitat ecosystems</u> remains intact has been noted as an important stewardship duty for Tr'ondëk Hwëch'in.
Socio-economic Values	
Agriculture	
Energy	
Forestry	White River Landscape Unit of Dawson Forest Resources Management Plan designated as a hinterland forest zone with a low priority for planning in the long-term.
Mineral Resources	Predominantly high to significantly prospective. Active placer exploration and mining and quartz exploration tenure within the area. High placer potential in the north, coming off the Matson Uplands area.
Outfitting and Trapping	Active trapping concessions in the area.

Tourism	This is not a high visitor use area, but has potential for more wilderness tourism activities, especially due to its remoteness.
Transportation and Access	<i>The frequency of use and potential impacts from off-road vehicles in this area is not well understood.</i>

6.196.20 **LMU 20: ŁUK TTHE K'ĀT (SCOTTIE CREEK WETLANDS)**

Land Use Designation:	Special Management Area		
Land Status:	Non-Settlement Land and White River First Nation Lands Set Aside S-147B <i>Overlaps with WRFN asserted territory</i>		
Area:	356km ²	Planning Region %	0.9%

Commented [A651]: LMUs overlapping White River First Nation's asserted Territory should explicitly reference WRFN. Scotty Creek is an important ancestral area for WRFN.



Walking on the Land Together (Intent Statement)

Our vision for this area is to protect the function of the wetland complex as fully as possible to respect cultural and ecological values.

Protection of this area ~~supports the Commission's commitment to providing~~ ~~provides~~ opportunities for connectivity beyond the boundaries of the ~~R~~region, ~~respecting respects~~ space for traditional economic activities, and ~~conserving conserves~~ wetlands as important habitat. ~~This area represents the largest intact wetland complex in the Region, and it offers important waterfowl staging grounds and nesting habitat. Access into the area is limited. The area also holds deep intrinsic value for maintaining ecological, social, and cultural connections for Tr'ondëk Hwëch'in and other First Nations with adjacent regions extending into~~ ~~Alaska.~~

The long-term future management of this area will see the ~~eventual end to industrial development~~ with the ultimate goal of fully protecting the wetland complex in its entirety for the ecological and cultural value it holds.

Tr'ëhudë (Our Way of Life) & Stewardship

Wetlands offer numerous socio-cultural values, as expressed by Tr'ondëk Hwëch'in, in inherent value on the landscape, harvesting opportunities, preservation of social connections and cultural vitality, and stewardship. Stewardship is a central tenant of Tr'ondëk Hwëch'in culture.

Ensuring wetland ~~habitat ecosystems~~ remains intact is an important stewardship duty for Tr'ondëk Hwëch'in. Although Scottie Creek is not currently an area of high traditional activity, the preservation of the area for future generations to reconnect with is important to Tr'ondëk Hwëch'in citizens.

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. ~~Surface disturbance threshold of 3.56km² (1.0% of LMU area).~~
2. ~~Linear feature density threshold of 178km (0.5km/km² of LMU area).~~
3. ~~Wetlands:~~
 - a. ~~Identification of all wetlands found within the Scottie Creek drainage as a Wetland of Special Importance.~~
 - b. ~~As per wetland direction in Section 3.2.4.3 – Wetlands of Special Importance, no development that could result in a loss or reduction of wetland benefits should be allowed within the Wetland of Special Importance.~~

~~4.4. The following industrial land uses are allowed:~~

- a. ~~Mineral development, is permitted only allowed~~ within existing ~~placer~~ mineral tenure.
- b. ~~Under the current regulatory system quartz exploration and development is not supported in this LMU (see rationale below).~~
- c. ~~Forestry as guided by the Forest Resource Management Plan (subject to wetland general and special management directions).~~

~~2.5. Withdrawal of all other lands from placer and quartz staking.~~

Commented [A652]: Edited to more directly tie results to the protection of the area rather than to the Commission's commitments.

Commented [A653]: Description of the LMU is not the intent for the area and the values table more thoroughly captures what is currently known about the LMU.

Commented [A654]: Clarify intent of this statement. "Industrial development" is not defined, "industrial land use" is allowed up to ISA 2 levels (forestry and mineral development explicitly mentioned other uses as per definition seemingly allowed within threshold).

Commented [A655]: Bullet below uses ISA 2 thresholds, nothing within s.3.6 limits thresholds to industrial land uses so they should apply to any human activities in the LMU.

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Commented [A657]: There are also existing quartz claims in this LMU that YG wishes to allow to continue to be developed.

Commented [A658]: Redundant, all development must meet Plan directions

Commented [A659]: Remove to meet management intent and further protect wetlands in this LMU

3. ~~Industrial land use permitted within ISA 2 cumulative effects thresholds.~~ 4. ~~When a mineral claim lapses, the land should revert to the prevailing designation of SMA.~~ 5-6. Access: a. Continued use of existing winter access road. b. ~~Outside of gaining~~ Except to access to existing dispositions, new surface access is not allowed. 6. ~~Scottie Creek Wetlands are recommended as a Wetland of Special Importance (see Section 5.2.5 – Wetlands, page 96).~~ 7. ~~Development within undisturbed wetlands is subject to the following:~~ a. ~~No disturbance to field verified marshes, fens, and bogs.~~ ~~Development in other wetland types subject to general management directions for wetlands.~~	
Priority Objectives	
✓ Functioning wetlands ecosystems that support ecological and socio-cultural values. ✓ <u>Alignment with wetland guidance and policy.</u> ✓ Continued and successful traditional land use and traditional economic activities. ✓ Honour the harvesting and fish and wildlife management customs of First Nations people and provide for ongoing needs for fish and wildlife. ✓ Sustainable fish and wildlife populations supported by healthy aquatic and terrestrial habitats. ✓ Honour the harvesting and fish and wildlife management customs of First Nations people and provide for ongoing needs for fish and wildlife (Chapter 16 FNFA).	
Rationale for Designation	
• Wetlands, as discussed in Section 5.2.5 – Wetlands (page 96), are considered high ecological and socio-cultural value. • Protecting the Scottie Creek wetland complex will protect valuable waterfowl staging and nesting habitat. • Productive placer mines are located in the north portion of LMU • Quartz exploration is not in line with the vision for this LMU due to the <u>designation of wetlands in this LMU as Wetlands of Special Importance, the</u> ultimate possibility of development into a mine and the downstream impacts on the wetlands complex and water quality. • Deeply important to First Nations who have cultural and heritage ties that are intrinsically linked to the ecological value of the area. • Ecosystem representation of Klondike Plateau for conservation.	
Ecological Integrity and Conservation Values	
Birds	Important waterfowl staging and nesting habitat.
Caribou	Located within the winter ranges of the Fortymile and Nelchina Caribou Herds.

Commented [A660]: Clarify if any other types of industrial land use beyond mineral development and forestry are acceptable.

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Commented [A661]: Redundant, if lands are withdrawn from staking, claims no longer in good standing cannot be re-staked.

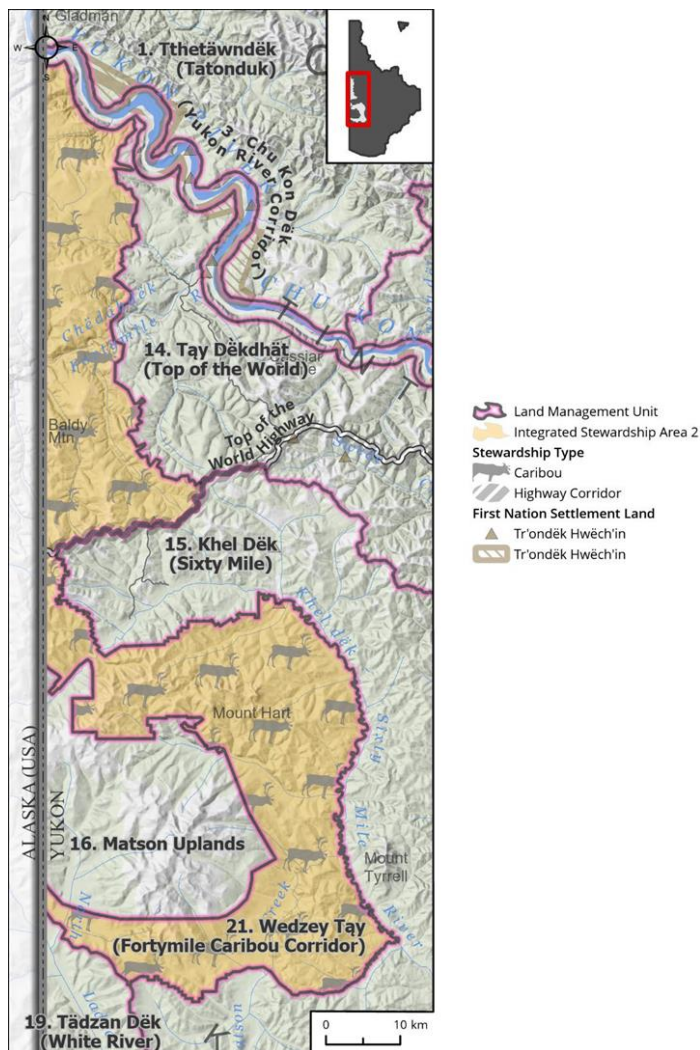
Ecosystem Representation	Ecosystem representation of Klondike Plateau for conservation.
Furbearers	Scottie Creek Flats is considered a wildlife key area for beaver and muskrat for all functions year round.
Grizzly Bear	
Landscape Connectivity	Wetlands are often considered at the wetland complex level given the nature of their interconnectedness and cumulative function. Isolated wetland habitat is ecosystems are less productive. Potential to retain connectivity from this area into adjacent Pplanning Rregions .
Moose	Within areas considered extensive good moose habitat, moderate moose populations.
Salmon and other Fish	
Sheep	
Species at Risk	<u>Expected to occur: Little Brown Myotis, Spiked Saxifrage, Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Barn Swallow, Common Nighthawk, Transverse Lady Beetle, Horned Grebe, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Short-eared Owl, Wolverine. Wetland habitat may provide habitat for common species at risk found in the Pplanning Region. Rare, Species at Risk and endemic plant and mollusk species located within the Scottie Creek Wetlands.</u>
Vegetation and Unique Features	<u>This region has rare wetland ecosystems which has rare and endemic species (Weak Sedge, Beach-head Iris, Yukon Floater).</u>
Water	
Wetlands	Contains extensive undisturbed wetland habitatecosystems .
Culture, Heritage Resources and Community Values	
Community Value	
Heritage Resources and Sites	One identified archaeological site in area.
Traditional Economy/ Traditional Uses	Limited access into the area thus limited opportunities for harvesting and gathering, but known and recognized natural resource values including wetland, riparian, and aquatic species.
Socio-economic Values	
Agriculture	
Energy	

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Forestry	Located within the White River Landscape Unit of the Forest Resources Management Plan. Unit identified as a low, long-term priority for planning with a high conservation focus.
Mineral Resources	Significantly prospective, active placer and quartz claims in the northern portion of the area.
Outfitting and Trapping	Active trapping concession.
Tourism	There is currently minimal interest in tourism activities.
Transportation and Access	Limited access into the area thus limited opportunities for harvesting and gathering.

6-206.21 **LMU 21: WĒDZEY TAY (FORTY MILE CARIBOU CORRIDOR)**

Land Use Designation:	Integrated Stewardship Area 2		
Land Status:	Non-Settlement Land and Tr'ondëk Hwëch'in Settlement Land TH S-13B1		
Area:	2021km ²	Planning Region %	5.1%



Walking on the Land Together (Intent Statement)

Aligning with the Special Management Area identified within LMU 16: Wëdzey Nähuzhi (Matson Uplands) (page 244), the intent for the Fortymile caribou corridor is to adequately preserve habitat requirements and migration routes for the Fortymile Caribou Herd, while allowing for limited development.

Future management of this area should continue to support the ongoing health and population of the Fortymile Caribou Herd ~~and as such continued quartz mining activity is not currently envisioned in this LMU.~~ This will help to ensure that Tr'ondëk Hwëch'in harvest rights and stewardship responsibilities are not compromised.

Tr'ëhudë (Our Way of Life) & Stewardship

Caribou have provided food, traditional supplies/tools, and clothing for the Tr'ondëk Hwëch'in people for thousands of years, and it is critical that this connection remain for future generations. As stewards of this land, it is crucial that the Tr'ondëk Hwëch'in protect caribou and their habitat as it is a part of cultural continuity and a way of life. Tr'ondëk Hwëch'in did not harvest the Fortymile Caribou herd for decades due to the depletion of the herd. In recent years the herd has rebounded to some extent and the Tr'ondëk Hwëch'in have recently started to rebuild a cultural connection through subsistence harvesting activities.

Adapted from Tr'ondëk Hwëch'in Review of the Dawson Regional Draft Plan, 2021

Special Management Directions (Recommendations to achieve Vision)

In addition to all applicable General Management Directions, this area is subject to:

1. Caribou Stewardship Overlay area (see **Section 3.2.4.1 – Caribou Stewardship Area**, page 44).
2. ~~Interim withdrawal of all lands from quartz staking until Plan review or such a time as both Parties agree to remove withdrawal.~~
3. ~~When a claim expires it should be withdrawn from further staking while interim withdrawal is in place.~~
4. ~~Industrial Land Use:~~
 - a. ~~Under the current regulatory system quartz exploration and development is not supported in this LMU (see Rationale for Designation below).~~
 - b. ~~2. Other Development in this area should take special precautions to ensure minimal disturbance to caribou, their habitat, and migration routes. This includes but is not limited to Proponents should:~~
 - i. ~~a. Application of Follow timing windows for caribou as determined by the Parties during the assessment and regulatory process.~~
 - ii. ~~b. Project proponents to work with the Parties to identify, and avoid, areas with suitable lichen habitat prior to undertaking mineral development activities.~~
 - iii. ~~c. Apply Reclamation standards should be applied that maximize the regrowth of caribou suitable habitat, including lichen, and avoidance of reclamation that leads to dense, wide thickets of willow in major creek or river bottoms.~~
 - iv. ~~d. Projects must include specific wildlife monitoring and mitigation plans~~

Commented [A662]: YG does not support this intent. Quartz mining should be allowed to continue in this area in the same manner as any other use within an ISA, subject to the other special management directions.

Commented [A663]: YG does not support the use of interim withdrawals. YG proposes removing withdrawals for areas outside of SMAs once the Plan is approved. The Plan should provide sufficient direction now to allow for sustainable development without the use of interim withdrawals.

Commented [A664]: YG does not support this, quartz should be allowed to continue in this area in the same manner as any other use within an ISA, subject to the other special management directions.

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Commented [A665]: Conditions to be met under the Plan are limited to these. This doesn't limit the ability to add more considerations at the assessment or regulatory phase but rather sets a minimum standard. Directions rewritten to be more applicable to proponents.

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in their project that consider impacts to caribou, and at a minimum, establish a phased approach to actions taken when caribou are present.

~~5.e. Development should~~ Consider guidance provided in wildlife management plans as applicable to this LMU (i.e., FMC Management Plan [pending]).

~~Industrial land use permitted within ISA 2 cumulative effects thresholds.~~

3. Wetlands:

a. Identification of all wetlands found within the North Ladue River drainage within the LMU as a Wetland of Special Importance.

a.b. As per wetland direction in **Section 3.2.4.3 – Wetlands of Special Importance** (page), no development that could result in a loss or reduction of wetland benefits should be allowed within the Wetland of Special Importance.

~~6.4.~~ Fire suppression options should be considered ~~in areas~~ and implemented if deemed necessary by the Parties to protect important caribou habitat (especially lichen areas) as a response to the potential increase in and intensity of fire activity due to climate change.

~~7.5. Access~~ Development within the Top of the World Highway corridor:

a. ~~Continued use of existing surface access is allowed.~~

b. ~~New surface access is allowed within the linear density threshold of ISA 2.~~

a. Top of the World Highway Corridor: Direction set out in **Section 5.4.3.1.2 – Top of the World Highway Corridor** (page 132) should apply. Take care not to disturb the unique biophysical and socio-cultural setting of the corridor, in particular with the use of ORVs within key ungulate, ecologically important, and cultural areas. (See Map 4 – Selected Ecologically Important Areas, Map 5 – Ungulates, and Map 6 – First Nations Land Use, Heritage, and Cultural Resources). The use of ORVs should not undermine cultural and wildlife values.

c.b. The visual integrity and natural aesthetic viewscape of the highway corridor should be maintained.

Commented [A666]: Clarify which management plan this is, the harvest management plan was released in November 2020 but may be less applicable for proponents.

Commented [A667]: Redundant - LMU 21 is an ISA 2

Commented [A668]: Redundant LMU 21 is an ISA 2

Commented [A669]: Directions from this section brought forward here rather than referred back to.

Priority Objectives

- ✓ Healthy and resilient caribou herd populations that grow towards historic levels.
- ✓ Caribou habitat and migration pathways are sufficient to support historic population levels.
- ✓ A society that respects and is connected to caribou.
- ✓ Sustainable fish and wildlife populations supported by healthy aquatic and terrestrial habitats.
- ✓ Continued and successful traditional land use and traditional economic activities.
- ✓ Honour the harvesting and fish and wildlife management customs of First Nations people and provide for ongoing needs for fish and wildlife (Chapter 16 FNFA).
- ✓ Stewardship principles are consistently applied by land, water, and resource users.

Rationale for Designation

- Caribou herds across the continent are in a state of decline. Under the existing mining legislation and technology, the Commission is concerned that quartz mining activity will cause a significant negative impact to the caribou herd, especially on ridgetops which are the predominant migratory pathway. The Fortymile Caribou Herd overlaps areas of high human-caused disturbance. The herd is at significant risk of experiencing a cumulative impact from existing and proposed development. Major issues facing the herd are barriers to movement and loss of habitat. As such, key caribou migration pathways must be maintained, and disturbance to key caribou (summer and winter) habitat areas, should be minimized.
- Existing mining legislation is out of date and does not provide adequate management tools. Successor legislation is in development and may provide better management tools.
- Mining methods/technology applied in Yukon is a concern to the Commission, as evidenced by recent and ongoing mining projects. The Commission is hopeful that greener technologies will one day be available.
- The location of this LMU within critical caribou habitat and migration corridors warrants strong direction as to where, when, and what development can happen. Ridgetops are important migration pathways for the Fortymile Caribou Herd and thus quartz exploration and development on these ridgetops is not conducive to achieve the Regional Plan's caribou objectives (see above).
- Strong special management direction and restricting new disturbance should ensure minimal impacts to the Fortymile Caribou Herd in this area.
- Tr'ondëk Hwëch'in rights to harvest the Fortymile Caribou Herd in this area must not be compromised, particularly within areas adjacent to the Top of the World Highway.
- Given the uncertain state of the Fortymile Caribou Herd with respect to the international migration paths, the Precautionary Principle is applicable in this case.

Commented [A670]: Vague rationale, provide additional detail on specific concerns and how they can be addressed,

Ecological Integrity and Conservation Values

Birds	Contains areas of high elevation habitat (>1,000 m) which is important for some migratory bird species.
Caribou	Within the range of the Fortymile and Nelchina Caribou Herds, and contains areas of important winter and summer habitat as well as within key migration corridors in the spring and fall, and the key summer corridor for Fortymile caribou.
Ecosystem Representation	Part of Klondike Plateau ecoregion.
Furbearers	
Grizzly Bear	

Landscape Connectivity	Caribou corridor to serve as a low development high conservation priority buffer for LMU 16 Matson Uplands.
Moose	Considered good habitat for moose in lowlands.
Salmon and other Fish	
Sheep	
Species at Risk	<u>Known to occur: Yukon Podistera, Collared Pika, Wolverine, Bank Swallow, Lesser Yellowlegs, Olive-sided Flycatcher, Rusty Blackbird, Short-eared Owl, Horned Grebe, Common Nighthawk.</u> <u>Expected in low numbers: Little Brown Myotis, Gypsy Cuckoo Bumble Bee, Suckley's Cuckoo Bumble Bee, Western Bumble Bee mckayi subspecies, Barn Swallow, Transverse Lady Beetle.</u> ~~Known occurrence of Yukon Podistera:~~
Vegetation and Unique Features	<u>Important ecosystems include low elevation steppe meadows which have endemic species. Unglaciaded high elevation alpine (>1,000 m) which has endemics species and is important for some migratory birds.</u> ~~Contains areas of high elevation habitat (>1,000 m) which is important for some migratory bird species.~~
Water	
Wetlands	Wetland ~~habitat ecosystems~~ along major watercourse, including bogs, fens, and swamps.
Culture, Heritage Resources and Community Values	
Community Value	Adjacency to the Top of the World Highway and presence of several secondary roads represents significant recreational opportunities in this area, predominately from ORV use, hiking, berry picking, wildlife viewing, and winter recreation.
Heritage Resources and Sites	Presence of traditional routes (Glacier Creek) and several archaeological sites.
Traditional Economy/ Traditional Uses	First Nation land-based connections to this area; active harvest area for all natural resources including moose and caribou, berries and medicines.
Socio-economic Values	
Agriculture	
Energy	
Forestry	Part of Sixty Mile River Landscape Unit of Dawson Forest Resources Management Plan. Area was designated for forest resource management with a medium priority for planning in the short-term. Considered to include potential for high timber values. No active timber harvest plans in the area.

Mineral Resources	Predominately considered moderately prospective for minerals with pockets of high to significant potential. Placer exploration and mining is prevalent in the area as well as areas of active quartz exploration.
Outfitting and Trapping	Active trapping concessions and presence of associated infrastructure.
Tourism	Top of the World Highway adjacent, which is an important area for tourism in the ~~R~~ region. Most tourism activity would occur within proximity to the highway or accessed off the Yukon River. Activities include wildlife viewing, winter recreation, etc.
Transportation and Access	Roads and trails are present in this LMU in addition to the Top of the World Highway.

7 PLAN IMPLEMENTATION

7.1 ON THE LAND WE WALK TOGETHER - NĀN KĀK NĀ Tr'ĀDĀL

A collaborative approach to management will be essential if the Dawson Regional Land Use Plan's goals, objectives, and recommendations are to be realized.

Moreover, as a product of the FNFA, this Plan represents 75 percent of Tr'ondëk Hwëch'in Traditional Territory, and ~~the Commission wishes to should~~ ensure that the objectives of Chapter 11 are achieved for the benefit of Tr'ondëk Hwëch'in citizens, Yukoners, and Canadians alike.

Tr'ondëk Hwëch'in and the Government of Yukon are the Parties to the Dawson Regional Land Use Plan. The Plan provides guidance that will enable the Parties to make well-informed land and resource management decisions in the Dawson ~~R~~region. As per the FNFA (~~Ss.~~ 11.7.0), Plan implementation is at the discretion of the Parties. Nothing in this Plan ~~is intended to should~~ diminish the ability of the Parties to make land and resource decisions under their current authority.

It will be important for the Parties to involve other organizations and groups during implementation, ~~including the Dawson Regional Planning Commission (DRPC), adjacent First Nations, individuals, groups, other government agencies and FNFA boards~~ to achieve successful implementation.

The Plan is intended to be a living document and implementation will be an ongoing process. This section outlines the Plan's vision for implementation and identifies some of the tools that may be used. Adaptive Management will play an essential role throughout implementation and the life of this Plan. Monitoring, evaluation, and revision will be required if the Plan is to be effective and its goals and objectives met.

7.2 PLAN IMPLEMENTATION RESPONSIBILITIES

As Plan signatories, the Parties will have the primary responsibility for implementing the Dawson Regional Land Use Plan. The Plan will be implemented by Government of Yukon according to its legislation, policies, and decision-making processes, and by the Tr'ondëk Hwëch'in according to its legislation, policies, customs, traditions, and decision-making processes. For much of this implementation, there will be a requirement for the Parties to work together.

7.2.1 Dawson Regional Planning Commission

This Plan recommends that the ~~Commission DRPC~~ continue to operate beyond the submission of the Final Recommended Plan to the Parties ~~as per the THFA and YESAA~~. As per the THFA, the Parties have discretion over Commission member appointments. The Commission has identified the following rationale for the Parties continuing to support their work in the Dawson Region:

- As per ~~s.s~~ 11.4.5.10 of the ~~FNFA 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

Commented [A671]: The Plan not the Commission should do this, it is the Plan that provides direction. The Commission is the one that writes the Plan, and thus expresses their wishes in the action of writing the Plan.

Commented [A672]: The Parties will determine which other organizations and groups to involve during implementation, which could include those listed here or others. The Plan cannot compel outside groups to participate.

Commented [A673]: The Commission does have a role as per THFA and YESAA this section of the plan should not stray from what is outlined in those documents. Any role during implementation outside of what has been outlined in treaty or legislation can be decided at that time by the Parties. Sections edited below are outside of the THFA and YESAA stated role of the Commission during implementation.

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Implementation

need for amendment of the plan.”

- As per s. 44(1) of YESAA
If a regional land use plan is in effect in a planning region established under a final agreement, a designated office, the executive committee or a panel of the Board shall, when conducting an assessment of a project proposed in the planning region, request the planning commission established under the final agreement to advise it as to whether the project is in conformity with the regional land use plan, unless such a request has already been made in relation to the project.
- ~~An ongoing Commission would increase capacity for Plan Implementation, Plan Implementation, Conformity Checks, Variances and Amendments, Monitoring, and Revision:~~
- ~~The DRPC has developed strong relationships with Planning Partners in the Region and elsewhere, and these relationships will aid Implementation and Monitoring activities:~~
- ~~Local knowledge will inform Implementation activities and reduce confusion as to how the Plan should be interpreted. This will also limit potential conflict and polarisation between different worldviews and perspectives on land use. Additionally, a local office may be able to provide support to development proponents, as local staff would have specific understanding and knowledge of the Plan and the Planning Region. Local relationships are important for Plan buy-in:~~
- ~~The DRPC and its staff will be more able to collaborate directly with YLUPC and YESAB, with whom relationships are already established. This will be important for conformity checks and representations:~~
- ~~A “Plan champion”, independent of the Parties, may aid in Plan implementation:~~

Commented [A674]: Outside of what the THFA and YESAA states is the role of a Commission in Implementation.

139-138. Recommended Action

The Parties and YLUPC should continue to fund the ~~DRPC~~ Commission. This work will include:

- Plan monitoring as per S 11.4.5.10 of the THFA.
- ~~Sub-regional planning:~~
- Conformity checks and representations to YESAB as per s. 44(1) of the YESAA.
- ~~The 5-year Status Report and 10-year Plan Review:~~
- ~~Land Stewardship Trust implementation and facilitation:~~

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Commented [A676]: An Implementation Committee is formed by the Parties after a Plan is approved. The Commission's role in implementation is outlined in Chapter 11 of the THFA. Some of the statements of this section are outside what is the role within the THFA and YESAA and have been edited. The Parties will determine these details during implementation, this has historically been done with an implementation plan and other documents outlining the role of the Implementation Committee but should be left to the Parties to decide.

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7.2.2 Implementation Committee

Once the Plan is approved, an Implementation Committee ~~(see Figure 7-1)~~ is required ~~to~~ should coordinate implementation of the Plan.

The Implementation Committee will primarily be composed of appointed representatives of the Parties. ~~as well as DRPC representation. The Implementation Committee may also involve other groups, including:~~

Dawson Recommended Land Use Plan Implementation

- Affected First Nations
- Government of Canada
- Yukon Environmental and Socio-economic Assessment Board (YESAB)
- Yukon Land Use Planning Council (YLUPC)
- Other FNFA UFA boards and committees
- Plan Partners:

Landscape Management Units Plan

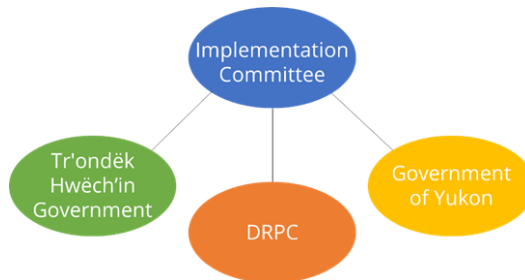


Figure 7-1 Proposed Implementation Committee Structure

Special consideration should be made with regard to Affected First Nations, YLUPC, and YESAB:

7.2.2.1 Affected First Nations

The Affected First Nations (Vuntut Gwitchin First Nation and First Nation of Na-Cho Nyäk Dun) and White River First Nation should, if they desire and the Parties agree, be involved with Plan implementation. The Region includes overlaps areas of both First Nations' the Affected First Nations' Traditional Territories and White River First Nation's asserted traditional territory, and while they are not signatories to the Plan, their involvement and knowledge of the Region will aid implementation activities and ensure the Plan adheres to the objectives of Chapter 11. Moreover, continued access to lands for harvesting and subsistence activities must be protected for all Yukon First Nation citizens.

7.2.2.2 YLUPC

As the FNFA body responsible for Land Use Planning in the Yukon, YLUPC have an invaluable role to play in Plan implementation (including conformity checks) from an advisory perspective. Under Chapter 11, they are responsible for making recommendations for new planning areas (including sub-regional planning).

7.2.2.3 YESAB

YESAB will be key to the successful implementation of the Plan. YESAB is responsible for making recommendations as to whether projects should proceed. Often as part of this, they will identify appropriate mitigations so that Valued Environmental and Socio-Economic Components in a project area are not compromised. YESAB specifically requires YESAB to consult with Regional Planning Commissions regarding project conformity, and the data requirements that will be needed for disturbance tracking should consider YESAB needs and processes;

Commented [A678]: These groups are not signatory's to the plan so they do not have specific actions that come out of the plan. They do have a role as per either the THFA or YESAA but do not have a jurisdiction over ensuring the plan is implemented in of itself, thus removed.

Implementation

140-139. Recommended Action	The Parties should jointly establish an Implementation Committee within one year of Plan approval. The Implementation Committee should include representation from the Parties; ~~DRPC, Affected First Nations, YESAB and YLUPC~~. It is recommended that the Parties consider committee structure based on their mutual experience of the Peel Watershed RLUP implementation. This will make the establishment timeline shorter and Implementation work may begin quickly.

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7.3 CAPACITY BUILDING

Effective implementation of the Dawson Regional Land Use Plan will be dependent, in part, on the availability of sufficient technical resources and capacity in the ~~R~~region. Additionally, fostering community stewardship will be essential to ensuring the Plan is adopted by all who live, work, and play in the Dawson ~~R~~region.

As part of implementation, the Parties should collaborate to jointly enhance capacity through strategies including:

- Strengthening ~~institutional arrangements~~, consistent with the THFA and other relevant legislation and policies.
- Ongoing technical cooperation between and among Tr'ondëk Hwëch'in and Government of Yukon departments.
- Cooperation and partnerships between Tr'ondëk Hwëch'in and Government of Yukon officials with residents, Tr'ondëk Hwëch'in citizens and Plan Partners including industry groups.
- Appropriate utilization of each Party's resources, expertise and knowledge;
- Involvement of independent scientists and advisors, as needed, to support research and monitoring initiatives.
- Communication strategies that promote stewardship and the Plan to non-technical audiences.
- Education opportunities and on-the-land experiences that will enable ~~non-government and technical experts~~ to foster greater understanding and knowledge of the ~~R~~region and encourage community stewardship.

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This Plan, in conjunction with industry led initiatives, the work of Tr'ondëk Hwëch'in, and Yukon regulations and policy will ensure that people who live, work, and play in the Dawson ~~R~~region are stewards with a shared responsibility to the land for future generations. Additionally, Indigenous planning work that is ongoing should be supported and used to inform implementation of the Plan.

141-140. Policy Recommendation	~~Explore the use of the~~ Tr'ondëk Hwëch'in Ninä'nkāk Hozo Wëk'ä'tr'ë'no'hcha Land Stewardship Framework ~~to should be used to~~ inform the Plan implementation process and ~~possible~~ future land use planning initiatives in Tr'ondëk Hwëch'in Traditional Territory.
142-141. Policy Recommendation	~~The Parties should look at opportunities for increased Government-to-Government cooperation. This includes:~~ • ~~Shared resources for monitoring and enforcement.~~

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Implementation

	- Shared training opportunities: - Continued development of the cumulative effects framework.
143-142. Recommended Action	The Parties should explore different ways to communicate the Plan with residents, Yukoners, and visitors to promote individuals' sense of stewardship when they are in the Region. This may include: - Plain language versions of the Plan - Alternate versions, including video or audio - Storytelling - School curriculum - Visitor information.
144-143. Recommended Action	The Parties should offer education and learning opportunities based in the Dawson Region that focus on stewardship and care for the land. The DDRRC should be consulted and involved on any education initiatives as their expertise and knowledge of the Region will be essential.

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7.4—SUB-REGIONAL PLANS

This Plan recommends the development of three sub-regional plans. The Commission's Recommendations for these areas are summarized in Table 7-1 on page 279. Detailed recommendations and intent statements will be found within the relevant sections of the Plan.

Table 7-1 Sub-regional Planning Summary

Sub-region	Who	Timing	Scope
Dempster Highway Corridor (see Section 5.4.3.1.1) (page 130)	Jointly by Government of Yukon; affected Yukon First Nations; and the Gwich'in Tribal Council.	Determined by Government of Yukon, affected Yukon First Nations, and the Gwich'in Tribal Council.	- The Dempster Corridor planning scope and extent should be defined jointly by Government of Yukon, affected First Nations, and the Gwich'in Tribal Council. - Consideration of: - Cultural value - Harvesting - Access - Tourism - Transportation and access - Viewscape - Porcupine caribou.

Commented [A683]: This section should be removed, sub-regional planning in these areas is discussed in more detail earlier in the Plan. Who will be involved and when sub-regional planning occurs will be determined by the Parties in accordance with Chapter 11 during implementation. YG again would like to state its proposal that LMU 3 not be a sub-regional planning area but that the northern portion should be a SMA and the southern portion an ISA 1.

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Landscape Management Units Plan

LMU 3: Chu Kon-Ďek (Yukon River Corridor) (page 174)	DRPG as per Chapter 11	Initiated within six months of Plan approval.	- Scope and extent to align within Dawson Region boundary - Issues are different to the north and south of the City of Dawson: - Consideration of: - Transportation and access - Garbage and pollution - Heritage and cultural value - Tourism - Recreation.
LMU 12: Tr'ondëk Täkä't (Klondike Valley) (page 224)	DRPG or sub-regional Commission as per Chapter 11	Initiated within three years of Plan approval.	- Guide future land use priorities and avoid land use conflicts. - Complement planning and development of the City of Dawson municipality. - Complement planning and development of the Central Tr'ondëk Land Management Area. - Consideration of: - Residential development - Water quality - Recreation - Multi-use zoning - Climate change adaptation.

7.57.4 PLAN CONFORMITY AND ASSESSMENT

New land development and expansion of existing development in the Dawson Rregion must be assessed to evaluate whether they conform to this Plan.

Conformity checks are a key part of ensuring the Plan's Commission's vision and goals are achieved. In the Yukon, project conformity checks for the North Yukon and Peel Watershed are currently undertaken by YLUPC and conformity is determined through:

1. Conformity with Plan management intent and management directions; and
2. Conformity with cumulative effectiveness indicator thresholds:

If a project is determined to be non-conforming, YESAB may shall, to the extent possible, identify mitigations to bring it into conformity or recommend that the project not proceed.

Commented [A684]: The Commission writes the plan but it is the Plan that outlines the vision and goals.

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Implementation

In the Yukon, project consistency checks for the North Yukon and Peel Watershed regions are currently undertaken by YLUPC and consistency is determined through:

1. Consistency with Plan management intent and management directions; and
2. Consistency with cumulative effectiveness indicator thresholds.

The conformity checks process for the Dawson Rregion will need to be different than that of previous plans due to the volume of applications that occur in the Rregion.

Additionally, YESAB has stated that the current model where YLUPC undertakes 'consistency checks' may does not fulfil YESAA requirements (S44(1) and 44(2)). and it may be more accurately characterized as YLUPC expressing its opinion as to whether a project is consistent with a regional plan. If YLUPC are to continue to perform this function, the Commission and the Parties will need to specifically provide specific direction as per the FNFA-THFA (s.S 11.3.4) for a secretariat to be established.

Conformity checks are currently undertaken during the evaluation stage of YESAB assessment as part of 'seeking views and information' rather than during the adequacy stage. This can lead to delays, because if a project that is deemed to be non-conforming, YESAB are required to seek additional information, which and requires more resources from both assessors and proponents (Staples & Fraser, 2022).

Key issues related to conformity checks:

- The volume of applications in the Dawson Rregion will stretch YLUPC's current capacity and will not be possible under the current approach.
- The current timing of conformity checks occurs during the 'seeking views and information' stage of assessment and thus projects may be delayed if they are returned to the adequacy stage.
- Proponents do not currently have access to clear guidance and information on how to ensure proposed projects conform with a regional plan (Staples & Fraser, 2022).
- The relationship between YLUPC and YESAB is not clearly defined or formalized, and there is disconnect between the two organizations (Staples & Fraser, 2022), including:
 - A lack of shared terminology and language, and limited understanding of each other's processes
 - Limited understanding of roles during and after a regional plan is in place
 - No shared information database, particularly geospatial data.

Commented [A686]: YLUPC does not perform conformity checks as further explained below. Paragraph moved as it connects better to following sentence about conformity process for Dawson rather than non-conforming uses.

Commented [A687]: From YESAB Information Bulletin <https://yesab.ca/wp-content/uploads/2022/12/7888-YESAB-Bulletin-Conformity-Check-Dec-19.pdf>

Commented [A688]: Recommend removing this sentence. As per 11.3.4, a secretariat can be established to assist YLUPC or Commissions "in carrying out their functions under this chapter." **Conformity checks are provided for in chapter 12, not chapter 11.**

Commented [A689]: Projects don't return to adequacy but may go through multiple rounds of information requests which could still cause delays.

Implementation

145-144. Policy Recommendation	YESAB and YLUPC should initiate regular and meaningful dialogue with each other to collaborate on shared priorities. This includes: - Development of a committee for collaboration on shared priorities in Dawson; - Regular dialogue with DRRRC, including potential development of a framework for integrated resource management; - Developing a shared terminology between regional planning and YESAB including terms, definitions, and tools across processes; - Development of a geospatial repository and database;
146-145. Recommended Action	A Plan conformity evaluation process should be developed within one year of Plan approval by the Implementation Committee with specific input from DRPC, the Commission, YESAB and YLUPC. The Parties should consider the following: - Who will be responsible for undertaking conformity checks and how this will be resourced. - Changing the timing of conformity checks and moving it into the adequacy stage of YESAB assessment; - How disturbance tracking will be incorporated and recorded, and who will have access to this information - Triage YESAB projects by type (smaller vs. larger projects). - Provide clear rationale and guidance to proponents so they can develop projects that conform.

Commented [A690]: Plan cannot direct YESAB or YLUPC as they are not parties to the plan or under the jurisdiction of either YG or TH.

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Commented [A691]: A full understanding of the project scope is needed to complete a conformity check. Adequacy stage defines this so conformity could not happen before or during this.

Commented [A692]: Plan itself is the rationale

7.67.5 IMPLEMENTATION STRATEGY AND GUIDELINES

7.6.1 Implementation Strategy

A detailed implementation strategy should be developed that will outline the activities and actions required of each Party and their respective agencies as well as other Yukon bodies and organisations. The strategy should be developed using public consultation and feedback on the Recommended Plan, as this consultation will help identify priorities and provide transparency to ensure the Implementation Committee remains accountable to the public.

7.6.27.5.1 Implementation Guidelines

Implementation guidelines should inform assessors, regulators, and proponents on how to use and interpret the Plan as well as provide guidance on conformity requirements, and variance or amendment applications. The content and scope of implementation guidelines should be determined by the Parties in collaboration with the Commission.

147-146. Recommended Action	The Parties, in collaboration with the DRPC, should develop an implementation strategy to include as part of the final recommended plan. The strategy should be reviewed and updated on an annual basis as part of plan monitoring activities.

Commented [A693]: The parties create an implementation plan which performs these functions outlined within this section. However requiring additional public consultation during implementation is outside of the Terms of Reference or the THFA role of the Commission. The Plan will have gone through as many as 3 rounds of community consultation which means that the Parties have a good handle on what the public and committees views are of the plan. Furthermore priorities for the Parties may change and as a result a flexible implementation plan is needed which this section would not accommodate. The Parties do not have jurisdiction over what could be interpreted by "Yukon bodies and organizations" which could be YESAB and therefore cannot commit to ensuring that these groups are held to actions of the plan. This section also is contrary to the first sentence in the section below.

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Commented [A694]: Remove from Final Plan as recommendation says to complete this as part of the final plan. Also as per the comment above this should be removed.

Implementation

148-147. Recommended Action	The Parties should, in collaboration with the ~~DRPC~~ Commission, jointly develop implementation guidelines within one year of Plan approval. The guidelines should outline how the recommendations in the Plan will be implemented. The Parties should look to other initiatives in Canada where such guidelines have been developed, including the Sahtu Land Use Plan in the Northwest Territories (Sahtu Land Use Planning Board, 2013).

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7-6.37.5.2 Implementation Priorities

The Plan acknowledges that the Parties have final discretion over implementation. As part of the planning process, a recommended timeline has been developed that may be used to guide the Parties regarding priority setting, and planning; this is shown in Figure 7-2 (page 284) and commentary is provided in Table 7-2 (page 283).

Table 7-12 Commission Recommended Implementation Timeline Commentary

Implementation Milestones	The Plan recommends that a five-year status report and 10-year review occur. This will ensure adaptive management is implemented effectively.
Implementation Activities	The Plan recommends that certain implementation processes and plans should be completed within one year of Plan Approval. This will provide clarity to Plan Partners, proponents and assessors, and others involved in Plan implementation.
SMA Planning	The Plan identifies five LMUs ~~to be designated as Special Management Areas as per Chapter 10 of the FNFA as Special Management Areas that require a management plan and legal designation~~ . SMA planning will take time, but it is recommended that it begin within three years of Plan approval. It is recommended that the Parties prioritize development of these plans in this order: 1. LMU 20: Łuk Tthe K'ät (Scottie Creek Wetlands) 2. LMU 10: Tintina Trench 3. LMU 1: Tthetäwndëk (Tatonduk) 4. LMU 4: Tsey Dëk (Fifteenmile) 5. LMU 16: Wëdzey Năhuzhi (Matson Uplands)
ISA 1 / 2 Planning	The Plan recommends certain ISAs have specific plans developed ~~before mineral staking can resume~~ . The Commission suggests the Parties prioritize the development of these plans as follows: 1. LMU 17: Năn Dhòhdăl (Upper Indian River Wetlands) 2. LMU 7: Wehtr'e (Antimony)
Sub-regional Future Planning	~~Three Two~~ areas are recommended for ~~sub-regional future~~ planning. ~~LMU 3: Chu Kon Dëk (Yukon River Corridor) and LMU 12: Tr'ondëk Tăk'it (Klondike Valley) will begin within six months and three years respectively. The~~ and Dempster Highway Corridor planning ~~has not been assigned a specific timeline and~~ will be completed at the Parties' discretion.

Commented [A695]: See minister letter and memo which outline a staged implementation process due to constraints (capacity, knowledge, software etc.).

Commented [A696]: See memo. Need to clarify the difference between SMA designation in the Plan and SMAs under Chapter 10.

Commented [A697]: YG does not support the use of interim withdrawals.

Commented [A698]: YG does not support a sub-regional plan for LMU 3, timelines for planning and contents of these plans will be determined by the Parties in accordance with Chapter 11 of the THFA.

Cumulative Effects	In Section 4.5.1 – Cumulative Effects Framework: Recommendations (page 68), short, medium, and long-term actions related to the Plan’s cumulative effects framework have been recommended. These should be completed within the following timeframes: ~~Short term – within three years~~ Medium term – within five years Long term – within 10 years This will help ensure that the cumulative effects framework is firmly embedded by the time of Plan review.
Monitoring Reports	As part of implementation, annual monitoring updates should be produced by the Parties for the Commission to compile into a single report to publish publicly.

Commented [A699]: Removed as per changes in s.4.5.1, also propose changing Gantt chart on following page.

Dawson Recommended Land Use Plan ~~Landscape Management Units~~ Plan Implementation

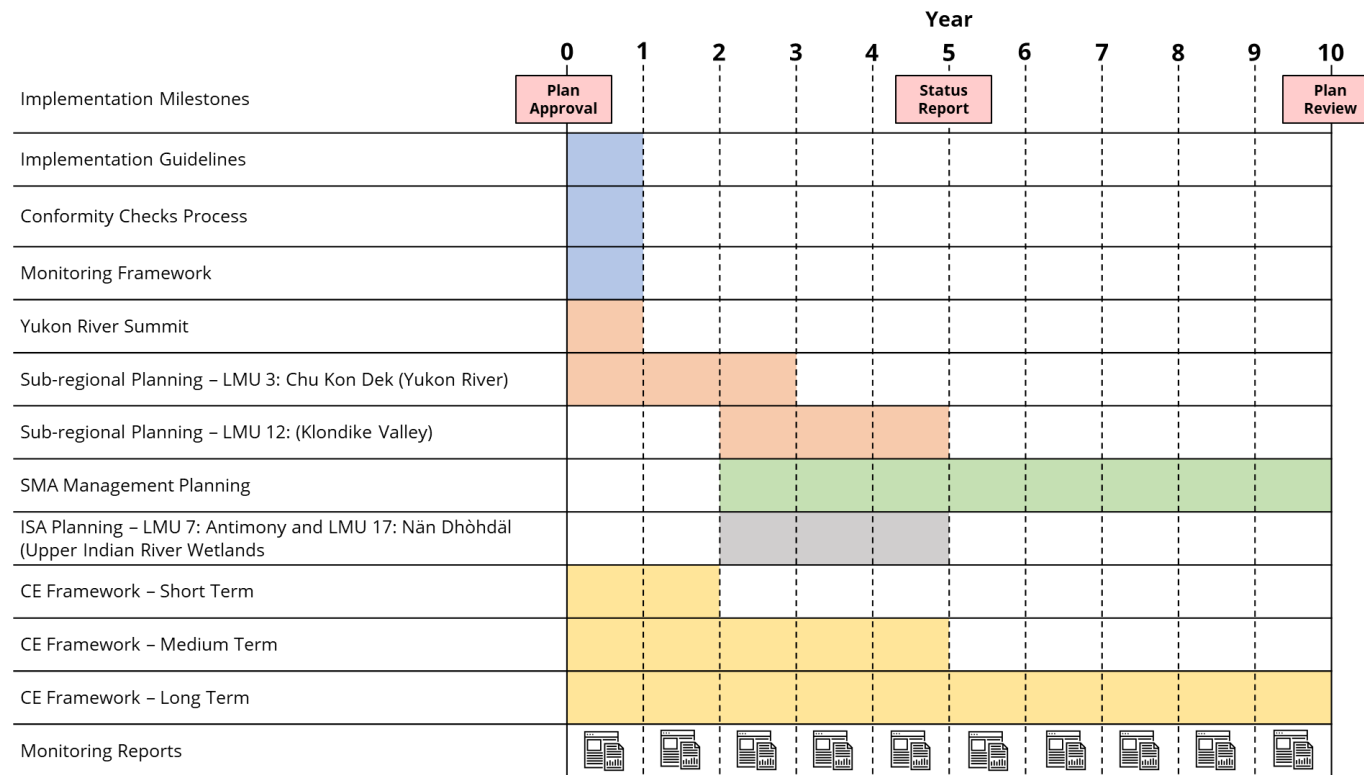


Figure 7-12 Commission Recommended Implementation Timeline

7-77.6 PLAN MONITORING

Plan Monitoring will be essential to ensure implementation of the Plan is on track to achieve the goals and objectives. It will establish a record of actions taken by the Parties ~~and other organisations such as YLUPC and YESAB~~. A report will reflect on how management activities are having impact on the land, wildlife, people, and activities in the ~~R~~region. By regularly monitoring and adjusting the Plan, users and decision-makers become adaptive managers, able to adjust to changing circumstances in the Dawson ~~R~~region and continually progress towards achieving the Plan's goals and objectives.

7-7-47.6.1 Monitoring Framework

A comprehensive monitoring framework is intended to be developed by the ~~DRPC~~ Parties and may be done in collaboration with the Commission as per 11.4.5.10 of the THFA. ~~Commission in collaboration with the Parties shortly after the Plan is approved.~~ The ~~DRPC~~Commission, as per 11.4.5.10 of the ~~FNFA~~THFA, intends to monitor the implementation of the Plan ~~and act as the Region's independent 'plan champion' as outlined in Section 7.2.1 – Dawson Regional Planning Commission (page 274).~~ An overview of the Commission's vision for the framework is shown in Figure 7-3.



Figure 7-23 Monitoring Framework Considerations

To support the above, the Commission have identified the following activities that may be used ~~to~~ inform plan monitoring:

- ~~Annual reporting by the Implementation Committee on progress, indicators, etc. and impact of the Plan. This must include disturbance reporting and progress on the cumulative effects framework.~~
- ~~Discussions with residents, planning partners, visitors, and seasonal workers to check in on the Plan's impact.~~
- ~~FNFA First Nation Final Agreements' boards' feedback (e.g., YESAB, YLUPC, DDRRC etc.).~~
- Annual surveys of Plan Partners, ~~FNFA First Nation Final Agreements' boards and~~

Commented [A700]: These groups are not signatory's to the plan so they do not have specific actions that come out of the plan. They do have a role as per either the THFA or YESAA but do not have a jurisdiction over ensuring the plan is implemented in of itself, thus removed.

Commented [A701]: Deleted as per comment in 7.2.1

Commented [A702]: The plans impact could take years to be understood or felt therefore annual reporting on this is unrealistic deleted.

Commented [A703]: This bullet and the last bullet in this list are almost the same therefore this one should be removed. The Community feedback on impacts of major projects is at a more appropriate scale than discussions on the plan impacts overall with visitors, seasonal workers etc.

Dawson Recommended Land Use Plan
Implementation

Landscape Management Units Plan

- project proponents.
- Traditional Knowledge sharing with Tr'ondëk Hwëch'in citizens, Elders and youth.
- Annual Reporting on cumulative effects framework.
- Community feedback on impacts of major projects.
- Feedback from within the Parties governments (e.g. regulators, enforcement officers conservation officers and land stewards).

Other activities may be identified as implementation progresses. **Section 4 – Cumulative Effects Framework** (page 58) outlines the Commission's intent for how Cumulative Effects Management will be applied in the Dawson Planning Region and will be an essential component of plan monitoring.

149-148. Research Recommendation	The Parties and the DRPC-Commission should commit to ongoing research (both traditional and western approaches) to identify and track the changing social, economic and ecological needs in the Planning Region.
150-149. Recommended Action	The DRPC, in collaboration with the Parties, will develop a plan monitoring framework within one year of Plan approval. The monitoring framework should: - Be informed by best practices. - Be specific to the Dawson Planning Region. - Be practical to implement. - Be transparent and easy to understand. The monitoring framework should meet the following objectives: - Tied to the Plan Vision, Goals and Objectives. - Focused on the Plan's impact on the values identified. - Incorporate Traditional Knowledge. - Support continued partnerships and communication.
151-150. Recommended Action	The DRPC, in collaboration with the Parties, will produce an annual report of Plan implementation activities and impacts. The Parties should provide updates to the Commission who will compile this information into a single report that will be available publicly. This report should consider: - Progress on Plan implementation. - Ongoing surface disturbance and linear feature tracking and mapping. - Progress of sub-regional, SMA or ISA planning. - Feedback from Affected First Nations, Plan Partners, project proponents and residents. - Parties' experience of co-management. - YESAB assessments, including project conformity checks.

Commented [A704]: Expanding this to take feedback into consideration from a broader group with a role in monitoring.

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Commented [A705]: Direction for Commission not Parties, and the commission is not a signatory to the plan. As per 11.4.5.10 the commission may monitor the plan however it is the responsibility of the parties to implement and thus monitor the plan.

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Commented [A706]: Direction for Commission not Parties

7.87.7 PLAN REVISION

Land Use Planning cannot foresee all future land use circumstances or issues, and the Plan is not intended to be a rigid or static document. The Dawson Planning Region will experience environmental, economic, and social changes over time. As such,

Dawson Recommended Land Use Plan

Landscape Management Units Plan

Implementation

regional land use plans in Yukon are designed to be living documents that are open to periodic change and revision. A process for reviewing and changing the Plan supports the principle of adaptive management.

Adaptive management means responding to changing land use and/or environmental conditions as new or better information (including Traditional Knowledge) becomes available, or if implementation is not adequately achieving the social, environmental, or economic goals as intended. It is a management philosophy that applies a structured, iterative process to decision-making. The principle of adaptive management provides flexibility; and through continued research, monitoring, and reflection, adjustments can be made to the Plan and planning tools to ensure the Plan goals are met.

The Commission envisions the following ways the Plan may be revised:

Administrative revision	Minor technical changes that do not affect the intent of an LMU or general management directions. For example, spelling or grammatical changes, descriptive refinements, correcting inaccurate information, or filling knowledge gaps.
Variance	Minor changes to the Plan that are necessary to permit certain Allowance for an otherwise non-conforming activities and projects use at the project-scale.
Amendment	Major changes when the Plan requires revision to its the Plan's management strategies (policies, designations, or directions), and the Plan's original intent as approved by the Parties
Status Report & Update	A five-year checkpoint after Plan approval to assess how the process of implementation is going and provide a summary of monitoring activities and reports.
Review	A 10-year re-evaluation of the whole Plan and when major changes and revisions will be made.

Commented [A707]: Variances should not change the Plan, see memo. They should be used to allow uses that can still meet the Plan's management intent but not all of its conformity requirements.

Commented [A708]: Redundant, all need approval by Parties

7.8.7.1 Plan Variance and Amendment

Periodically, the Plan may require small changes (Variances) or substantial changes (Amendments). The Parties will need to develop a process and criteria for considering such variances or changes to the Plan. However, Variances and Amendments should continue to uphold the intent, guiding principles, goals, and objectives of the Plan.

In addition, Plan amendment and variance processes should include meaningful opportunities to obtain feedback from proponents and the public. Variances and Amendments will require approval consent from both the Parties as per 11.6.2 and 11.6. to proceed.

Plan Variance

For changes to the Plan that are small, A variance is a small change to a condition in the Plan for an individual project, no change is made to the Plan itself. Variances should be used infrequently and are not intended to be used regularly to permit non-

Commented [A709]: Paragraph removed as it is explained above or within each subsection below.

Implementation

conforming uses. Where there is demonstrable proof that a project can still meet the intent, guiding principles, goals and objectives of the Plan a variance can be considered by the Parties. Variances should only be considered and approved by the Parties as per the Parties' jurisdiction and if they both agree:

- There is a unique circumstance related to the use that could not have been considered at the Plan or LMU scale;
- The variance request is desirable for the development, use or conservation of lands, water and/or resources;
- The variance request does not result in an undesirable precedent for other land use activities of similar nature to occur; and
- The intent of the Plan is maintained.

7.7.2 Plan Amendment

An amendment should be used for substantial changes when the Plan may require revision to its a management strategies, policy or land designation if these strategies are ineffective in meeting the original intent. Amendments change the Plan and would apply to any uses going forward.

Amendments should only be considered and approved, as per their jurisdictions, by the Parties if they both agree:

- On the need for the Amendment.
- That the Amendment will not affect the Plan's overall ability to achieve its goals, objectives, and recommendations.
- The Amendment conforms with the FNFA-THEA and applicable Tr'ondëk Hwëch'in, Government of Yukon, and Government of Canada policies and legislation.

7.8-27.7.3 Status Report and Plan Review

The periodic review of a Plan in its entirety is an essential part of land use planning. Plan review is an opportunity for the Parties, planning partners and the public to evaluate the extent to which the Plan remains effective in achieving its vision, goals, and objectives. The Plan should be formally reviewed at five- and 10-year intervals and changes made if necessary, depending on the kind of review:

Status Report:

A five-year status report will be an opportunity for the Parties Commission to review the Plan's intent against the implementation plan strategy and determine if it is having the desired impacts. Changes may be required based on outcomes. Major changes are not anticipated at this stage.

7.7.4 Plan Review

Plan review will be an opportunity for the Parties, planning partners and the public to extensively evaluate whether the Plan has been effective in achieving the vision, goals, and objectives, and make changes to the intent and recommendations if necessary.

Commented [A710]: A variance should not be a change to the Plan itself but rather an allowance for a use that otherwise does not meet a direction in the Plan but can still meet the overall intent. This could be due to the unique nature of the project location, technology or methods to conduct activities proposed, updated information or other factors that cannot be accounted for at the Plan or LMU-scale.

Commented [A711]: clarifying jurisdiction

Commented [A712]: Agreement based on jurisdiction

Commented [A713]: Moved to sentence above list

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Commented [A714]: Review at 5 and 10 year intervals means the Parties are reviewing the plan every 5 years. It is not realistic that a plan will be implemented enough to have a full review every 5 years. Also considering the number of other plans that are coming out of this Plan a 10 year review period is sufficient to understand the need for changes to the Plan that cannot be achieved at an amendment level. The next section discusses a 5 year review. Also there is not a significant enough difference between a 5 year review and a status report outlined in the next section, thus duplication work and therefore a 5 year review is redundant.

Commented [A715]: Much of this is included in the Plan review section below, don't need to repeat here.

Commented [A716]: The parties implement and review the plan the Commission may monitor implement as per 11.4.5.10.

Commented [A717]: See implementation strategy section 7.6.1 and edits to 7.6.2

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152-151. Recommended Action	A process for assessing Plan Variances and Amendments should be jointly developed within one year of Plan approval by the Parties. The process should consider the following: • The definition of Variance and Amendment and what the scale of each would be (i.e., what is considered minimal or significant); • Who may request Variances or Amendments, including activities or projects are eligible to apply; • Who will be responsible for assessing applications. • Application guidelines, supporting documentation requirements, and standards for complete applications. • Review timelines and evaluation criteria for applications; and • Public notice and engagement requirements, including how Traditional Knowledge will be captured and incorporated. The DRP Commission, YLUPC and YESAB should be consulted during process development to ensure there is no conflict with existing processes and regulatory assessment and the intent of the Plan is maintained.
153-152. Recommended Action	The Parties Commission should, with considerations from the Commission in collaboration with the Parties, produce a status report five years after Plan approval. The status report should consider the following: • Review and summarize results of Plan monitoring; • Review Implementation Committee progress and make recommendations to adjust implementation plan if necessary; • Assess if Amendments are needed in relation to new/updated legislation and make recommendations if needed; • Adopt additional cumulative effects indicators including potential new socio-economic and socio-cultural indicators; • Gather feedback from Parties, Plan Partners, FNFA boards and residents and make recommendations if needed; • Evaluate progress of SMA Management Planning; • Review status of Caribou Stewardship Areas i.e., LMU 7: Weht'e (Antimony) (page 196) and LMU 21: Wëdzey Tay (Fortymile Caribou Corridor) (page 268); • Review status of ISA 1/Wetland Stewardship Area LMU 17: Nän Dhòhdäl (Upper Indian River Wetlands) (page 248);

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Commented [A718]: What if the parties can't "jointly develop" such processes? What if there is a stalemate? YG strongly recommends that we don't kick the can down the road on this. The planning process we are engaged in is supposed to provide procedures to amend regional land use plans (11.2.1.5). We feel strongly that YG, TH and the Commission need to work together to develop a variance and amendment process for the Dawson Plan that includes dispute resolution before the Final Recommended Plan is finalized.

Commented [A719]: Defined in sections above

Commented [A720]: Activities or projects don't apply for these, Parties will determine who.

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Commented [A721]: The Parties implement the Plan not the Commission and therefore the parties will determine in implementation what the status report should consider.

Implementation

154-153. Recommended Action	The Parties should jointly develop a Plan review process following approval of the Plan. Plan reviews should occur at least every 10 years. Plan Reviews should consider the following: • Evaluate success of Plan against vision, goals and objectives • Review if Plan vision, goals and objectives are still relevant and applicable • Reassess values in the Region including availability of new information, technology, and knowledge • Assess progress against recommended actions, policies and research • Review demand for land and resources • Account for new understanding of climate change impacts on values • Assess number of Variances and Amendments which may signal need for change • Review LMU boundaries and designations and make changes if necessary • Review status of Caribou Stewardship Areas i.e., LMU 7: Wehtr'e (Antimony) (page 196) and LMU 21: Wëdzey Tay (Fortymile Caribou Corridor) (page 268). • Review status of ISA 1 / Wetland Stewardship Area LMU 17: Nän Dhòhdäl (Upper Indian River Wetlands) (page 248). • Review status of North Yukon Annex with the Parties and Vuntut Gwitchin (if required).

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9 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*

Adaptive Management: A systematic approach to resource management that uses structured, collaborative research and monitoring with the goal of improving land and resource management policies, objectives, and practices over time. It means responding to changing land use and/or environmental conditions as new or better information or technology becomes available, or if the Plan is not adequately achieving the environmental, social, or economic goals as intended.

Affected First Nation: As per the Dawson Regional Planning Commission Terms of Reference, a Yukon First Nation whose traditional territory is included within a Yukon land use planning region. The Affected First Nations of the Dawson Regional Planning process per the Terms of Reference are: Tr'ondëk Hwëch'in, Vuntut Gwitchin First Nation and the First Nation of Na-Cho Nyäk Dun.

Aggregate Resources: Any combination of sand, gravel, or crushed stone in a natural or processed state. Aggregates are used in the construction of highways, dams, and airports, as well as residential, industrial, and institutional buildings. Also known as granular resources.

All-season Access: In the context of this Plan, all-season access is gravel roads and associated roadbed under the Yukon Highways Act. Though not always required for mineral exploration, all-season roads (or other all-season transportation infrastructure) are required for conventional approaches to developing most mineral deposits. A road or trail that provides access to a site or property throughout the year.

Project Assessment: YESAB's evaluation of a proposed project by a Designated Office, a screening by the Executive Committee or a review by a Panel of the Board. (YESAA)

Backcountry

Barren-ground Caribou: Colloquially referred to as 'migratory caribou'. Barren-ground Caribou herds, which include the Porcupine Caribou Herd (218,000+) and the Fortymile Caribou Herd (~84,000), are found in the Dawson Land Use Planning Region. Habitat: The open tundra and sparse trees allow the herds to see predators from a great distance. Large herds will move together between calving grounds and summer feeding, to wintering grounds to the south. Cows will keep antlers until they calve in June allowing pregnant females to claim and defend the best feeding areas in late winter when they need high quality food.

Baseline Data Current status: Studies and surveys that determine unmodified site conditions, or alternately the current status or characterization of an area that it provides a reference point to analyze predicted change of conditions because of a proposed project's activities. Adequacy is determined by the agency responsible for its

Commented [A722]: Ensure that any definition sources are included in the Plan's references

Definitions should not include the term being defined.

Glossary does not need to include all terms used in the Plan, only those that have a specific meaning or intent in the Plan or that are relevant to directions/recommendations in the Plan.

Commented [A723]: Definition added as term is used throughout document.

Commented [A724]: Simplified and expanded from roads as trails also provide access

Commented [A725]: "Assessment" is not always used this way in the Plan (e.g. cumulative effects assessment), where the Plan refers to assessments completed by YESAB the term should be updated for clarity.

Commented [A726]: Add definition as term is used throughout the document

Commented [A727]: See new caribou definition below.

Commented [A728]: Term may not be accurate as "baseline" could be used for conditions before any development or to describe conditions before a new development occurs. Current status should be used here and throughout the Plan instead

~~assessment, and requirements may differ. For example, DFO reporting requirements will be different from the Government of Yukon. Baseline data Current status~~ can include (but is not limited to):

- Physical: geology, soil properties, topography, watershed properties,
- Chemical: water, air, soil
- Biological: biodiversity, flora and fauna, species richness, species distribution, types of ecosystems, presence or absence of endangered species and/or sensitive ecosystems
- Socioeconomic: demography, social structure, economic conditions, current uses
- Cultural: location and state of archaeological and/or religious sites, traditional knowledge about past and current land use.

Commented [A729]: Removed as the term doesn't and shouldn't speak to adequacy

~~Beringia: An ancient landscape of northwestern North America and eastern Siberia that remained unglaciated during the last Ice Ages (three million to 10,000 years ago).~~

Commented [A730]: Unnecessary definition - term used when providing context on the region.

Best Management Practices: A range of practices that have been determined to be the most effective and practical means of preventing or reducing the time, intensity, or duration of human-based activities on the land base on/in land, air, or water.

~~Bioclimate Zone: An ecological zone, observable at broad spatial scales that represents a relatively stable, observable vegetation type of environment. The Yukon Bioclimate Ecosystem Classification (YBEC) identifies seven bioclimate zones, organized by elevation and latitude, in the Planning Region: Boreal Low (Klondike Plateau), Boreal Low (Yukon Plateau North), Boreal High, Boreal Subalpine, Boreal and Subarctic Alpine, Subarctic Woodland, and Subarctic Subalpine.~~

Commented [A731]: Term not used in the Plan.

Biodiversity: The amount of variation of life forms within a given ecosystem or area. A simple measure of biodiversity is the number of species found in an area.

Bogs: Bogs are peat-covered wetlands (peatlands), in which the vegetation shows the effects of a high-water table and a general lack of nutrients. The bog surface is often raised relative to the surrounding landscape and isolated from mineralized soil waters. The surface waters of bogs are strongly acid and the upper peat layers are generally nutrient poor. At least 30-40 cm of peat are present. The plant community is dominated by cushion forming sphagnum mosses (peat mosses), ericaceous shrubs and black spruce trees (National Wetlands Working Group, 1997)

Commented [A732]: Peat accumulation in Yukon is slower than other/southern areas

~~Boreal Woodland Caribou: Commonly referred to as Woodland Caribou, these animals roam in small herds moving from the boreal forest in winter, up into the alpine tundra in summer, although some herds also spend much of the winter on windswept alpine slopes. They are the only animals that forage substantially on lichen in the winter. They are very susceptible to disturbance from habitat loss and encroachment. The Clear Creek and Hart herds are found within the Dawson Region. (Government of Yukon, no date).~~

Commented [A733]: See new caribou definition below.

Caribou: See Boreal Woodland Caribou and Barren-ground Caribou. Refers to all types of caribou in the planning region, or when the paragraph has already established which

Commented [A734]: Combined caribou into one definition, as the document sometimes speaks to caribou generically and sometimes, within sections uses the term to speak to specific groups of caribou. Added the three groups of caribou and the associated hers here.

type of caribou is being referred to. The planning region includes the **Northern Mountain Population** of Woodland Caribou (Klaza, Hart River and Clear Creek herds), **Barren-ground Caribou** (Porcupine herd), and **migratory caribou** (Fortymile and Nelchina herds).

Category A Settlement Land: Settlement land owned fully by a Yukon First Nation, including both surface and subsurface (mines and minerals) rights and the right to work the mines and minerals. (FNFA)

Category B Settlement Land: Settlement land owned fully by a Yukon First Nation, not including subsurface (mines and minerals) rights. (FNFA);

Conservation: The management of fish and wildlife populations and habitats and the regulation of users to ensure the quality, diversity and long-term optimum productivity of fish and wildlife populations, with the primary goal of ensuring a sustainable harvest and its proper utilization. (FNFA/THFA)

Consider (as in “consider a factor”): Parties or proponents should take into account an action, idea or concept when making a decision but does not require a specific resolution or determination of a specific factor.

Consultation: This term has a specific meaning within the FNFA. Therefore, where, in relation to any matter, a reference is made in the regional land use plan to consultation, the act of consultation is understood as To provide:

- To the party to be consulted, notice of a matter to be decided in sufficient form and detail to allow that party to prepare its views on the matter;
- A reasonable period of time in which the party to be consulted may prepare its views on the matter, and an opportunity to present such views to the party obliged to consult; and
- Full and fair consideration by the party obliged to consult of any views presented.

(THFA)

See also: [Engagement](#).

Contaminated Site: An area of land in which the soil, including groundwater lying beneath it, or the water, including the sediment and bed below it, contain a contaminant in an amount, concentration, or level which is equal to or greater than that prescribed by the *Contaminated Sites Regulations*, Yukon O.I.C. 2002/174 (YESAA).

Corridor: A belt of land linking two other areas, or following a road or river.

Critical Minerals: Critical minerals are mineral resources that are essential to the economy and whose supply may be disrupted. The 'criticality' of a mineral changes with time as supply and society's needs shift (American Geosciences Institute).

Critical minerals are required for renewable energy and clean technology applications (batteries, permanent magnets, solar panels and wind turbines). They are also required inputs for advanced manufacturing supply chains, including defence and security technologies, consumer electronics, agriculture, medical applications

Commented [A735]: The Northern Mountain population of Woodland Caribou have been designated a species of Special Concern under the federal *Species at Risk Act*.

Commented [A736]: The Fortymile and Nelchina herds are both herds that complete long-distance annual migrations. Unlike the Porcupine caribou herd (also a migratory herd but Barren-ground type), Fortymile and Nelchina herds have not been assigned a designatable unit for conservation by the Government of Canada, so are not further defined into a type of caribou. Migratory caribou populations are prone to significant changes in herd size over time which can result in the expansion or contraction of their range and movements across the land. Much of the Fortymile and Nelchina caribou herd's preferred winter habitat is within boreal forest and is prone to high fire frequency.

Commented [A737]: Terms not used in the Plan

Commented [A738]: Recommend removing as word is used for other meaning in the Plan, if not, adjust as recommended.

Commented [A739]: Not defined, definition should be added. Engagement is separate from consultation, terms should not be used interchangeably.

Commented [A740]: Term not used in Plan.

Commented [A741]: Definition should speak to more specific use of terms “corridor area” (as used in s.3.2.5), “river corridor” and “migration corridor”. Uses of “corridor” in the Plan should be specific to these terms (area/river/migration) or removed to avoid confusion.

and critical infrastructure (Government of Canada). Critical minerals in the **P**lanning **R**egion include, but are not limited to, antimony, copper, cobalt, and zinc.

Cultural Landscape: For Tr'ondëk Hwëch'in, cultural landscape refers to the unity of culture, history, the spirit of the world, the land, and its inhabitants (Tr'ondëk Hwëch'in, 2016b). Places are valued because of humans' long and complex relationships with that land. It expresses unity with the natural and spiritual environment. It embodies traditional knowledge of spirits, places, land uses, and ecology. Material remains of the association may be prominent but will often be minimal or absent. (Buggey, 1999). Combined works of nature and humankind, they express a long and intimate relationship between peoples and their natural environment. (UNESCO, ND)

Cultural Resources: Places ~~and~~, locations ~~and things~~, associated with events, stories, and legends. ~~Cultural resources can include such things as~~ the Fortymile Caribou Herd, moose, wetlands, lakes and rivers, and locations associated with legends, traditional economic activities, and cultural activities.

Cumulative Disturbance: The ~~cumulative landscape disturbance in the environment~~ ~~collective changes to a landscape~~ caused by anthropogenic activities ~~and/or~~ natural events.

Cumulative Effects: ~~Cumulative effects are~~ ~~Changes in environmental, social, cultural and economic values that result from interactions with human activities and natural processes in combination with other past, present, and future activities~~ ~~the result of human activities and natural ecological processes, and include past, present, and potential future activities.~~

Cumulative Effects Assessment: A systematic process of identifying, analyzing, and evaluating ~~the cumulative potential~~ effects of ~~a proposed project~~ ~~past, present, and likely future, human activities and natural events.~~

Cumulative Effects Framework: A structural approach to bring together different indicator tools and management actions or strategies to address cumulative effects management objectives

Cumulative Effects Management: The identification and implementation of mitigation measures to control, minimize or prevent the negative consequences of cumulative effects. This means taking a holistic view of the **R**egion by assessing the overall impacts of all activities occurring on the landscape or in one particular area, and linking the indicators associated with anticipated impacts to management triggers.

Decommissioning: ~~A general term for a formal process to remove something from active status.~~

Mineral Deposit (mineral): A mass of naturally occurring mineral material, usually of economic value.

Determine: ~~As in "determine if there are significant adverse effects" – make a finding, decide, or resolve.~~

Commented [A742]: Reworded to not include term in definition

Commented [A743]: Added specificity

Commented [A744]: Assessment is broader than single project

Commented [A745]: Recommend changing use of "decommissioning" in the Plan to "reclamation" and removing definition. Decommissioning alone does not address impacts caused.

Commented [A746]: "Deposit" is used for other meanings in the Plan, "mineral deposit" is used this way.

Commented [A747]: Unnecessary definition.

Development: As ~~per modified from~~ 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 ~~R~~region.

Direct Impacts: ~~Impacts that result directly from a land-use activity. Physical development footprints create direct habitat impacts.~~

Disposition Process: ~~A sale or lease of Yukon lands or a grant of right-of-way or easement with respect to those lands and also includes mineral claims and oil and gas leases or permits legal instrument (such as a sale, lease, license, or permit) that allows a government to give a benefit from public land to any person or company.~~

Duration: ~~The length of time an effect or project is predicted to last.~~

Ecological Integrity: The degree to which the physical, chemical, and biological components, including composition, structure, and function, of an ecosystem and their relationships are present, functioning, and capable of self-renewal.

Ecological Indicator: ~~A measurable signal that can be used to assess and track the condition of ecological values (e.g., population size, migration rate, habitat quality).~~

Ecological Viability: ~~The ability to sustain the natural functioning and evolution of ecosystems on a long-term scale.~~

Ecoregion: An area ~~characterized by distinctive regional ecological factors, including climate, physiography, vegetation, soil, water, fauna and land use.~~ of the earth's surface characterized by distinctive physiography (geology and surface features) and ecological responses to climate as expressed by the development of vegetation, soil, water, fauna, etc. Under the National Ecological Framework, ~~t~~he ~~P~~lanning ~~R~~egion contains portions of ~~is within~~ six ecoregions – North Ogilvie Mountains, Eagle Plains, Mackenzie Mountains, Yukon Plateau-North, Yukon Plateau-Central, and Klondike Plateau (National Ecological Framework for Canada).

Ecosystem Service: ~~An ecosystem service (also referred to as Ecological Service) is a~~ Any positive benefit that wildlife or ecosystems provide to people and the natural world. These include provisioning services such as food, water, timber, and fiber; regulating services that affect climate, floods, disease, wastes, and water quality; cultural services that provide recreational, aesthetic, and spiritual benefits; and supporting services such as soil formation, photosynthesis, air filtration, carbon sequestration, and nutrient cycling (Millennium Ecosystem Assessment, 2005).

Ecosystem: A community of organisms and their physical environment interacting as a distinct ecological unit at a range of spatial scales.

Ecozone: ~~Represents an area of the earth's surface representative of large and very generalized ecological units characterized by interactive and adjusting abiotic and biotic factors.~~ Large areas of the earth's surface, representative of broad-scale and generalized ecological conditions. Major physiographic conditions (e.g., mountains versus plains) and climate are the primary basis for determining terrestrial ecozones. The ~~P~~lanning ~~R~~egion contains portions of two ecozones: Taiga Cordillera and Boreal Cordillera ~~(National Ecological Framework for Canada).~~

Commented [A748]: Add definition for mineral development, as this is slightly different than other types of development, see section 5.4.1. From the Quartz Mining Act “development” means the construction of a facility or work for the production of minerals, but excludes the construction of a facility or work for the sole or principal purpose of assessing land for its suitability for the production of minerals.

The term “development” is used frequently throughout the Plan, use should follow definition or an alternate term should be used.

Commented [A749]: Term not used in the Plan, “indirect impacts” is but is covered by definition of “impact”

Commented [A750]: “Disposition process” not used in Plan, “disposition” is

Commented [A751]: As per the *Lands Act*, *Oil and Gas Act*, *Placer Mining Act*, and *Quartz Act*

Commented [A752]: Term used once in the Plan (“duration of a license timeframe”), use does not match this definition

Commented [A753]: “Indicator” is defined on its own below, separate definition not required here; term only used once in the Plan.

Commented [A754]: Unnecessary term, used once in the Plan in a quote.

Commented [A755]: <https://sis.agr.gc.ca/cansis/publications/manuals/1996/A42-65-1996-national-ecological-framework.pdf>

Commented [A756]: <https://sis.agr.gc.ca/cansis/publications/manuals/1996/A42-65-1996-national-ecological-framework.pdf>

Effects Monitoring: Studies explicitly designed to link the impacts of stressors (or industries and mitigations) to impacts on ecological, socio-cultural, or socio-economic values through regular tracking of values-based indicators. These studies are necessary to identify potential effects caused by stressors.

Commented [A757]: Term not used in the Plan.

Endemic: A species or organism that is only found in a particular Rregion and that has a relatively restricted distribution, due to factors such as isolation or response to soil or climatic conditions.

Environment: As modified from the *Environment Act* (RSY 2002, c.76) Mmeans:

- a) Air, land and water;
- b) All layers of the atmosphere;
- c) All organic and inorganic matter and living organisms; and
- d) The interacting natural systems that include components referred to in (a), (b) and (c).

Existing Mmineral tenure Rright: Means a Mmineral Rtenureright, other than a right to locate a claim or an unrecorded right to explore for minerals, other than oil and gas, existing at the date the affected land became subject to a withdrawal and includes

- a. A renewal or replacement of such a mineral right after that date;
- b. A licence, permit or other right in respect of oil or gas granted after that date as of right to a person holding such a mineral right, and
- c. A licence, permit or other right in respect of mines or minerals granted after that date pursuant to the *Yukon Quartz Mining Act* or the *Yukon Placer Mining Act* to a person holding such a mineral right.

Commented [A758]: Term not used in the Plan, Plan uses "existing mineral tenure", "... claims", "... exploration" and "... dispositions"; recommend simplifying and only using tenure. Update definition to existing mineral tenure.

Fens: Fens are peatlands characterized by a high-water table, but with very slow internal drainage by seepage. Similar to bogs, the surface water in fens is also generally nutrient poor and the peat layer is at least 40 cm thick. The vegetation in fens usually reflects the water quality and quantity available, resulting in three basic types: graminoid fens without trees or shrubs, shrub fens, and treed fens. Dominant plants include black spruce, tamarack, sedges, etc. (National Wetlands Working Group, 1997)

Final Agreements: The successful negotiations of modern-day treaties between First Nation claimant groups, Canada and the relevant province or territory. While each one is unique, these agreements usually include provisions for things such as land ownership, money, wildlife harvesting rights, participation in land, resource, water, wildlife, and environmental management as well as measures to promote economic development and protect Aboriginal culture. In the Yukon these agreements also included Aboriginal self-government. Detailed agreements reached between the Aboriginal group, the province or territory, and Canada on all issues at hand, including resources, financial benefits, self-government, and land ownership.

Commented [A759]: Rather than using final agreements generally, the Plan should refer to the THFA when appropriate.

Commented [A760]: <https://www.rcaanc-cirnac.gc.ca/eng/1100100030583/1529420498350>

Commented [A761]: Term not used in the Plan (except in definition for proponent). "Traditional law" is used though that may have a different meaning than this definition. Consider whether the uses in the Plan should refer to First Nations Law when they use other terms like Traditional Law or just law generally.

First Nation Law: A law enacted by a First Nation in accordance with the *Yukon First Nations Self-Government Act* or the *First Nation's Final Agreement*.

Commented [A762]: Mammals and plants should not be considered fish in the Plan

Fish: Fish includes:

a. — portions parts of fish; and

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b. ~~shellfish, crustaceans, marine animals, marine plants and portions thereof;~~

c. the eggs, ~~sperm~~, spawn, larvae, spat and juvenile stages of fish, ~~shellfish~~, crustaceans and marine animals; and

d. ~~such fish products and by-products as are prescribed pursuant to section 34 of the Fisheries Act, R.S.C. 1985, c. F-14. of fish. (FNFA)~~

Fish Habitat: ~~Spawning grounds and nursery, rearing, food supply, and migration areas on which fish depend directly or indirectly in order to carry out their life processes. Water frequented by fish and any other areas on which fish depend directly or indirectly to carry out their life processes, including spawning grounds and nursery, rearing, food supply and migration areas (Fisheries Act, R.S.C. 1985 c. F-14). Up~~

Focal Species: ~~The species of most value and interest, either socially or economically, to residents of a region.~~

Footprint: The ~~physical~~ area directly disturbed by ~~activities and/or development structure, road, gravel pit, seismic line, or any other disturbance feature is considered the physical “footprint” of that feature.~~

Forest Resources: Means all flora in a wild state and for greater certainty, includes mushrooms. (~~FNFA~~THFA)

Fortymile Caribou: ~~A barren-ground migratory~~ herd of caribou that ranges from north of Fairbanks, Alaska to south of Dawson and west of Pelly Crossing. Its range overlaps with several other herds, primarily in fall and winter, including large migratory herds like the Nelchina and Porcupine Caribou Herds, and several Northern Mountain Woodland caribou ~~herd~~ ranges. See ~~Barren-ground Caribou~~ Migratory Caribou.

Fragmentation: ~~The disruption of~~ Breaking apart large continuous areas of habitat into smaller, ~~less continuous areas~~ patches of habitat ~~independent of habitat loss.~~

Functional Integrity: ~~Maintaining the functional capacity of an area or value in an adequate state to maintain ecological integrity and ecosystem function, even though the area or value may be altered from its pristine state.~~

Furbearers: ~~Refers to a~~ Any of the following species native to the Yukon: Castor including beaver; Alopex including white fox or arctic fox; Lutra including otter; Lynx including lynx; Martes including martens and fishers; Mustela including weasel and mink; Ondatra including muskrat; Vulpes including red, cross, black and silver fox; Gulo including wolverine; Canis including wolves and coyotes; Marmota including marmots; Tamiasciurus including red squirrel; and Spermophilus including ground squirrels. ~~Focal species within the Dawson Region are Beaver, Muskrat and Lynx. (FNFA)~~

General Management Directions: ~~In this Plan, General Management Directions~~ Guide land use decisions in the ~~P~~planning ~~R~~region. ~~They are communicated in the Plan in the form of~~ through strategies and recommendations and are intended to be integrated into existing regulatory processes.

Habitat: ~~As per the Species At Risk Act, habitat means:~~

- a. In respect of aquatic species, spawning grounds and nursery, rearing, food

Commented [A763]: Updated to match Act definition

Commented [A764]: Term not used in Plan (except in definition of furbearers)

Commented [A765]: Fortymile is a migratory but not a Barren-ground caribou.

Commented [A766]: For consistency, if defining one caribou herd, then all herds should be defined.

Commented [A767]: Term not used in the Plan.

supply, migration and any other areas on which aquatic species depend directly or indirectly in order to carry out their life processes, or areas where aquatic species formerly occurred and have the potential to be reintroduced; and

- b. In respect of other wildlife species, the area or type of site where an individual or wildlife species naturally occurs or depends on directly or indirectly in order to carry out its life processes or formerly occurred and has the potential to be reintroduced.

(*Species at Risk Act*, S.C. 2002, c.29)

Habitat Integrity: The ability or capacity of habitat to support wildlife or plant populations. For wildlife, a landscape with high habitat integrity contains habitat of adequate amount, composition, structure, and function to support the long-term persistence of healthy wildlife populations.

Harvesting: Means gathering, hunting, trapping or fishing in accordance with the a FNFA.

Heritage Resources: As per the Tr'ondëk Hwëch'in *Heritage Act* and the FNFA, 'Heritage Resources' means Includes Moveable Heritage Resources, Heritage Sites and Documentary Heritage Resources as well as the interconnected landscape. (THFA)

Historic Resource: As per the *Historic Resources Act*, this Includes

- a. a historic site,
- b. a historic object, and
- c. any work or assembly of works of nature or of human endeavour that is of value for its archaeological, palaeontological, pre-historic, historic, scientific, or aesthetic features.

(*Historic Resources Act*, RSY 2002, c.109)

Historic Site: A location at which is found where a work or assembly of works of human endeavour or of nature that is of value for its archaeological, palaeontological, prehistoric, historic, scientific, or aesthetic features is found. Yukon historic sites are designated under the Yukon *Historic Resources Act* and Chapter 10 of the FNFA Yukon First Nation Final Agreements. National Historic Sites are designated under the federal Historic Sites and Monuments Act.

As per the Tr'ondëk Hwëch'in *Heritage Act* and the FNFA THFA, 'Heritage Site' also refers to an area of land which contains Moveable Heritage Resources, or which is of value for aesthetic or cultural reasons. It includes intangibles associated with the Yukon First Nations concept of "cultural landscape."

Hydrological System: The interconnected water system, including soil, surface water, groundwater and atmosphere.

Hunting: As per the *Wildlife Act*, hunting means Includes to shoot at, attract, search for, chase, flush, pursue, follow after or on the trail of, stalk or lie in wait for wildlife, or to attempt to do any of those things, whether or not wildlife is then or subsequently wounded, killed or captured,

Commented [A768]: Term not used in the plan

Commented [A769]: At times hunting/harvesting are used interchangeably in the Plan and not differentiated between FN and non-FN hunters. Confirm usage in Plan meets this definition or change term.

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- a. With the intention to wound, kill or capture wildlife; or
- b. While in the possession of a firearm or other weapon, except that “hunt” does not include trap.

(Wildlife Act, RSY 2002, c.229)

Impact(s): When a land-use activity or activities have an effect or influence on a value(s) and/or resource(s). Impacts may be direct or indirect, and negative or positive.

Indicator: A measurable signal that can be used to assess and track the condition of ecological, socio-cultural, or socio-economic values.

Indicator monitoring: Ongoing activities undertaken to determine measure the current status of a value or to track the effects of a project indicators in relation to triggers.

Industrial Land Use: May refer to Includes:

- Mineral Exploration and development, and mining of mines and minerals;
- Oil and gas exploration and development;
- Aggregate resource extraction;
- a- Development of hydro- electric and other energy resources; or
- b- Development of 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.

Integrated Stewardship Area (ISA): In the Plan, the Integrated Stewardship Area Plan designation is used to identify areas where higher levels of industrial and other development can occur. The intent of all ISAs is to enable existing and future economic activities for both surface uses and subsurface resource extraction.

Land Use Designation System: The purpose of a Land Use Designation System is to describe the management intent of each identified Landscape Management Unit (LMU). Each LMU is assigned a land use category depending on the priority values and land use issues identified within the area, and the sensitivity of each area to disturbance.

Land Withdrawal (of land): A land area that is not available, either permanently or temporarily, for land disposition and oil and gas and/or mineral exploration activities. Land withdrawals are enacted or terminated by a government Orders-in-Council.

Land withdrawals are required to create Special Management Areas.

Landscape Connectivity: The degree to which the landscape facilitates or impedes movement among habitat or resource patches and relates to habitat loss and fragmentation. Landscape connectivity is a species-specific concept, dependent on an animal's ability to move through the landscape. Landscape connectivity thus combines a description of the physical structure of the landscape with an organism's response to that structure and how an organism's interaction with spatial heterogeneity may ultimately affect dispersal and colonization success.

Commented [A772]: Remove, term not used in Plan. If term is added definition should be updated as suggested.

Commented [A773]: Ensure that this definition in particular matches use in Plan, used to describe differences between ISAs and SMAs but some of these uses are allowed in SMAs.

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Commented [A774]: Some ISAs have lower thresholds than SMAs

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Wildlife's ability to use resource patches is dependent upon its ability to get there, and this is determined by the distance, the biophysical nature of the route(s) between patches, and the biology and behaviour of the animal (Taylor, et al., 1993).

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Landscape Management Unit (LMU): An LMU is a discrete area of land. Each LMU is with a distinct management intent that was identified and delineated from the others based on a review of human use, ecological properties, current and anticipated levels of development, and/or identified land use issues. Each LMU has a distinct management intent which translates to differences in how they are designated for land use. See Integrated Stewardship Area and Special Management Area for further information on land use designations for LMUs.

Landscape: A large, observable land unit that has identifiable and repeating patterns of landforms and vegetation. Landscapes may also have characteristic natural disturbance regimes and hydrologic patterns. Landscapes with similar properties are assumed to respond in a consistent manner to management prescriptions. In this Plan, individual landscape management units are intended to represent similar landscapes. See [Cultural Landscape](#).

Levels of Acceptable level of Disturbance (or change): A planning approach that establishes an acceptable limit for the amount of allowable disturbance or level of disturbance change for a specific indicator relating to a value or resource. Under a results-based management system, limits of acceptable change for indicators are required to differentiate between acceptable and unacceptable conditions. The limits are based on a combination of science and social choice that considers the values of the area. See also **Thresholds**.

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Linear Feature Density: The average total length of all human-created linear features (roads, seismic lines, access trails, etc.) (measured in km), within a landscape management unit divided by the total area of the landscape management unit (measured in km²). Linear feature density is expressed as km/km². Linear feature density provides an indication measure of landscape fragmentation and habitat integrity.

Commented [A780]: Corrected density calculation

Linear Features: Human-created linear disturbances (roads, cut lines, trails etc.)

Loop (Resource) Road: In the context of resource access, loop roads can occur when multiple access roads intersect at multiple points, or a developed single road creates a loop and thus starts and ends at the same location. Loop roads results in increased human mobility access and efficiency and increased habitat fragmentation. However, this may result in wildlife (and particularly moose) having fewer places to hide or escape.

Commented [A781]: Simplified

Magnitude: The extent of a change from baseline conditions as a result of a proposed project.

Commented [A782]: Term used once in plan (magnitude of climate change impacts), use doesn't match this definition

Management: Strategic, tactical or operational actions implemented with the intent to change a system, usually by acting on a factor that is causally related to an indicator.

Commented [A783]: Term used for various meanings in Plan, usually further qualified (e.g. management practices, landscape management units etc.), does not need its own definition

Marsh: Marshes are wetlands that are periodically inundated by standing or slowly moving water and hence are rich in nutrients. Marshes are mainly wet, mineral-soil

areas, but shallow, well-decomposed peat may be present. Marshes are subject to a gravitational water table, but water remains within the rooting zone of plants for most of the growing season. They are characterized by an emergent vegetation of reeds, rushes or sedges and the absence of woody vegetation. (National Wetlands Working Group, 1997)

Metric: Unit of measure that reflects the state of an indicator. A system or standard of measurement.

Mineral Lick: Mineral licks are unique habitat features important to many wildlife species. They are a place where animals go to lick naturally-occurring deposits of essential mineral nutrients needed for healthy growth. Mineral licks are often areas of high wildlife activity and many species, including moose, caribou and sheep, use mineral licks these naturally-occurring deposits of essential mineral nutrients. Mineral lick locations are considered sensitive information and specific locations are not made public. Mineral licks can also be created by human activities such as roads.

Minerals: Minerals refers to precious and base metals and other non-living, naturally occurring substances, whether solid, liquid or gaseous, and includes coal, Petroleum and Specified Substances. (FNTHFA)

Migratory Bird: As set out means a migratory bird referred to in the *Migratory Birds Convention Act*, and includes the sperm, eggs, embryos, tissue cultures and parts of the bird. Environment and Climate Change Canada (ECCC) is responsible for the conservation of migratory birds in Canada and the management of the sustainable hunting of these birds.

Mitigation(s): Measures applied to activities for the elimination, reduction or control of adverse environmental or socio-economic effects. Mitigation of the potential effects of land use activities is a central role of YESAB.

Moose: Moose are the largest member of the deer family. These areas also experience high moose hunting pressure and contain a relatively large human footprint. Moose are known to use different habitats based on sex and stage of life history.

Negative Impact: When a land-use activity or activities have a negative effect or influence on a value(s) and/or resource(s). Impacts may be direct or indirect.

Non-Settlement Land: As per YESAA, refers to

- Land other than settlement land;
- Water lying on or flowing through land, including settlement land; or
- Mines and minerals, other than specified substances, in category B or fee simple settlement land.

Northern Mountain Woodland Caribou: see Boreal Woodland Caribou.

Objectives: Statements of future desired conditions associated with values. Objectives can be expressed either qualitatively or quantitatively.

Outfitting Concession: An outfitting concession is an area in which a limited right to provide services of a guide is granted. Concessions are granted under the *Wildlife Act*.

Palaeontological Resources: Palaeontological resources are the fossil and other

Commented [A784]: Term used once in the Plan, use could be replaced with "indicator" and definition removed.

Commented [A785]: Unnecessary information for the definition.

Commented [A786]: Unnecessary information for the definition

Commented [A787]: Unnecessary definition

Commented [A788]: Unnecessary, "impact" is defined above

Commented [A789]: See new caribou definition

Commented [A790]: Definition here does not match definition in Figure 3-1 or in s.5.1.1. Term should be used consistently throughout plan and only needs to be defined one.

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remains of extinct or historic plants and animals. These include tusks of woolly mammoths; bones of ancient horse; bison and other ice age fauna as well as fossil remains and traces of plants; vertebrate and invertebrate animals. Because much of central and northern Yukon were unglaciated during the ice ages, the frozen organic-rich sediments in these regions preserve some of the most important North American remains of Pleistocene species such as mammoth, horse, and bison. Yukon's bedrock also contains fossils, from dinosaur bones and footprints to leaf impressions and trilobites (Government of Yukon, 2015).

The Parties: Refers to the Government of Yukon and Tr'ondëk Hwëch'in as the signatories to the Plan as per Chapter 11 of the THFA.

Permafrost: Ground in which a temperature below 0°C has existed continuously for two or more years. Permafrost is defined exclusively on the basis of temperature; ground ice does not need to be present.

Placer Claim: A parcel of land located or granted for placer mining. Placer claims entitle claim holders to the minerals (gold) located above bedrock in "pay gravels" Placer claims include any ditches or water rights used for mining on the claim, and all other things belonging or used in the working of the claim for mining purposes.

Plan Amendment: Changes to the Plan's management strategies (policies, designations, or directions). Major changes when the Plan requires revision to its management strategies and the Plan's original intent as approved by the Parties. Plan Amendments require consent by both Parties.

Plan Review: In this Plan, Plan Review is a 10-year re-evaluation of the whole Plan and when major changes and revisions will be made.

Plan Variance: Allowance for an otherwise non-conforming use at the project-scale. Minor changes to the Plan that are necessary to permit certain non-conforming activities and projects. Plan Variances require consent by both Parties

Porcupine Caribou Herd: A barren-ground herd of caribou that ranges from northeastern Alaska to the Yukon/Northwest Territories border (west to east), and from the Beaufort Sea to the Ogilvie Mountains (north to south). See Barren-ground Caribou.

Precautionary Principle: The Plan interprets the Precautionary Principle to mean that the burden of proof rests with an activity's proponent, i.e., it must be established that activities will not substantially harm the environment before permission is granted to proceed (Sands and Peel, 2012). Further, if scientific evidence suggests that a lack of action will result in harmful effects, regulatory action may be required by the Parties.

Progressive Reclamation: Reclamation that is carried out on an ongoing basis rather than at the end of a project lifespan.

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 Socio-economic Assessment Act (YESAA).

Commented [A791]: Redundant, all need approval by Parties

Commented [A792]: If one caribou herd is defined, all should be. Otherwise could be removed, as included in 'caribou' definition.

Commented [A793]: Unnecessary definition, explained in-situ, YG has otherwise proposed changes to s. 1.9.3 and does not agree with this definition as it is not a common interpretation of the precautionary principle.

Commented [A794]: "Project" is used over 100 times in Plan and often does not refer to assessable activities (or it is unclear if use was intended to be limited to only assessable activities). Consider use of term in Plan and if definition should be updated.

Commented [A795]: Don't need to specify sections.

Proponent: ~~As per YESAA, in relation to a project or other activity, means a~~ person or body that proposes to undertake ~~a project or other activity~~, or a government agency, independent regulatory agency, municipal government or first nation that proposes to require — under a federal or territorial law, a municipal bylaw or a first nation law — that ~~a project or activity~~ be undertaken: (*Yukon Environmental and Socio-economic Assessment Act*, S.C. 2003, c. 7~~YESAA~~).

Protected Area: ~~In the Yukon, Protected Areas are a~~ areas of land that are established as Parks under the *Parks and Land Certainty Act* ~~and or Habitat Protected Areas under the Wildlife Act~~. Protection of ecological and ~~cultural heritage~~ resources is the management goal.

Public Road: A road which is always available to the public, is within a surveyed right-of-way and is located on public land, or if not, is formally recognized as a highway (public road). The road must be connected to a highway as defined by the *Highways Act*. (Government of Yukon, 2015)

Quartz Claim: A parcel of land located or granted for hard rock mining. Quartz claims entitle holders to the minerals located in hard rock (i.e., bedrock). A quartz claim also includes any ditches or water rights used for mining the claim, and all other things belonging to or used in the working of the claim for mining purposes.

Regional Land Use Plan: ~~A collective statement about how to use and manage land and resources within a geographic area.~~

Renewable Energy: The generation of heat or electricity from natural resources that are not depleted over time.

Renewable Resource: ~~Renewable Resources refers to~~ fish, wildlife, habitat, and forestry. See [Renewable Resources Council](#). (FNTHFA)

Renewable Resources Council (RRC): ~~Under the FNFA, in each Yukon First Nation's Traditional Territory, a Renewable Resources Council has been established as a~~ primary instrument ~~established under Yukon First Nation Final Agreements~~ for local renewable resources management in ~~each First Nation's~~ the Traditional Territory. The RRCs function as a voice for local community members in managing renewable resources, such as fish, wildlife, habitat, and forestry specific to their Traditional Territory.

In the ~~Dawson planning~~ Region, ~~there are~~ three Renewable Resources Councils:

1. Tr'ondëk Hwëch'in ~~First Nation~~: Dawson District Renewable Resources Council
2. First Nation of Na-cho Nyäk Dun: Mayo District Renewable Resources Council
3. Vuntut Gwitchin First Nation: North Yukon Renewable Resources Council

Resource Road: ~~A road, that is not a public road, which provides vehicular access to~~ ~~valued a~~ resource (minerals, mines, oil and gas, aggregate materials, coal and/or energy generation). ~~Regions and economic sectors of the territory.~~ (Government of Yukon, 2015)

Results-based Management Framework: ~~A results-based management framework is a structured way to determine if the Plan goals and objectives are being met. It is a way~~

Commented [A796]: There are likely other types of areas that could be considered “protected areas” such as National Parks which are not created under either of these processes.
Consider instead the IUCN definition “A clearly defined geographical space, recognised, dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values.”
<https://portals.iucn.org/library/sites/library/files/documents/PAG-021.pdf>

Commented [A797]: Unnecessary definition

Commented [A798]: <https://yukon.ca/sites/yukon.ca/files/emr/emr-proposed-resource-roads-regulation-discussion-document.pdf>

to link general, higher-level objectives with more detailed, operational decisions.

Riparian Zone (or area): Flowing water (lotic) environments and their adjacent terrestrial surroundings influenced by the moving water (fluvial) processes of erosion and deposition, commonly referred to as river or stream valleys. In northern Yukon, riparian zones typically support the most productive vegetation and tree growth due to warmer and better drained soil conditions.

Salmon: In this Plan Salmon means Pacific Salmon of the species Sockeye (*Oncorhynchus nerka*) including Sockeye; Coho (*Oncorhynchus kisutch*) including coho; Pink (*Oncorhynchus gorbuscha*) including Pink; Chum (*Oncorhynchus keta*) including Chum; and Chinook (*Oncorhynchus tshawytscha*) including Chinook; anadromous whitefish and cisco (*Coregonidae* spp.); and anadromous Arctic char (*Salvelinus alpinus*). (FNFA) Refers to chum, coho and/or Chinook salmon individually or collectively.

Scenic Integrity: See Visual Integrity

Settlement Land: Land that is category A settlement land, category B settlement land or fee simple settlement land under a final agreement or under section 63 of the *Yukon Surface Rights Board Act*, or land that is to be treated as such by virtue of a self-government agreement, and includes Tetlit Gwich'in Yukon land, but does not include water or mines and minerals defined to be non-settlement land. See Category A Settlement Land and Category B Settlement Land

Shallow Open Water wetlands: ~ Shallow open water wetlands, also known as ponds or sloughs, are relatively small bodies of standing water, representing a transition stage between lakes and marshes. The surface waters impart an open aspect, free of emergent vegetation, but floating, rooted, aquatic macrophytes may be present. The depth of water is usually less than 2 m in mid-summer. (National Wetlands Working Group, 1997)

Sheep: Also known as thimhorn sheep or Dall's sheep. These are the wild sheep found in the Planning Region, largely around the mountain ranges

Socio-economic Effects: Effects on economies, connection to the land, health, culture, traditions, lifestyles and heritage resources understanding that the health of the land directly and indirectly affects the health of the people.

Spawning Habitat: See Fish Habitat.

Species at Risk Act: The Species at Risk Act (SARA) part of the Government of Canada's strategy for the protection of wildlife species at risk. The Act aims to prevent wildlife species from becoming extinct, and to secure the necessary actions for their recovery. Species at Risk fall into these four categories:

- a. Special Concern: A wildlife species that may become a threatened or an endangered species because of a combination of biological characteristics and identified threats.
- b. Threatened: A wildlife species that is likely to become endangered if nothing is done to reverse the factors leading to its extirpation or extinction.
- c. Endangered: A wildlife species that is facing imminent extirpation or extinction.

Commented [A799]: Explained in-situ

Commented [A800]: Plan should use only one of either zone or area for clarity and consistency

Commented [A801]: Chinook, chum and coho are the salmon species within the region.

Commented [A802]: Plan should use only one of these terms for clarity and consistency

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Commented [A803]: Terms not use in Plan

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Commented [A805]: Add separate definition as this term is used in the Plan to mean a more specific area than the fish habitat definition

d. ~~Extirpated: A wildlife species that no longer exists in the world in Canada, but exists elsewhere.~~

Commented [A806]: Unnecessary definition

Special Management Directions: ~~Special management directions are c~~Conditions to be applied to a specific Landscape Management Units ~~where development is permitted.~~ Conditions vary between Landscape Management Units.

Commented [A807]: Directions can also prevent development and therefore apply even in areas where development cannot occur.

Special Management Area (SMA): ~~A conservation area identified and established within a Traditional Territory of a Yukon First Nation under a Final Agreement. SMAs can be Yukon Parks, Habitat Protection Areas, National Parks or Wildlife Areas, or other types. The level of protection is defined in a management plan developed for each area, with management shared among the Yukon government, First Nation governments, and Renewable Resource Councils, depending on the area and jurisdiction (Chapter 10, FNFA/THFA). Plan designation used to identify areas intended to be jointly managed by Government of Yukon and Tr'ondëk Hwëch'in, in the spirit of Chapter 10 of the THFA, for conservation. During Plan implementation SMAs will require permanent prohibition of entry orders, development of a management plan and legal designation. Development in SMAs is allowed in accordance with the management intent and directions of the individual LMU.~~

Commented [A808]: An SMA in the Plan is not the same as an SMA under Chapter 10. New definition needed. Should be similar to ISA, speak to SMAs as a land designation within the Plan.

Spot Land application Development: ~~The process of singling out~~A request to develop a ~~small~~ parcel of land outside of formal planning and development ~~channels~~processes. In the Yukon, spot land applications ~~are accepted~~may be submitted for public land that does not overlap settlement land, titled parcels, or conflicts with other uses. ~~This includes, including~~ mineral claims.

Commented [A809]: Applicant request, no size restriction.

Commented [A810]: Submissions will be reviewed, not automatically accepted.

Stewardship: The Plan is guided by the principle of stewardship and a shared responsibility and respect for the land. This Plan uses two approaches to stewardship as a guiding principle: **ancestral stewardship** and **community stewardship**. See **Section 1.9.2 – Stewardship** (page 23).

Commented [A811]: Glossary should not point to other sections of the Plan but should fully define terms here. If term is explained in situ, definition in glossary may not be needed, as written currently no definition is provided.

Surface access: Access features include winter roads and trails, all-season roads and railways.

Surface Ddisturbance: ~~Surface disturbance in this Plan is measured as t~~The area of land that is physically disturbed by human activities expressed as a percentage of the total a Landscape Management Unit ~~area that is disturbed. The amount of surface disturbance refers to the area of land physically disturbed by human activities. This includes activities such as tree cutting, soil changes, hydrology changes, structures, cleared sites (e.g., placer mine sites, gravel quarries, drill pads, helicopter pads).~~ These disturbance footprints represent a decrease in habitat.

Sustainable Ddevelopment: Beneficial socio-economic change that does not undermine the ecological and social systems upon which communities and societies are dependent (THFA)

Commented [A812]: Add reference to definition of "Development" to show how these terms do or do not overlap.

Subsistence Hharvesting: The use of edible fish or wildlife products, or edible plant products, by a Yukon First Nation's person for sustenance and for food for traditional ceremonial purposes and the use of non-edible by-products of harvests of fish or wildlife for such domestic purposes as clothing, shelter or medicine, and for domestic,

spiritual and cultural purposes.

Swamps: ~~Swamps are w~~Wetlands where standing or gently moving waters occur seasonally or persist for long periods, leaving the subsurface continuously waterlogged. The water may also be present as a subsurface flow of mineralized water. The water table may drop seasonally below the rooting zone of the vegetation, creating aerated conditions at the surface. Their substrate consists of mixtures of mineral and organic materials, and peat deposited may be present. The vegetation may consist of dense coniferous or deciduous forest, or tall shrub thickets. (National Wetlands Working Group, 1997)

~~Target: A target is a desired condition related to a specific management goal or objective.~~

Threshold: A point where an indicator is reaching, or has reached, a level such that undesired impacts to ecological, socio-cultural and/or economic values may begin to occur. ~~Thresholds are applied in a results-based management framework. (See Section 4.2.3 - Thresholds, page 63) and at which point certain actions must occur. The Plan includes thresholds for surface disturbance and linear feature density for each Landscape Management Unit.~~

Timing W~~w~~**indows:** ~~The practice of e~~Conducting or avoiding land use activities during specific ~~time~~ periods with the purpose of minimising potential impacts on a valued ecological or cultural resource.

Traditional E~~e~~**conomy:** As defined by Tr'ondëk Hwëch'in, a traditional economy is based on the harvest of natural resources, providing direct value such as meat harvested, fuelwood and income from sale of cultural products, and non-consumptive values such as, for example, the cultural and social well-being of its members and passing on traditional ecological knowledge.

Traditional Knowledge: The accumulated body of knowledge, observations, and understandings about the environment, and about the relationship of living beings with one another and the environment, that is rooted in the traditional way of life of First Nations.

Traditional Territory: The geographic area within the Yukon identified as that Yukon First Nation's traditional territory as outlined in the Umbrella Final Agreement.

Trapping E~~e~~**concession:** A trapping concession gives an individual the exclusive opportunity to commercially trap in an area. Trapping concessions may be granted to a partnership or a group if all members are eligible to trap for commercial purposes. Concessions are granted under the *Wildlife Act*.

~~Triggers: The point at which a change in the state of an indicator should result in a change in management.~~

Umbrella Final Agreements: See [Final Agreements](#).

~~Ungulate: A four-legged, plant-eating mammal with hoofs. Caribou, moose, deer and musk-oxen are ungulates.~~

Values: Things deemed important by society and ~~E~~governments for assuring the

Commented [A813]: Term not used in the Plan.

Commented [A814]: Broaden definition to include asserted traditional territory.

Commented [A815]: Plan uses "triggers" as a noun with this meaning a single time in the sentence "The framework seeks to connect values-based indicators to management objectives and adaptive management triggers to achieve the goals of the Plan." Term otherwise used as a verb. Triggers are not developed in the Plan.

Commented [A816]: Add description of UFA and THFA to Final Agreements definition

Commented [A817]: Term only used in Plan to refer to a map which shows which animals it applies to.

integrity and well-being of communities, the environment, and economies. Also ~~called known as~~ valued components or valued ecosystem components (VECs).

Values-Based Indicators: A measurable signal directly related to tracking the state of an ecological, socio-cultural, or socio-economic value; developed through a values-focused workshop to identify CE-based concerns and management objectives.

Viewscape:

~~Visual Impacts: Visual impacts are changes to the scenic attributes of the landscape brought about by the introduction of visual contrasts (e.g., development) and the associated changes in the human visual experience of the landscape.~~

Visual Integrity: The aesthetic value of landscapes. A landscape's visual integrity is considered a natural and cultural resource to be valued and protected where possible.

Watercourse: A natural watercourse, body of water or water supply, whether usually containing water or not, and includes groundwater, springs, swamps, and gulches.

Watershed: The region or area drained by a river or stream system, divided from adjacent drainage basins by a height of land.

Wetland Benefits: The ecological and cultural benefits that result from the specific characteristics of a wetland and the processes occurring within the wetland; including hydrological, biophysical and chemical, and socio-cultural benefits, as well as benefits to people. (Yukon Government Draft Wetland Policy).

~~Wetland Class: The Canadian Wetland Classification System divides wetlands into 5 classes based on how they are formed and their ecological characteristics: bog, fen, marsh, swamp, and shallow open water wetland classes.~~

Wetland Complex: A concentrated geographic grouping of individual wetlands. Wetland complexes may include both wetland and non-wetland biophysical landscape types. Wetland complexes function as integrated hydrologic systems.

Wetland Inventory: A database or resource that provides detailed information on the abundance, characteristics, and distribution of wetlands (Government of Yukon, 2021b)

Wetlands: Land where the water table is at, near or above the surface or which is saturated for a long enough period to promote such features as wet-altered soils and water tolerant vegetation. Wetlands include organic wetlands or "peatlands" (fens and bogs), and mineral wetlands (marshes, swamps, shallow open water) (National Wetlands Working Group 1997, Canadian Wetland Classification System).

Wetlands of Special Importance: All wetlands are important ecosystems, but some wetlands merit enhanced protection or special mitigation requirements measures by virtue of their unique ecological characteristics, and the benefits derived from them, or the cultural connections people have with them. A Wetland of Special Importance is legally designated by the Government of Yukon and is subject to specific mitigation measures to ensure no loss of benefits. For wetlands outside of established protected areas, listing as a Wetland of Special Importance can be used to protect wetland benefits during regulatory review and planning processes (Government of Yukon,

Commented [A818]: Removed bolding to avoid confusion as these terms are not used in the Plan and therefore not defined though they may be used elsewhere (e.g. in YESAB processed) and can be referenced.

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Commented [A819]: Add definition

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2021b)

Wilderness or Wilderness Character: Areas in the Planning Region that are largely natural condition in which ecosystem processes are generally unaltered by human activity

Commented [A824]: “Wilderness Character” is not an area, it is a description of the area.

Wilderness Tourism Activity: Any type of commercially guided tourism activity occurring in the wilderness, including, without limiting the generality of the foregoing, canoeing, cross country skiing, dog mushing, heli-hiking, heliskiing, hiking and backpacking, horseback riding, kayaking, motorized boat tours, mountain biking, mountaineering, photographic safaris, river rafting, rock climbing, snowmobiling, sport fishing, and First Nation cultural interpretive tours. An activity which takes place partly in a wilderness area and partly in a non wilderness area is deemed to be a wilderness tourism activity.

Commented [A825]: Term used a single time in Plan, could be replaced by wilderness tourism

Wilderness Tourism: A sector of the tourism industry where an operator, for gain, reward, or for material or financial benefit received, provides a wilderness-based activity.

Wildlife: a vertebrate animal of any species or type that is wild by nature but does not include fish (Wildlife Act RSY 2002, c. 229).

Commented [A826]: Added definition as term is used throughout the plan, particularly as “fish and wildlife”, fish is defined in glossary, wildlife was not.

Winter Road: In this Plan, winter roads are roads or routes constructed and used only in the winter without the use of gravel or other soil materials. They are typically made of compacted snow or ice ploughed over a frozen waterway or ground impassable in the summer.

Yukon Environmental and Socio-economic Assessment Board (YESAB): YESAB is an independent arms-length assessment body, responsible for the assessment responsibilities of whose roles and responsibilities are set out in the Yukon Environmental and Socio-economic Assessment Act (YESAA).

Yukon First Nations: Has the same meaning as in the FNFA and includes “Yukon Indian People.” It also refers to the collective and shared ethnicity of First Nations located in the Yukon and refers to their collective and shared ethnicity. Yukon First Nations as per the FNFA are any one of the following:

Commented [A827]: Simplified and alphabetized

- Carcross/Tagish First Nation
- Champagne and Aishihik First Nations
- First Nation of Nacho Nyak Dun
- Tr’ondëk Hwëch’in First Nation
- Kluane First Nation
- Kwanlin Dün First Nation
- Liard First Nation
- Little Salmon / Carmacks First Nation
- First Nation of Na-Cho Nyäk Dun
- Ross River Dena Council
- Selkirk First Nation
- Ta’an Kwäch’än Council
- Teslin Tlingit Council

- Tr'ondëk Hwëch'in
- Vuntut Gwitchin First Nation
- White River First Nation.

Yukon Fish & Wildlife Management Board: Established under Chapter 16 of the FNFA, the Yukon Fish and Wildlife Management Board is the primary instrument of Fish and Wildlife Management in the Territory.

Yukon Geographical Place Names Board: Reviews geographical name submissions and makes recommendations to the Minister on whether an application should be approved or not. The recommendations are based on careful research and consultation with the people who live in the area where a name is being considered.

Yukon Indian People: A term used in the FNFA First Nation Final Agreements referring to people of Indigenous ancestry members of a Yukon First Nation who are enrolled under a First Nation Final Agreement. This term is outdated and is no longer part of everyday lexicon but is used when citing directly from First Nation Final Agreements the FNFA, e.g., Chapter 11 Objective 11.1.1.3 to recognize and promote the cultural values of Yukon Indian people.

Yukon Water Board: The Yukon Water Board is an independent body established under the Waters Act and the Water Board Secretariat provides administrative support. The Yukon Water Board issues water licences for various activities for the use of water and/or the deposit of waste to water. The process aims to balance of conservation, development and utilization of Yukon water for all Yukoners and Canadians.

Commented [A828]: Term not used in the Plan

Commented [A829]: YWB guidelines referenced once in Plan recommendation, YWB itself not mentioned otherwise in Plan

10 APPENDICES

APPENDIX 1: RECOMMENDED PLANNING STRATEGIES OVERVIEW

APPENDIX 2: LMU NAMES

APPENDIX 3: CUMULATIVE EFFECTS FRAMEWORK THRESHOLDS

APPENDIX 4: DAWSON LAND STEWARDSHIP TRUST

Commented [A830]: Delete, repeat of Tables 3-2 and 3-3; separate appendix not needed.

Commented [A831]: Delete, beyond the scope of the Plan

MAPS

MAP 1 – LAND DESIGNATIONS

MAP 2 – LAND WITHDRAWALS

MAP 3 – REGIONAL OVERVIEW AND CURRENT STATE

MAP 4 – SELECTED ECOLOGICALLY IMPORTANT AREAS

MAP 5 – UNGULATES

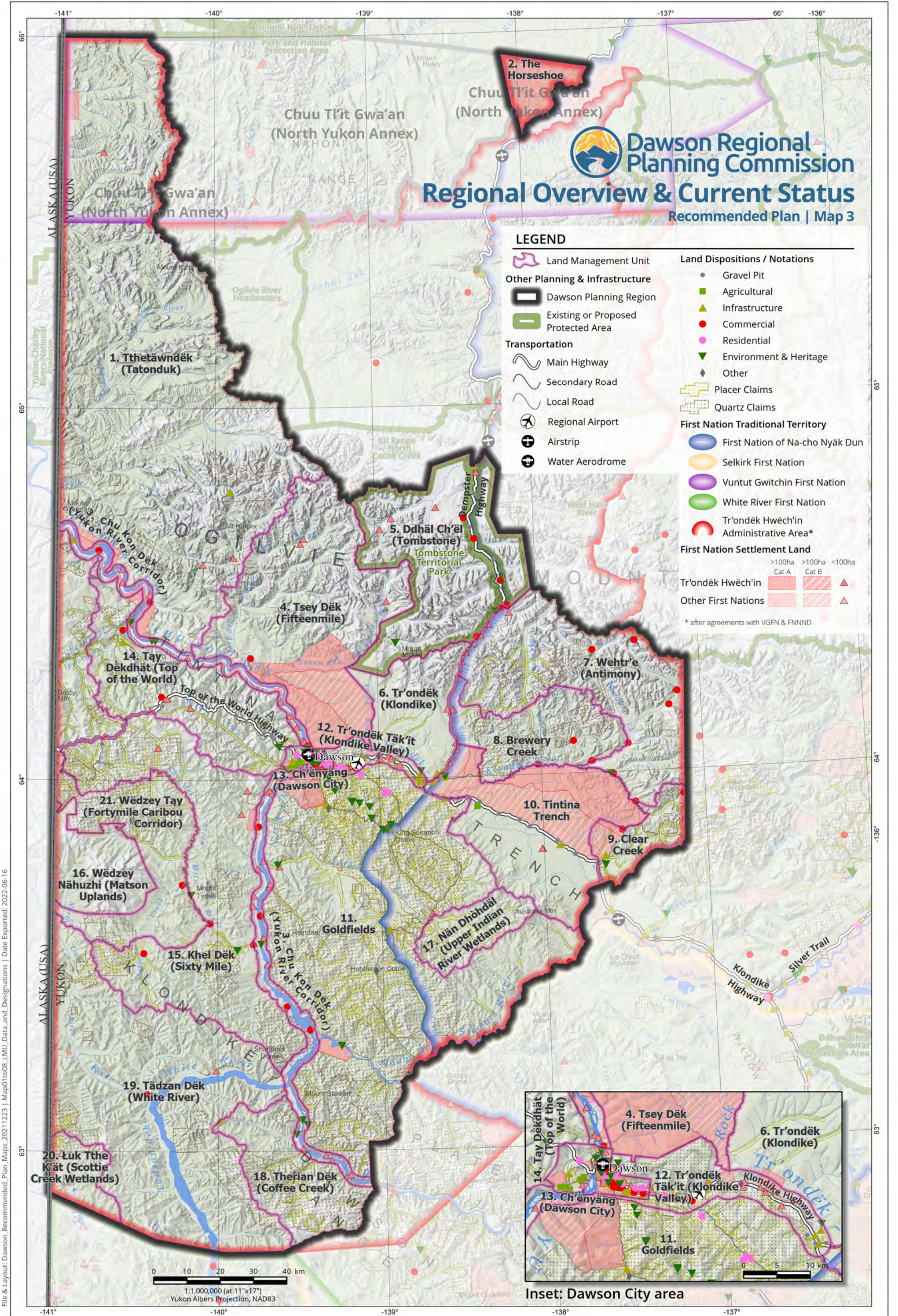
MAP 6 – FIRST NATIONS LAND USE, HERITAGE AND CULTURAL RESOURCES

MAP 7 – RENEWABLE ECONOMIC DEVELOPMENT: POTENTIAL AND INTEREST

MAP 8 – NON-RENEWABLE ECONOMIC DEVELOPMENT: POTENTIAL AND INTERESTS

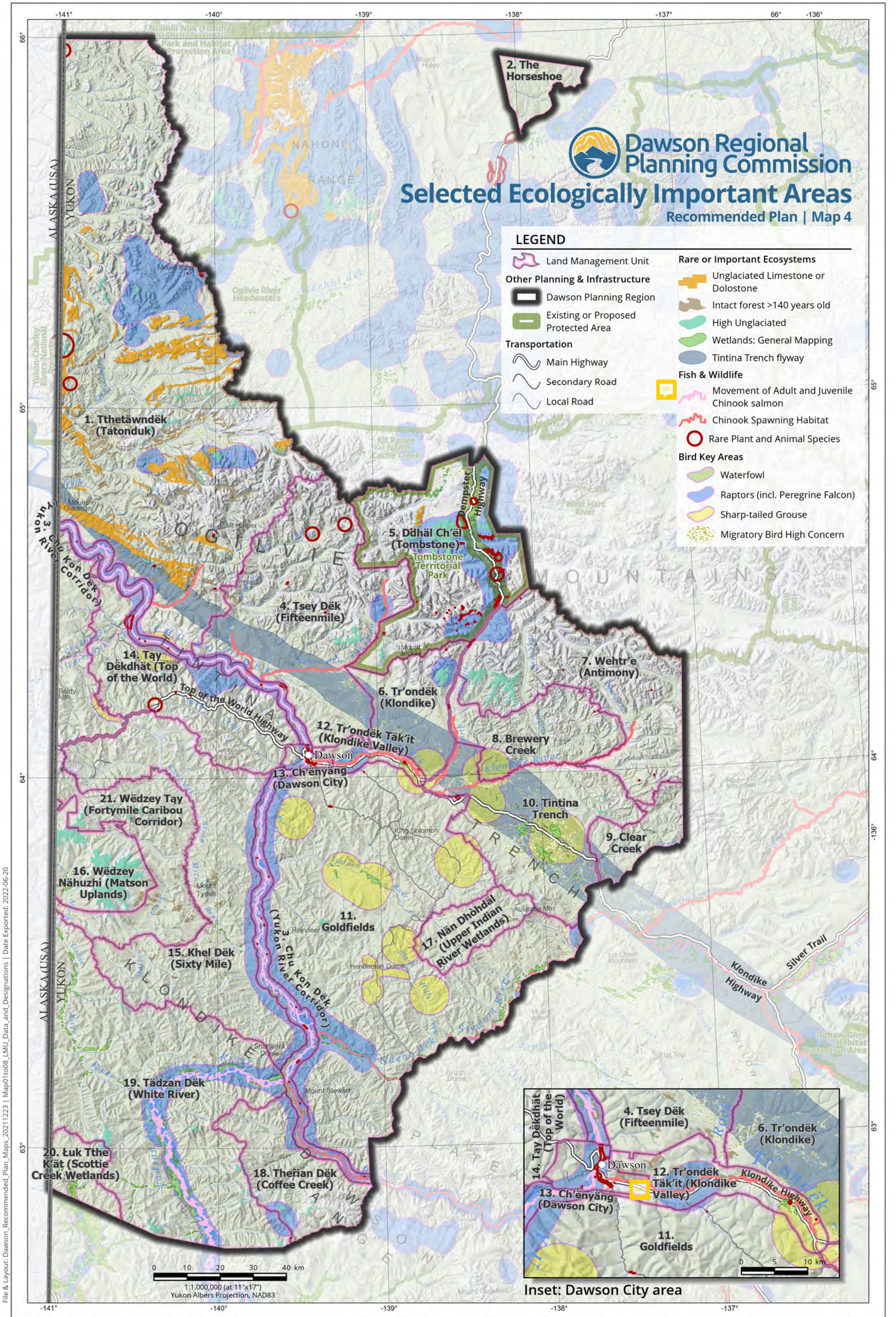
Commented [A832]: See tracked change map package for further comments on maps.

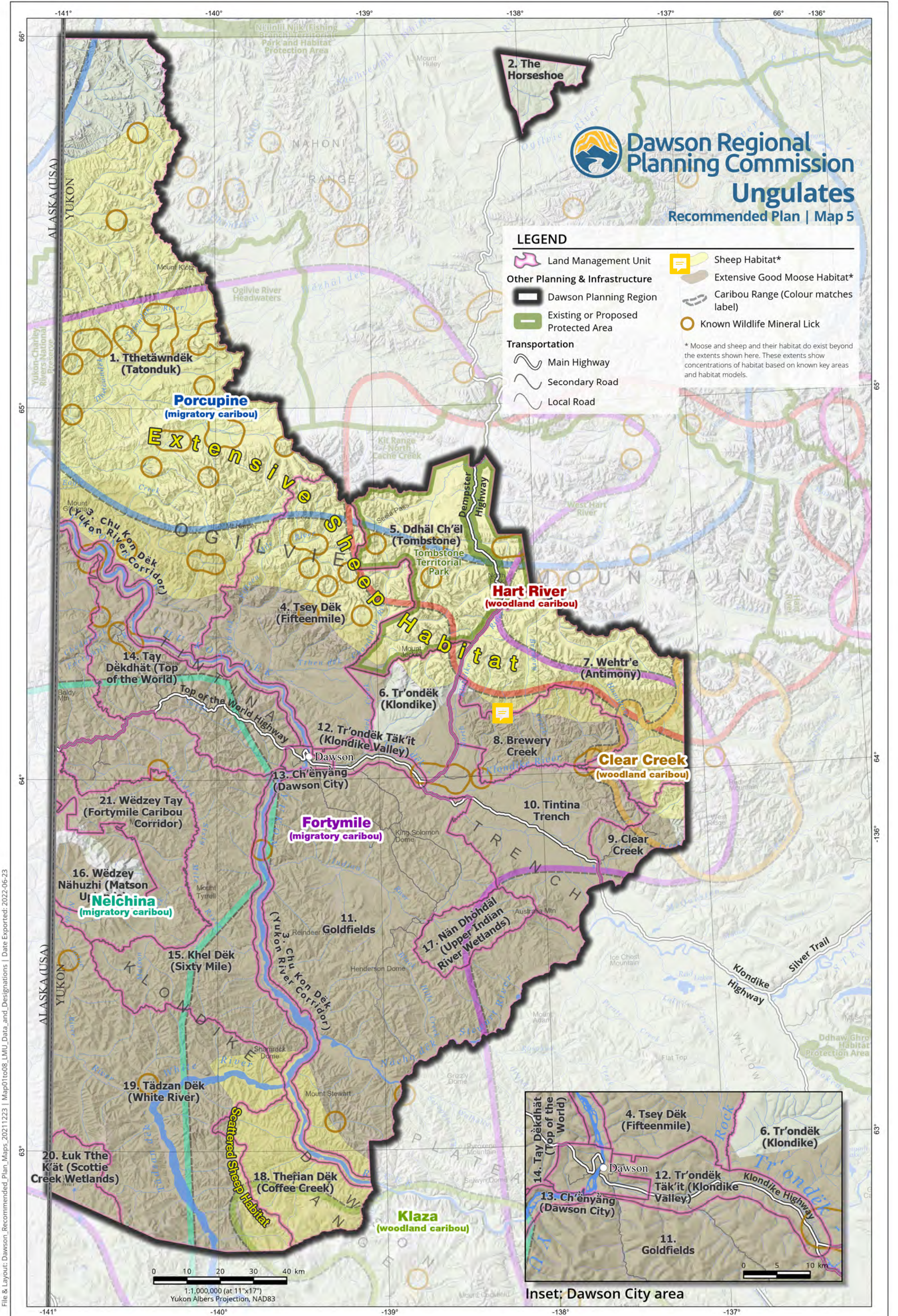
Commented [A833]: These maps are not referenced in the Plan and can be removed.



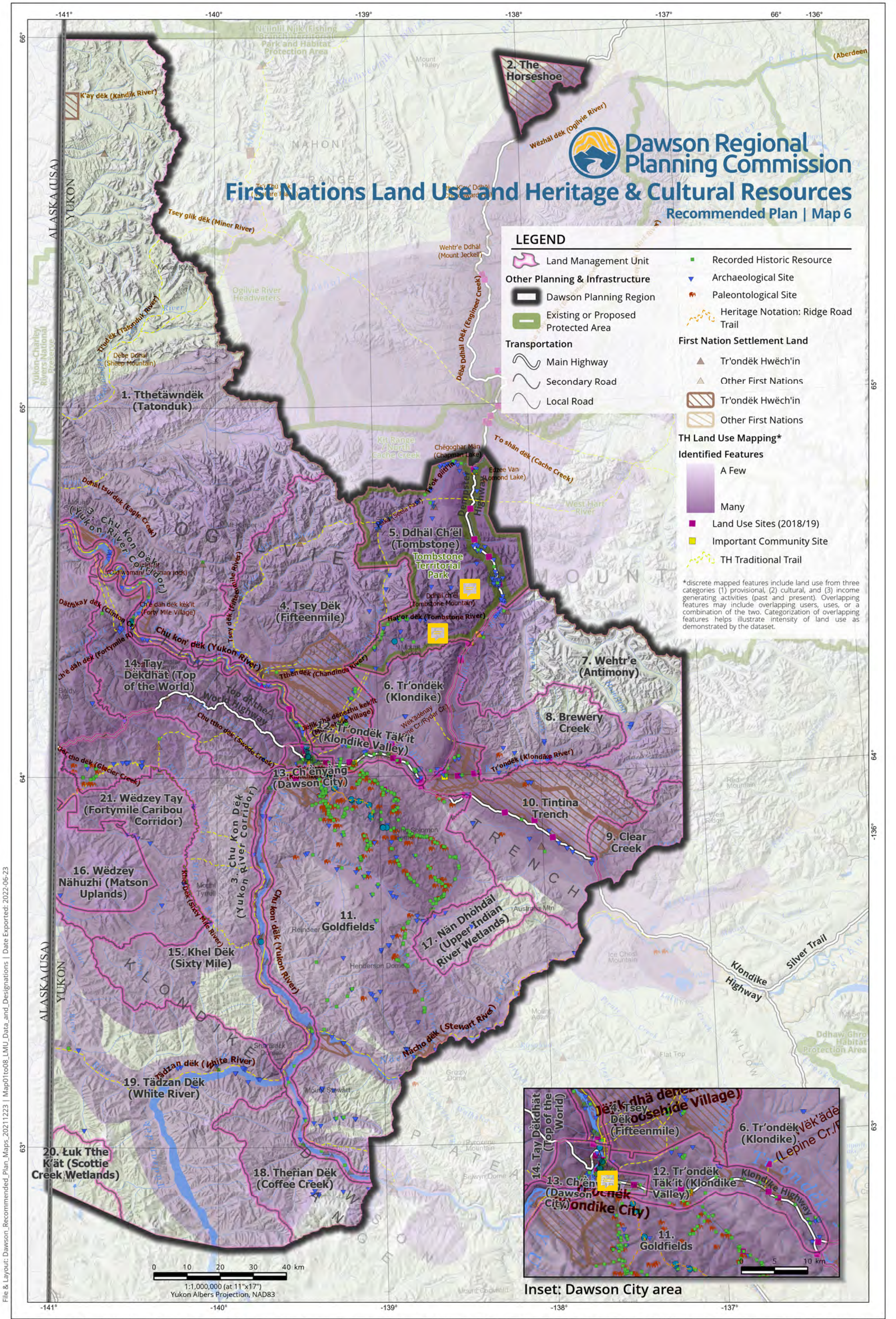
File & Layout: Dawson_Recommended_Plan_Maps_Map01to08_LMU_Data_and_Designations | Date Exported: 2022-06-16

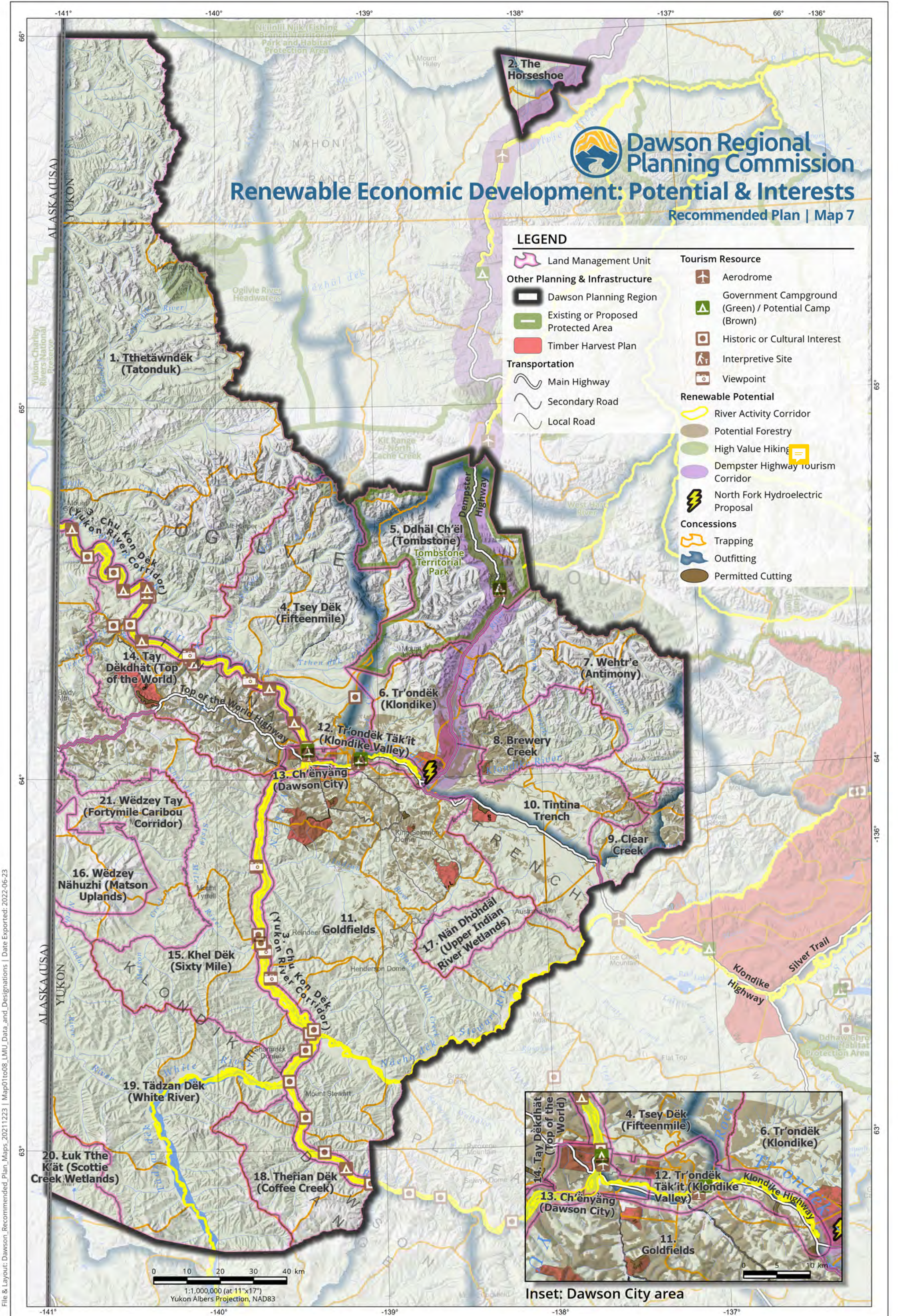
Data sources: Maps in this series includes base and thematic data provided by NRCan, GeoYukon (Yukon Government), Tr'ondëk Hwëch'in Government, US National Parks Service, Ducks Unlimited Canada, YLUPC, NYPC, or DRPC. **Data disclaimer:** This map is a graphical representation depicting the approximate size, configuration, and spatial relationship of geographic features. Some datasets have specific disclaimers available from the data provider. While great care has been taken to ensure the best possible quality, this document is neither intended for legal descriptions nor to calculate precise areas, dimensions, or distances. It is possible for errors, omissions, and inaccuracies occur in these data which is beyond our control. Wildlife Key Areas (WKA) are compiled by the Yukon Department of Environment WKA Inventory Program (2014 and 2019), against 1:250,000 NTDB from various data sources. Key Areas are based on observed locations of wildlife at key times of year, not on habitat assessment. With new information, boundaries and designations of Key Areas can change and additional Key Areas can be identified. Furthermore, Key Areas are not the only sites important for wildlife. Other information sources can identify other sites important for wildlife for reasons outside the scope of the WKA Inventory Program. Updates to Key Areas occur only periodically. For the most current information, please consult with the Regional Biologist for your area of interest. If you have questions or would like to contribute to the WKA database, please contact the WKA Inventory Program. Digital copies of this map may be obtained from the Dawson Regional Planning Commission and the Yukon Land Use Planning Council websites at: dawson.planyukon.ca and www.planyukon.ca



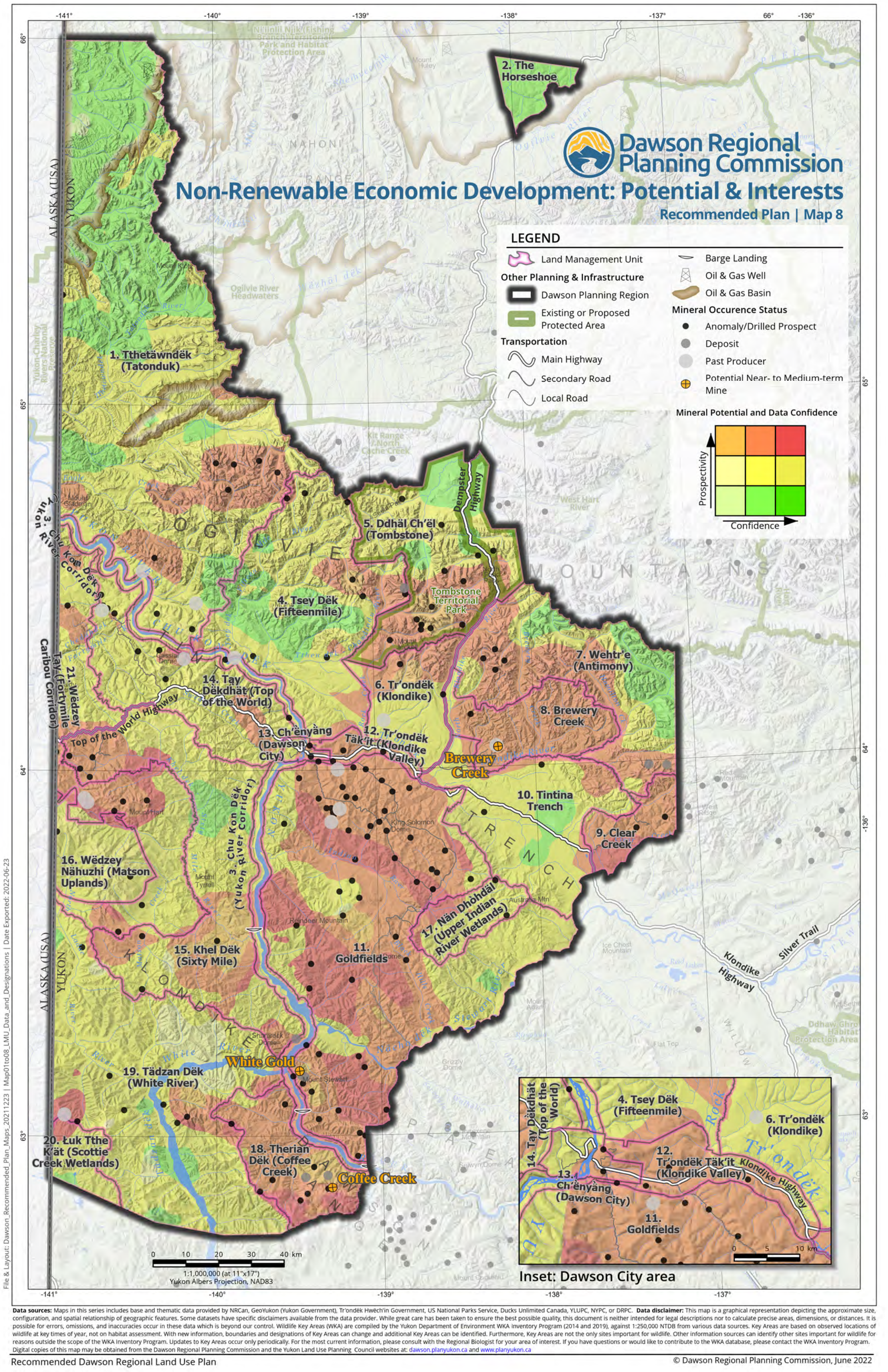


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Proposed Changes for Effective Document Design and Writing Style

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).

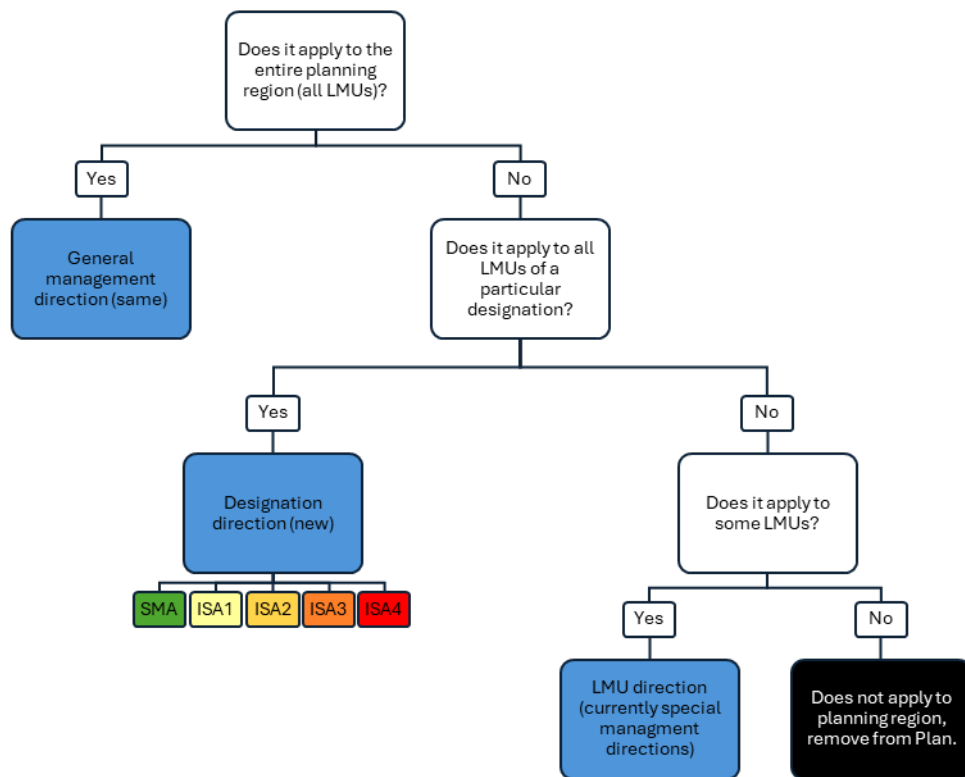
How can this issue be resolved?

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: • 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 • 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 pared 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	• Climate Change • Fish and Wildlife and Habitat • Protected and Conserved Areas		• Key Species ○ Caribou ○ Moose ○ Salmon ○ Sheep ○ Grizzly and Black Bears • Other Fish and Wildlife Habitat ○ Resident Fish Species ○ Migratory Birds and Raptors ○ Species at Risk and Rare Endemic Species • Water • Wetlands • Climate Change	• 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	• Harvesting Rights and Activities • Heritage Resources and Sites • Traditional Economy	• Traditional Economy	• Heritage Resources and Sites • Stewardship • Harvesting Rights and Activities • Hän Language • Community Growth ○ Community Water • Recreation	• 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	• Access and Infrastructure • Agriculture • Community Growth and Recreation • Forestry • Mineral Exploration and Development and Mining Operations • Renewable energy • Tourism	• Transportation • Non-renewable resources • Hard Rock Mining • Placer Mining • Renewable resources • Forestry and Timber • Agriculture • Traditional Economy • Tourism	• Mineral Exploration and Development • Resource Development and Impacts to MMIWG2S+ • Transportation and Access ○ Existing Access ○ New All-Season Surface Access and Winter Roads ○ Air Access ○ Water Access • Agriculture • Tourism • Outfitting • Forestry • Aggregate Resources • Traditional Economy	• 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.

Government of Yukon Review of all Recommended Dawson Regional Land Use Plan Management Directions and Recommendations to the Parties

How to read table

Plan Section	Section Ref	#	Type	Text	Location	Recommended Plan Text	YG Proposed Modification	Notes
Section name	Section number	Recommendation number or letter	- Recommendation to the Parties - Policy - Action - Research - Management directions - Management Practice (MP) - Special Management Direction (SMD)	Add – New proposed direction Keep – No text change proposed Change Type – direction addressed to wrong group (MP/SMD vs. Recommendation to Parties) or should apply more broadly or narrowly (MP vs. SMD) Modify – Text changes proposed Remove – Direction not needed (redundant, inappropriate, incorporated into other directions etc.)	Remove – direction not needed (redundant, inappropriate, incorporated into other directions etc.) Plan – direction should remain in main Plan text Appendix – direction better suited to an appendix (see proposed changes for effective document design and writing style)	Text as found in Recommended Plan	Government of Yukon’s proposed modification to text	Explanation of proposed change

Plan Section	Section Ref	#	Type	Text	Location	Recommended Plan Text	YG Proposed Modification	Notes
Cumulative Effects Framework (CEF)	4.5.1	1	Policy	Modify	Appendix	Parties should continue to develop values-based indicators for SOCIO-CULTURAL values listed in the Plan. The Commission have identified the following values-based indicators that could be included as part of a values-based cumulative effects framework: - Harvest effort - Ability to meet needs - Changes to huntable area - Traffic patterns in harvest areas. Other values-based indicators should be jointly identified by the Parties as new information and data become available. Indicators based on socio-cultural values should incorporate traditional knowledge and on-the-land experience. The Parties should look to other initiatives in Canada where indicators of this nature have been developed, including for example the Metlakatla Cumulative Effects Management Program in British Columbia.	Parties should develop values-based indicators for SOCIO-CULTURAL values listed in the Plan. Values-based indicators should be jointly identified by the Parties as new information and data become available. Indicators based on socio-cultural values should incorporate traditional knowledge and on-the-land experience. The Parties should look to other initiatives in Canada where indicators of this nature have been developed.	Changed to remove suggested indicators as list is provided earlier and is not needed in the recommendation.
CEF	4.5.1	2	Policy	Modify	Appendix	Parties should continue to develop values-based indicators for SOCIO-ECONOMIC values listed in the Plan. The Commission have identified the following values-based indicators that could be included as part of a values based cumulative effects framework: - Housing - Jobs - Wellbeing indicators. Other values-based indicators should be jointly identified by the Parties as new information and data become available.	Parties should develop values-based indicators for SOCIO-ECONOMIC values listed in the Plan. Values-based indicators should be jointly identified by the Parties as new information and data become available.	Changed to remove suggested indicators as list is provided earlier and is not needed in the recommendation.
CEF	4.5.1	3	Policy	Modify	Appendix	Government of Yukon to develop policies along with a process and methodology to monitor and update all additional values-based indicators proposed.	Parties should develop policies along with a process and methodology to monitor and update all identified additional values-based indicators.	Changed to reflect intent to work with TH on indicators as indicated in Recommendations 1 and 2 and to limit to "identified" rather than "proposed" indicators.
CEF	4.5.1	4	Policy	Modify	Appendix	Reclamation and Restoration The Parties must define what is meant by reclamation and restoration and how these concepts relate to the Dawson Regional Plan’s cumulative effects framework. Restoration should be values-based and focus on returning the disturbed area as close as possible to its original ecological function, recognizing that this may be harder for some ecosystem types (for example, restoring a bog to a bog).	Reclamation and Restoration The Parties must define what is meant by reclamation and restoration and how these concepts relate to the Dawson Regional Plan’s cumulative effects framework.	The Parties are working together through the cumulative effects working group to address this prior to the completion of the final Plan. No definitions have been agreed to yet, goal for “restoration” may change through these discussions.
CEF	4.5.1	5	Research	Keep	Appendix	To improve surface and linear disturbance tracking, other sources of imagery should be considered, based on cost, ease of use, resolution, update frequency and suitability.		
CEF	4.5.1	6	Research	Modify	Appendix	Undertake and evaluate values-based indicator research, with a priority placed on the impacts of human-caused disturbance on caribou, moose, salmon, and wetlands.	Undertake and evaluate values-based indicator research, with a priority placed on the impacts of human-caused disturbance and disturbance from wildfire and permafrost thaw on caribou, moose, salmon, and wetlands within the context of the cumulative effects framework. Based on this research, Parties may recommend changes to indicators and the cumulative effects framework.	Incorporates multiple recommendations into one comprehensive recommendation
CEF	4.5.1	7	Research	Remove	Remove	Research wildfire disturbance as an indicator with the context of the cumulative effects framework.		Remove, incorporated into 6
CEF	4.5.1	8	Action	Remove	Remove	Based on the above research, the Parties should assess and revise indicator thresholds to meet plan objectives.		Remove, incorporated into 6; if keeping, modify as Commission not Parties should revise thresholds
CEF	4.5.1	9	Action	Remove	Remove	Based on the above research, the Parties should assess whether to revise the cumulative effects framework.		Remove, incorporated into 6
CEF	4.5.1	10	Action	Modify	Appendix	Government of Yukon develops standard estimates of surface disturbance and linear feature density to be applied for different types of Class 1 and 2 activities so that cumulative effects may be estimated without being onerous to proponents of smaller projects.	Government of Yukon develops standard estimates of surface disturbance and linear feature density to be applied for different types of Class 1 and 2 activities so that surface disturbance and linear feature density may be estimated without being onerous to proponents of smaller projects.	Cumulative effects is not synonymous with SD and LD
CEF	4.5.1	11	Policy	Remove	Remove	The Parties work with DRPC, YLUPC and YESAB to ensure conformity checks include cumulative effects threshold assessment. This work should include clarifying information requirements in project proposal for determining conformity. A worksheet or separate application should be considered		Remove - redundant, conformity checks must consider all directions and requirements of the Plan

CEF	4.5.1	12	Action	Modify	Appendix	Short term Government of Yukon produces an annual summary of surface disturbance and linear feature density for each LMU. Medium term Government of Yukon develops an indicator tracking system to be publicly accessible for use in conformity checks and in proposal development. Long term Government of Yukon develops an online platform that would allow proponents to have information that supports their project design. This would make assessment and permitting processes more efficient. Furthermore, this aligns with the Commission’s desire to have proponents working in the Dawson planning Region to take on a greater role as stewards of the land.	Medium term Government of Yukon develops an indicator tracking system that is publicly accessible for use in conformity checks and in proposal development. Long term Government of Yukon develops an online platform that would allow proponents to have information that supports their project design.	Remove short-term action, unachievable without tracking system included in medium-term action. Last two sentences unnecessary.
CEF	4.5.1	New	Research	Add	Appendix	Research ways to incorporate the impacts of projected climate change on values and land use patterns into the cumulative effects framework.		Added climate change considerations
Caribou	5.2.1.1	a	MP	Modify	Plan	Planning for, and assessment of, placer and quartz exploration and mining activities should define and implement safe operating distances from caribou as advised by regional biologists.	Placer and quartz operators should follow safe operating distances from caribou as determined during the assessment and regulatory process.	YG would like to see these text changes so that the management practice is more applicable to proponents themselves. Additionally, project-level assessment or regulatory process are the correct venue for determining the specifics for safe operating distances. Regional biologist may be one source, but there may be others as well.
Caribou	5.2.1.1	b	MP	Keep	Plan	Higher densities of placer mining activity should be avoided within high quality caribou habitat. This determination should be made based on surface disturbance and linear feature density tracking as a part of the cumulative effects framework taking into consideration habitat type and caribou species.		
Caribou	5.2.1.1	c	MP	Modify	Plan	High concentrations of small-scale disturbance and any large quartz exploration projects (Class 4) or quartz mines should be avoided within key migration routes. This determination should be made based on surface disturbance and linear feature density tracking as a part of the cumulative effects framework taking into consideration habitat type and caribou species.	High concentrations of small-scale disturbance, any large quartz exploration projects (Class 4), and quartz mines should be avoided within key migration routes. This determination should be made based on surface disturbance and linear feature density tracking as a part of the cumulative effects framework taking into consideration habitat type and caribou species.	Define this, surface disturbance/linear feature density tracking is completed at the LMU-scale based on identified thresholds. Unclear how these areas will be treated differently to meet this.
Caribou	5.2.1.1	d	MP	Modify	Plan	Activities should be avoided in high quality caribou habitat during important biological periods. Consider the following when determining timing windows for industrial operations: (see Map 5 – Ungulates) - Concentrated critical summer and winter habitat areas. - Migration corridors during fall, summer, and spring migration; rutting areas for woodland caribou. - Concentrated woodland caribou use areas.	Avoid activities in the following areas during use periods: - Concentrated critical summer and winter habitat areas. - Migration corridors during fall, summer, and spring migration; rutting areas for Northern Mountain caribou. - Concentrated Northern Mountain caribou use areas. Consider climate trends and extremes relevant to habitat areas and/or shifts in the times when habitat is used by caribou.	Map 5 does not show these areas - Direction is provided at a project level scale during assessment and regulatory processes. Also modified to clarify when activities should be avoided and where.
Caribou	5.2.1.1	e	MP	Modify	Plan	New road and trail development should be avoided or minimized within the following: - Identified seasonal migration corridors (e.g., along alpine/subalpine ridges) - Areas that bisect corridors at critical migration pinch points; and - Mapped woodland caribou rutting range.	New road and trail development should be avoided or minimized within the following: - Identified seasonal migration corridors (e.g., along alpine/subalpine ridges) - Areas that bisect corridors at critical migration pinch points; and - Northern Mountain caribou rutting range.	Mapped does not need to be specified. All of these three points are information gathered during assessment and regulatory review processes.
Caribou	5.2.1.1	13	Research	Modify	Appendix	The Parties should work together, and collaboratively with other planning partners (e.g., DDRRC and Yukon Fish & Wildlife Management Board, PCMB) to improve research, knowledge, and understanding of caribou in the Planning Region. Key considerations for a research and monitoring program may include: - Improved understanding of caribou–industry interactions to support stewardship objectives and adaptive management. - Continued monitoring of caribou migration patterns and habitat to reflect changes in industrial development activity and cumulative habitat alteration (i.e., development, fire, climate shifts, etc.) and identification of potential effects on caribou habitat use and distribution. - FMCH and PCH mitigations should be designed to address migration of the herd to maximise efficacy. - Undertake lichen mapping/modelling to monitor implications of possible effects of natural processes and climate change (i.e., increase in fire activity, etc.) on the main forage species (lichen) for caribou. - Develop caribou movement alert system based on collared caribou to maximise efficiency and compliance for project proponents.	The Parties should work collaboratively with each other and other planning partners (e.g., DDRRC and Yukon Fish & Wildlife Management Board, PCMB) and industry to improve research, knowledge, and understanding of caribou in the planning region. Key considerations for a research and monitoring program may include: - Improved understanding of caribou–industry interactions, including monitoring and assessing changes to migration patterns and effects to habitat use and distribution, to support stewardship objectives and adaptive management. - Mitigations should be designed to address impacts to caribou migration to maximize efficacy. Mitigations should consider how to incorporate available collar data. - Undertake habitat modelling to assess possible effects of natural processes and climate change (i.e., increase in precipitation, temperatures and fire activity, etc.) on the main forage species (lichen) for caribou.	Bullets combined and simplified
Caribou	5.2.1.1	14	Research	Remove	Remove	The Parties should collaborate with the Porcupine Caribou Management Board to determine the availability and suitability of habitat within LMU 2: Horseshoe (page 170). Based on the results, special management directions for any future development in this area should be developed as appropriate.		Remove - duplicates SMD 6.2 1
Caribou	5.2.1.1	15	Research	Remove	Remove	The Parties should continue to work towards linking the cumulative effects indicator of surface disturbance to the value of caribou as per the recommendations in the Cumulative Effects section of this Plan (Section 4 - Cumulative Effects Framework, page 58).		Remove - redundant; recommendations in section 4 provide stronger direction that achieves this
Caribou	5.2.1.1	16	Action	Remove	Remove	The Commission supports the continued implementation of the Fortymile Caribou Harvest Management Plan and the Porcupine Caribou Harvest Management Plan to ensure survival of the herds for current and future generations.		Remove - no action recommended, by signing Parties agreed to implement these plans.
Caribou	5.2.1.1	17	Action	Remove	Remove	The DDRRC together with technical specialists with Tr’ondëk Hwëch’in and Government of Yukon are currently developing management guidelines for the FMCH. This Plan supports the finalization and implementation of these guidelines.		Remove - no action recommended

Caribou	5.2.1.1	18	Action	Remove	Remove	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. As indicated in Section 5.4.3.2.2 – Access Management Planning Recommendations, priority LMUs include: - LMU 7: Weht'r'e (Antimony) (page 196) - LMU 11: Goldfields (page 218) - LMU 15: Khel Dëk (Sixty Mile) (page 238) - LMU 9: Clear Creek (page 208) - LMU 18: Therian Dëk (Coffee Creek) (page 254) Access management plans should consider the management strategies recommended in this Plan in addition to others developed collaboratively by the Parties.		Remove - covered by recommendation 102
Moose	5.2.1.2	a	MP	Modify	Plan	Avoid or minimize development activity within seasonal use/concentration areas and movement corridors, with specific emphasis on known key calving areas and areas of post-rut aggregation.	Avoid or minimize development activity within seasonal use/concentration areas and movement corridors, with specific emphasis on known areas of post-rut aggregation and late winter habitat.	YG ENV doesn't have information on moose key calving areas. Wording changed based on information YG has or asks proponents to collect.
Moose	5.2.1.2	b	MP	Modify	Plan	Avoid or minimize new road and trail access: - That will result in 'loop road' connections to decrease harvesting pressure. - Within key moose habitat areas where access is currently limited to minimize adverse effects from overharvesting, increased predation, and moose / vehicle collisions.	- Avoid or minimize new road and trail access: - That will result in 'loop road' connections. - Within key moose habitat areas where access is currently limited.	Don't need justification in recommendation
Moose	5.2.1.2	New	MP	Add	Plan		Temporarily reduce human disturbance in key late-winter habitat during years of above-normal snowfall, which are projected to increase under a changing climate.	Added to provide a specific management practice that could make a difference to moose during climate events that are challenging for them.
Moose	5.2.1.2	19	Research	Modify	Appendix	The Parties should work together, and collaboratively with other planning partners (e.g., DDRRC and Yukon Fish & Wildlife Management Board) to improve research, knowledge, and understanding of moose in the planning Region. Key considerations for a research and monitoring program may include: - Improved mapping of important riparian habitat used for calving areas and effects of land use activities on these areas. - Developing a cumulative effects indicator and threshold based on moose habitat in LMU 11: Goldfields (page 218). - Potential consideration could include a road density threshold of 0.6 km/ km² (Beazley, et al., 2004). - Continued monitoring of population trends in areas that experience significant access development and/or hunting pressure to help inform land planning decisions. - Continued work on identifying key mineral licks that are affected by land use disturbance. - Long-term study involving moose and socio-cultural indicators in reclaimed placer areas to further define 'successful' reclamation and its effects on the community.	- The Parties should work together, and collaboratively with other planning partners (e.g., DDRRC and Yukon Fish & Wildlife Management Board) to improve research, knowledge, and understanding of moose in the planning region to help inform future decisions. Key considerations for a research and monitoring program may include: - Improved mapping of important riparian habitat used for calving and the effects of land use activities on these areas. - Developing a cumulative effects indicator and threshold based on moose habitat. - Continued monitoring of moose population trends in areas that experience significant access development and/or hunting pressure. - Continued work on identifying key mineral licks that may be affected by disturbance.	Removed redundancy, expanded to all Plan rather than single LMU
Moose	5.2.1.2	20	Research	Modify	Appendix	Continue to monitor moose density to contribute to access development decision making processes	Continue to monitor moose population density, abundance and composition.	Expanded, justification removed
Moose	5.2.1.2	21	Action	Remove	Remove	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. As indicated in Section 5.4.3.2.2 – Access Management Planning Recommendations, priority LMUs include: - LMU 7: Weht'r'e (Antimony) (page 196) - LMU 11: Goldfields (page 218) - LMU 15: Khel Dëk (Sixty Mile) (page 238) - LMU 9: Clear Creek (page 208) - LMU 18: Therian Dëk (Coffee Creek) (page 254) Access management plans should consider the management strategies recommended in this Plan in addition to others developed collaboratively by the Parties.		Remove - covered by recommendation 102
Moose	5.2.1.2	22	Action	Change Type	Plan	Promote the practice of progressive reclamation of disturbed areas to create suitable moose habitat (e.g., wetlands) where appropriate.	Practice progressive reclamation when disturbing moose habitat areas to recreate suitable moose habitat.	Change to direction for proponents and reword as suggested.
Moose	5.2.1.2	New	Action	Add	Plan		Implement targeted monitoring of precipitation-as-snow for key late-winter habitat.	Supports added management practice.
Salmon	5.2.1.3	a	MP	Modify	Plan	Avoid direct disturbance to known sensitive over-wintering, rearing habitats for juveniles, as well as spawning habitats for salmon.	Avoid direct disturbance to sensitive over-wintering, rearing habitats for juveniles, as well as spawning habitats for salmon.	"Known" removed per request by TH, in line with DFO guidance to avoid impacts whether areas are known or not
Salmon	5.2.1.3	b	MP	Keep	Plan	Minimize surface and vegetation disturbance in riparian areas by maintaining riparian buffers/setbacks from development activities where possible.		
Salmon	5.2.1.3	c	MP	Modify	Plan	Avoid significant levels of winter in-stream water withdrawals in known sensitive over-wintering and rearing fish habitat.	Avoid winter in-stream water withdrawals in or upstream of sensitive over-wintering and rearing fish habitat.	"Known" removed per request by TH, in line with DFO guidance to avoid impacts whether areas are known or not, "significant levels" removed as this is undefined
Salmon	5.2.1.3	d	MP	Remove	Remove	Avoid or minimize adverse effects of large-scale industrial and/or infrastructure projects within river corridors.		Redundant, already required for projects generally by YESAA and government policy not just within these areas
Salmon	5.2.1.3	e	MP	Modify	Plan	Avoid direct or indirect blocking of identified fish migration routes.	Avoid direct or indirect blocking of fish migration routes.	"Identified" removed per request by TH, in line with DFO guidance to avoid impacts whether areas are known or not
Salmon	5.2.1.3	f	MP	Modify	Plan	Implement timing windows for lifecycle related habitat types (i.e., overwintering habitat and water withdrawals, spawning streams etc.) as per Freshwater Timing Windows Identified for the Yukon (https://www.dfo-mpo.gc.ca/pnw-ppe/timing-periodes/yk-eng.html).	Adhere to timing windows for lifecycle related habitat types (i.e., overwintering habitat and water withdrawals, spawning streams etc.) as per Freshwater Timing Windows Identified for the Yukon (https://www.dfo-mpo.gc.ca/pnw-ppe/timing-periodes/yk-eng.html).	Modified to direct to proponents

Salmon	5.2.1.3	23	Policy	Modify	Appendix	Implement the recommendations found in the Review and Evaluation of Adaptive Management in the Fish Habitat Management System for Yukon Placer Mining (Olson, et al., 2020).	The Parties should implement the recommendations found in the Review and Evaluation of Adaptive Management in the Fish Habitat Management System for Yukon Placer Mining (Olson, et al., 2020).	Include recommendations relevant to achieving Plan goals
Salmon	5.2.1.3	24	Research	Modify	Appendix	A comprehensive, publicly accessible aquatic habitat inventory should be conducted prior to mining and other land use activities in areas that have not yet been mined to determine whether salmon habitat is at risk. Such an assessment should identify and map key habitat with specific focus on spawning and over-wintering areas.	A comprehensive, publicly accessible aquatic habitat inventory should be conducted in [specify LMUs of interest]. Such an inventory should identify and map key habitat with specific focus on spawning and over-wintering areas and their response to climate change impacts. This information should be used to update the classification of streams and Areas of Special Consideration identified on the Yukon Placer Fish Habitat Suitability maps for watersheds in the planning region.	Focuses research on priority areas and add use for results.
Salmon	5.2.1.3	25	Research	Remove	Remove	Working with other organisations as necessary, including Fisheries and Oceans Canada (DFO), the Parties should continue to re-evaluate the effectiveness of the Fish Habitat Management System for Yukon Placer Mining.		Remove - covered by recommendation 23
Salmon	5.2.1.3	26	Research	Modify	Appendix	The Parties, together with other potential planning partners (e.g., YSSC and DFO) should collaborate and implement research strategies focusing on: - Recognizing the work done to date, continue to gain a better understanding of Yukon River Chinook salmon rearing and overwintering habitat in the planning Region. - Developing a publicly available aquatic inventory of streams, rivers, and tributaries in areas that have not been mined or areas not currently being mined, to ascertain if salmon habitat or freshwater fish habitat is likely to be at risk if developed. - Examine the current water withdrawal tracking system to explore opportunities for improvement and to better understand the impact on aquatic habitat in the Region. - Understanding and assessing the cumulative effects of land use activities on salmon and their habitat to further inform indicators and thresholds in Plan monitoring and implementation. - Research the impact of use of high-powered boats, which cause significant wake and turbulence leading to damage to riverbanks and mouths of small tributaries, resulting in adverse effects to salmon and their habitat (see Section 5.4.3.5 – Water Access, page 143).	The Parties, together with relevant organizations (e.g., YSSC and DFO) should collaborate and implement research strategies focusing on: - Recognizing the work done to date, continue to gain a better understanding of Yukon River Chinook salmon rearing and overwintering habitat in the planning Region. - Examine the current water withdrawal tracking system to explore opportunities for improvement and to better understand the impact on aquatic habitat in the Region. - Understanding and assessing the cumulative effects of land use activities on salmon and their habitat to further inform indicators and thresholds in Plan monitoring and implementation. - Research the impacts of use of high-powered boats on salmon and salmon habitat. - Study climate change impacts on salmon habitat in the planning region.	Bullet 2 covered by recommendation 24.
Salmon	5.2.1.3	27	Action	Remove	Remove	Evaluate the existing watershed authorizations under the Federal Fisheries Act, the Fish Habitat Management System, and the adaptive management framework within the FHMS, and how this system can work as a part of and within the Region.		Remove - covered by recommendation 23
Salmon	5.2.1.3	28	Action	Modify	Appendix	Implementation of long-term water quality monitoring, which should be used to inform decision making to protect salmon habitat, similar in scope to the Environment and Climate Change National Long-term Water Quality Monitoring Data. A station currently exists within the Planning Region at the Klondike River. Additional stations could be installed at the following important major watercourses: - Yukon River South and North - Sixty Mile River - Indian River - White River - Stewart River - Fortymile River - Fifteen Mile River	Implementation of long-term water quality monitoring, which should be used to inform decision making to protect salmon habitat, similar in scope to the Environment and Climate Change Canada National Long-term Water Quality Monitoring Data. A station currently exists within the Planning Region at the Klondike River. Additional stations could be installed at the following important major watercourses: - Yukon River South and North - Sixty Mile River - Indian River - White River - Stewart River - Fortymile River - Fifteen Mile River	
Salmon	5.2.1.3	29	Action	Modify	Appendix	Continue to support ongoing work on chinook salmon restoration projects by Tr’ondëk Hwëch’in and other organisations in collaboration with potential planning partners (e.g., Yukon Salmon Sub-Committee, Fisheries and Oceans Canada, Yukon River Panel).	Continue to support ongoing work on Chinook salmon habitat restoration projects by Tr’ondëk Hwëch’in and other organisations in collaboration with potential planning partners (e.g., Yukon Salmon Sub-Committee, Fisheries and Oceans Canada, Yukon River Panel).	
Salmon	5.2.1.3	30	Action	Modify	Appendix	The Parties should create/fund an education platform to educate the public on the impact of land uses on salmon habitat and mitigation through best management practices/management strategies, to communicate the cultural importance of salmon, and to foster stewardship initiatives.	The Parties should create/fund an educational platform to inform the public on the impact of land uses on salmon habitat, best management practices/management strategies to mitigate effects, the cultural importance of salmon, and stewardship initiatives.	
Sheep	5.2.1.4	a	MP	Remove	Remove	In specific LMUs where sheep habitat is of concern, Special Management Direction is provided including: - Avoidance of industrial activities within sensitive sheep habitats and key areas, with emphasis on winter range avoidance (Map 5 – Ungulates). - Implementation of timing windows for land use activities and aerial access restrictions during lambing periods in areas of known key sheep habitat.		Remove - redundant, included as SMDs where needed
Sheep	5.2.1.4	31	Policy	Remove	Remove	The Commission have recommended that LMU 1: Tthetäwndëk (Tatonduk) (page 164), LMU 4: Tsey Dëk (Fifteenmile) (page 180) and LMU 7: Wehtr’e (Antimony) (page 196) be designated as Special Management Areas. These three LMUs contain the highest quality known sheep habitat in the Region (DRPC, 2020c).		Remove - no recommendation to the Parties
Grizzly and Black Bears	5.2.1.5	32	Research	Modify	Appendix	The Parties should work together, and collaboratively with other planning partners (e.g., DDRRC, PCMB, Fortymile Harvest Management Committee, and YFWMB) to improve research, knowledge and understanding of grizzly bears in the planning Region. - Key considerations for a research and monitoring program should focus on identifying and mapping key habitat areas and other research topics identified under Goal #3 of the Conservation Plan for Grizzly Bears in Yukon (2019). - Management decisions for grizzly bear habitat management should have a strong foundation in local Traditional Knowledge. - Decisions should be developed and promoted as an educational tool to promote stewardship of bear habitat.	The Parties should work together, and collaboratively with other planning partners (e.g., DDRRC, PCMB, Fortymile Harvest Management Committee, and YFWMB) to improve research, knowledge and understanding of grizzly bears in the planning Region. - Key considerations for a research and monitoring program should focus on identifying and mapping key habitat areas and other research topics identified under Goal #3 of the Conservation Plan for Grizzly Bears in Yukon (2019). - To better understand how climate change may influence human-grizzly bear conflict, monitor climate change impacts to grizzly bears, including their seasonal behaviour and food sources. - Management decisions for grizzly bear habitat management should have a strong foundation in local Traditional Knowledge. - Develop and promote educational tools to promote stewardship of bear habitat.	Added climate change considerations Decisions are not educational tools

Grizzly and Black Bears	5.2.1.5	33	Action	Remove	Remove	The Parties should establish the proposed SMAs identified for conservation management in this Plan to ensure there is a large-scale connected landscape that protects key grizzly bear habitat.		Don't need to recommend accepting portions of the Plan, parties sign off on as a whole
Grizzly and Black Bears	5.2.1.5	34	Action	Keep	Appendix	The Parties should continue to work at implementing the Conservation Plan for Grizzly Bears in Yukon in collaboration with the Yukon Fish and Wildlife Management Board (YFWMB), with specific attention to Goal #2 (Take care of the land and other species that grizzly bears require).		
Resident Fish Species	5.2.2.1	a	Management Practice	Remove	Remove	The management strategies listed in Subsection 5.2.1.3 – Salmon should be considered to reduce the potential effects of land use activity on fish, aquatic habitats, and water quality, where applicable.		Adapt practices to focus on the habitat requirements of freshwater fish species which may differ from those of salmon - three new management directions proposed instead.
Resident Fish Species	5.2.2.1	New	MP	Add	Plan		Implement timing windows for lifecycle related habitat types (i.e., overwintering habitat and water withdrawals, spawning streams, etc.) as per Freshwater Timing Windows identified for the Yukon (https://www.dfo-mpo.gc.ca/pnw-ppe/timing-periodes/yk-eng.html)	
Resident Fish Species	5.2.2.1	New	MP	Add	Plan		Do not allow direct disturbance to known sensitive over-wintering, rearing habitats for juveniles, as well as spawning habitats for freshwater fish.	
Resident Fish Species	5.2.2.1	New	MP	Add	Plan		Minimize surface and vegetation disturbance in riparian areas by maintaining riparian buffers/setbacks from development activities where possible.	
Resident Fish Species	5.2.2.1	35	Research	Modify	Appendix	The Parties should work collaboratively with DDRRC and YFWMB to define and map key aquatic habitat for resident fish species prior to the assessment process for large-scale industrial and/or infrastructure projects focusing specifically on spawning and over-wintering habitat within ISAs 3 & 4 and the LMU 3: Chu Kon Dëk (Yukon River Corridor). Data should be made publicly available.	The Parties should work collaboratively with DDRRC and YFWMB to define and map key aquatic habitat for resident fish species focusing specifically on spawning and over-wintering habitat within ISAs 3 & 4 and the LMU 3: Chu Kon Dëk (Yukon River Corridor). Data should be made publicly available.	"Large-scale industrial or infrastructure projects" undefined terms therefore removed
Migratory Birds and Raptors	5.2.2.2	a	MP	Modify	Plan	As per guidance from the Canadian Wildlife Service, project planning should consider avoidance of activities in migratory bird high concern areas (such as the Tintina Trench) and during key migratory periods (spring and fall). (See Map 4 – Selected Ecologically Important Areas).	Avoid activities in migratory bird high concern areas and the Tintina Trench flyway (See Map 4 – Selected Ecologically Important Areas) during key migratory periods (spring and fall).	Map 4 shows Tinitina Trench flyway and migratory bird high concern areas but it is very difficult to decipher where these areas are.
Migratory Birds and Raptors	5.2.2.2	b	MP	Remove	Remove	Avoid or minimize disturbance in areas where elevation is greater than 1,000 metres to protect migratory bird specialist species that use high elevation habitats.		Overly broad, Migratory Birds Act provides protection for habitat.
Migratory Birds and Raptors	5.2.2.2	36	Research	Modify	Appendix	The Parties should undertake research initiatives with the Canadian Wildlife Service, and other planning partners as appropriate, to build knowledge of the location of key staging and nesting areas in the planning Region to further build Yukon's Wildlife Key Area database.	The Parties should undertake research initiatives with the Canadian Wildlife Service, and other planning partners as appropriate, to build knowledge of the location of key staging and nesting areas in the planning Region to further build Yukon's Wildlife Key Area database. This research should consider/monitor how projected climate change, such as shifts in freeze-thaw cycles, could alter accessibility, timing, and use of staging and nesting areas.	Additions to address climate change
Species at Risk and Rare Endemic Species (SAR & RES)	5.2.2.3	a	MP	Keep	Plan	Apply mitigations for known locations of species at risk or rare endemic species as provided by Canadian Wildlife Service and Government of Yukon.		
SAR & RES	5.2.2.3	b	MP	Remove	Remove	Avoid activity that may cause disturbance or destruction of Bank Swallow residences whenever the burrow is occupied, which is typically during the nesting period that may extend from early May to late August in the Yukon, where found along clay/silt banks in river corridors, sandy banks along roads, and stockpiles and mining pits, as per Species at Risk Act.		Remove, required by <i>Migratory Birds Act</i> and <i>Species at Risk Act</i>
SAR&RES	5.2.2.3	New	MP	Add	Plan		Integrate species at risk recovery strategies (https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies.html).	Added biodiversity considerations
SAR & RES	5.2.2.3	c	MP	Modify	Plan	Continue to work with Canadian Wildlife Service and other planning partners to identify and document species at risk or rare endemic species in advance of submitting a project for review.	Work with Government of Yukon and Canadian Wildlife Service to identify and document species at risk or rare endemic species in the project area in advance of submitting a project for assessment.	YG has some info on rare species
SAR & RES	5.2.2.3	New	MP	Add	Plan		Avoid or minimize disturbance in rare habitats and ecosystems, for example, steppe, riparian old growth, saline flats, alpine wetlands.	Added to support the planning issues for species at risk and rare/endemic species.
SAR & RES	5.2.2.3	37	Policy	Remove	Remove	The Parties should implement recommended SMAs, some of which contain known occurrences of species at risk and ecosystem types that are likely to contain species at risk or rare endemic species based on best available information. The recommended SMAs also provide for landscape connectivity which will help to sustain healthy habitat for other species at risk (e.g., grizzly bears).		Remove - redundant, SMAs and their requirements accepted by accepting the Plan
SAR & RES	5.2.2.3	New	Policy	Add	Appendix		The Parties should continue to advance research, knowledge sharing and action in the planning region in a manner that is consistent with this Plan. This work will increase awareness of the planning region's unique biodiversity, and advance proactive actions that will safeguard this unique biodiversity.	Added to support the planning issues for species at risk and rare/endemic species.
SAR & RES	5.2.2.3	New	Research	Add	Appendix		The Parties should continue to prioritize research that increases our understanding of rare species and ecosystems, in particular low elevation steppe meadows and alpine areas, and monitor changes to those species and ecosystems. This knowledge should be used to advance biodiversity impact mitigations for proposed activities.	Added to support the planning issues for species at risk and rare/endemic species.
SAR & RES	5.2.2.3	New	Research	Add	Appendix		The Parties, in partnership with the Canadian Wildlife Service and other agencies, should continue to monitor distribution of federally-listed species at risk, as defined by the Species At Risk Act, 2002, to ensure pro-active management and recovery actions can be undertaken to ensure these species continue to prosper within the Planning Region.	Added to support the planning issues for species at risk and rare/endemic species.
SAR & RES	5.2.2.3	New	Research	Add	Appendix		The Parties should work collaboratively to identify the species at risk, rare endemic species and the ecosystems in the planning region that face the highest risk from a changing climate to inform management of activities in those areas.	Added to support the planning issues for species at risk and rare/endemic species.
Rivers and Watercourses	5.2.4	a	MP	Keep	Plan	Conduct activities in a way that minimizes the runoff of sediment into water courses.		

Rivers and Watercourses	5.2.4	b	MP	Remove	Remove	Monitor the use of rivers, watercourses, and riparian zones. Use an integrated approach considering cumulative impacts and include the full range of users, from industry to recreational use. There needs to be better monitoring and enforcement related to barge landings. When a permit/licence changes hands, clean-up is recommended.		These are three separate issues. The first (monitoring of rivers) is beyond the ability of proponents. The second (monitoring and enforcement) is also beyond proponents but does not provide specific direction. The third (clean-up) is likely not desired if operations are intended to continue.
Rivers and Watercourses	5.2.4	38	Policy	Remove	Remove	Promote “leave no trace” approaches to recreation and tourism activities along the rivers.		Covered by 5.4.5 a
Rivers and Watercourses	5.2.4	39	Policy	Modify	Appendix	The Parties to allocate resources to develop capacity for monitoring and guardianship. Capacity includes expertise/local knowledge/ training.	Monitor water ways for potential adverse impacts of industrial development, in keeping with Yukon Water Board recommendations and support local participation in water monitoring.	Recommendation was too broad and not specific to rivers and watercourses.
Rivers and Watercourses	5.2.4	40	Policy	Modify	Appendix	As part of reconciliation, allocate funding to help First Nations citizens reconnect to the rivers.	Promote and support First Nations citizens' reconnection to rivers.	Method to be determined by Parties
Rivers and Watercourses	5.2.4	41	Action	Keep	Appendix	Parties to work together to explore opportunities for users to educate themselves about respectful use of rivers (e.g., pamphlets, online materials, and signs).		
Rivers and Watercourses	5.2.4	42	Action	Modify	Appendix	Undertake clean-up initiatives along the rivers to address recreational and industrial waste. Government of Yukon Tourism Branch should take responsibility for this, with participation from Tr’ondëk Hwëch’in Government. Special attention be given to LMU 3: Chu Kon Dëk (Yukon River Corridor) (page 174).	Parties to undertake clean-up initiatives along the rivers to address recreational and industrial waste. Special attention be given to LMU 3: Chu Kon Dëk (Yukon River Corridor) (page 174).	Beyond YG Tourism mandate
Rivers and Watercourses	5.2.4	43	Action	Keep	Appendix	Re-establish traditional ceremonies along the rivers.		
Rivers and Watercourses	5.2.4	New	Research	Add	Appendix		Expand continuous monitoring of hydrologic, water quality and climate variables throughout the planning region to support detection and attribution of climate change impacts on rivers and water courses.	Addition to address climate change
Wetlands	5.2.5	44	Policy	Change Type	Plan	No development is to be permitted in undisturbed bogs and marshes throughout the Region.	No development in undisturbed bogs and marshes throughout the Region.	Change to direction for proponents and reword as suggested.
Wetlands	5.2.5	45	Policy	Change Type	Plan	No development is to be permitted in undisturbed fens in: - Special Management Areas; and - LMU 19: Tădzan Dëk (White River) (page 258)		Change to SMD for applicable LMUs, change LMU 19 to WSIs. Already included in LMUs 10, 19, 20 need to add to LMU 1, 4, 16 and 21.
Wetlands	5.2.5	46	Policy	Change Type	Plan	Fen Thresholds - In LMU 17: Năn Dhòhdäl (Upper Indian River Wetlands) (page 248) development is permitted in up to 50 percent of fens on a claim block or permit area basis. - For the purposes of measuring fen thresholds, the definition of disturbance is as per the glossary, consistent with cumulative effects indicator measurement. - Thresholds should be established with the baseline state of wetlands as of 2022, not based on the amount of fens existing at the time of application. - Proponents should, for each development proposal, identify and verify wetlands, submit a wetland mitigation plan outlining the steps of the mitigation hierarchy, and create a wetland reclamation plan for approval before work commences. - Disturbance of wetlands at the LMU scale should be monitored, reported, and tabulated annually.	Fen Thresholds - In LMU 17: Năn Dhòhdäl (Upper Indian River Wetlands) (page 248) development is allowed in up to 50 percent of fens on a claim block or permit area basis. - For the purposes of measuring fen thresholds, the definition of surface disturbance is as per the glossary, consistent with cumulative effects indicator measurement. - Thresholds should be established with the baseline state of wetlands as of 2022, not based on the amount of fens existing at the time of application. - Proponents should, for each development proposal, identify and verify wetlands, submit a wetland mitigation plan outlining the steps of the mitigation hierarchy when wetlands are identified, and create a wetland reclamation plan for approval before work commences. - Disturbance of wetlands at the LMU scale should be monitored, reported, and tabulated annually.	Change first three bullets to SMD for LMU 17 (combine with SMD 6.17 3 b) Fourth bullet should be a management practice Final bullet could remain as recommendation to Parties.
Wetlands	5.2.5	47	Policy	Remove	Remove	Wetlands of Special Importance The Yukon Government Draft Wetland Policy proposes ‘Wetlands of Special Importance’ which can be nominated through the regional planning process. Currently, this designation would mean no loss of wetlands in these areas. Subject to approval of a Yukon Wetland Policy, Scottie Creek, Flat Creek, and Ladue Wetlands are to be designated as Wetlands of Special Importance, under the condition that the provisions in the final Wetland Policy meet or exceed the standard for conserving wetland values management of this Plan.		Remove - redundant, WSI recommendations included in SMDs for LMUs 10 (Flat Creek), 19/21 (Ladue) and 20 (Scottie Creek)
Wetlands	5.2.5	48	Policy	Remove	Remove	Prioritisation of completion of policy documents and wetland guidance The completion of the following wetland-related government initiatives and policies should be prioritized: The Yukon Wetland Policy and the Yukon Water Board Wetland Plan Guidelines. The Commission also supports the prioritized completion of the Government of Yukon and Tr’ondëk Hwëch’in Government’s co-developed study on wetlands and guidelines for the reclamation of naturally occurring wetlands affected by placer mining in the Indian River Watershed.		Remove - Wetland Policy complete, YWB not a party to the Plan
Wetlands	5.2.5	49	Policy	Keep	Appendix	Public Awareness Appreciation for wetlands should be promoted through public education, focusing on understanding the values and function of wetlands with the goal of creating stewardship opportunities to further the connection to wetlands in the area.		

Wetlands	5.2.5	50	Policy	Change Type	Plan	Buffers A buffer of 20 meters around undisturbed bogs/marshes/protected fens wetlands where no development should occur, until such a time that the research can inform a buffer size (undertaken by the Parties as stated in the research recommendations) is conducted	Buffers The following buffers shall be applied around protected fen wetlands. Wetland Size (ha) Reserve Zone Width (m) Management Zone (m) Riparian Management Area Width (m) <1 5 60 65 1-5 60 40 100 >5 60 140 200 No development should occur within the reserve zone (measured from the edge of the wetland), and only activities that do not harm the integrity of the wetland and reserve zone should occur within the management zone (measured from the outer edge of the reserve zone). The purpose of creating buffers is to protect wetland functions and benefits in areas where development is permitted. Recognizing that the recommended buffer may not be sufficient to protect certain wetland functions or benefits, an adaptive management approach may be used to increase the recommended buffer when site-specific assessment or research is conducted and the revised buffers are agreed upon by the Parties.	Change to management practice
Wetlands	5.2.5	51	Research	Remove	Remove	Buffers The purpose of creating buffers is to protect wetland features and functions in areas where development is permitted. Recognizing that the recommended buffer of 20 meters may not be sufficient to protect intact wetland values an adaptive management approach should be used to alter the recommended buffer when research is conducted and agreed upon by the Parties. The Parties should consider the best available data and literature on wetland buffers to determine a solution based on the characteristics of the watershed, wetland type, and the intensity of associated land activities.		Incorporated into 50
Wetlands	5.2.5	52	Research	Keep	Appendix	Wetland Inventory The Parties are to ensure that wetland classification mapping and hydrological models are done to support implementation of wetland disturbance thresholds. These should be completed using a scale that works for ‘on the ground’ implementation of the Plan. The mapping already completed by Ducks Unlimited Canada and Tr’ondëk Hwëch’in can be expanded on for the wetland inventory. Parties should prioritise detailed wetland inventories in areas with concentrations of wetlands and development interest (e.g., LMU 17: Nän Dhòhdäl (Upper Indian River Wetlands) (page 248) and these should be made publicly available for use by regulators and proponents.		
Wetlands	5.2.5	53	Research	Modify	Appendix	Wetland Research Initiatives The Parties should undertake and promote research projects and initiatives that align with the Plan objectives. These could focus on the following areas: - Effective wetland reclamation strategies to restore wetland functions. - Impacts of a changing climate on wetlands. - Cumulative impact thresholds and wetland ecosystem resilience. - Measurable indicators of wetland health. Collaboration and partnerships with industry, non-profit, academic, and local and international sources of knowledge are needed to create a more complete understanding of the Region’s wetlands.	Wetland Research Initiatives The Parties should undertake and promote research projects and initiatives that align with the Plan objectives. These could focus on the following areas: - Effective wetland reclamation strategies to restore wetland functions. - Impacts of a changing climate on wetlands. Collaboration and partnerships with industry, non-profit, academic, and local and international sources of knowledge are needed to create a more complete understanding of the Region’s wetlands.	Partially covered by recommendation 6
Wetlands	5.2.5	54	Action	Remove	Remove	Wetland Development Index The Parties should consider an adaptive management approach to assessing wetland disturbances in areas where development is permitted in wetlands. The DFO Fish Habitat Management System for Placer Mining should be considered as a model for such an approach.		Removed, as wetland policy now outlines (YG) approach to assessing wetland disturbance. The policy's approach will evolve as the policy implementation progresses, but serves as suitable guidance at this time.
Climate Change	5.2.6	a	MP	Remove	Remove	Ensure resilience when designing, developing, and maintaining transportation infrastructure (see Section 5.4.3 – Transportation and Access, page 129).		Remove - combined with 5.2.6 b
Climate Change	5.2.6	b	MP	Modify	Plan	Climate change considerations, including potential variability in environmental conditions and adaptation/resilience, should be assessed and addressed in the design and adaptive management of major resource development and infrastructure projects.	Climate change considerations, including information from climate risk assessments and other climate data, potential variability in environmental conditions and adaptation/resilience, should be assessed and addressed in the design and adaptive management of major resource development and infrastructure projects, including transportation infrastructure. Build in resilience to transportation and other infrastructure that may be impacted by slow-onset events such as permafrost thaw, increases in precipitation and temperature and other risks.	Incorporated 5.2.6 a in
Climate Change	5.2.6	c	MP	Keep	Plan	Apply mitigations to minimize the risk of introducing invasive species related to development activities. Priority should be in previously undisturbed areas and areas of high ecological or socio-cultural value.		Wrong section, unrelated to climate change. Keep but move to s. 5.2.2.2
Climate Change	5.2.6	d	MP	Remove	Remove	Proponents, land users, and project assessors should apply information from climate risk assessments and other climate data to land management decisions. This includes taking steps to ensure infrastructure is resilient to climate change impacts such as permafrost thaw and precipitation changes.		Parties are the ones making land management decisions not these groups, b otherwise covers proponents’/ assessors’ roles.
Climate Change	5.2.6	55	Policy	Modify	Appendix	Fortymile Caribou Given that caribou habitat is less resilient than other habitat, the Parties should consider climate driven shifts in habitat requirements for the Fortymile Caribou Herd at Plan review to ensure the Plan remains true to the caribou objectives. See also Section 5.2.1.1 – Caribou (page 74).	Caribou The Parties should consider climate driven shifts in habitat requirements for caribou at Plan review to ensure the Plan remains true to the caribou objectives. See also Section 5.2.1.1 – Caribou (page 74).	Broadened to consider climate change impacts on all herds

Climate Change	5.2.6	56	Policy	Remove	Remove	Food Security Parties should implement policy and research recommendations in Section 5.4.4 – Agriculture (page 145) to improve self-sufficiency through sustainable and reliable food networks in the Dawson Region, such as making more agricultural lands available.		Remove - redundant, referenced recommendations would be accepted by accepting the Plan
Climate Change	5.2.6	57	Policy	Keep	Appendix	Energy Production The Parties should support the development of alternative green energy sources within the Planning Region, including advances in hydroelectricity, biomass, geothermal, wind, and solar.		
Climate Change	5.2.6	58	Research	Modify	Appendix	Wildlife and Land Use The Parties should continue to support and fund initiatives to better understand the impacts of climate change in the Dawson planning Region, including the full consideration of traditional knowledge, which is particularly important for informing our understanding of climate change impacts in northern ecosystems. - Research initiatives may include but are not limited to: - Wildlife species-specific or multi-species vulnerability assessment, and climate-induced shifts in species distribution. - How climate driven shifts impact land use patterns and the pursuit of traditional economic activities. - Identification of refugia areas for species at risk.	Wildlife and Land Use The Parties should continue to support and fund initiatives to better understand the impacts of climate change in the Dawson planning region. This includes the full consideration of traditional knowledge, which is particularly important for informing historical context. Research initiatives may include but are not limited to: - Wildlife species-specific or multi-species vulnerability assessment, and climate-induced shifts in species distribution. - How climate driven shifts impact land use patterns and the pursuit of traditional economic activities. - Identification of refugia areas for plants, fish and wildlife.	Refugia will be needed for more than species at risk
Climate Change	5.2.6	59	Research	Modify	Appendix	Permafrost The Parties should continue to develop specific research initiatives in the planning Region that align with the Goals and Objectives of the Plan: - The identification of high-risk areas for permafrost thaw locations. - The impacts of permafrost thaw on local biophysical conditions, including water quality and availability, flow, and wetlands. - Greenhouse gas emissions resulting from melting permafrost. - Appropriate and effective mitigation measures for minimizing permafrost thaw from resource and road development projects. - Explore techniques for encouraging re-establishment of permafrost. - Geohazard mapping and permafrost studies along major transportation routes, including the Dempster and Top of the World Highways.	Permafrost The Parties should continue to develop specific research initiatives in the planning Region that align with the Goals and Objectives of the Plan: - The identification of high-risk areas for permafrost thaw. - The impacts of permafrost thaw on local biophysical conditions, including water quality and availability, flow, and wetlands. - Greenhouse gas emissions resulting from permafrost thaw. - Appropriate and effective mitigation measures for minimizing permafrost thaw from resource and road development projects. - Explore techniques for encouraging re-establishment of permafrost. - Geohazard mapping and permafrost studies along highway corridors.	
Climate Change	5.2.6	60	Action	Remove	Remove	Consider potential climate change threats and take proactive measures to improve resilience and mitigate the impacts.		Remove - to broad, no recommendation to the Parties, covered by 5.2.6 b
Climate Change	5.2.6	61	Action	Remove	Remove	Adaptive Management The Parties should follow and implement adaptive management recommendations in the Cumulative Effects (see Section 3 – Plan Concepts (page 41) and Implementation and Review (see Section 6 – Landscape Management Units (page 160) with a particular emphasis on climate change considerations.		Remove - redundant, referenced sections would be accepted by accepting the Plan
Climate Change	5.2.6	62	Action	Change Type	Plan	Build in resilience to transportation and other infrastructure that may be impacted by floods, permafrost thaw and other risks.		Reworded and combined with 5.2.6 b
Climate Change	5.2.6	63	Action	Modify	Appendix	Build capacity for flood forecasting, preparedness, and response.	Build capacity for disaster risk reduction, with particular attention to reducing the risk and impact of natural disasters resulting from flooding, landslide and wildfire	Expanded
Climate Change	5.2.6	New	Research	Add	Appendix		Expand collection, and improve accessibility of basic meteorological monitoring data throughout the planning region, with a target of having one monitoring station per LMU.	Added by CCS
Heritage Resources and Sites	5.3.1	a	MP	Remove	Remove	Where required by the Parties, ensure that adequate heritage and historic: resource assessments are completed as part of the review and assessment of projects.		Remove - redundant, if required by Parties, proponents would have to follow
Heritage Resources and Sites	5.3.1	b	MP	Modify	Plan	Avoid or reduce the level of land use activities in the vicinity of heritage and historic resources. This may include areas that have not been formally identified but are important for Tr’ondëk Hwëch’in or other First Nations. The assessment process should consider oral traditions and testimony as equal to other forms of evidence and criteria.	Avoid or reduce the level of land use activities in the vicinity of heritage and historic resources. The assessment process should consider oral traditions and testimony as equal to other forms of evidence and criteria.	This is too vague to follow- the Historic Resources Act already regulates activities in proximity to heritage resources and requires mitigations if development activities are to occur. To implement these mitigations, heritage resources have to be identified- asserting that mitigations need to happen where heritage resources are ‘not formally identified’ could mean everywhere. This seems impractical as a management practice.
Heritage Resources and Sites	5.3.1	c	MP	Keep	Plan	Avoid or reduce the level of land use activities in cultural and heritage use areas during important seasonal use periods (e.g., use timing windows).		
Heritage Resources and Sites	5.3.1	d	MP	Keep	Plan	Report the discovery of any heritage and/or historic resource within an affected First Nation’s traditional territory to their applicable heritage departments, in addition to the Government of Yukon.		
Heritage Resources and Sites	5.3.1	e	MP	Modify	Remove	Where impacts to identified heritage and cultural sites and resources may occur, ensure appropriate mitigations are in place using best practices as determined by the Parties and YESAB.	Where impacts to identified heritage and cultural sites and resources may occur, follow appropriate mitigations as determined by the Parties and YESAB .	Remove - redundant, YESAB and Parties already determine mitigations (if possible) in the case that impacts are identified
Heritage Resources and Sites	5.3.1	f	MP	Change Type	Plan	Implement monitoring of known cultural and heritage resources and sites with regard to climate change impacts.		Change to direction to Parties, beyond proponent's abilities and broader than project-scale

Heritage Resources and Sites	5.3.1	64	Policy	Keep	Appendix	Avoid the promotion of ancestral trails as recreational trails for use by the public to preserve their heritage and cultural value.		
Heritage Resources and Sites	5.3.1	65	Research	Modify	Appendix	The Parties should continue to support and fund research to better understand ancient trails and travel routes within the Planning Region to ensure their cultural and heritage values are appropriately managed and protected, while minimising potential land use conflicts.	The Parties should continue to support and fund research to better understand heritage resources including ancient trails and travel routes within the Planning Region to ensure their cultural and heritage values are appropriately managed and protected, while minimising potential land use conflicts.	Broadened
Heritage Resources and Sites	5.3.1	66	Research	Remove	Remove	The Parties should continue to research and use traditional Hân names wherever possible on mapping and other products developed through Plan implementation and monitoring.		Remove - covered by recommendation 71
Heritage Resources and Sites	5.3.1	67	Research	Keep	Appendix	The Parties should undertake an assessment of the potential impacts of climate change to heritage and cultural resources.		
Heritage Resources and Sites	5.3.1	68	Action	Keep	Appendix	The Parties should jointly develop management guidelines for identified heritage routes and sites within the Integrated Stewardship Area (ISA). Routes and sites within SMAs should be considered as part of each SMA's respective management plan.		
Stewardship	5.3.2	69	Action	Remove	Remove	Dawson Land Stewardship Trust The Parties should create and fund a Land Stewardship Trust for the Dawson Region with the mandate to fund projects to promote the ongoing practice of stewardship of the land beyond Plan approval. The purpose of the Land Stewardship Trust will be to invite people to think differently about their relationship to the land and to encourage stewardship in the Region. It is not intended to be a regulatory body. The Trust should be governed by the Commission, a model demonstrated by the Yukon Fish and Wildlife Enhancement Trust as per Chapter 27 of the FNFA. Appendix 4: Dawson Land Stewardship Trust outlines the Commission's vision and intent for the Land Stewardship Trust.		Beyond Plan scope
Harvesting Rights and Activities	5.3.3	a	MP	Modify	Plan	Avoid or reduce the level of land use activities in important harvesting, cultural and traditional use areas (See Map 6 – First Nations Land Use, Heritage, and Cultural Resources).	Avoid or reduce the level of land use activities in important harvesting, cultural and traditional use areas.	Map 6 does not show these areas
Harvesting Rights and Activities	5.3.3	b	MP	Modify	Plan	Adhere to appropriate buffers zones as determined by Regional biologists or assessors (which may be permanent or temporary) around culturally and traditional important harvesting areas (see LMU 10: Tintina Trench (page 212) and LMU 14: Tay Dëkdhât (Top of the World) (page 232).	Adhere to appropriate buffers zones (which may be permanent or temporary) as determined during assessment or regulatory processes around culturally and traditional important harvesting areas.	Regional bios should not determine this. If this only applies to LMUs 10 and 14 it should be a SMD for these LMUs rather than a management practice
Harvesting Rights and Activities	5.3.3	c	MP	Remove	Remove	Ensure land use activities do not compromise First Nations harvesting and subsistence rights as established by land claim agreements and constitutional law.		Objective not management practice
Harvesting Rights and Activities	5.3.3	70	Policy	Modify	Appendix	Working with the DDRRC, the Parties should commit to the continued collection of community-based input related to harvesting activities (e.g., hunters, Tr'ondëk Hwëch'in citizens, other local land users) to support community land stewardship and inform the monitoring program for this Plan (see Section 7 – Plan Implementation, page 274). As part of this, new metrics and additional data collection may need to be required.	Working with the DDRRC, the Parties should commit to the continued collection of community-based input related to harvesting activities (e.g., hunters, Tr'ondëk Hwëch'in citizens, affected First Nations' citizens, other local land users) to support community land stewardship and inform the monitoring program for this Plan (see Section 7 – Plan Implementation, page 274). As part of this, new metrics and additional data collection may need to be required.	Who to collect from is specified not what to collect
Hân Language	5.3.4	71	Policy	Modify	Appendix	Recognizing that the process of language revitalization is an ongoing, Hân phrasing, and place names should continue to be incorporated into the Plan and subsequent planning documents as deemed appropriate. Parties should explore tools and platforms (i.e., digital, audio files etc.) to promote language as related to the Plan.	Recognizing that the process of language revitalization is ongoing, Hân phrasing and place names should continue to be incorporated into the Plan and subsequent planning documents, as deemed appropriate. Parties should explore tools and platforms (e.g., digital, audio files etc.) to promote language as related to the Plan.	
Community Growth	5.3.5	a	MP	Remove	Remove	Future community growth should be concentrated in existing development nodes to ensure ecological disturbance is minimized.		Better suited to recommendation to the Parties, covered by recommendation 72
Community Growth	5.3.5	b	MP	Modify	Plan	New residential growth outside of the City of Dawson should consider: • Additional pressure to municipal services and City of Dawson residents • Access to water • Agricultural value (see Section 5.4.4 – Agriculture (page 145) • Future commercial and industrial growth needs • Recreation access • Active transportation	New residential growth outside of the City of Dawson should consider: • Resource and infrastructure access and demand • Needs for other land uses which may have limited available suitable growth areas	This list is not exhaustive, which could be mis-interpreted. Replaced bullets with broad categories.
Community Growth	5.3.5	c	MP	Change Type	Plan	Reclamation of mineral development sites in the Klondike Valley should consider the intended future use, particularly residential development.	Reclamation of mineral development sites in the Klondike Valley should consider the intended future use.	Make SMD for LMU 12.
Community Growth	5.3.5	d	MP	Modify	Plan	Land users working in proximity to streams that are known sources of potable water should be made aware. Appropriate mitigations must be implemented to ensure contamination does not occur.	Land users working in proximity to streams that are known sources of potable water should follow appropriate mitigations to ensure contamination does not occur.	Modified to be more applicable to proponents, stated that these are known sources.
Community Growth	5.3.5	e	MP	Modify	Plan	Integrate climate change assessment into planning processes for development nodes. This includes planning for and mitigating climate change impacts, particularly flood risk and protection of areas of suitable high agricultural value.	Integrate climate change assessment into planning processes for development nodes by: • identifying areas subject to risk of increased hazards due to a changing climate (e.g., flooding, geohazards, permafrost thaw, and wildfire); • limiting new development in these areas; and • following best practices to mitigate risk of hazardous impacts to areas of existing or future development or suitable high agricultural value.	The policy did not include how to plan for and mitigate climate change hazards. Added direction to identify areas of hazards, limit development in areas of increased hazard, and follow best practices to mitigate areas that pose a risk to development or areas of high agricultural value.
Community Growth	5.3.5	72	Policy	Change Type	Plan	New spot land applications for permanent dispositions should be considered within or in proximity to existing development nodes, subject to LMU Management Intent and Special Management Directions.	New spot land applications for permanent dispositions only within or in proximity to existing development nodes.	Other areas of the Plan automatically apply, limited to only these areas

Community Growth	5.3.5	73	Research	Modify	Appendix	The Parties should identify all water sources used by the community, including for traditional pursuits, to enable land users to plan accordingly. This includes water sources used at important Tr’ondëk Hwëch’in heritage sites including Tr’ochëk, Moosehide, and Forty Mile as well as traditional hunting and fishing camps.	The Parties should identify all water sources used by the community and affected First Nations, including for traditional pursuits, to enable land users to plan accordingly. This includes water sources used at important Tr’ondëk Hwëch’in heritage sites including Tr’ochëk, Moosehide, and Forty Mile as well as traditional hunting and fishing camps.	
Community Growth	5.3.5	74	Research	Modify	Appendix	The Parties should assess flood vulnerability and develop appropriate adaptation recommendations to protect development nodes and community assets, similar to the research undertaken for the City of Dawson (Turcotte and Saal, 2022).	The Parties should assess flood vulnerability, land stability and wildfire risk and develop appropriate adaptation recommendations to protect development nodes and community assets, similar to the research undertaken for the City of Dawson (Flooding in Dawson City: exposure analysis and risk reduction recommendations., 2022).	Added other risks, could combine with 63
Community Growth	5.3.5	75	Action	Remove	Remove	A sub-regional plan for the Klondike Valley LMU should be jointly developed by the Parties under Chapter 11 in collaboration with other planning partners as appropriate. Considerations for the sub-regional plan can be found in LMU 12: Tr’ondëk Tāk’it (Klondike Valley) (page 224).		Remove - redundant, required to follow Chapter 11 process
Recreation	5.3.6	a	MP	Remove	Remove	In areas of suitable high agricultural value that are being developed for other temporary purposes, land should be reclaimed such that it is left in a natural state that will not degrade the high agricultural value of the land.		Remove - duplicates 5.4.4 a and unrelated to recreation
Recreation	5.3.6	b	MP	Keep	Plan	Maintain access to new and existing recreational trails by delineating their location, identifying any potential land use conflicts and recommending appropriate mitigation measures (e.g., buffers) as part of the application and review process for new land use tenure.	Maintain access to new and existing recreational trails by delineating their location in their application package, identifying any potential land use conflicts	Partially directed to Parties
Recreation	5.3.6	c	MP	Remove	Remove	Recreational activities should follow ‘leave no trace’ principles. (https://yukon.ca/en/travel-safely-yukon-wilderness)		Captured in 5.4.5 a
Recreation	5.3.6	76	Action	Modify	Appendix	Develop a trails master plan for the Dawson Region, in collaboration with planning partners (e.g., KATTS) that identifies existing trails, historic trails, and potential future trail development opportunities.	Develop a trails master plan for the Dawson region, in collaboration with planning partners (e.g., KATTS) that identifies existing trails, historic trails, and potential future trail development opportunities. In areas overlapping with trails, provide this information to applicants with recommended mitigation measures (e.g., buffers) to avoid land use conflicts. Consider projected climate change impacts on safety and accessibility of trail systems.	Added CC consideration
Recreation	5.3.6	77	Action	Remove	Remove	Implement interim measures as described in LMU 3: Chu Kon Dëk (Yukon River Corridor) (page 174) and guidance set out in Section 5.2.4 – Rivers and Watercourses (page 93) for the management of the Yukon River Corridor, until such a time that a sub-regional plan can be developed.		Remove - redundant; accepted by accepting the Plan, don't need to request twice
Mineral Exploration and Development	5.4.1	a	MP	Modify	Plan	Continued adherence to industry best management practices. For example, Yukon Mineral Exploration Best Management Practices for Heritage Resources (Yukon Government, 2010a).	Ensure operations on the ground contribute toward the objectives of the region by adhering to industry best management practices and guidance documents.	Without context, this could be misinterpreted to apply to internal organizational management practices - e.g., running a business
Mineral Exploration and Development	5.4.1	b	MP	Remove	Remove	Development is guided by cumulative effects indicators for surface disturbance and linear feature density, as set out by this Plan, to reduce overall landscape disturbance.		Remove - redundant; already required to meet these conditions
Mineral Exploration and Development	5.4.1	c	MP	Remove	Remove	Mining is conducted responsibly and due diligence is exercised by operators to ensure that reclamation requirements are completed.		Remove - redundant; if required must complete anyways
Mineral Exploration and Development	5.4.1	d	MP	Change Type	Appendix	Efforts to educate and support the mining industry in land reclamation and compliance should be encouraged. As the collective knowledge of mining reclamation improves over time, new techniques and strategies should be incorporated into existing regulatory processes and Plan reviews. This strategy supports the principle of adaptive management.	Educate and support the mining industry in reclamation and compliance. As the collective knowledge of mining reclamation improves over time, new techniques and strategies should be incorporated into existing regulatory processes and Plan reviews. This strategy supports the principle of adaptive management.	Change to recommendation to Parties
Mineral Exploration and Development	5.4.1	78	Policy	Remove	Remove	Allowance of continued mineral exploration and development on existing mineral tenure in SMAs, subject to existing regulatory processes and the recommendations of this Plan, including the cumulative effects guidelines. Development of claims within SMAs must carefully manage activities that may impact the values identified in each SMA (see Section 6 – Landscape Management Units (page 160).		Covered by SMA SMDs
Mineral Exploration and Development	5.4.1	79	Policy	Remove	Remove	Allowance of continued mineral staking, exploration, and development within ISA 1-4, subject to existing regulatory processes and the recommendations of this Plan, including the cumulative effects guidelines in Section 4 - Cumulative Effects Framework (page 58). This includes established mining areas including Goldfields, Sixty Mile, Fortymile, and Clear Creek as part of the continued working landscape.		Remove, nothing in the Plan would otherwise restrict this
Mineral Exploration and Development	5.4.1	80	Policy	Remove	Remove	The Plan supports advanced exploration projects currently proceeding in the Planning Region, subject to the regulatory process and recommendations of this Plan.		Remove - no action recommended for Parties
Mineral Exploration and Development	5.4.1	81	Policy	Keep	Appendix	The Parties should consider implementation of the recommendations of the Yukon Mineral Development Strategy related to Strategic Priority #3 to establish effective, efficient, and transparent environmental and regulatory processes.		Include text from specific recommendations from this strategy needed to achieve the Plan’s vision, goals and objectives.
Mineral Exploration and Development	5.4.1	82	Policy	Keep	Appendix	With the aim of fostering relationships built on trust, understanding, and respect, Tr’ondëk Hwëch’in and industry organisations should seek to provide joint educational opportunities for Tr’ondëk Hwëch’in citizens and employees of the mineral industry. Examples include: - Participation in TH 101 to educate non-citizens on Tr’ondëk Hwëch’in culture and values - Tours of placer operations for citizens		
Mineral Exploration and Development	5.4.1	83	Policy	Modify	Appendix	The Parties should encourage the continued work of industry organisations who are implementing industry-led programs such as the KPMA 101 as a means of promoting excellence and innovation in mining reclamation, strengthening partnerships, and building confidence in the placer mining industry.	The Parties should encourage the continued work of industry organisations who are implementing industry-led programs such as the KPMA 101 to continue this work as a means of promoting excellence and innovation in mining reclamation, strengthening partnerships, and building confidence in the placer mining industry.	
Resource Development and Impacts to MMIWG2s+	5.4.2	84	Policy	Change Type	Plan	Proponents should partner with the signatories of the Yukon Strategy on MMIWG2S+ to implement the important actions that have been identified in the strategy. (Government of Yukon, 2020b).		Directed to proponents

Resource Development and Impacts to MMIWG2s+	5.4.2	85	Research	Remove	Remove	The Parties should take steps to increase understanding on the relationship between resource and development projects and violence against Indigenous women and girls in the Dawson Planning Region. YESAB is currently undertaking an evaluation of the effects of industrial activities on the personal safety of Indigenous and non-Indigenous women and girls and LGBTQ2S+ persons in Yukon. The Parties should consider the work that is currently being done by YESAB on this subject to satisfy this recommendation.		Remove – recommendation met, YESAB has completed their study, available here: https://yesab.ca/resources
Resource Development and Impacts to MMIWG2s+	5.4.2	86	Action	Change Type	Plan	The Parties shall implement requirements for projects that include all camp(s) located in remote areas in the Dawson Planning Region to prepare gender-based socio-economic and impact assessments.	Projects that include a camp(s) for accommodation in the Dawson planning region should implement best practices to increase safety, including but not limited to anti-violence policies, appropriate housing, access to mental wellness support, mentorship programs, and access to adequate cell phone and Internet availability on site	Change to direction for proponents and reword as suggested
Dempster Highway Corridor	5.4.3.1.1	87	Action	Modify	Appendix	A sub-regional plan for the Dempster Highway Corridor should be jointly developed by the Government of Yukon, Tr’ondëk Hwëch’in, affected First Nations (First Nation of Na-Cho Nyäk Dun and Vuntut Gwitchin) and the Gwich’in Tribal Council. The sub-regional plan should consider the following: - The corridor planning area should be defined jointly by the Yukon Government, affected First Nations and the Gwich’in Tribal Council. - First Nations’ values, knowledge, Issues and Interests (e.g., Tr’ondëk Hwëch’in Cultural Integrity Area Resolution (CIA)). - Direction and values as set out in this plan for all LMUs that are adjacent to highway, in addition to direction and values as set out in Peel Watershed and North Yukon Regional Land Use Plans. - Coordinated access management off highway for potential oil and gas development in Eagle Plains basin (NYRP LMU 9: Eagle Plains and DRPC LMU 2: Horseshoe, page 170). - Harvesting and traditional economic activities and concerns. - Porcupine Caribou Herd — effects of access to health of the herd and impact to harvest. - Commercial and unguided wildlife viewing activities and concerns. - The scenic integrity of the entire highway corridor should be maintained. - The impacts of climate change on the highway infrastructure and surrounding area within the corridor (including geohazard mapping and targeted permafrost study). - Unregulated backcountry access (i.e., not authorized under the Dempster Highway Development Area Regulation,) particularly for off-road vehicles (ORV), should not be allowed. - As with all human-caused disturbances, high standards of reclamation/decommissioning should apply to all new surface disturbances within the corridor (e.g., gravel pits and telecommunications infrastructure, bridges etc.).	A sub-regional plan for the Dempster Highway Corridor should be jointly defined and developed by the Government of Yukon, Tr’ondëk Hwëch’in, affected First Nations (First Nation of Na-Cho Nyäk Dun and Vuntut Gwitchin) and the Gwich’in Tribal Council. The sub-regional plan should consider the following: - First Nations’ values, knowledge, Issues and Interests (e.g., Tr’ondëk Hwëch’in Cultural Integrity Area Resolution (CIA). - Direction and values as set out in this plan for all LMUs that are adjacent to the Dempster Highway, in addition to relevant direction and values set out in the Peel Watershed and North Yukon Regional Land Use Plans. - Coordinated access management off highway for potential oil and gas development in Eagle Plains basin (North Yukon Regional Land Use Plan LMU 9: Eagle Plains and LMU 2: Horseshoe, page 170). - Harvesting and traditional economic activities and concerns. - Porcupine Caribou Herd — effects of access to health of the herd and impact to harvest. - Commercial and unguided wildlife viewing activities and concerns. - The visual integrity of views of natural features, from the highway, should be maintained. - The impacts of climate change on the highway infrastructure and surrounding area within the corridor (including geohazard mapping and targeted permafrost study). - Unregulated backcountry access in areas not controlled through the Dempster Highway Development Area Regulation, particularly for off-road vehicles (ORV), should not be allowed. As with all human-caused disturbances, high standards of reclamation should apply to all new surface disturbances within the corridor (e.g., gravel pits and telecommunications infrastructure, bridges etc.).	
Top of the World Highway Corridor (TOTWHC)	5.4.3.1.2	a	MP	Change Type	Plan	Travellers and users of this area must take care not to disturb the unique biophysical and socio-cultural setting of the corridor, in particular with the use of ORVs within key ungulate, ecologically important, and cultural areas. (See Map 4 – Selected Ecologically Important Areas, Map 5 – Ungulates, and Map 6 – First Nations Land Use, Heritage, and Cultural Resources)	Take care not to disturb the unique biophysical and socio-cultural setting of the corridor, in particular with the use of ORVs within key ungulate, ecologically important, and cultural areas. (See Map 4 – Selected Ecologically Important Areas, Map 5 – Ungulates, and Map 6 – First Nations Land Use, Heritage, and Cultural Resources). The use of ORVs should not undermine cultural and wildlife values.	Change to SMD for LMUs overlapping TOTWH and reword as suggested.
TOTWHC	5.4.3.1.2	b	MP	Remove	Remove	The use of ORVs should not undermine the cultural and wildlife values – see LMU 15: Khel Dëk (Sixty Mile) (page 238) for LMU values.		Combined with 5.4.3.1.2 a; unclear if LMU 21 (which also overlaps the corridor) was intentionally or unintentionally excluded from this recommendation.
TOTWHC	5.4.3.1.2	c	MP	Modify	Plan	The scenic integrity and natural aesthetic viewscape of the highway corridor should be maintained.	The visual integrity and natural aesthetic viewscape from the highway corridor should be maintained.	Visual integrity is defined scenic integrity isn't
TOTWHC	5.4.3.1.2	d	MP	Remove	Remove	As with all human-caused disturbances, high standards of reclamation/decommissioning should apply to all new surface disturbances within the corridor (e.g., gravel pits, roads, and telecommunications infrastructure).		Remove -reclamation should be its own management direction for all uses not just for access
TOTWHC	5.4.3.1.2	88	Policy	Remove	Remove	The integrity of this area must be maintained to ensure harvesting and traditional economic activities can continue.		Remove - covered by 5.3.3 c and no recommendation to Parties
TOTWHC	5.4.3.1.2	89	Policy	Keep	Appendix	Opportunities to promote education and mitigation of wildlife-vehicle collisions along the highway should be explored.		
TOTWHC	5.4.3.1.2	90	Research	Modify	Appendix	In collaboration with the Dawson District Renewable Resource Council, the use of off-road vehicles (ORVs) within the Top of the World Highway Corridor should be monitored for: - Impacts to key values. Key values are described in adjacent LMU tables in Section Landscape Management Units. Specifically, refer to LMU 14: Tay Dëkdhât (Top of the World) (page 232), LMU 15: Khel Dëk (Sixty Mile) (page 238), LMU 16: Wëdzey Nähuzhi (Matson Uplands) (page 244) and LMU 21: Wëdzey Tay (Fortymile Caribou Corridor) (page 268). - Identification of areas for potential ORV management as per ORV Management Area Regulation (OIC 2021/11)	In collaboration with the Dawson District Renewable Resource Council, the use of off-road vehicles (ORVs) within the Top of the World Highway Corridor should be monitored for: - Impacts to key values. Key values are described in adjacent LMU tables in Section Landscape Management Units. Specifically, refer to LMU 14: Tay Dëkdhât (Top of the World) (page 232), LMU 15: Khel Dëk (Sixty Mile) (page 238), and LMU 21: Wëdzey Tay (Fortymile Caribou Corridor) (page 268). - Identification of areas to create ORV management areas, through ORV Management Area Regulation (OIC 2021/11)	LMU 16 is not within or adjacent to the TOTW highway corridor.
TOTWHC	5.4.3.1.2	91	Action	Keep	Appendix	Implement the Top of the World Highway Interpretive Plan (Tr’ondëk Hwëch’in & Government of Yukon, 2019b).		

TOTWHC	5.4.3.1.2	New	Action	Add	Appendix		Monitor and address impacts of climate change on the highway infrastructure and surrounding area within the corridor (including geohazard mapping and targeted permafrost study).	Added to address impacts from climate change
North Klondike Highway Corridor (NKHC)	5.4.3.1.3	a	MP	Remove	Remove	As with all human-caused disturbances, high standards of restoration should apply to all new surface disturbances within the corridor (e.g., gravel pits, roads, and telecommunications infrastructure)		Remove -reclamation should be its own management direction for all uses not just for access
NKHC	5.4.3.1.3	b	MP	Remove	Remove	The integrity of this area must be maintained to ensure harvesting and traditional economic activities can continue.		Remove - covered by 5.3.3 c and no recommendation to Parties
NKHC	5.4.3.1.3	92	Policy	Keep	Appendix	The Parties and affected First Nations should work together to update the North Klondike Highway Interpretive Plan (1996) or alternatively co-create a new North Klondike Highway Interpretive Plan as created for the Top of the World Highway. The interpretive plan should consider: - Tourism and recreational opportunities along the highway - First Nation history, language, culture, stories, and values - Yukon history and stories - Opportunities for education (through appropriate signage)		
NKHC	5.4.3.1.3	93	Policy	Remove	Remove	The integrity of this area must be maintained to ensure harvesting and traditional economic activities can continue.		Remove - covered by 5.3.3 c and no recommendation to Parties
NKHC	5.4.3.1.3	94	Policy	Remove	Remove	New spot land applications for residential development should be discouraged outside of existing development nodes.		Remove - covered by recommendation 72
NKHC	5.4.3.1.3	95	Policy	Keep	Appendix	Opportunities to promote education and mitigation of vehicle-wildlife collisions along the North Klondike Highway should be explored and supported within areas of high concern.		
NKHC	5.4.3.1.3	New	Action	Add	Appendix		Monitor and address impacts of climate change on the highway infrastructure and surrounding area within the corridor (including geohazard mapping and targeted permafrost study).	Added to address impacts from climate change
New All Season Surface Access and Winter Roads (NASSA & WR)	5.4.3.2	a	MP	Modify	Plan	Access road and trail routes should take into consideration the avoidance of permafrost areas and wetlands while also noting that south-facing slopes are often home to many rare and endemic species in the Region.	Access road and trail routes should take into consideration the avoidance of permafrost areas, areas of high flood risk and wetlands while also noting that south-facing slopes are often home to many rare and endemic species in the Region.	
NASSA & WR	5.4.3.2	b	MP	Modify	Plan	The creation of looped access roads or trails should be discouraged.	Avoid creating looped access roads or trails.	Reworded to be more directed to proponents.
NASSA & WR	5.4.3.2	c	MP	Modify	Plan	Opportunities for shared, multi-party use of roads or trails should be explored whenever possible and practical.	Where practicably possible, road planning should prioritize efficiency and consider existing roads and all possible users to limit the necessity for multiple roads accessing similar areas.	
NASSA & WR	5.4.3.2	d	MP	Modify	Plan	Reclamation and decommissioning should occur as soon as roads and trails are no longer needed for resource development activities.	Reclamation should occur as soon as roads and trails are no longer needed for resource development activities.	
NASSA & WR	5.4.3.2	e	MP	Keep	Plan	Proponents should indicate the access requirements of their projects, including the location, construction process, and reclamation details of all access roads and trails prior to entering the assessment and permitting process of their project.		
NASSA & WR	5.4.3.2	f	MP	Modify	Plan	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	- 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 reclamation plans with clear closure objectives	
NASSA & WR	5.4.3.2	96	Policy	Change Type	Plan	Special Management Areas New surface access (all-season or winter roads) must be jointly agreed upon by both Parties within Special Management Areas. Existing access in Special Management Areas is supported in this Plan. See Section 6 – Landscape Management Units (page 160) for additional access related special management directions for Special Management Areas.	Special Management Areas New surface access (all-season or winter roads) must be jointly agreed upon by the Parties within Special Management Areas. Existing access in Special Management Areas is allowed to continue.	Change to special management direction for SMAs.
NASSA & WR	5.4.3.2	97	Policy	Remove	Remove	New surface access (all-season or winter roads) into LMU 7: Wehtr’e (Antimony) (page 196) for Special Management Directions) should not be permitted until an Access Management Plan for that LMU is completed jointly by both Parties.		Conflicts with special management direction 6.7 4 e (In the absence of an access management plan, Parties should jointly determine whether new surface access be permitted, with consideration of the above.)
NASSA & WR	5.4.3.2	98	Policy	Remove	Remove	The Northern Access Route (NAR) should take into consideration the direction for access and values outlined in this Plan. See LMU 11: Goldfields (page 218) and LMU 18: Therian Dëk (Coffee Creek) (page 254) for Special Management Directions.		Remove - NAR assessed pre-Plan approval
NASSA & WR	5.4.3.2	99	Policy	Change Type	Plan	Due to the environmental impact of all-season access, when access is deemed necessary by Parties and / or accounted for in Access Management Plans, the feasibility of winter access should always be considered first as an option ahead of new all-season roads/trails.	Due to the environmental impact of all-season access, the feasibility of winter access should always be considered first as an option ahead of new all-season roads/trails.	Change to direction to proponents
NASSA & WR	5.4.3.2	100	Policy	Remove	Remove	The Government of Yukon is currently developing a Resource Roads Regulation that will include regulations for the entire lifecycle of resource roads, from construction to reclamation. The Plan supports the prioritized completion of the Resource Roads Regulation to better inform future land use decision-making in the Planning Region.		Remove - no recommendation to the Parties

NASSA & WR	5.4.3.2	101	Action	Keep	Appendix	The Parties should develop and implement an appropriate framework for the tracking and monitoring of access development and reclamation activities within the Dawson Planning Region. This tracking system should include: - Location and details (i.e., width, length, and surface material) of any newly constructed roads and trails - Information on the status of roads and trails (i.e., active or inactive) - Any on-going/completed reclamation activities.		
Access Management Planning	5.4.3.2.2	102	Action	Change Type	Plan	In consideration of the baseline linear disturbance data and results, the Parties should develop overarching access management plans for the Planning Region, with the priority for development as follows: - LMU 7: Wehtr’e (Antimony) (page 196) - LMU 11: Goldfields (page 218) - LMU 15: Khel Dëk (Sixty Mile) (page 238) - LMU 9: Clear Creek (page 208) - LMU 18: Therian Dëk (Coffee Creek) (page 254) At a minimum, Access Management Plans should consider* : - Impacts to key ecological values with an emphasis on moose and caribou from increased access development. - Impacts to other land users, including the use of the land for traditional economic activities, subsistence harvesting, and trapping. - Impacts to heritage values, cultural landscapes, heritage resources etc. - New transportation routes to areas of significant to high economic value for minerals, tourism, etc.	In consideration of the baseline linear disturbance data and results, the Parties should develop overarching access management plans for the Planning Region, with the priority for development as follows: - LMU 1: Tthetäwndëk (Tatonduk) - LMU 7: Wehtr’e (Antimony) (page 196) At a minimum, Access Management Plans should consider* : - Impacts to key ecological values with an emphasis on moose and caribou from increased access development. - Impacts to other land users, including the use of the land for traditional economic activities, subsistence harvesting, and trapping. - Impacts to heritage values, cultural landscapes, heritage resources etc. - New transportation routes to areas of significant to high economic value for minerals, tourism, etc.	Change to SMD for applicable LMUs.
Off-Road Vehicle Access	5.4.3.3	103	Research	Remove	Remove	The Plan supports the ability of the DDRRC to specifically seek public input to identify areas that may require consideration under the Off-Road Vehicle Management Area Regulations.		Remove - no recommendation to the Parties, Plan can propose ORVMAs separate from the DDRRC.
Air Access	5.4.3.4	a	MP	Keep	Plan	Aerial flights should follow all applicable best management guidelines on how to minimize impacts to disturbance to wildlife (see Flying in Caribou Country (Government of Yukon, 2010b) and Flying in Sheep Country (Government of Yukon, 2006).		
Air Access	5.4.3.4	b	MP	Keep	Plan	Opportunities for shared, multi-party use of airstrips and helicopter landings should be explored whenever possible.		
Air Access	5.4.3.4	c	MP	Keep	Plan	Fuel caches should be well maintained, inaccessible by wildlife, and kept at a safe distance from watercourses		
Air Access	5.4.3.4	104	Policy	Change Type	Plan	Within SMAs, outside of existing dispositions, new airstrips should not be allowed. Existing airstrips and landing locations can continue to be used.	Within SMAs: - Existing permitted airstrips and landing locations can continue to be used. - New airstrips should only be permitted in outside of existing dispositions.	Change to special management direction for SMAs.
Water Access	5.4.3.5	a	MP	Modify	Plan	Stream crossings should be constructed to minimize impacts to fish and fish habitat, including a hierarchical approach to construction with the least invasive type being applied first.	Stream crossings should be constructed to minimize impacts to fish and fish habitat, including a hierarchical approach to construction with the least invasive type being applied first. Proponents should follow Fisheries and Oceans Canada’s Interim code of practice: temporary stream crossings.	
Water Access	5.4.3.5	b	MP	Remove	Remove	No construction of stream crossings should occur during sensitive time periods for fish (e.g., during spawning or egg incubation). Time periods will depend on species and location as determined on a at a project level assessment.	No construction of stream crossings should occur during sensitive time periods for fish (e.g., during spawning or egg incubation). Time periods will depend on species and location as determined by Fisheries and Oceans Canada’s Freshwater Timing Windows Identified for the Yukon	Covered by management practice 5.2.1.3 f
Water Access	5.4.3.5	New	MP	Add	Appendix		Ensure that future climate, hydrological conditions, and water quality are considered in design of infrastructure that supports stream crossings.	Added to address impacts from climate change
Water Access	5.4.3.5	105	Research	Modify	Appendix	Access by water can be an energy-efficient means of transport and can also help reduce the impacts of climate change of overland routes. Parties should research the potential of river corridors as a transportation route considering: - Different watercraft types. - Thresholds for use if this form of access is to be promoted. - Comparison made with overland access from a climate change and or cumulative effects perspective.	Access by water can be an energy-efficient means of transport and can also help reduce the impacts of climate change of overland routes. Parties should research the potential of river corridors as a transportation route considering: - Different watercraft types. - Comparison made with overland access from a climate change and or cumulative effects perspective.	Thresholds for watercraft beyond Parties authorities - Transport Canada manages navigable waters and watercraft
Water Access	5.4.3.5	106	Research	Modify	Appendix	The Parties should design and conduct a study into the ecological and social impacts of barging along the Yukon River. The study should consider, at a minimum, the impacts to fish and fish habitat and traditional land use within LMU 3: Chu Kon Dëk (Yukon River Corridor) (page 174). The results of the study should inform development of best management practices and guidelines by the Parties for barging within this LMU.	The Parties should design and conduct a study into the ecological and social impacts of barging along the Yukon River. The study should consider, at a minimum, the impacts to fish and fish habitat and traditional land use within LMU 3: Chu Kon Dëk (Yukon River Corridor) (page 174). The results of the study should be considered during Plan review.	Beyond Parties authorities - Transport Canada manages navigable waters and watercraft
Water Access	5.4.3.5	107	Research	Modify	Appendix	The impacts to key values in the White, Fortymile, Stewart, Klondike, and Fifteenmile Rivers from jet boats are not well understood. Further research into the potential for this activity to affect water quality and salmon habitat should be conducted in these areas, and this information should be used to develop guidance to better manage this activity.	The impacts to key values in the White, Fortymile, Stewart, Klondike, and Fifteenmile Rivers from jet boats are not well understood. Further research into the potential for this activity to affect water quality and salmon habitat should be conducted in these areas, and this information should be considered during Plan review.	Beyond Parties authorities - Transport Canada manages navigable waters and watercraft
Agriculture	5.4.4	a	MP	Keep	Plan	In areas of suitable high agricultural value that are being developed for other temporary purposes, land should be reclaimed such that it is left in a natural state that will not degrade the high agricultural value of the land.		
Agriculture	5.4.4	108	Policy	Keep	Appendix	The Parties should support implementation of the Yukon Agriculture Policy (2020), specifically related to Objective #2 (Create and Protect Agricultural Land) scale up local food production and increase self-sufficiency in local food production in the Dawson planning Region.		
Agriculture	5.4.4	109	Policy	Remove	Remove	Suitable land for agricultural use that is close to the City of Dawson should be prioritized for agricultural use where practical (e.g., LMU 12: Tr’ondëk Tāk’it (Klondike Valley) (page 224).		Remove - covered by SMD 1.6 for LMU 12 and recommendation 110.
Agriculture	5.4.4	110	Research	Modify	Appendix	Areas of "high" (class 3 to 5) agricultural potential within the planning Region (within the Klondike Valley at a minimum) should be identified and prioritized for this use.	Areas of "high" (class 3 to 5) agricultural potential within the planning Region (within LMU 12: Tr’ondëk Tāk’it (Klondike Valley) at a minimum) should be identified and prioritized for this use with consideration of other values.	Other values should be considered beyond agriculture.

Agriculture	5.4.4	111	Research	Modify	Appendix	The Parties should consider the location of future agricultural development (including type and amount) in relation to future availability and access to water.	The Parties should consider the location of future agricultural development (including type and amount) in relation to future availability and access to water, flood risks – informed by climate change projections, and in consideration of other values within the area.	
Agriculture	5.4.4	112	Action	Remove	Remove	The Parties should continue to explore and implement collaborative efforts where multiple interests and rights exist, such as through the development of formal multi-use arrangements between mineral rights holders, forestry, and agricultural producers.		Remove - duplicates recommendation 125 and 130
Agriculture	5.4.4	113	Action	Keep	Appendix	The Parties should continue to support research into the feasibility of procuring an abattoir for the Dawson Region, including the identification of a suitable location for such infrastructure.		
Tourism	5.4.5	a	MP	Keep	Plan	Tourism and recreational activities should follow the ‘leave no trace’ principles (https://yukon.ca/en/travel-safely-yukon-wilderness)		
Tourism	5.4.5	114	Policy	Change Type	Plan	The natural scenic viewscales within corridor areas, with an emphasis on the Yukon River Corridor, the Dempster Highway, and the Top of the World Highway should be considered in development applications and preserved where possible.		Change to SMD for proponents for specific LMUs rather than direction to the Parties. Already included in 5.4.3.1.2 c, 6.7 4 b., 6.8 1.
Tourism	5.4.5	115	Policy	Modify	Appendix	Tr’ondëk Hwëch’in cultural history and contemporary use should be incorporated into tourism management strategies and signage for the Klondike Goldfields.	Tr’ondëk Hwëch’in cultural history and contemporary use should be incorporated into tourism management strategies and signage for the planning region. Signage in the planning region should incorporate local artistry, Tr’ondëk Hwëch’in history, and the Hän language.	
Tourism	5.4.5	116	Policy	Keep	Appendix	The Parties should support implementation of the Yukon Tourism Development Strategy (Government of Yukon, 2018), specifically pertaining to Goal #2 for Sustainable Tourism Development for the Dawson Planning Region.		
Tourism	5.4.5	117	Policy	Modify	Appendix	In areas of high conflict between aerial flights and tourism pursuits the following should be considered: - Setting limits to the number of allowable landings in specific areas during peak visitation times - Providing information to aircraft users (e.g., local pilots, tourism operators, mineral exploration companies, etc.) about areas of concern and encouraging avoidance of key wildlife areas and heritage resource areas wherever possible (see Map 4 – Selected Ecologically Important Areas and Map 5 – Ungulates).	Provide educational information to aircraft users (e.g., local companies that operate aircraft, tourism operators, mineral exploration companies, etc.) about areas of concern to encourage avoidance of key wildlife areas and heritage resource areas wherever possible.	Parties do not have jurisdiction over airspace
Tourism	5.4.5	118	Action	Remove	Remove	Management guidelines for commercial wilderness tourism and commercial wildlife viewing along the Dempster Highway, Top of the World Highway, and Yukon River Corridor should be developed as part of corridor management plans (see Section 5.4.3.1.1 – Dempster Highway Corridor (page 130), Section 5.4.3.1.2 – Top of the World Highway Corridor (page 132), and LMU 3: Chu Kon Dëk (Yukon River Corridor) (page 174) .		YG is supportive of a sub-regional planning process for Dempster Highway in being consistent with the Peel and North Yukon RLP. Not supportive of ‘Corridor Management Plans’ as it defers decision making to another planning process.
Tourism	5.4.5	119	Action	Keep	Appendix	Develop and publish best management practices for tourism industries, including wilderness tourism.		
Tourism	5.4.5	120	Action	Remove	Remove	Implement interim measures as described in LMU 3: Chu Kon Dëk (Yukon River Corridor) (page 174) and guidance set out in Section 5.2.4 – Rivers and Watercourses (page 93) for the management of the Yukon River Corridor until such a time that a sub-Regional plan can be developed.		Remove - redundant, accepted by accepting the Plan, don't need to ask twice
Tourism	5.4.5	121	Action	Remove	Remove	Continued use of signage in the planning Region that incorporates local artistry, Tr’ondëk Hwëch’in history, and the Hän language, should be explored.		Incorporated into 115
Outfitting	5.4.6	122	Policy	Remove	Remove	Status quo should be maintained. Existing outfitting concessions should continue, and outfitting activities should be allowed in all land use designations in this Plan, subject to legislation, regulations and the THFA.		Remove - redundant, no changes suggested
Outfitting	5.4.6	123	Research	Keep	Appendix	Land use patterns associated with outfitting, including but not limited to the location of camps and trails, should be documented to facilitate improved project assessment and future resource planning.		
Forestry	5.4.7	124	Policy	Remove	Remove	Allowance of continued forest resource development within ISA 1-4 designations and within some SMAs as per Special Management Direction in Section 6 – Landscape Management Units (page 160). Development is subject to the cumulative effects thresholds of this Plan, the Dawson FRMP, and existing regulatory processes.		Remove - redundant and direction to proponents not Parties
Forestry	5.4.7	125	Policy	Modify	Appendix	The Parties should continue to explore and implement collaborative efforts where multiple interests and rights exist, such as through the development of formal multi-use arrangements between mineral rights holders, forestry, and agricultural producers. Explore options for harvesting timber and fuelwood from placer and quartz claims.	The Parties should continue to explore and implement collaborative efforts where multiple interests and rights exist, such as through the development of formal multi-use arrangements between mineral rights holders, forestry, aggregates and agricultural producers. Explore options for harvesting timber and fuelwood from placer and quartz claims develop a framework for use of timber for sawlogs and fuelwood within existing mineral tenure.	Duplicate of recommendation 112 and largely the same as recommendation 130 (minus "aggregates")
Forestry	5.4.7	126	Research	Keep	Appendix	The Parties should continue to explore the feasibility of advancing the use of biomass energy in the Dawson Planning Region. Climate change should be considered as part of this research in terms of climate change mitigation, availability of forest resources, and assessing net benefit of biomass.		
Forestry	5.4.7	127	Action	Keep	Appendix	Implement the Dawson FRMP; In cases where management direction in this Regional Plan conflicts with the Dawson FRMP, the FRMP should be brought into conformity, as per Chapter 17 of the FNFA.	Implement the Dawson FRMP; In cases where management direction in this Regional Plan conflicts with the Dawson FRMP, the FRMP should be brought into conformity, as per Chapter 17 of the THFA.	
Forestry	5.4.7	128	Action	Modify	Appendix	Continue developing Timber Harvest Plans (THPs) within ISA designations. The Goldfields THP should include development of a more effective framework for use of timber for saw logs and fuelwood within existing mineral tenure.	Continue developing Timber Harvest Plans (THPs) within ISA designations.	Removed portion incorporated in recommendation 125 above as such a framework would be broadly applied rather than done within a single THP.
Aggregate Resources	5.4.8	a	MP	Modify	Plan	Aggregate resource extraction should be planned to avoid sensitive fish habitats and other ecologically important areas.	Aggregate resource extraction should be planned to avoid sensitive fish habitats, other ecologically important areas, and areas of cultural importance or containing heritage resources.	

Aggregate Resources	5.4.8	b	MP	Keep	Plan	Minimize gravel requirements for necessary infrastructure through coordinated access and geotechnical engineering. This could be accomplished by collaboration between those responsible for aggregate extraction, mining, and road development.		This should likely apply to industrial land uses more broadly than just aggregate resource extraction. Fish concerns covered by management directions 5.2.1.3 a-e, others may need new management directions added to applicable sections (key species, other fish and wildlife habitat, and heritage resources and sites sections). If done can remove from this section.
Aggregate Resources	5.4.8	129	Policy	Remove	Remove	When proposing and reviewing aggregate resource projects, priority should be given to extraction of materials from existing quarries, near to highways and other existing all-season roads.		Combined with 131
Aggregate Resources	5.4.8	130	Policy	Remove	Remove	The Parties should continue to explore and implement collaborative efforts where multiple interests and rights exist, such as through the development of formal multi-use arrangements between mineral rights holders, aggregate, forestry, and agricultural producers.		Remove - largely the same as recommendations 112 and 125
Aggregate Resources	5.4.8	131	Action	Change Type	Plan	Within Integrated Stewardship Areas, the identification of potential sources of aggregate should be undertaken in advance of the assessment process for industrial and/or infrastructure projects.	Identify potential sources of aggregate resources in advance of the assessment process for industrial and/or infrastructure projects. Prioritize extraction from existing quarries, near to highways and other existing all-season roads	Change to direction for proponents, combined with 129
Aggregate Resources	5.4.8	132	Action	Modify	Appendix	The Parties should seek to develop and communicate clear guidelines with respect to the process for reviewing, assessing, and enforcing quarry permits to ensure consistency in the regulatory between private and government proponents.		Modified to be more applicable to proponents.
Aggregate Resources	5.4.8	133	Action	Keep	Appendix	Aggregate assessments should be undertaken to identify areas of high potential for aggregate resource development within the North Klondike Highway, Top of the World Highway, and Dempster Highway Corridors, as well as secondary roads to support ongoing construction and maintenance activities.		
Traditional Economy	5.4.9	a	MP	Modify	Plan	During the Environmental and Socio-Economic Assessment process, land use activities that overlap with where traditional economic activities are practiced, the Parties or the evaluator (YESAB) should utilize a communication and engagement protocol to share information and minimize conflict. The protocol should ensure activities likely to cause disturbances to other land users (trappers, outfitters, etc.) are communicated and consulted on prior to approval.	Communicate with other land users when planning activities in areas used for traditional economic activities, including trapping.	Modified to be more applicable to proponents.
Traditional Economy	5.4.9	b	MP	Modify	Plan	Where important sites for traditional economic activities have been identified, it is important that the route/access to the site be treated with a higher standard of care and consideration.	Where important sites for traditional economic activities have been identified, the route/access to the site should be treated with a higher standard of care and consideration.	
Traditional Economy	5.4.9	135	Policy	Keep	Appendix	The Parties should support the ongoing local resource knowledge project being conducted annually by the Dawson District Renewable Resource Council and Tr’ondëk Hwëch’in harvest data. The general purpose of this study is to better understand and document changes that are taking place in the environment, with a focus on hunting access, harvested species, trapped species, moose, caribou, berries, edible plants, and fish. A mechanism should be developed to feed the results of this project into the current management regime. This information should also be considered in Plan review (Section 7 – Plan Implementation, page 274).		
Traditional Economy	5.4.9	136	Policy	Modify	Appendix	The Parties shall implement requirements for proponents of class 4 advanced exploration and mining in the Dawson Planning Region to prepare traditional use impact studies.	Proponents of class 4 advanced exploration and mining in the Dawson Planning Region should prepare traditional use impact studies.	Change to management practice
Traditional Economy	5.4.9	137	Research	Keep	Appendix	Tr’ondëk Hwëch’in have identified areas of high traditional economy value in their Ninānkāk hqzq wëk’âtr’ênòhcha 'We Take Good Care of Our Land' submission (2020b). Further work needs to be done by the Parties to identify appropriate development buffers.		
Traditional Economy	5.4.9	138	Research	Keep	Appendix	Land use patterns associated with trapping, including but not limited to the location of cabins and trails, should be documented to facilitate improved project assessment and future resource planning.		
LMU 1	6.1	New	SMD	Add	Plan		Surface disturbance threshold of 19.8975km2 (0.25% of LMU area).	Removed “ISA 1” and instead listed specific disturbance allowed by thresholds to avoid confusion as this is a SMA. Nothing in s.3.6 limits thresholds to industrial land uses, clarify if other uses are permitted up to the thresholds specified.
LMU 1	6.1	New	SMD	Add	Plan		Linear feature density threshold of 1989.75km (0.25km/km2 of LMU area).	Removed “ISA 1” and instead listed specific disturbance allowed by thresholds to avoid confusion as this is a SMA. Nothing in s.3.6 limits thresholds to industrial land uses, clarify if other uses are permitted up to the thresholds specified.
LMU 1	6.1	1	SMD	Modify	Plan	Mineral development permitted within existing mineral tenure	Mineral development may be permitted only within existing mineral tenure	
LMU 1	6.1	2	SMD	Modify	Plan	Industrial land use permitted within ISA 1 cumulative effects thresholds.	Industrial land use may be permitted.	Clarify what types (e.g forestry, agriculture etc.) and where these are permitted. If no other industrial land uses beyond mineral development in existing tenure are permitted, specify this.
LMU 1	6.1	3	SMD	Modify	Plan	Withdrawal of all other lands from quartz and placer mineral staking and oil and gas dispositions	Withdrawal of all lands from quartz and placer mineral staking and oil and gas dispositions	
LMU 1	6.1	4	SMD	Modify	Plan	If existing mineral claims are proven viable by a proponent, the Parties shall jointly consider permitting new surface access and access route	An access management plan for this Landscape Management Unit should be jointly created by the Parties. If existing mineral claims are proven viable prior to completion of the access management plan, details of where and how access is provided to these claims will be dealt with at the project level, and in accordance with existing processes.	Modification proposed to add intent to complete access management planning and to clarify what would happen in its absence.
LMU 1	6.1	5	SMD	Keep	Plan	Activities on existing mineral tenure that overlap with sheep habitat must consider and mitigate potential impacts to sheep habitat. Specifically, timing windows may apply in winter habitat and lambing areas.		
LMU 1	6.1	6	SMD	Keep	Plan	Limitations to air landings may be required to reduce impacts to key wildlife values.		
LMU 1	6.1	7	SMD	Keep	Plan	This area is not to be promoted as a tourism destination, as extensive use may have a negative impact on sensitive wilderness values.		

LMU 2	6.2	1	SMD	Keep	Appendix	The Parties should collaborate with the Porcupine Caribou Management Board to determine the availability and suitability of habitat within this LMU. If required, special management directions for any future development in this area should be developed as appropriate		
LMU 2	6.2	2	SMD	Modify	Plan	Dempster Highway corridor sub-regional plan will affect this LMU and thus interim measures and future sub-regional planning direction in Section 5.4.3.1.1 – Dempster Highway Corridor (page 130) should be considered.	Dempster Highway corridor sub-regional plan directions will apply to portions of this LMU once the sub-regional plan is approved, see Section 5.4.3.1.1 – Dempster Highway Corridor (page 130).	Section 5.4.3.1.1 does not detail any interim measures for this area. If there are any interim measures or other directions related to the sub-regional planning area (similar to bullet 3 below), they should be added to this section rather than referring to an earlier section. Text change recommended to inform reader that further directions could be added in this LMU once sub-regional plan is complete.
LMU 2	6.2	3	SMD	Modify	Plan	Coordinated management off highway for potential oil and gas development in Eagle Plains basin (NYRP LMU-9 and DRPC LMU-2) should be considered.	Coordinated access off highway for potential oil and gas development should be considered.	
LMU 3	6.3	IM 1	SMD	Remove	Remove	Withdrawal of lands from placer and quartz mineral staking until the completion and approval of a sub-regional plan or such a time as both Parties agree to remove withdrawal.		YG does not support the use of interim withdrawals.
LMU 3	6.3	IM 2	SMD	Remove	Remove	When a claim expires it should be withdrawn from further staking while interim withdrawal is in place.		YG does not support the use of interim withdrawals.
LMU 3	6.3	IM 3	SMD	Remove	Remove	Mineral development permitted within existing mineral tenure.		
LMU 3	6.3	IM 4	SMD	Modify	Plan	Industrial land use permitted within ISA 2 cumulative effects thresholds.	Surface disturbance threshold of 9.26 km2 (1.0% of LMU area). Linear feature density threshold of 463 km (0.5 km/km2 of LMU area).	Removed “ISA 2” and instead listed specific disturbance allowed by thresholds to avoid confusion as this is a SRPA. Nothing in s.3.6 limits thresholds to industrial land uses, clarify if other uses are acceptable up to the thresholds specified or if only industrial uses are acceptable in this LMU.
LMU 3	6.3	IM 5	SMD	Modify	Appendix	A scoping exercise for Yukon River sub-regional planning issues and interests to include a DRPC hosted Yukon River Summit/gathering with affected First Nations, community, and stakeholders.	A scoping exercise for issues and interests in LMU 3: Yukon River Corridor sub-regional planning to include a Yukon River Summit/gathering with affected First Nations, community, and stakeholders.	Recommendation to the parties should be in Appendix. It is up to the Parties to decide how they do the sub-regional planning.
LMU 3	6.3	IM 6	SMD	Modify	Plan	A buffer near the Forty Mile Heritage Site should be implemented to protect the cultural significance and multi-use nature of the site.		Specify distance and what activities (if any) can occur within the buffer. (or make this a recommendation for the Parties to establish, and move to Appendix)
LMU 3	6.3	SRP 1	SMD	Keep	Appendix	To be conducted by the DRPC and initiated within 6 months of Dawson Regional Land Use Plan approval.	Intiate sub-regional planning within 6 months of Dawson Regional Land Use Plan approval.	Chapter 11 details who will conduct sub-regional planning. Recommendation to the parties should be in Appendix. It is up to the Parties to decide how they do the sub-regional planning.
LMU 3	6.3	SRP 2	SMD	Keep	Appendix	Consideration should be given to the differences in activities and activity levels to the north and to the south of the City of Dawson for the management of the corridor.		
LMU 3	6.3	SRP 3	SMD	Remove	Remove	Sub-Regional planning should specifically plan for the management of activities along the Yukon River Corridor within the Dawson Planning Region.		Redundant, this is the area specified.
LMU 3	6.3	SRP 4	SMD	Keep	Appendix	Recreation management, and access management (roads, barges, etc.) should be key focus areas of sub-regional planning.		
LMU 3	6.3	SRP 5	SMD	Keep	Appendix	Maintaining wilderness characteristics of river for valued recreational, traditional, and economic (tourism) purposes should be considered.		
LMU 3	6.3	SRP 6	SMD	Keep	Appendix	A buffer near the Forty Mile Camp/Heritage Site should be implemented to protect the cultural significance and multi-use nature of the site.		
LMU 3	6.3	CYRM 1	SMD	Remove	Remove	A Yukon-wide plan for the health and vitality of the Socio-cultural, economic, and environmental values of the entire Yukon River should be developed.		Beyond the scope of the regional plan.
LMU 3	6.3	CYRM 2	SMD	Remove	Remove	Consideration of legal personhood for the Yukon River (precedent exists for Magpie River in Quebec).		Beyond the scope of the regional plan.
LMU 3	6.3	CYRM 3	SMD	Remove	Remove	Explore the possibility of developing a Yukon River Management Plan with all affected First Nations, territorial, and municipal governments to gauge interest in the concept to determine its feasibility.		Beyond the scope of the regional plan.
LMU 4	6.4	1	SMD	Keep	Plan	Tr’ondëk Hwëch’in should have the primary responsibility of managing this area through the establishment of an Indigenous Protected and Conserved Area (IPCA).		
LMU 4	6.4	New	SMD	Add	Plan		1. Surface disturbance threshold of 6,9025 km2 (0.25% of LMU area). 2. Linear feature density threshold of 690.25 km (0.25 km/km2 of LMU area)	Removed “ISA 1” and instead listed specific disturbance allowed by thresholds to avoid confusion as this is a SMA.
LMU 4	6.4	2	SMD	Modify	Plan	Industrial Land Use: a. Mineral development is permitted within existing mineral tenure. b. Withdrawal of all other lands from placer and quartz mineral staking. c. Industrial land use permitted within ISA 1 cumulative effects thresholds.	The following industrial land uses may be permitted: a. Mineral development, only within existing mineral tenure. b. (Industrial) land use permitted .	Nothing in s.3.6 limits thresholds to industrial land uses, clarify if other uses are permitted up to the thresholds specified. b. need to specify which industrial land uses are permitted, bullet 5a below speaks to access for forestry but forestry is not explicitly mentioned here as an allowable use.
LMU 4	6.4	New	SMD	Add	Plan		Withdrawal of all lands from placer and quartz mineral staking.	
LMU 4	6.4	3	SMD	Modify	Plan	In the absence of a SMA management plan, surface access should be considered jointly by the Parties on a project-by-project basis: a. Carefully managed surface access should be considered jointly by the Parties to support sustainable tourism activities, forestry, Tr’ondëk Hwëch’in cultural activities, and access to a mineral deposit that has been proven viable by a proponent.	removed "a mineral deposit", change to "existing mineral tenure"	

LMU 4	6.4	4	SMD	Modify	Plan	Activities that overlap with sheep habitat (Map 5 – Ungulates) will need to consider impacts to sheep habitat. Impact to late winter habitat and timing windows may apply.	reworded to: impacts to sheep habitat, particularly impacts to late winter habitat. Timing windows may apply.	Map does not distinguish between habitat types. Sentence modified as its intent previously was unclear (impacts to late winter habitat may apply), if misinterpreted please clarify.
LMU 4	6.4	5	SMD	Modify	Appendix	The SMA Management plan should consider a long-term sustainable tourism framework. Due to the high concentration of settlement lands this framework should be led by Tr’ondëk Hwëch’in.	The SMA Management plan should consider a long-term sustainable tourism framework	Management will be determined during implementation, this is beyond the scope of the Plan.
LMU 5	6.5	1	SMD	Remove	Remove	Existing Plans and Regulations: a. Tombstone Territorial Park Management Plan (2009). b. Dempster Highway Development Area Regulations (C.O.1979/064)		Tombstone Park should not be included in the Plan as set out in the terms of reference. If kept in the Plan, this section should follow the model of LMU 13: City of Dawson
LMU 5	6.5	2	SMD	Remove	Remove	Access: a. Tombstone Corridor: Generally, 500m on either side of the centre line of the Dempster Highway, see park management plan for details of corridor (Trondëk Hwëch’in & Government of Yukon, 2009). Managed under the Area Development Act. b. Activities managed within the Corridor may include continued highway maintenance activities, a possible future pipeline, transmission line or other public visitor infrastructure (i.e., fibre optic line). c. Carefully managed surface access should be considered jointly by the Parties to support sustainable tourism activities, forestry, Tr’ondëk Hwëch’in cultural activities, and access to a mineral deposit that has been proven viable by a proponent.		
LMU 5	6.5	3	SMD	Remove	Remove	Tombstone Territorial Park Management Plan Review.		
LMU 5	6.5	4	SMD	Remove	Remove	Industrial Land Use: a. Mineral development is permitted within existing mineral tenure. b. Industrial land use permitted within ISA 1 cumulative effects thresholds.		
LMU 5	6.5	5	SMD	Remove	Remove	Withdrawal of all other lands from placer and quartz mineral staking.		
LMU 5	6.5	6	SMD	Remove	Remove	See Tombstone Territorial Park Management Plan (2009) for a comprehensive description of the area and values, and allowable activities and management directions.		
LMU 5	6.5	7	SMD	Remove	Remove	Dempster Highway corridor sub-regional plan will affect this LMU and thus interim measures and future sub-regional planning direction should be considered (see Section 5.4.3.1.1 – Dempster Highway Corridor, page 130).		
LMU 6	6.6	1	SMD	Remove	Remove	Activities that have the potential to disturb salmon spawning habitat should be suspended during the spawning season (July 1 to August 15).		The proposed timing window is incorrect, this area in in the Yukon drainage (Yukon downstream per DFO’s timing windows). Timing windows indicate the time during which work can occur based on fish presence, for Chinook salmon this is between June 10 and July 5. A requirement to follow timing windows is included as general management direction 5.2.1.3 f so this direction should be removed entirely as it is incorrect and redundant.
LMU 6	6.6	2	SMD	Modify	Plan	Area is considered to contain critically important habitat for regional lynx populations. Development in this area should ensure impacts to lynx and their key habitat requirements are minimized or avoided.	Development in this area should ensure impacts to lynx and their key habitat requirements are minimized or avoided.	Context should be in the Values table. (it is already in here)
LMU 6	6.6	3	SMD	Remove	Remove	Activities that have the potential to disturb migratory bird nesting should proceed as guided by the Migratory Birds Convention Act and its regulations to minimize and/or avoid impacts to migratory birds.		Redundant - already must meet legislated requirements
LMU 6	6.6	4	SMD	Modify	Plan	Area represents important headwaters for drinking water catchment for City of Dawson and surrounding residential neighbourhoods. Development in this area should not impact this important water source (see Section 5.3.5.1 – Community Water, page 118).	Development in this area should not impact the headwaters for drinking water catchment for the City of Dawson (see Section 5.3.5.1 – Community Water, page 118).	Context should be in the Values table.
LMU 6	6.6	5	SMD	Keep	Plan	The North Fork Hydro site as identified in the THFA should be considered at the discretion of both Parties.		
LMU 6	6.6	6	SMD	Modify	Plan	Dempster Highway Corridor sub-regional plan will affect this LMU and thus interim measures and future sub-regional planning direction should be considered (see Section 5.4.3.1.1 – Dempster Highway Corridor, page 130).	Dempster Highway Corridor sub-regional plan directions will apply to portions of this LMU once the sub-regional plan is approved, see Section 5.4.3.1.1 – Dempster Highway Corridor, page 130.	No interim measures identified.
LMU 7	6.7	1	SMD	Keep	Plan	Caribou Stewardship overlay area (see Section 3.2.4.1 – Caribou Stewardship Area, page 44).		
LMU 7	6.7	2	SMD	Remove	Remove	Industrial Land Use: a. Mineral development is permitted within existing mineral tenure. b. Industrial land use is permitted within ISA 1 cumulative effects thresholds.		Include directions related to the overlay in this section rather than referring elsewhere.
LMU 7	6.7	3	SMD	Remove	Remove	Interim withdrawal of all other lands from placer and quartz mineral staking to be in place until the Access Management plan is completed or Regional Plan 10-year Review or until such a time that both Parties agree to remove.		Removed as YG does not support interim withdrawals. Without withdrawals development is not limited to existing tenure and as an ISA 1 the thresholds do not need to be restated.

LMU 7	6.7	4	SMD	Modify	Plan	An access management plan / agreement to be jointly created by the Parties which should consider the following: a. New all season surface access: When new access is required, coordinated access routes for industrial activities should be encouraged to reduce linear footprint. b. The viewscape from the Dempster Highway should be maintained. c. The sensitivity of caribou to cumulative effects. d. See also Section 5.4.3.2.2 – Access Management Planning Recommendations (page 140) and Recommended Action 102 for additional guidance on Access Management Plans. e. In the absence of an access management plan, Parties should jointly determine whether new surface access be permitted, with consideration of the above.	An access management plan / agreement to be jointly created by the Parties which should consider the following: a. Impacts to key ecological values with an emphasis moose and caribou from increased access development. b. Impacts to other land users, including the use of the land for traditional economic activities, subsistence harvesting, and trapping. c. Impacts to heritage values, cultural landscapes, heritage resources etc. d. New transportation routes to areas of significant to high economic value for minerals, tourism, etc. e. When new access is required, coordinated access routes for industrial activities should be encouraged to reduce linear footprint. f. The viewscape from the Dempster Highway should be maintained. g. The sensitivity of caribou to cumulative effects. [Make this its own recommendation] In the absence of an access management plan, Parties should determine whether new surface access be allowed, with consideration of the above with consideration of the above and in accordance with existing approval processes.	Considerations from recommendation 102 brought into this section rather than referred back to (original recommendation 6.7.4 d.). (Orignially 6.7.4. a, now e) - if its own direction rather than a considerations for access management plans, this is already covered by 5.4.3.2.1 c and can be removed. Orignially 6.7.4. e - modified to be its own recommendation and changed to clarify who approves.
LMU 7	6.7	5	SMD	Modify	Plan	Dempster Highway Corridor sub-regional plan will affect this LMU and thus interim measures and future sub-regional planning direction should be considered (see Section 5.4.3.1.1 – Dempster Highway Corridor (page 130)).	Dempster Highway Corridor sub-regional plan directions will apply to portions of this LMU once the sub-regional plan is approved(see Section 5.4.3.1.1 – Dempster Highway Corridor (page 130)).	No interim measures provided. Changed to inform reader that additional directions may be added in this area once sub-regional plan is approved.
LMU 8	6.8	1	SMD	Keep	Plan	The viewscape off the Dempster Highway should be maintained for its aesthetic and natural value.		
LMU 8	6.8	2	SMD	Keep	Plan	Except for winter access, new surface access infrastructure off the Dempster Highway should be considered jointly by the Parties.		
LMU 8	6.8	3	SMD	Modify	Plan	Heap-leach mining involves the use of chemicals, normally a cyanide solution, to extract precious metals from ore. Use of heap-leach mining practices in this area should take every precaution to not harm the surrounding aquatic environment. The collection of accurate and robust baseline data collection on groundwater and surface water quality parameters as well as continued monitoring for impacts will be important considerations for development in this area.	Use of heap-leach mining practices in this area should take every precaution to not harm the surrounding aquatic environment.	Heap-leach mining info should be in the context/background. The collection of accurate and robust baseline data collection on groundwater and surface water quality parameters as well as continued monitoring for impacts will be important considerations for development in this area. - context or recommendation (in Appendix)
LMU 8	6.8	4	SMD	Modify	Plan	This area contains important habitat for sharp-tailed grouse, which are a species of management concern. Development in this area should be planned to minimize impacts of key habitat for sharp-tailed grouse.	Development in this area should be planned to minimize impacts of key habitat for sharp-tailed grouse.	Corrected terminology Reworded to move the first sentence to Values table (Species at Risk) - it is context, not a management direction
LMU 8	6.8	5	SMD	Keep	Plan	If the mine becomes active again traffic may need to be managed to ensure the continued peaceful enjoyment of the adjacent settlement land in LMU 10: Tintina Trench (page 212).		
LMU 8	6.8	6	SMD	Modify	Plan	Dempster Highway Corridor sub-regional plan will affect this LMU and thus interim measures and future sub-regional planning direction should be considered (see Section 5.4.3.1.1 – Dempster Highway Corridor, page 130).	Dempster Highway Corridor sub-regional plan directions will apply to portions of this LMU once the sub-regional plan is approved, see Section 5.4.3.1.1 – Dempster Highway Corridor, page 130.	No interim measures identified, if there are any other considerations they should be brought forward as directions here rather than referring back to another section.
LMU 9	6.9	1	SMD	Modify	Plan	Industrial activities within caribou fall breeding (rut) habitat should be suspended during the key rutting period, (or as advised by a Regional Biologist) each year.	Industrial activities within caribou fall breeding (rut) habitat should be suspended during the key rutting period each year.	Capitalization
LMU 9	6.9	2	SMD	Keep	Plan	Any access development (roads and trails) within caribou fall breeding (rut) habitat should be avoided.		
LMU 9	6.9	3	SMD	Remove	Remove	North Klondike Highway Corridor: Direction set out in Section 5.4.3.1.3 – North Klondike Highway Corridor (page 135) should apply.		Directions were not specific to this area (duplicated other sections of the plan) so were recommended to be removed, if rewritten they should be included here rather than referring to section 5.4.3.1.3.
LMU 10	6.10	New	SMD	Add	Plan		Surface disturbance threshold of 18.14km2 (1.0% of LMU area).	Removed “ISA 2” and instead listed specific disturbance allowed by thresholds to avoid confusion as this is a SMA. Nothing in s.3.6 limits thresholds to industrial land uses, clarify if other uses are permitted up to the thresholds specified.
LMU 10	6.10	New	SMD	Add	Plan		Linear feature density threshold of 907km (0.5km/km2 of LMU area).	Removed “ISA 2” and instead listed specific disturbance allowed by thresholds to avoid confusion as this is a SMA. Nothing in s.3.6 limits thresholds to industrial land uses, clarify if other uses are permitted up to the thresholds specified.

LMU 10	6.10	1	SMD	Modify	Plan	Industrial Use: a. Industrial land use permitted within ISA 2 cumulative effects thresholds. b. Forestry and fuel wood harvest as guided by the Dawson Forest Resources Management Plan. c. 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. d. The North Fork Hydro site as identified in the THFA would be considered at the discretion of both Parties. e. Agricultural Corridor Area: Agricultural leases permitted within a 2km buffer on either side of the North Klondike Highway (see Section 3.2.5 – Corridor Areas, page 44)	The following industrial uses may be permitted: a. Forestry and fuel wood harvest as guided by the Dawson Forest Resources Management Plan. b. The North Fork Hydro site as identified in the THFA would be considered at the discretion of both Parties. c. Agricultural leases only permitted within a 2km buffer on either side of the North Klondike Highway (Agricultural Corridor)	Specify if any other industrial land uses are allowable, there is existing mineral tenure within the LMU that should be allowed to be developed. Removed as this is not an industrial land use and any activities must consider the rest of the Plan. Section 3.2.5 provides no further information about the purpose or requirements for these areas and may instead cause confusion for the reader. Suggest removing from Plan and modifying this recommendation as suggested. Suggest keeping label of agricultural corridor as this area is excluded from WSI but it does not need another section in the Plan.
LMU 10	6.10	2	SMD	Keep	Plan	Withdrawal of all lands from placer and quartz mineral staking.		
LMU 10	6.10	3	SMD	Keep	Plan	In the absence of a SMA management plan, surface access should be managed jointly by the Parties in consideration of sustainable development and cultural activities, including tourism, agriculture, and forestry.		
LMU 10	6.10	4	SMD	Modify	Plan	Designation is not intended to limit Tr’ondëk Hwëch’in’s ability to access the land and develop infrastructure for traditional land use activities.		Clarify if linear features created to access traditional use activities or if disturbance created by traditional land use activities are exempt from surface disturbance and linear feature density thresholds and if this applies only within this LMU or more broadly.
LMU 10	6.10	5	SMD	Modify	Plan	This area contains important habitat for sharp-tailed grouse, which are a species of immediate management concern. Development in this area should be planned to minimize impacts to key habitat for sharp-tailed grouse.	Development in this area should be planned to minimize impacts to key habitat for sharp-tailed grouse.	Corrected terminology Should also reworded to move the first sentence to the Values table (Species at Risk) - it is context, not a management direction itself.
LMU 10	6.10	6	SMD	Modify	Plan	Dempster Corridor sub-regional plan will affect this LMU and thus interim measures and future sub-regional planning direction should be considered (see Section 5.4.3.1.1 – Dempster Highway Corridor, page 130).	Dempster Highway Corridor sub-regional plan directions will apply to portions of this LMU once the sub-regional plan is approved, see Section 5.4.3.1.1 – Dempster Highway Corridor, page 130.	Corrected terminology No interim measures in s.5.4.3.1.1, if there are other considerations they should be brought forward to this section not referred back to.
LMU 10	6.10	7	SMD	Modify	Plan	Wetlands: a. Consideration of Flat Creek Wetlands as a Wetland of Special Importance. b. As per wetland direction in Section 5.2.5 – Wetlands (page 96), no development should occur in bogs, fens, or marshes in an SMA.	Wetlands: a. Identification of all wetlands found within the Klondike River drainage within this LMU and outside of the Agricultural Corridor as a Wetland of Special Importance. b. As per wetland direction in Section 3.2.4.3 – Wetlands of Special Importance (page), no development that could result in a loss or reduction of wetland benefits should be allowed within the Wetland of Special Importance.	Updated to reflect recommendations re: wetlands of special importance.
LMU 11	6.11	1	SMD	Change Type	Appendix	Opportunities to promote awareness of Tr’ondëk Hwëch’in cultural history and contemporary land use in this area should be explored.		This is not a management direction. Recommendation to the Parties should be in the Appendix.
LMU 11	6.11	2	SMD	Modify	Plan	This area contains important habitat for sharp-tailed grouse, which are a species of immediate management concern. Development in this area should be planned to minimize impacts to key habitat for sharp-tailed grouse.	Development in this area should be planned to minimize impacts to key habitat for sharp-tailed grouse, which are a Yukon species of conservation concern	Corrected terminology Should also reworded to move the first sentence to the Values table (Species at Risk) - it is context, not a management direction itself.
LMU 11	6.11	3	SMD	Modify	Appendix	Contains the highest concentration of historic sites (outside of the City of Dawson) within the Planning Region, including the Ridge Road Heritage Trail, Discovery Claim, and Dredge #4 which represents significant tourism and recreational potential. Efforts to enhance the recreational aspects of this area should be explored.	Efforts to enhance the recreational aspects of this area should be explored given high potential for tourism and recreational potential.	First part is context, should be in the Values table below under Heritage Resources and Sites (and some area already mentioned).
LMU 11	6.11	4	SMD	Remove	Remove	This LMU is listed in Section 5.4.3 – Transportation and Access (page 129), as being a priority area for an access management plan. The proposed Northern Access Route modifications and extension will likely have a significant impact to this LMU and its values.		YG does not support the requirement of an access management plan for this area as this LMU already has existing access routes. YG believes access management planning is a process intended to plan for potential new major access routes. The application for access routes to the Coffee Project have already been accepted and reviewed under existing legislation. YG cannot amend the review process for an existing application.
LMU 12	6.12	IM 1	SMD	Modify	Plan	This LMU is exempt from surface and linear disturbance tracking as the appropriate indicators will be selected during the sub-regional planning process.	This LMU is exempt from surface disturbance and linear feature density thresholds as the appropriate indicators will be selected during the sub-regional planning process.	Changed to be consistent with terms used in s. 3.6

LMU 12	6.12	IM 2	SMD	Modify	Plan	New spot land applications for permanent dispositions should be discouraged. a. If a land disposition is permitted to proceed, development should first be considered within or close to existing settlement areas (i.e., the City of Dawson, Bear Creek, Rock Creek, and Henderson Corner). b. New residential development in areas of high potential for agriculture, forestry and/or mineral exploration should be discouraged. c. Access to existing recreational trails should be maintained and where land use conflicts occur, appropriate mitigations put in place. d. Impacts to fish in the Klondike River, in particular salmon, should be mitigated.	New applications for permanent dispositions is discouraged. a. Land disposition should first be considered within or close to existing settlement areas (i.e., the City of Dawson, Bear Creek, Rock Creek, and Henderson Corner). b. Residential development should avoid areas of high potential for agriculture, forestry and/or mineral exploration. c. Access to existing recreational trails should be maintained and where land use conflicts occur, appropriate mitigations put in place. d. Impacts to fish in the Klondike River, in particular salmon, should be mitigated.	Clarify that “spot land applications” does not include development planning. The intent is to allow for this to proceed prior to completion of the future planning. Subsequent bullets are not related to spot land applications. Land dispositions are broader than spot land applications.
LMU 12	6.12	IM 3	SMD	Modify	Plan	Ensure Tr’ondëk Hwëch’in citizens have continued use and peaceful enjoyment of Settlement Land, as per the THFA. Particular attention should be given to Settlement Lands that intersect with other LMUs, such as R64B, R38A, S11B1 and C14B		Redundant if required under THFA however could keep as it highlights sites of particular interest
LMU 12	6.12	IM 4	SMD	Keep	Plan	City of Dawson expansion may occur before sub-regional planning is completed. The Parties should work with the City of Dawson to ensure LMU values are not negatively impacted.		
LMU 12	6.12	IM 5	SMD	Modify	Plan	Mitigate potential harmful impacts to the Klondike River watershed and City of Dawson municipal water supply catchment area (see Section 5.3.5.1 – Community Water, page 118).	Development in this area should not impact the Klondike River watershed and City of Dawson municipal water supply catchment area (see Section 5.3.5.1 – Community Water, page 118).	Reworded to be closer to similar direction for LMU 6.
LMU 12	6.12	IM 6	SMD	Modify	Plan	High value agricultural land should be prioritized for agricultural purposes.	Areas of "high" (class 3 to 5) agricultural potential should be identified and prioritized for this use with consideration of other values.	Reworded to clarify what these areas are and to account for other values.
LMU 12	6.12	SRP 1	SMD	Remove	Remove	To be conducted jointly by the Parties as per Chapter 11 of the THFA and initiated within 3 years of Plan approval. a. Sub-regional planning should be undertaken by the existing DRPC or a new specific sub-regional planning commission which should be comprised of residents from the planning area and the Dawson community. b. Collaboration with other planning partners is encouraged, and this includes the City of Dawson, the Klondike Development Organisation, and the Tr’ondëk Hwëch’in Community Development Corporation.		Recommend removing directions related to sub-regional planning as Parties will determine method, process and considerations when this planning is initiated.
LMU 12	6.12	SRP 2	SMD	Remove	Remove	Establishment of new Klondike Valley zoning guidelines to regulate future land use activities and help ensure land use conflicts are avoided. a. Identify areas suitable for new residential development, including expansion of existing residential areas e.g., City of Dawson, Bear Creek, Rock Creek, Henderson’s Corner. b. Ensure areas of "high" (Class 3 to 5) agricultural potential are prioritized for agricultural and accessory uses to enhance food security in the Region. c. Determine the need for future commercial and industrial land uses and identify appropriate areas. d. Identify areas that have potential for mixed or multiple land uses, such as agriculture and mineral development. e. Identify new and preserve existing recreation areas. This includes walking/biking trails and outdoor aquatic amenities. f. Identify areas that are appropriate for renewable energy generation.		Recommend removing directions related to sub-regional planning as Parties will determine method, process and considerations when this planning is initiated.
LMU 12	6.12	SRP 3	SMD	Remove	Remove	Complement planning and development of the City of Dawson municipality		Recommend removing directions related to sub-regional planning as Parties will determine method, process and considerations when this planning is initiated.
LMU 12	6.12	SRP 4	SMD	Remove	Remove	Complement planning and development of the Central Tr’ondëk Land Management Area.		Recommend removing directions related to sub-regional planning as Parties will determine method, process and considerations when this planning is initiated.
LMU 12	6.12	SRP 5	SMD	Remove	Remove	Ensure Tr’ondëk Hwëch’in citizens have continued use and peaceful enjoyment of Settlement Land, as per the THFA. Particular attention should be given to Settlement Lands that intersect with other LMUs, such as R64B, R38A, S11B1 and C14B.		Recommend removing directions related to sub-regional planning as Parties will determine method, process and considerations when this planning is initiated.
LMU 12	6.12	SRP 6	SMD	Remove	Remove	Consider the potential impacts of climate change, particularly regarding flooding around residential areas, wildlife habitats, and permafrost slumping.		Recommend removing directions related to sub-regional planning as Parties will determine method, process and considerations when this planning is initiated.
LMU 12	6.12	SRP 7	SMD	Remove	Remove	Ensure City of Dawson municipal water supply is protected, and land uses that could lead to contamination be discouraged within the catchment area.		Recommend removing directions related to sub-regional planning as Parties will determine method, process and considerations when this planning is initiated.
LMU 12	6.12	SRP 8	SMD	Remove	Remove	Consider how residential growth may impact services offered within the City of Dawson and municipal tax ratepayers.		Recommend removing directions related to sub-regional planning as Parties will determine method, process and considerations when this planning is initiated.

LMU 12	6.12	SRP 9	SMD	Remove	Remove	Climate Change mitigations and adaptations: a. Consideration of the potential effects of climate change in the area including (but not limited to) flooding, landslide potential, slumping, and permafrost degradation. b. Proposed renewable energy projects must consider LMU values, interim measures as outlined in this section, and adjacent LMUs.		Recommend removing directions related to sub-regional planning as Parties will determine method, process and considerations when this planning is initiated.
LMU 14	6.14	1	SMD	Remove	Remove	Activities that have the potential to disturb salmon and other fish spawning sites should be restricted during known species-dependent freshwater timing windows for the Yukon (as per DFO).		Covered by management practice 5.2.1.3 f (Implement timing windows for lifecycle related habitat types (i.e., overwintering habitat and water withdrawals, spawning streams etc.) as per Freshwater Timing Windows Identified for the Yukon (https://www.dfompo.gc.ca/pnw-ppe/timing-periodes/yk-eng.html).)
LMU 14	6.14	2	SMD	Keep	Plan	The operation of large, high-powered tourist watercraft on the Fortymile River should not result in appreciable mortality to juvenile or adult salmon, or disruption of their habitats.		
LMU 14	6.14	3	SMD	Modify	Plan	Land users working in proximity to Mickey Creek and Swede Creek should be made aware of the stream’s use for human consumption. An appropriate buffer should be explored and implemented where appropriate to ensure no negative impacts to these important water sources.	An appropriate buffer, as determined during assessment and regulatory processes, should be followed to ensure no negative impacts to important water sources Mickey Creek and Swede Creek.	Context re water source is already in the Values table. Users in these areas must follow the Plan, therefore the Plan can provide this notice.
LMU 14	6.14	4	SMD	Remove	Remove	The Clinton Creek asbestos mine was abandoned in 1978 and is now under the care and maintenance of Government of Yukon and Government of Canada. Remediation planning is underway in collaboration with Tr’ondëk Hwëch’in. Continued work on future reclamation and closure planning is a priority due to community concerns.		Removed, no recommendation or management direction. Context added to the Values table below.
LMU 14	6.14	5	SMD	Remove	Remove	Top of the World Highway Corridor: Direction set out in Section 5.4.3.1.2 – Top of the World Highway Corridor (page 132) should apply.		Directions from 5.4.3.1.2 brought forward rather than referred back to.
LMU 14	6.14	5	SMD	Add	Plan	Take care not to disturb the unique biophysical and socio-cultural setting of the Top of the World Highway corridor, in particular with the use of ORVs within key ungulate, ecologically important, and cultural areas. (See Map 4 – Selected Ecologically Important Areas, Map 5 – Ungulates, and Map 6 – First Nations Land Use, Heritage, and Cultural Resources). The use of ORVs should not undermine cultural and wildlife values.		Directions from 5.4.3.1.2 brought forward rather than referred back to.
LMU 14	6.14	5	SMD	Add	Plan	The visual integrity and natural aesthetic viewscape of the Top of the World Highway corridor should be maintained.		Directions from 5.4.3.1.2 brought forward rather than referred back to.
LMU 15	6.15	1	SMD	Modify	Plan	This area is located within important caribou herd ranges and considered extensive moose habitat. It is imperative to maintain key caribou migration pathways and to minimize disturbance to key (summer and winter) habitat areas, and that impacts to moose through overharvesting are minimized: a. Avoid disturbance in key caribou migration pinch points along ridges as identified by regional biologists. b. Development within the large core patches of winter habitat found adjacent to the Top of the World Highway should be avoided where possible and limited otherwise. c. Timing windows that reduce industrial impacts to moose and caribou should be applied as guided by regional biologists. d. Access management planning as per Section 5.4.3.2.2 – Access Management Planning Recommendations (page 140).	To maintain key caribou migration pathways and to minimize disturbance to key (summer and winter) habitat areas, and to minimize impacts to moose through overharvesting: a. Avoid disturbance in key caribou migration pinch points along ridges as identified during assessment and regulatory processes. b. Development within the large core patches of winter habitat found adjacent to the Top of the World Highway should be avoided where possible and limited otherwise. c. Timing windows that reduce industrial impacts to moose and caribou should be applied as guided by regional biologists. d. While activities are underway, special care should be taken during the months of June through November to maintain caribou summer range habitat. Specific provisions related to this time period should be considered as part of the regulatory and assessment process for individual projects.	Context is already in the Values table below. removed. a. need to identify the "key caribou migration pinch points along ridges" Previous d. YG does not support the requirement of an access management plan for this area as this LMU already has existing access routes. YG believes access management planning is a process intended to plan for potential new major access routes.
LMU 15	6.15	2	SMD	Keep	Plan	This area is particularly important for subsistence harvesting and the pursuit of traditional economic activities. The ability for residents to continue using the land in this way must be maintained.		
LMU 15	6.15	3	SMD	Modify	Plan	Top of the World Highway Corridor: Direction set out in Section 5.4.3.1.2 – Top of the World Highway Corridor (page 132) should apply.	Take care not to disturb the unique biophysical and socio-cultural setting of the Top of the World Highway corridor, in particular with the use of ORVs within key ungulate, ecologically important, and cultural areas. (See Map 4 – Selected Ecologically Important Areas, Map 5 – Ungulates, and Map 6 – First Nations Land Use, Heritage, and Cultural Resources). The use of ORVs should not undermine cultural and wildlife values. The visual integrity and natural aesthetic viewscape of the Top of the World Highway corridor should be maintained.	Management directions from 5.4.3.1.2 brought here instead of referred back to.
LMU 16	6.16	1	SMD	Modify	Plan	Withdrawal of all lands from placer and quartz mineral staking.		There is one existing placer claim in the middle of this LMU. SMDs should speak to what development is permitted within this existing tenure.
LMU 16	6.16	2	SMD	Keep	Plan	Access: a. No new surface access. b. Continued use of existing access.		
LMU 16	6.16	3	SMD	Modify	Plan	No new industrial land uses.		Are other uses permitted? Up to what thresholds?
LMU 16	6.16	New	SMD	Add	Plan		4. Wetlands: a. Identification of all wetlands found within the North Ladue River drainage within the LMU as a Wetland of Special Importance (page 44). b. As per wetland direction in Section 3.2.4.3 – Wetlands of Special Importance, no development that could result in a loss or reduction of wetland benefits should be allowed within the Wetland of Special Importance	
LMU 17	6.17	1	SMD	Remove	Remove	Wetland Stewardship Overlay area (see Section 3.2.4.2 – Wetland Stewardship Area, page 44).		Recommend removing overlay as it only applies to this LMU, any overlay conditions should be added as special management conditions within this LMU.
LMU 17	6.17	2	SMD	Remove	Remove	Industrial Land Use: a. Mineral development is permitted within existing mineral tenure. b. Industrial land use is permitted within ISA 2 cumulative effects thresholds.		Recommend removing overlay as it only applies to this LMU, any overlay conditions should be added as special management conditions within this LMU.

LMU 17	6.17	3	SMD	Modify	Plan	Development within undisturbed wetlands is subject to the following: a. No disturbance to field-verified marshes and bogs. b. Development in undisturbed fens is limited to (50 percent) by claim block or permit area as per wetland fen threshold direction in Section 5.2.5 – Wetlands (page 96). c. Development of wetlands subject to general management directions.	Development in undisturbed fens is limited to (50 percent) by claim block or permit area. - For the purposes of measuring fen thresholds, the definition of surface disturbance is as per the glossary, consistent with cumulative effects indicator measurement. - Thresholds should be established with the baseline state of wetlands as of 2022, not based on the amount of fens existing at the time of application.	a. & c. Redundant, covered by recommendation 44 b. This is the only LMU for which these directions apply, bring them to this section rather than direct to earlier in the Plan.
LMU 17	6.17	4	SMD	Remove	Remove	When a claim expires, it should be withdrawn from further staking while the interim withdrawal is in place.		YG does not support the use of interim withdrawals. Also, it is redundant (while there is a prohibition of entry in place, no new staking can occur).
LMU 17	6.17	5	SMD	Remove	Remove	Interim withdrawal of all lands from placer and quartz staking. Withdrawal can be jointly reassessed by the Parties upon completion of an Upper Indian River Stewardship Plan (see below), or at the time of 10-year Plan Review, or until such a time that both Parties agree to remove.		Removed as YG does not support interim withdrawals. Without withdrawals development is not limited to existing tenure and as an ISA 2 the thresholds do not need to be restated.
LMU 17	6.17	5	SMD	Keep	Appendix	Priority is given to this LMU for the development of socio-cultural indicators as a part of the cumulative effects framework led by Tr’ondëk Hwëch’in due to the cultural importance of this area		Recommendation to the Parties - move to Appendix.
LMU 17	6.17	UIRSP 1	SMD	Keep	Appendix	An Upper Indian River Stewardship Plan must be jointly created by the Parties and should consider the following: Stewardship as understood and practiced by Tr’ondëk Hwëch’in, and community stewardship as understood by the broader community should guide the development of this Plan.		Recommendation to the Parties - move to Appendix.
LMU 17	6.17	UIRSP 2	SMD	Modify	Appendix	[An Upper Indian River Stewardship Plan must be jointly created by the Parties and should consider the following:] When new access is required, coordinated access routes for industrial activities should be encouraged to reduce linear feature footprint.	When new access is required, coordinate access routes for industrial activities to reduce linear feature density	Use consistent wording (linear feature density, not footprint) Recommendation to the Parties - move to Appendix.
LMU 17	6.17	UIRSP 3	SMD	Keep	Appendix	[An Upper Indian River Stewardship Plan must be jointly created by the Parties and should consider the following:] Traditional knowledge should inform and guide the development of the management plan.		Recommendation to the Parties - move to Appendix.
LMU 17	6.17	UIRSP 4	SMD	Keep	Appendix	[An Upper Indian River Stewardship Plan must be jointly created by the Parties and should consider the following:] Opportunities for partnerships and collaborations (industry partners, traditional knowledge holders, academic institutions, and environmental non-governmental organizations, etc.) where possible recognizing the expertise and on the ground experience that partners can bring to the body of knowledge surrounding new mining techniques, experiences from outside jurisdictions, monitoring and inspection, and wetland reclamation.		Recommendation to the Parties - move to Appendix.
LMU 17	6.17	UIRSP 5	SMD	Modify	Appendix	Consider opportunities for innovation (techniques/technology) in post-mining reclamation. Explore opportunities with the aforementioned collaborations to further research and techniques in restoration of wetlands in northern ecosystems (including peatland restoration).	Consider opportunities for innovation (techniques/technology) in mining reclamation....	Progressive reclamation may be occurring at the same time as mining Recommendation to the Parties - move to Appendix.
LMU 17	6.17	UIRSP 6	SMD	Keep	Appendix	Parties to jointly develop reclamation guidance and standards for placer operators.		Recommendation to the Parties - move to Appendix.
LMU 18	6.18	1	SMD	Modify	Appendix	Area contains important caribou migration routes and ridgetops. Yukon Government and Tr’ondëk Hwëch’in to identify appropriate conditions to minimize impacts to these areas from future development.	Government of Yukon and Tr’ondëk Hwëch’in to identify appropriate conditions to minimize impacts to these areas from future development.	Clarify if this is at a project or plan level. Context should be in the Values table.
LMU 18	6.18	2	SMD	Modify	Plan	Adjacent to this LMU there are small, isolated sheep populations that are particularly sensitive to disturbance. Access via land and air into this area should take every precaution to minimize disturbance to sheep.	Access via land and air into this area should take every precaution to minimize disturbance to sheep and sheep habitat.	Context should be in the Values table.
LMU 18	6.18	3	SMD	Modify	Appendix	Efforts to enhance the use of this area for traditional economic activities and cultural/educational pursuits should be explored.		Not a management direction.
LMU 18	6.18	4	SMD	Modify	Plan	Heap-leach mining involves the use of chemicals, normally a cyanide solution, to extract precious metals from ore. Use of heap-leach mining practices in this area should take every precaution to not harm the surrounding aquatic environment. The collection of accurate and robust baseline data collection on groundwater and surface water quality parameters as well as continued monitoring for impacts will be important considerations for development in this area.	Use of heap-leach mining practices in this area should take every precaution to not harm the surrounding aquatic environment.	Heap-leach mining info should be in the context/background. The collection of accurate and robust baseline data collection on groundwater and surface water quality parameters as well as continued monitoring for impacts will be important considerations for development in this area. - context or recommendation (in Appendix)
LMU 19	6.19	1	SMD	Modify	Plan	The Ladue River Wetlands are recommended as a Wetland of Special Importance.	1. Wetlands: a. Identification of all wetlands found within the Ladue and North Ladue River drainages within the LMU as a Wetland of Special Importance (page 44). b. As per wetland direction in Section 3.2.4.3 – Wetlands of Special Importance (page 44), no development that could result in a loss or reduction of wetland benefits should be allowed within the Wetland of Special Importance.	Updated based on recommendation for this area to be a wetland of special importance.
LMU 19	6.19	2	SMD	Remove	Remove	Development within undisturbed wetlands is subject to the following: a. No disturbance to field-verified marshes, fens, and bogs. b. Development in all other wetland types subject to general management directions for wetlands (see Section 5.2.5 – Wetlands, page 96).		Updated based on recommendation for this area to be a wetland of special importance.
LMU 19	6.19	3	SMD	Keep	Plan	Area contains isolated sheep population. Development in this area should take every precaution to minimize disturbance to sheep and sheep habitat along the White River.		

LMU 19	6.19	4	SMD	Modify	Plan	The frequency of use and potential impacts from off-road vehicles in this area is not well understood. In line with Section 4 - Cumulative Effects Framework, page 58, if linear feature density thresholds exceed the cautionary level (see Table 3-2 on page 56 or Appendix 3: Cumulative Effects Framework Thresholds) appropriate avenues should be explored to manage off-road vehicle use.	If linear feature density thresholds exceed the cautionary level of 774.75 km, appropriate avenues should be explored to manage off-road vehicle use	Context should be in the Values table.
LMU 20	6.20	1	SMD	Modify	Plan	Industrial land use: a. Mineral development is permitted within existing placer mineral tenure. b. Under the current regulatory system quartz exploration and development is not supported in this LMU (see rationale below). c. Forestry as guided by the Forest Resource Management Plan (subject to wetland general and special management directions).	The following industrial land uses may be permitted: a. Mineral development is permitted only within existing placer mineral tenure.	There are also existing quartz claims in this LMU that YG wishes to allow to continue to be developed. (re subject to...) Redundant, all development must meet Plan directions
LMU 20	6.20	2	SMD	Modify	Plan	Withdrawal of all other lands from placer and quartz staking.	Withdrawal of all lands from placer and quartz staking.	accuracy
LMU 20	6.20	3	SMD	Modify	Plan	Industrial land use permitted within ISA 2 cumulative effects thresholds.	1. Surface disturbance threshold of 3.56km2 (1.0% of LMU area) 2. Linear feature density threshold of 178km (0.5km/km2 of LMU area	Clarify if any other types of industrial land use beyond mineral development and forestry are acceptable
LMU 20	6.20	4	SMD	Remove	Remove	When a mineral claim lapses, the land should revert to the prevailing designation of SMA.		Redundant, if lands are withdrawn from staking, claims no longer in good standing cannot be re-staked.
LMU 20	6.20	5	SMD	Modify	Plan	Access: a. Continued use of existing winter access road. b. Outside of gaining access to existing dispositions, new surface access is not allowed.	Except to access existing dispositions, new surface access is not allowed.	
LMU 20	6.20	6	SMD	Modify	Plan	Scottie Creek Wetlands are recommended as a Wetland of Special Importance (see Section 5.2.5 – Wetlands, page 96).	Wetlands: a. Identification of all wetlands found within the Scottie Creek drainage as a Wetland of Special Importance. b. As per wetland direction in Section 3.2.4.3 – Wetlands of Special Importance, no development that could result in a loss or reduction of wetland benefits should be allowed within the Wetland of Special Importance	redundant (now 3.a)
LMU 20	6.20	7	SMD	Remove	Remove	Development within undisturbed wetlands is subject to the following: a. No disturbance to field verified marshes, fens, and bogs. b. Development in other wetland types subject to general management directions for wetlands.		redundant (now 3.b)
LMU 21	6.21	1	SMD	Keep	Plan	Caribou Stewardship Overlay area (see Section 3.2.4.1 – Caribou Stewardship Area, page 44).		
LMU 21	6.21	2	SMD	Remove	Remove	Interim withdrawal of all lands from quartz staking until Plan review or such a time as both Parties agree to remove withdrawal.		YG does not support the use of interim withdrawals.
LMU 21	6.21	3	SMD	Remove	Remove	When a claim expires it should be withdrawn from further staking while interim withdrawal is in place.		YG does not support the use of interim withdrawals. Also, it is redundant (while there is a prohibition of entry in place, no new staking can occur).
LMU 21	6.21	4	SMD	Remove	Remove	Industrial Land Use: a. Under the current regulatory system quartz exploration and development is not supported in this LMU (see Rationale for Designation below).		YG does not support a. Quartz should be allowed to continue in this area in the same manner as any other use within an ISA, subject to the other special management directions.
LMU 21	6.21	4	SMD	Modify	Plan	[Industrial Land Use:] b. Other development in this area should take special precautions to ensure minimal disturbance to caribou, their habitat, and migration routes. This includes but is not limited to: i. Application of timing windows for caribou as determined by the Parties. ii. Project proponents to work with the Parties to identify, and avoid, areas with suitable lichen habitat prior to undertaking mineral development activities. iii. Reclamation standards should be applied that maximise the regrowth of caribou suitable habitat, including lichen, and avoidance of reclamation that leads to dense, wide thickets of willow in major creek or river bottoms. iv. Projects must include specific wildlife monitoring and mitigation plans that consider impacts to caribou, and at a minimum, establish a phased approach to actions taken when caribou are present. v. Development should consider guidance provided in wildlife management plans as applicable to this LMU (i.e., FMC Management Plan [pending]).	Development in this area should take special precautions to ensure minimal disturbance to caribou, their habitat, and migration routes. Proponents should: a. Follow timing windows for caribou as determined by the Parties . b. Work with the Parties to identify, and avoid, areas with suitable lichen habitat prior to undertaking mineral development activities. c. Apply Reclamation standards should be applied that maximize the regrowth of caribou suitable habitat, including lichen, and avoidance of reclamation that leads to dense, wide thickets of willow in major creek or river bottoms d. Include specific wildlife monitoring and mitigation plans in their project that consider impacts to caribou, and at a minimum, establish a phased approach to actions taken when caribou are present. e. Consider guidance provided in wildlife management plans as applicable to this LMU (li.e., FMC Management Plan [pending]).	(re: a. (formerly i.) timing windows) Clarify if this is at project or Plan level. (re FMC Management Plan) Clarify which management plan this is, the harvest management plan was released in November 2020 but may be less applicable for proponents.
LMU 21	6.21	5	SMD	Remove	Remove	Industrial land use permitted within ISA 2 cumulative effects thresholds.		Redundant - LMU 21 is an ISA 2
LMU 21	6.21	New	SMD	Add	Plan		Wetlands: a. Identification of all wetlands found within the North Ladue River drainage within the LMU as a Wetland of Special Importance. b. As per wetland direction in Section 3.2.4.3 – Wetlands of Special Importance (page), no development that could result in a loss or reduction of wetland benefits should be allowed within the Wetland of Special Importance.	
LMU 21	6.21	6	SMD	Modify	Appendix	Fire suppression options should be considered in areas and implemented if deemed necessary by the Parties to protect important caribou habitat (especially lichen areas) as a response to the potential increase in and intensity of fire activity due to climate change.	Fire suppression options should be considered and implemented if deemed necessary by the Parties to protect important caribou habitat (especially lichen areas) as a response to the potential increase in and intensity of fire activity due to climate change.	Recommendation to the Parties

LMU 21	6.21	7	SMD	Modify	Plan	Access: a. Continued use of existing surface access is allowed. b. New surface access is allowed within the linear density threshold of ISA 2. c. Top of the World Highway Corridor: Direction set out in Section 5.4.3.1.2 – Top of the World Highway Corridor (page 132) should apply.	1. Development within the Top of the World Highway corridor: a. Take care not to disturb the unique biophysical and socio-cultural setting of the corridor, in particular with the use of ORVs within key ungulate, ecologically important, and cultural areas. (See Map 4 – Selected Ecologically Important Areas, Map 5 – Ungulates, and Map 6 – First Nations Land Use, Heritage, and Cultural Resources). The use of ORVs should not undermine cultural and wildlife values. The visual integrity and natural aesthetic viewscape of the highway corridor should be maintained.	a & b - redundant, remove c - rather than refer to another section of the Plan, include the applicable RMP and Recommendations to Parties in this section
DRPC	7.2.1	139	Action	Modify	Appendix	The Parties and YLUPC should continue to fund the DRPC. This work will include: - Plan monitoring as per S 11.4.5.10. - Sub-regional planning. - Conformity checks and representations to YESAB. - The 5-year Status Report and 10-year Plan Review. - Land Stewardship Trust implementation and facilitation.	The Parties and YLUPC should continue to fund the Commission. This work will include: - Plan monitoring as per S 11.4.5.10 of the THFA. - Conformity checks and representations to YESAB as per s. 44(1) of the YESAA.	Other suggestions beyond scope of the Plan, Terms of Reference, UFA and/or YESAA
Implementation Committee	7.2.2	140	Action	Modify	Appendix	The Parties should jointly establish an Implementation Committee within one year of Plan approval. The Implementation Committee should include representation from the Parties, DRPC, Affected First Nations, YESAB and YLUPC. It is recommended that the Parties consider committee structure based on their mutual experience of the Peel Watershed RLUP implementation. This will make the establishment timeline shorter and Implementation work may begin quickly	The Parties should jointly establish an Implementation Committee within one year of Plan approval. The Implementation Committee should include representation from the Parties. It is recommended that the Parties consider committee structure based on their mutual experience of the Peel Watershed RLUP implementation. This will make the establishment timeline shorter and Implementation work may begin quickly	Plan cannot direct these other groups
Capacity Building	7.2.3	141	Policy	Modify	Appendix	The Tr’ondëk Hwëch’in Ninä’nkäk Hozo Wëk’ä’t’r’ë’no’hcha Land Stewardship Framework should be used to inform the Plan implementation process and future land use planning initiatives in Tr’ondëk Hwëch’in Traditional Territory.	Explore the use of the Tr’ondëk Hwëch’in Ninä’nkäk Hozo Wëk’ä’t’r’ë’no’hcha Land Stewardship Framework to inform the Plan implementation process and possible future land use planning initiatives in Tr’ondëk Hwëch’in Traditional Territory.	
Capacity Building	7.2.3	142	Policy	Remove	Remove	The Parties should look at opportunities for increased Government-to-Government cooperation. This includes: - Shared resources for monitoring and enforcement. - Shared training opportunities. - Continued development of the cumulative effects framework.		Remove – redundant, covered by recommendations 1,2,9 (CEF) and 39 (The Parties to allocate resources to develop capacity for monitoring and guardianship. Capacity includes expertise/local knowledge/ training.)
Capacity Building	7.2.3	143	Action	Keep	Appendix	The Parties should explore different ways to communicate the Plan with residents, Yukoners, and visitors to promote individuals’ sense of stewardship when they are in the Region. This may include: - Plain language versions of the Plan - Alternate versions, including video or audio - Storytelling - School curriculum - Visitor information.		
Capacity Building	7.2.3	144	Action	Keep	Appendix	The Parties should offer education and learning opportunities based in the Dawson Region that focus on stewardship and care for the land. The DDRRC should be consulted and involved on any education initiatives as their expertise and knowledge of the Region will be essential.		
Plan Conformity and Assessment	7.2.5	145	Policy	Remove	Remove	YESAB and YLUPC should initiate regular and meaningful dialogue with each other to collaborate on shared priorities. This includes: - Development of a committee for collaboration on shared priorities in Dawson. - Regular dialogue with DDRRC, including potential development of a framework for integrated resource management. - Developing a shared terminology between regional planning and YESAB including terms, definitions, and tools across processes. - Development of a geospatial repository and database.		Remove - no action recommended to Parties, YLUPC and YESAB can initiate meetings without Parties approval and Plan cannot direct them.
Plan Conformity and Assessment	7.2.5	146	Action	Modify	Appendix	A Plan conformity evaluation process should be developed within one year of Plan approval by the Implementation Committee with specific input from DRPC, YESAB and YLUPC. The Parties should consider the following: - Who will be responsible for undertaking conformity checks and how this will be resourced. - Changing the timing of conformity checks and moving it into the adequacy stage of YESAB assessment. - How disturbance tracking will be incorporated and recorded, and who will have access to this information - Triage YESAB projects by type (smaller vs. larger projects). - Provide clear rationale and guidance to proponents so they can develop projects that conform.	A Plan conformity evaluation process should be developed within one year of Plan approval by the Implementation Committee with specific input from the Commission, YESAB and YLUPC. The Parties should consider the following: - Who will be responsible for undertaking conformity checks and how this will be resourced. - How disturbance tracking will be incorporated and recorded, and who will have access to this information - Triage YESAB projects by type (smaller vs. larger projects). - Provide clear guidance to proponents so they can develop projects that conform.	Full project scope needed to determine conformity, this is completed during adequacy stage.
Implementation Guidelines	7.6.2	147	Action	Remove	Remove	The Parties, in collaboration with the DRPC, should develop an implementation strategy to include as part of the final recommended plan. The strategy should be reviewed and updated on an annual basis as part of plan monitoring activities.		Remove - Timeline for development is before final plan, therefore recommendation should not be included in final plan.
Implementation Guidelines	7.6.2	148	Action	Keep	Appendix	The Parties should, in collaboration with the DRPC, jointly develop implementation guidelines within one year of Plan approval. The guidelines should outline how the recommendations in the Plan will be implemented. The Parties should look to other initiatives in Canada where such guidelines have been developed, including the Sahtu Land Use Plan in the Northwest Territories (Sahtu Land Use Planning Board, 2013		
Plan Monitoring	7.7	149	Research	Keep	Appendix	The Parties and the DRPC should commit to ongoing research (both traditional and western approaches) to identify and track the changing social, economic and ecological needs in the Planning Region.		

Plan Monitoring	7.7	150	Action	Remove	Remove	The DRPC, in collaboration with the Parties, will develop a plan monitoring framework within one year of Plan approval. The monitoring framework should: • Be informed by best practices. • Be specific to the Dawson Region. • Be practical to implement. • Be transparent and easy to understand.\ The monitoring framework should meet the following objectives: 1. Tied to the Plan Vision, Goals and Objectives. 2. Focused on the Plan’s impact on the values identified. 3. Incorporate Traditional Knowledge. 4. Support continued partnerships and communication.		Remove - direction for Commission not Parties
Plan Monitoring	7.7	151	Action	Remove	Remove	The DRPC, in collaboration with the Parties, will produce an annual report of Plan implementation activities and impacts. The Parties should provide updates to the Commission who will compile this information into a single report that will be available publicly. This report should consider: • Progress on Plan implementation. • Ongoing surface disturbance and linear feature tracking and mapping. • Progress of sub-regional, SMA or ISA planning. • Feedback from Affected First Nations, Plan Partners, project proponents and residents. • Parties’ experience of co-management. • YESAB assessments, including project conformity checks.		Remove - direction for Commission not Parties
Plan Revision	7.8	152	Action	Modify	Appendix	A process for assessing Plan Variances and Amendments should be jointly developed within one year of Plan approval by the Parties. The process should consider the following: • The definition of Variance and Amendment and what the scale of each would be (i.e., what is considered minimal or significant). • Who may request Variances or Amendments, including activities or projects are eligible to apply. • Who will be responsible for assessing applications. • Application guidelines, supporting documentation requirements, and standards for complete applications. • Review timelines and evaluation criteria for applications; and • Public notice and engagement requirements, including how Traditional Knowledge will be captured and incorporated. The DRPC, YLUPC and YESAB should be consulted during process development to ensure there is no conflict with existing processes and regulatory assessment and the intent of the Plan is maintained.	A process for assessing Plan Variances and Amendments should be jointly developed within one year of Plan approval by the Parties. The process should consider the following: • Who may request Variances or Amendments, including activities or projects are eligible to apply. • Who will be responsible for assessing applications. • Application guidelines, supporting documentation requirements, and standards for complete applications. • Review timelines and evaluation criteria for applications; and • Public notice and engagement requirements, including how Traditional Knowledge will be captured and incorporated. The Commission, YLUPC and YESAB should be consulted during process development to ensure there is no conflict with existing processes and regulatory assessment and the intent of the Plan is maintained.	Terms defined above; Parties will determine who is eligible to apply
Plan Revision	7.8	153	Action	Modify	Appendix	The Commission should, in collaboration with the Parties, produce a status report five years after Plan approval. The status report should consider the following: • Review and summarise results of Plan monitoring. • Review Implementation Committee progress and make recommendations to adjust implementation plan if necessary. • Assess if Amendments are needed in relation to new/ updated legislation and make recommendations if needed. • Adopt additional cumulative effects indicators including potential new socio-economic and socio-cultural indicators. • Gather feedback from Parties, Plan Partners, FNFA boards and residents and make recommendations if needed. • Evaluate progress of SMA Management Planning. • Review status of Caribou Stewardship Areas i.e., LMU 7: Wehtr’e (Antimony) (page 196) and LMU 21: Wëdzey Tày (Fortymile Caribou Corridor) (page268). • Review status of ISA 1/Wetland Stewardship Area LMU 17: Nän Dhòhdäl (Upper Indian River Wetlands) (page 248).	The Parties should, with consideration from the Commission, produce a status report five years after Plan approval.	The Parties implement the Plan not the Commission and therefore the parties will determine in implementation what the status report should consider.
Plan Revision	7.8	154	Action	Modify	Appendix	The Parties should jointly develop a Plan review process following approval of the Plan. Plan reviews should occur at least every 10 years. Plan Reviews should consider the following: • Evaluate success of Plan against vision, goals and objectives • Review if Plan vision, goals and objectives are still relevant and applicable • Reassess values in the Region including availability of new information, technology, and knowledge • Assess progress against recommended actions, policies and research • Review demand for land and resources • Assess number of Variances and Amendments which may signal need for change • Review LMU boundaries and designations and make changes if necessary • Review status of Caribou Stewardship Areas i.e., LMU 7: Wehtr’e (Antimony) (page 196) and LMU 21: Wëdzey Tày (Fortymile Caribou Corridor) (page 268). • Review status of ISA 1 / Wetland Stewardship Area LMU 17: Nän Dhòhdäl (Upper Indian River Wetlands) (page 248). • Review status of North Yukon Annex with the Parties and Vuntut Gwitchin (if required).	The Parties should jointly develop a Plan review process following approval of the Plan. Plan reviews should occur at least every 10 years. Plan Reviews could consider the following: • Evaluate success of Plan against vision, goals and objectives • Review if Plan vision, goals and objectives are still relevant and applicable • Reassess values in the Region including availability of new information, technology, and knowledge • Assess progress against recommended actions, policies and research • Review demand for land and resources • Account for new understanding of climate change impacts on values • Assess number of Variances and Amendments which may signal need for change • Review LMU boundaries and designations and make changes if necessary • Review status of Caribou Stewardship Areas i.e., LMU 7: Wehtr’e (Antimony) (page 196) and LMU 21: Wëdzey Tày (Fortymile Caribou Corridor) (page 268). • Review status of ISA 1 / Wetland Stewardship Area LMU 17: Nän Dhòhdäl (Upper Indian River Wetlands) (page 248). • Review status of North Yukon Annex with the Parties and Vuntut Gwitchin (if required).	Added climate change consideration

Summary of Government of Yukon’s Proposed Modifications to Recommended Dawson Regional Land Use Plan

Plan Section	Plan Subsection	Currently in Recommended Plan	YG Proposed Modification Summary	For Further Information See:
All Plan	Overall		Changes to improve implementability of Plan.	Ministers Letter & Memo
All Plan	Overall		Add references to White River First Nation to Plan including reference to asserted territory	Ministers Letter
All Plan	Overall	Caribou overlays confined to LMU boundaries which do not provide clear direction for Plan users	Match Northern Mountain Caribou overlay to herd range boundary	Memo
All Plan	Overall	Uses British spelling (e.g. prioritise)	Updated to Canadian spelling (e.g. prioritize)	Tracked Changes Plan
All Plan	Overall	All headers refer to Section 6 Landscape Management Units	Headers updated to reflect appropriate Plan sections	Tracked Changes Plan
All Plan	Overall	All headers refer to Section 6 Landscape Management Units	Fixed headers to match section heading names	Tracked Changes Plan
All Plan	Overall		Fixed spelling, grammar and sentence structure issues.	Tracked Changes Plan
All Plan	Overall	Uses terms "Commission" and "DRPC" interchangeably.	Changes use of DRPC to the Commission.	Tracked Changes Plan
All Plan	Overall	[When citing THFA] "THFA 11.3" vs. "THFA s. 11.3" vs. "THFA Ch. 11.3"	Be consistent	Tracked Changes Plan
All Plan	Overall		The Plan should be written with proponents, assessors and regulators as the main audience and provide clear directions to follow to determine conformity rather than be written as recommendations for the Parties to consider.	Document Design and Writing Style
All Plan	Overall		Be consistent with themes/categories and values used throughout headings and sections in the Plan	Document Design and Writing Style
All Plan	Overall		The Plan should be written with an active, clear and positive voice	Document Design and Writing Style
All Plan	Overall		Capitalization of terms should be consistent throughout the Plan and indicative of the same meaning.	Document Design and Writing Style
All Plan	Overall		Information should be clearly cited.	Document Design and Writing Style
All Plan	Overall		Terms should be used consistently throughout the Plan in accordance with their definition. Synonyms should be avoided to reduce the number of terms used and avoid confusion. Where needed for further precision or for a clear distinction, additional terms can be used provided they are also appropriately defined.	Document Design and Writing Style
All Plan	Overall		Reorganising plan to limit policies in general management directions to apply to entire region and restructure Land Use Policies to include policies and intent for each designation.	Memo
All Plan	Overall		Ensure language used throughout the plan, particularly for land use objectives and policies, is specific, minimizes interpretations, and legally, technically, financially and administratively sound.	Memo
All Plan	Overall		Updated climate projections, revised management directions and recommendations, and adaptive management sections to further consider climate change in the Plan	Tracked Changes Plan
All Plan	Overall	Directs proponents to regional biologists for further information and buffer distances.	Direct to YG Department of Environment or TH Lands and Resources Department and refer to assessment/regulatory processes.	Memo
Contents	List of Acronyms		Added missing acronyms	Tracked Changes Plan
1. Introduction	1.1 Walking Together		Move to the "Message from the Commission"	Document Design and Writing Style
1. Introduction	1.2 Vision	Multiple vision statements	Focus on a vision for the region.	Document Design and Writing Style
1. Introduction	1.3.2 Plan Goals		Updated wording and order of goals	Tracked Changes Plan
1. Introduction	1.2, 1.3, 1.8, 1.9		Consolidate and pare down, organize into a hierarchy linking vision to guiding principles to goals	Document Design and Writing Style
1. Introduction	1.3.2 Plan Goals		Use consistent categories/labels/themes as those elsewhere in the Plan	Document Design and Writing Style
1. Introduction	1.4, 1.6, 1.7		Consolidate sections, move portions of these sections to the appendix.	Document Design and Writing Style
1. Introduction	Table 1-2 (1.7)		Move table to appendix (if not moving the section to Appendix)	Tracked Changes Plan
1. Introduction	1.7.2		Add reference to s.13.4.6.4 of THFA	Tracked Changes Plan
1. Introduction	1.5 History of the Plan		Move to appendix	Document Design and Writing Style
1. Introduction	1.9 Guiding Principles	Sustainable development, Stewardship, Precautionary Principle	Clarify the connection to the Plan directions in relevant sections elsewhere.	Document Design and Writing Style

1. Introduction	1.9.3 Precautionary Principle		Provide further information on how this applies to the Plan, use definition from draft Plan	Tracked Changes Plan
2. Description of the Planning Region	Overall		Add citations for all figures, use trends rather than single year of data and add comparison to territory as a whole	Tracked Changes Plan
1. Introduction	1.9.2.2 Community Stewardship	Green text box "It is the Commission’s hope that this Plan reflects community and Tr’ondëk Hwëch’in values and will in turn encourage all people to act as stewards of the Region to ensure the land, water, and animals are healthy for future generations."	Move to Message from the Commission	Document Design and Writing Style
1. Introduction	1.9.2.3 Stewardship and Management		Remove, information is found elsewhere in the Plan	Document Design and Writing Style
2. Description of the Planning Region	Overall		Incorporate important background information from section 5 subsections here. If background is too detailed, it should move to an appendix	Document Design and Writing Style
2. Description of the Planning Region	Overall	2.3 Environment, 2.4 People and Communities, and 2.5 Economy	Use the same categories/themes as those elsewhere in the Plan.	Document Design and Writing Style
2. Description of the Planning Region	2.7 Climate Change		Added climate modelling and further information on projected changes for the region	Tracked Changes Plan
3. Plan Concepts	Overall		Generally, define what planning tools are and how they were determined in this section. Management directions related to the tools are better suited to later sections of the Plan.	Document Design and Writing Style
3. Plan Concepts	3.2 Land Designation System	Repetitive headings with the subsequent Subsection 3.3 and 3.4	Consolidate with applicable sections to simplify	Document Design and Writing Style
3. Plan Concepts	3.2.2 SMAs		Remove references to THFA Chapter 10, define SMAs by what they are in the Plan	Memo
3. Plan Concepts	3.2.2 SMAs		Add text about joint management similar to Peel	Memo
3. Plan Concepts	3.2.2 SMAs		Improve clarity on allowable land uses	Memo
3. Plan Concepts	3.2.5 Corridors		Incorporate Corridors into Overlays	Document Design and Writing Style
3. Plan Concepts	3.2.4 Overlay		Added section related to Wetlands of Special Importance	Tracked Changes Plan
3. Plan Concepts	3.2.5 Corridors	Agricultural Overlay	Incorporate into LMU 10	Document Design and Writing Style
3. Plan Concepts	3.2.6 Other Areas		Add Tombstone to list of excluded areas	Memo
3. Plan Concepts	3.2.6 Other Areas		Remove this section, repeats section 1.4	Document Design and Writing Style
3. Plan Concepts	3.5 Resource Based Management Framework	Plan does not follow this structure	Remove or restructure the plan itself to follow.	Document Design and Writing Style
3. Plan Concepts	3.6 Cumulative Effects Framework	Overlapping information in Section 4. Cumulative Effects Framework	Combine with section 4, limit to content relevant to this section. Move other information to Appendix if needed.	Document Design and Writing Style
3. Plan Concepts	3.6.3 How is the framework applied in the Plan?		Move section to be with other directions in the Plan.	Document Design and Writing Style
3. Plan Concepts	3.6.3 How is the framework applied in the Plan?		Updated definitions of surface disturbance to include all human caused disturbance, added exclusion for permafrost thaw and other natural disturbances	Tracked Changes Plan
3. Plan Concepts	3.6.3 How is the framework applied in the Plan?	Precautionary, cautionary and critical thresholds levels identified	Remove precautionary level thresholds	Memo
3. Plan Concepts	3.6.3 How is the framework applied in the Plan?	Recommended Plan critical threshold levels of 2% for ISA3 and 4% for ISA 4.	Surface disturbance critical thresholds return to Draft Plan levels for ISA 3 and 4; increase by 0.5% and 1% to 2.5% and 5% respectively.	Ministers Letter & Memo
4. Cumulative Effects Framework	Overall	Overlapping information in 3.6.	Combine with section 3.6 Move recommendations in 4.5.1 to be with other directions in the Plan.	Document Design and Writing Style
4. Cumulative Effects Framework	New		Add wildfire, lichen cover, and caribou demographic rates as value-based indicators.	Memo
4. Cumulative Effects Framework	New		New section added speaking to recovery from extreme events related to climate change	Tracked Changes Plan

4. Cumulative Effects Framework	4.5.1 Recommendations		Recommendations simplified	Recommendations Table
4. Cumulative Effects Framework	4.5.1 Recommendations	Policy Recommendation 4 - Parties to define reclamation/restoration	YG would like to work with TH and Commission to complete this prior to Final Recommended Plan.	Ministers Letter & Memo
5. General Management Directions	Overall		Changes to policy recommendations relating to biodiversity monitoring and research to inform management decisions on a continual basis	Tracked Changes Plan
5. General Management Directions	Overall		Follow structure outlined in 5.1.1, where subsections cannot follow this and there are no management directions, it should be removed from this section and incorporated elsewhere in the Plan.	Document Design and Writing Style
5. General Management Directions	Overall	includes background information	Move important background information to Section 2, other background information can move to an appendix.	Document Design and Writing Style
5. General Management Directions	Overall	Category headings do not follow the Plan Goals	Use the same categories for topics (Values and Resources) and describe them in the same format as elsewhere in the Plan.	Document Design and Writing Style
5. General Management Directions	Overall		Include maps, descriptions or other data sources when recommending management practices for areas more specific than the LMU-scale (e.g. within key habitat)	Tracked Changes Plan
5. General Management Directions	Overall		Duplicate recommendations removed, recommendations simplified for clarity and misinformation corrected	Recommendations Table
5. General Management Directions	Overall		Make management directions applicable for proponents and recommendations to the Parties applicable to the Parties (some changes recommended where pointing to wrong group)	Tracked Changes Plan
5. General Management Directions	Overall		Objectives updated to remove any actions	Tracked Changes Plan
5. General Management Directions	Overall		Removed impractical management directions and recommendations to the Parties	Recommendations Table
5. General Management Directions	Overall		Removed recommendations to the Parties that would be completed anyways by accepting the Plan	Recommendations Table
5. General Management Directions	Overall		Add management practice to reclaim all disturbances, remove directions related to reclamation within individual values sections.	Tracked Changes Plan
5. General Management Directions	Planning Strategies	Includes recommendations for policy, research and actions	Move recommendations to the Parties to an appendix.	Recommendations Table
5. General Management Directions	5.2.1 and 5.2.2		Combine under single "Key Species" headline	Document Design and Writing Style
5. General Management Directions	5.2.1.4 Sheep		Remove section as there are no general management directions	Document Design and Writing Style
5. General Management Directions	5.2.2.3 Species at Risk and Rare Endemic Species		Updated background information to add more detail on species found in the region and to more closely align the Plan with requirements of federal recovery strategies and management plans for listed species at risk	Tracked Changes Plan
5. General Management Directions	5.2.3 Water and 5.2.4 Rivers and Watercourses	Similar topics covered in 2 separate subsections.	Consolidate.	Document Design and Writing Style
5. General Management Directions	5.2.5 Wetlands	includes a lot of context/background information.	Use the standard format and eliminate overlap/duplication in 5.2.6.1. Clarify directions re Wetlands of Special Importance	Document Design and Writing Style
5. General Management Directions	5.2.5 Wetlands	information prior to the territorial wetland stewardship policy being published	changes to better align the Plan with existing territorial guidance	Tracked Changes Plan
5. General Management Directions	5.2.5 Wetlands	Wetland buffer of 20m	Use existing forestry wetland buffers	Memo
5. General Management Directions	5.2.6 Climate Change	includes a lot of context/background information.	Move information about SMA and Wetlands to respective subsections.	Document Design and Writing Style
5. General Management Directions	5.3.2 Stewardship	Not a planning issue or interest.	Remove & consolidate to 1.9 Guiding Principles.	Document Design and Writing Style
5. General Management Directions	5.3.5.1 Community Water	Sub-subsection in 5.3.1 Community Growth	Incorporate into broader subsection without breaking into sub-subsection.	Document Design and Writing Style
5. General Management Directions	5.3.4 Hân Language	Not a planning issue or interest.	Remove & consolidate to 1. Introduction.	Document Design and Writing Style
5. General Management Directions	5.4.2 Resource Development and Impacts to MMIWG2SS+	Not a planning issue or interest.	Incorporate in 5.4.1 Mineral Exploration and Development.	Document Design and Writing Style

5. General Management Directions	5.4.3 Transportation and Access	Sub-subsections provide directions but causes overlaps	Restructure this section, outline standard access provisions as general management directions rather than defer to access management plans.	Memo
5. General Management Directions	5.4.3 Transportation and Access		Consolidate subsections to avoid repetition	Document Design and Writing Style
5. General Management Directions	5.4.3.2.1 NAR	Planning Strategy and recommendations come after this subsection but relate to the broader heading of new surface access	Move to after current recommendations, if no new directions are proposed related to this topic, remove section and incorporate information on the topic into other sections of the Plan as appropriate.	Document Design and Writing Style
5. General Management Directions	5.4.7 Forestry		Added to background and key planning issue and interests	Tracked Changes Plan
5. General Management Directions	New		Add access management section	Memo
5. General Management Directions	New		Add subsection to 5.4 speaking to critical minerals	Ministers Letter & Memo
6. Landscape Management Units	Overall	LMU 8 missing section number, subsequent LMU section numbers one off from LMU number.	Added section number for LMU 8, renumbered subsequent LMUs.	Tracked Changes Plan
6. Landscape Management Units	Overall		SMA quantum of 39.9% of planning region for public lands (including Tombstone and excluding settlement lands)	Ministers Letter
6. Landscape Management Units	Overall	Special Management Directions include interim withdrawals for LMU 3, 7, 17, 21	Removed interim withdrawals from Plan	Ministers Letter & Memo
6. Landscape Management Units	Overall		Use same headings in values table as elsewhere in the Plan	Document Design and Writing Style
6. Landscape Management Units	Overall		Simplify table headings and content to focus on the management directions, add thresholds, remove rationale for designation.	Document Design and Writing Style
6. Landscape Management Units	Intent Statements (all LMUs)		Removed description of LMU from intent statement.	Tracked Changes Plan
6. Landscape Management Units	Values Tables (all LMUs)		Corrections and additions recommended where information was available including species at risk information for all LMUs).	Tracked Changes Plan
6. Landscape Management Units	SMAs	Include ISA1 or ISA2 thresholds	Remove "ISA" from threshold label as these are SMAs, included exact calculation of how much surface and linear disturbance is allowed. Include all uses not just "industrial" in disturbance calculations.	Memo
6. Landscape Management Units	LMU 1	Special Management Direction states: If existing mineral claims are proven viable by a proponent, the parties shall jointly consider permitting new surface access and access route.	Recommend that if existing mineral claims are proven viable by a proponent, details of where and how access is provided to these claims shall be dealt with at the project level, and in accordance with exiting processes.	Memo
6. Landscape Management Units	LMU 1		Address access to critical minerals claims in this LMU	Memo
6. Landscape Management Units	LMU 2		Updated SMD related to Dempster corridor	Tracked Changes Plan
6. Landscape Management Units	LMU 3	Designated sub-regional planning area	Recommend that no sub-regional planning is required in LMU 3, re-designated northern portion as SMA and southern portion as ISA 1	Memo
6. Landscape Management Units	LMU 3	Recommends creating management plan for entire Yukon River	Remove as this is out of scope for the Dawson plan	Memo
6. Landscape Management Units	LMU 5		Change to similar format as LMU 13, remove management intent and SMDs	Memo
6. Landscape Management Units	LMU 5		Remove portion of Dempster highway not included in Tombstone Territorial Park from this LMU, create new Dempster Highway Corridor LMU with sub-regional planning area designation	Memo
6. Landscape Management Units	LMU 6		Removed redundant SMDs Updated SMD related to Dempster corridor	Tracked Changes Plan
6. Landscape Management Units	LMU 7		Added SMD related to access management plan Updated SMD related to Dempster corridor	Tracked Changes Plan
6. Landscape Management Units	LMU 7/8		Adjust boundary, northern portion changed to SMA, southern portion of former LMU 7 joins LMU 8	Memo
6. Landscape Management Units	LMU 8		Adjusted boundary and changed to ISA 4	Memo
6. Landscape Management Units	LMU 8		Add SMD for ORVMA aligning with Clear Creek and Hart River caribou herds	Memo
6. Landscape Management Units	LMU 8		Updated SMD related to Dempster corridor	Tracked Changes Plan
6. Landscape Management Units	LMU 9		Removed SMD related to North Klondike corridor	Tracked Changes Plan
6. Landscape Management Units	LMU 10		Added SMDs related to WSI designation Updated SMD related to Dempster corridor	Tracked Changes Plan
6. Landscape Management Units	LMU 11		Removed access management plan SMD	Tracked Changes Plan

6. Landscape Management Units	LMU 12		Removed SMDs related to sub-regional planning	Tracked Changes Plan
6. Landscape Management Units	LMU 14		Removed redundant SMDs Added SMDs related to Top of the World corridor	Tracked Changes Plan
6. Landscape Management Units	LMU 15		Removed access management plan SMD Added SMDs related to Top of the World corridor	Tracked Changes Plan
6. Landscape Management Units	LMU 16		Added SMDs related to WSI designation Requested clarity re acceptable uses	Tracked Changes Plan
6. Landscape Management Units	LMU 17		Removed redundant SMDs	Tracked Changes Plan
6. Landscape Management Units	LMU 17	Interim withdrawal while developing Upper Indian River Stewardship Plan	Remove interim withdrawal but keep stewardship plan	Memo
6. Landscape Management Units	LMU 18	Designated ISA 3	Re-designated to ISA 4 to accommodate Coffee Gold Mine within the critical surface disturbance threshold	Memo
6. Landscape Management Units	LMU 19		Added SMDs related to WSI designation	Tracked Changes Plan
6. Landscape Management Units	LMU 20		Added SMDs related to WSI designation Removed restriction on quartz mining, added for existing tenure only	Tracked Changes Plan
6. Landscape Management Units	LMU 21		Removed restriction on quartz mining	Tracked Changes Plan
7. Plan Implementation	Overall		Remove recommendations that include groups beyond the Parties (e.g. RRC, YESAB etc.) and those related to work of the Commission	Recommendations Table
7. Plan Implementation	7.2.1 DRPC	Outlines role for DRPC past Plan approval, recommends Parties continue to fund	Remove, role of DRPC past Plan approval is beyond the scope of the Terms of Reference	Tracked Changes Plan
7. Plan Implementation	7.2.2 Implementation Committee	Outlines role for implementation committee past Plan approval	Remove, implementation role beyond the scope of the Terms of Reference	Tracked Changes Plan
7. Plan Implementation	7.4 Sub-Regional Plans	Details areas where sub-regional planning should occur including what it should consider, who should be involved and when it should occur.	Recommend removing this section entirely.	Tracked Changes Plan
7. Plan Implementation	7.5 Plan Conformity and Assessment	Section refers to conformity checks being undertaken by YLUPC	Propose modifying this section for accuracy	Tracked Changes Plan
7. Plan Implementation	7.6.1 Implementation Strategy		Remove section	Tracked Changes Plan
7. Plan Implementation	7.8 Plan Revision	Variance - Minor changes to the Plan that are necessary to permit certain non-conforming activities and projects.	Variances should not be changes to the Plan itself. YG would like to continue working with TH and the Commission to determine process to request, review and approve plan revisions.	Memo
7. Plan Implementation	New		Add information on Adaptive Management to this section	Memo
7. Plan Implementation	New		Speak to phased implementation for recommendations that cannot be achieved immediately upon Plan approval	Memo
8. References	Overall		Update this section to reflect additional citations suggested throughout the Plan.	Tracked Changes Plan
9. Glossary	Overall		Added missing key terms	Tracked Changes Plan
9. Glossary	Overall		Removed terms that aren't used in the Plan	Tracked Changes Plan
9. Glossary	Overall		Simplified and improved accuracy of definitions	Tracked Changes Plan
10. Appendices	Appendix 3	Cumulative Effects Framework Thresholds	Remove	Document Design and Writing Style
10. Appendices	Appendix 4	Dawson Stewardship Trust	Remove	Memo
Maps	Overall		Simplify information presented on each map, create more maps as needed for this.	Tracked Changes Plan
Maps	Overall		Move maps linked to specific policies to the body of the Plan.	Tracked Changes Plan

Dawson Regional Land Use Plan Scenario exercise report

June 06, 2024



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Acknowledgements

The Government of Yukon and Tr'ondëk Hwëch'in Government would like to acknowledge the contributions of all those who participated in the scenario exercise for the Recommended Plan. The scenario exercise would not have succeeded without the meaningful participation of all those who took part. We are deeply grateful for their time, effort, and thoughtfulness. Out of this group, the Parties would like to specifically acknowledge the contributions of the Yukon Environmental and Socio-economic Assessment Board and the Dawson Regional Planning Commission for their contribution to the exercise.

Special thanks to the Yukon Chamber of Mines and Klondike Placer Miners' Association for advocating scenario exercises and for their valuable contributions to the development of the mock applications.

Thank you to John Glynn-Morris for facilitating. John's involvement allowed participants to be more comfortable, open, and fully participate in the exercise.

Executive Summary

About this Scenario Exercise Report

The Government of Yukon and Tr'ondëk Hwëch'in Government jointly conducted this Scenario Exercise Report. Both Parties participated in writing, revising and reviewing this report. However, the Government of Yukon is solely responsible for the release of this report.

Background

The Dawson Regional Planning Commission (the Commission) delivered the Dawson Recommended Plan to the Government of Yukon and Tr'ondëk Hwëch'in Government (the Parties) in June 2022. The Parties completed a 90-day public consultation on the Recommended Plan and are now considering whether to accept, reject, or propose modifications to this Plan.

On February 15 and 16, 2023, the Parties held two scenario exercises to identify potential gaps and areas for improvement in the Recommended Plan. The Parties co-developed two simulated mineral development applications (one placer and one quartz) to test existing assessment and permitting processes as though the Recommended Plan were implemented as presented with no modifications. Participants of the exercise included assessors, regulators, monitoring and enforcement bodies, and industry proponents as well as representatives of the Parties and Dawson Regional Planning Commission. Mineral industry representatives and environmental non-governmental organizations were invited as observers on February 16.

Briefly, the scenario exercises included:

- working with regulators to develop mock mining project applications within the Dawson Region that would appropriately test elements of the Recommended Plan;
- collaborating to create tabletop exercise handbooks specific to the Yukon assessment and permitting process and project applications;

- facilitating scenario exercises with expert participants to test the systems involved in implementing the plan; and
- identifying issues and inconsistencies in the Recommended Plan for the Parties to consider in relation to implementation.

Key Takeaways

The goal of the exercise was to understand how the Recommended Plan would work if implemented without modifications and identify potential issues that could arise. The scenario exercise was not a review of the existing mineral development assessment and permitting regime in the Yukon.

Issues or challenges identified during the exercise were characterized as “gaps”. The scale and implications of gaps varied widely. Although some gaps are specific to the mock scenarios explored in the exercises, discussions revealed other issues and considerations that could be applied more broadly to other activities unrelated to mineral development.

Implementability

There are necessary regulatory structures and information systems that must be created, changed and/or augmented before the Parties can implement the Recommended Plan. Regulators and the Commission will eventually require multiple inputs to determine conformity and permit projects, including:

- databases and associated user interfaces;
- research and mapping;
- definition, clarification and delegation of responsibilities related to inputs to applications; and
- development of new, and enhancement of existing, monitoring and enforcement.

The Recommended Plan will need to be implementable to meet its Objectives, protect Final Agreement rights, and serve the public. To achieve full implementation of the Recommended Plan as written, it will be necessary to increase the capacity of both governments and complete substantial up-front and ongoing work.

Timing of Conformity Checks

Currently, conformity checks take place during Yukon Environmental and Socio-Economic Assessment Board (YESAB) Seeking Views and Information Stage. During the exercise, it was identified that this timing is not sufficient as an application may change multiple times during a process. As a project may move out of conformity following the initial conformity check, multiple conformity checks would be required to ensure conformity and inform decision-making. Implementing iterative conformity checks has the risk of delayed timelines for applications and the Commission may lack capacity to undertake them.

Data and Mapping

A substantial amount of data is required to implement the plan. Data needs to be collected to eliminate the current deficit and needs to be regularly collected and updated to maintain the database. All data should be indexed and organized so regulators and proponents can use it. Clarity is required around who will be required to collect and fact check project-specific data.

Clarity

The scenario exercise identified uncertainty around who will assess and approve access management, wetland management and reclamation plans that would be required under the Recommended Plan. Such plans are not currently required or assessed by YESAB. The Commission identifies that these need to be reviewed and approved, but there is uncertainty around who will be responsible for review and approval of these plans and what criteria will be used.

It was further identified that clarity is required on how conflicting values within a Land Management Unit (LMU) are considered and prioritized.

Legacy Text

The Commission identified a few items that are left over from the Draft Plan. The expectation is that these will be updated before plan approval.

Conclusion

The scenario exercise was successful at identifying gaps in the Recommended Plan. Regulators, First Nations, monitoring and enforcement bodies and industry representatives worked collaboratively to provide perspectives and to identify

potential challenges that could arise if the Commission's Recommended Plan were to be implemented as written. Early identification of gaps provides the opportunity to explore how challenges can be addressed in the Plan and its implementation, including through clarity in the Plan itself, additional resources and capacity, interim guidance, implementing or adapting existing tools, or developing new tools.

Introduction

Tr'ondëk Hwëch'in Government and the Government of Yukon are currently undertaking land use planning for the Dawson Region under the process outlined in Chapter 11 of the Tr'ondëk Hwëch'in Final Agreement (THFA). Pursuant to Chapter 11, the Dawson Regional Planning Commission (the Commission) developed a Recommended Plan and presented it to Tr'ondëk Hwëch'in Government and the Government of Yukon (the Parties) in June 2022. Representatives from the mineral industry requested the Parties consider testing the plan with a mock-assessment exercise. The Parties agreed to undertake this as part of ongoing work to decide whether to approve, reject, or propose modifications to the Recommended Plan.

Scenario Exercise

The scenarios consisted of two mock mining project applications that were developed by the Parties. The exercise format was based on methodology commonly used in information technology and emergency management. Exercise participants included groups frequently involved in assessment and permitting in the Dawson Region, including industry groups, First Nations, regulators, and key stakeholders identified by the Parties. Two days of tabletop exercises were conducted on February 15 and 16, 2023.

The participant handbooks that were developed for the scenario exercise can be found in **Appendix A**.

Purpose

The purpose of the scenario exercise was to assess the completeness and implementability of the Recommended Plan “as written”. The goal of the exercise was to reveal potential issues, problems, or gaps that had not already been captured through public and First Nation consultation or internal review by the Parties. In doing so, the Parties and the Commission aimed to better understand the implications of the Recommended Plan and where changes may be required.

It is important to acknowledge that this was not a solution-focused exercise. The intention was to identify where potential issues might exist if the Parties approved and implemented the Recommended Plan as written.

Although some ideas and solutions were discussed and recorded through the course of the scenario exercise, the focus of this report is issue identification.

Methodology

The Scenario Exercise involved the following steps:

1. **Project start-up:** Following a request from the mineral industry, the Parties' Senior Liaison Committee met and discussed hosting a scenario exercise. Parties agreed to task their staff with collaboratively creating and conducting the exercise. Technical staff from both governments worked in partnership to develop the goals, understand challenges of the project, and design it to achieve an effective outcome. John Glynn-Morris was the contractor hired to facilitate and aid exercise development.
2. **Participant Identification and Communication:** The Parties worked together to identify individuals, groups, and organizations who are involved in the assessment, permitting and monitoring of projects in the Dawson Region. The consultant and the Parties met with participants to elicit input on where they believed the scenarios should focus and how they should be formatted.
3. **Scenario Creation:** The Government of Yukon's Department of Energy, Mines, and Resources and Department of Environment worked closely with Tr'ondëk Hwëch'in Government's Natural Resources, Heritage and Implementation departments to develop scenarios that were as realistic and detailed as possible to test the Recommended Plan.
4. **Scenario Exercise Creation:** The tabletop format was borrowed from proven methodology used in emergency management. The template and associated process were adapted by the Parties to accomplish their goals. One significant change made to the original format is participants were given the scenario booklet in advance, so they were able to prepare. As such, there were no surprises or sudden interjects that participants would need to react to.

5. **Scenario Exercise:** Two full days of exercises were held virtually on Zoom on February 15 and 16. They were hosted by both Parties and facilitated by John Glynn-Morris.
6. **Information Synthesis and Actioning:** The knowledge and understanding the participants gained is a key outcome of the scenario exercise. This information will be useful for creating and implementing a strong plan for the Dawson Region. A secondary benefit of the scenario exercise includes a more robust understanding of all aspects of the existing assessment and permitting process by all participants.

It is important the Parties acknowledge that both the scenario exercises and this report are not a review of the existing assessment and permitting regime in the Yukon. Rather, they provide a list of potential issues related to the implementation of the Recommended Plan that need to be better understood. As stated above, the scenario exercise did not seek to elicit or provide solutions. The findings in this report are intended for further discussion and consideration as the Parties move forward with government-to-government Consultation and make best efforts to come to consensus decisions on the Recommended Plan. While the Parties may not be able to address all the potential issues identified, knowing where these potential issues are, will help their technical staff develop both short-term and long-term strategies for implementation of the final approved plan.

Whether the Parties decide to approve, reject, or propose modifications to the Recommended Plan, the gaps identified and lessons learned through the scenario exercise will support the creation and implementation of a plan for the Dawson Region that fulfills the objectives of Chapter 11 of the Tr'ondëk Hwëch'in Final Agreement.

Assessment and Permitting

Overview

This section provides an overview of the assessment and permitting process in the Yukon. Once approved, the regional land use plan for the Dawson Region will interact with these processes at many stages. It is important to understand the stages and responsibilities of the assessment and permitting bodies to appreciate the challenges that were identified when gaps were found in the plan. An overview of the process is provided below. It is for reference in the report only and is not a guideline for proponents. Please refer to the appropriate assessment or regulatory body for questions or guidance on this process.

Project Proponent Legacy

Project proponents are responsible for a range of activities required to bring an application, and subsequently the project, from planning through to closure. Proponents navigate the assessment and permitting process working with assessors and regulators to provide information and incorporate terms and conditions into their project plan and permits. Proponents trigger assessment and permitting and are required to provide informational inputs during the process.

Yukon Environmental and Socio-economic Assessment Board

The Yukon Environmental and Socio-Economic Assessment Board (YESAB) carries out a comprehensive assessment process to examine the environmental and socio-economic effects of projects in the Yukon before they commence. As per the *Yukon Environmental and Socio-Economic Assessment Act (YESAA)*, assessors are mandated to evaluate projects and determine the potential environmental and socio-economic effects of proposed activities and recommend whether the project should proceed, proceed with terms and conditions, or not proceed.

The mock project applications created for the scenario exercise were based on typical mining projects that might be assessed by a YESAB Designated Office. Larger projects that are subject to Executive Committee screening were not explored because they are subject to a different, more comprehensive assessment. The Parties acknowledge the

Recommended Plan will affect this process but did not include it within the scope of the scenario exercise. The Parties further acknowledge that to date the Dawson Regional Land Use Planning Commission has had limited involvement in making conformity determinations pursuant to the Tr'ondëk Hwëch'in Final Agreement section 12.17.

Pre-submission

- Before a project proposal is submitted to the YESAB Designated Office, a proponent may work with YESAB informally to get direction on what to include in their proposal.
- There may also be initial discussions between the proponent and affected First Nations.

Adequacy Stage

- At this stage of the process, YESAB is looking to understand project design, what activities are being proposed and the project location. There is no consideration of effects or significance at this point, only a determination of whether the proposal application is complete so it can be effectively assessed and evaluated.
- If the project proposal is not found to be adequate, YESAB will request further information from the proponent to fill in any gaps or omissions. Multiple information requests may be required and may also be requested in subsequent stages based on public input.

Once the project proposal is deemed adequate, the application proceeds to the Seeking Views and Information stage. During this stage, YESAB will also identify the Decision Bodies who will be responsible for issuing decisions regarding the project, in accordance with the provisions in YESAA.

Seeking Views and Information

- At this stage, YESAB is looking for comments from First Nations, the Government of Yukon, Government of Canada (if they have an interest), the public and stakeholders to better understand effects, pathways and mitigations.

For example, during this stage, YESAB may receive input about how the proposed project will impact environmental values and whether these impacts can be mitigated. Comments will be used to further scope the project and identify valued components and effects pathways.

- YESAB will also receive a plan conformity determination (or 'conformity check' - also see next section) of the project from the Commission. This is a review of the project, which considers the approved regional plan's goals and objectives including whether the project location is in a Landscape Management Unit that supports the activities proposed.
- Comments received, including the conformity check, may determine that additional information is required from the Proponent prior to proceeding with the assessment.
- If the proponent submits information that is considered a significant change to the project scope, YESAB may provide a second Seeking Views and Information period to seek further input.
- Once YESAB is satisfied that enough information has been collected to assess the project, it proceeds to the next step.

Evaluation Report

- Based on its assessment of the project's environmental and socio-economic effects, YESAB produces an Evaluation Report that recommends to the Decision Bodies whether the project should proceed, proceed with terms and conditions, or not proceed.
- The Decision Bodies consult with affected First Nations on the Evaluation Report prior to issuing a Decision Document. After this consultation, the original terms and conditions of the Decision Document may change.
- While Decision Bodies have an obligation to respond to YESAB Evaluation Report, there is no further role for YESAB beyond the issuance of their Evaluation Report.
- Once a Decision Document is finalized, the project moves into the regulatory phase, which includes the proponent pursuing the necessary permits.

Conformity Check: Dawson Regional Planning Commission

When YESAB receives a project application in a region where a regional land use plan is in effect, YESAB shall request that the Regional Land Use Planning Commission for the planning region advise whether the project is in conformity with the approved regional land use plan (UFA 12.17.1 / YESAA s. 44).

Note, the conformity determination, or ‘conformity check’ currently takes place during the Seeking Views and Information stage of a YESAB evaluation. It is being detailed here to avoid convoluting the YESAB process description.

New land development and expansion of existing development in the Dawson Region must be assessed to evaluate whether they conform to this Plan. Conformity checks are a key part of ensuring the Commission’s vision and goals are achieved. (DRPC, Recommended Plan, p. 280)

Project conformity is determined by checking a proposed project’s activities against the following:

- the relevant Land Management Unit (LMU)(s) objectives and directions;
- general management directions in the Plan; and
- cumulative effects indicator thresholds (currently, linear feature density and surface disturbance).

The conformity check determines whether the project fits within the prescribed disturbance thresholds, considers whether the project aligns with a LMU’s management intent, how it will impact the identified LMU values and whether the general management directions in the Recommended Plan are being followed.

Once the Commission has completed their conformity check, they present their determination to YESAB to incorporate into their assessment.

Decision Bodies

Decision bodies for the mock project proposals used in the scenario exercise included the Government of Yukon, Mineral Resources Branch; Tr’ondëk Hwëch’in Government, Land and Resources; and Department of Fisheries and Oceans Canada. Decision Bodies are responsible for issuing a Decision Document based on considering the

YESAB Evaluation Report and issuing a decision document. The Decision Document becomes the basis for permitting, monitoring and enforcement and is what the proponent and subsequent regulators are bound to follow.

Decision Document phase

- The Decision Body or Bodies draft a Decision Document either accepting, varying, or rejecting YESAB's recommendations in the Evaluation Report.
- A Decision Body must give full and fair consideration to scientific information, traditional knowledge and other information that is provided with the recommendation in YESAB's evaluation report.
- A Decision Body must include in a Decision Document the reasons for which it rejects or varies any recommendation.
- Variations may include term variations, new terms, and term removals.
- The draft Decision Document is consulted on between the Decision Body and affected First Nations to understand how it may impact Treaty or Aboriginal rights.
- The Decision Body may make further changes to the Decision Document based on consultation before it is signed and may be required to provide a written explanation of how the concerns of First Nations were considered and the impact they had on the decision.
- The Decision Body cannot consult with the proponent during the decision document phase.
- If the final Decision Document determines a project should proceed, with or without additional terms, the project may proceed to the regulatory phase.
- If the final Decision Document determines that the project should not proceed, the proponent will need to redesign their project and start a new YESAB assessment.

Yukon Water Board

The Yukon Water Board (YWB) is an independent body responsible for issuing water licences for various activities for the use of water, including Class 4 placer operations. YWB is bound to produce a permit that does not contradict the associated Decision Document.

Adequacy Review

- Once an application is submitted it is checked for completeness. Proponents may be required to provide additional information and/or clarification.
 - If there is a Decision Document, YWB will check if the project scope is consistent with the Decision Document.
 - Placer operators can submit their water licence application in parallel with their YESAB submission although the licence will not be granted until a Decision Document has been issued.

Public Comment

- Once the Licensing Officer has received all necessary information, the public review process begins.
- Comments and responses to those comments are included in a public registry.
- Anyone can submit public comments during the intervention process.

Public Hearing

- Public hearings are required for issuance or renewal, and some amendments and cancellations, of a Type A water licence, unless no person is interested in participating and making representations to the YWB on the matter, and the applicant consents to not having a hearing.
- The YWB may, where satisfied that it would be in the public interest, hold a public hearing in connection with any matter relating to its objects, including the issuance or renewal of, or an amendment to, a type B water licence.

Board Review

- A Licensing Officer will present the application to the Board. The Board has the right to request further information from an applicant at this stage.
- The Board must issue and make available to the public written reasons for its decisions or orders relating to any licence or any application.

Reporting

- The licensee is required to submit reports as per the reporting section of the Water Licence.

Government of Yukon: Mineral Resources Branch

Mineral Resources Branch (MRB) is responsible for permitting all mineral exploration and development activity (except for issuing water licences and mining land use approvals for Class 4 placer operations, which are issued by the YWB). On Settlement Land, both MRB and the issue Decision Documents for mineral exploration and development activity with the proviso that in the event of a conflict the MRB Decision Document prevails as per section 12.13.4.3 of the THFA.

- Proponents submit an application to the regulator for an approval once they have received a Decision Document that allows the project to proceed.
- The application must be consistent with the activities assessed in the YESAB process.
- Once the proponent has submitted an adequate application with fees to MRB, MRB will draft an approval.
 - The approval must include any terms that were included in the Decision Document, including as a result of consultation.
 - The approval includes the Standard Operating Conditions from the *Quartz and Placer Mining Land Use Regulations*.
- MRB then simultaneously consults with affected First Nations and engages with the proponent on the draft approval.
 - Consultation with First Nations is done to identify any impacts to Treaty or Aboriginal Rights not considered in the Decision Document. Changes may be made based on that consultation to mitigate identified impacts.
 - Engagement with the operator is done to ensure that the operating plan is consistent with their project plan and to ensure that any changes in the regulatory phase do not make the project inoperable.
- Once consultation is complete, the approval is issued.
- The project may proceed subject to the terms of the approval, any other permits and relevant legislation.

Government of Yukon: Compliance, Monitoring and Inspections

Compliance, Monitoring and Inspections (CMI) ensures that the proponent is in compliance with their permits and licenses issued.

Compliance and Monitoring

- CMI conducts inspections including site visits and reviews, sampling protocols, education and enforcement.
- CMI may issue Variation Notices, which are amendments allowing minor amendments that pose no risk of significant adverse environmental effect.
- Inspector's directions are actions required by CMI to be undertaken by the operator regardless of the operating plan, usually due to compliance issues or unforeseen circumstances.

Project closure

- Project closure occurs when a project is complete or reached its permit expiry without subsequent approvals in place. At this time, projects undergo final inspections.
- If final inspections are satisfactory, the operator receives a certificate of completion indicating they are no longer liable for any part of the site.

Scenario Exercise

Overview

Scenario exercises are realistic tabletop simulations designed to test an organization's systems and processes. Scenario exercises also help organizations think about how they respond to a sequence of events and identify what critical gaps exist. They are often used to test emergency situations in the areas of health, cybersecurity, and disaster preparedness.

Given the complexities of the Dawson region and the variety of activities that occur within it, the Parties designed a novel approach that brought many participants together with a common goal of identifying where potential further work was needed to create and implement a meaningful and effective land use plan for the Dawson region.

Scenario Exercise Development

The Government of Yukon and Tr'ondëk Hwëch'in Government worked closely together for three months to develop the exercises for a Class 4 Placer application and a Class 3 Quartz application. Throughout the process, the exercises were refined based on input from industry, planners, assessors, and regulators to ensure the scenarios accurately reflect how assessment and permitting processes would interact with the Recommended Plan for the Dawson region.

Participants

Approximately 40 participants and observers from Federal, Territorial and First Nation governments, industry, conservation and mining organizations, and Umbrella Final Agreement bodies attended the scenario exercise. A list of participating entities can be found below.

- Canadian Parks and Wilderness Society
- Dawson Regional Planning Commission
- Department of Fisheries and Oceans Canada
- Facilitator – John Glynn-Morris
- First Nation of Nacho Nyak Dun Lands and Resources Department
- Government of Yukon – Compliance, Monitoring and Inspections
- Government of Yukon – Department of Environment
- Government of Yukon – Land Planning branch
- Government of Yukon – Mineral Resources branch
- Klondike Placer Miners' Association
- Tr'ondëk Hwëch'in Government – Development Assessment
- Tr'ondëk Hwëch'in Government – Heritage
- Tr'ondëk Hwëch'in Government – Land and Resources
- Wilderness Conservation Society
- Yukon Chamber of Mines
- Yukon Conservation Society
- Yukon Environmental and Socio-economic Assessment Board
- Yukon Land Use Planning Council
- Yukon Minerals Advisory Board
- Yukon Prospectors Association
- Yukon Water Board

Scenario Play

To increase equity and ensure the greatest number of invitees were able to attend, the exercises were held virtually over Zoom. Each morning, the facilitator guided participants through the placer application scenario and asked questions based on challenges presented. In the afternoon, the facilitator provided an overview of the morning scenario and guided participants through the quartz application scenario. Afterwards, participants shared what they learned and were given the opportunity to provide further feedback in a post-scenario meeting. Overall, the informal, discussion-based simulation format fostered positive interaction among participants.

Feedback

Participants were encouraged to share their feedback on the scenario exercises through a variety of options. The facilitator sent a survey to participants, offered to meet with them individually, and encouraged other forms of feedback. The Yukon Chamber of Mines prepared and delivered a presentation to the Parties and the Klondike Placer Miners' Association submitted a report.

Project Scenarios

Application Types

Two types of mineral development projects were chosen for the scenario exercise: a Class 4 placer operation and a Class 3 quartz exploration program. Project locations and activities were selected for their effectiveness at exploring the management directions and policies of the Recommended Plan. Many stakeholders expressed support for conducting a scenario exercise to work through questions about how and where mining activity would be able to occur under the Recommended Plan. Mining is the most common industrial activity in the Dawson Region and involves more regulators than other industrial activities, and as such, mining scenarios were chosen to test specific aspects of implementation requirements for the Recommended Plan. Both areas selected were identified in the Recommended Plan as lowest or low development, with high ecological and cultural value.

Quartz Scenario

The quartz scenario developed for the exercise was a Class 3 quartz exploration proposal within Landscape Management Unit (LMU) 7: Wehtr'e (Antimony), 80 km from Dawson City. The mock proposal was a new quartz exploration program across 750 claims. The Project was within the Tr'ondëk Hwëch'in Traditional Territory and activities overlapped with Tr'ondëk Hwëch'in Settlement Land. Tr'ondëk Hwëch'in and the Government of Yukon were joint Decision Bodies on the Project. Access to the property was proposed through existing roads, a barge, and helicopter. Project activities were proposed to occur from January 1 to December 31 annually for 10 years.

Placer Scenario

The placer scenario developed for the exercise was a Class 4 placer mine proposal within LMU 17: Nän Dhòhdäl (Upper Indian River Wetlands), approximately 60 km from Dawson City. The mock proposal was for the renewal of a Class 4 placer mining operation located on 210 claims along tributaries to the Indian River within the Indian River watershed. The Project was within the Traditional Territories of the Tr'ondëk

Hwëch'in and the First Nation of Nacho Nyak Dun. Project activities were proposed to occur between April 1 and October 15, annually for 10 years.

Gaps Identified

The purpose of the scenarios was to identify gaps in the plan. The main gaps are categorized into four general themes: Data and Mapping, Clarity, and Language.

Data and Mapping:

- Some participants noted that more comprehensive wetland mapping and effect characterization are required for wetland management, access management, and reclamation plans, and do not currently exist.
- Others noted that proponents require access to wetland mapping in order to consider this information in their project proposal and ensure conformity with plan requirements such as disturbance limits and buffers.
- Surface disturbance mapping needs to be perpetually updated to reflect current disturbance levels, especially if mapping is used in the review process to make determinations.
- Participants also highlighted that if field verification is a requirement of wetland location and type under the Plan, there is a need to consider that most mining projects are submitted to YESAB in the winter. If the proponent cannot get a field verification prior to YESAB assessment, how will this be considered, and will it lead to undue delays to proponents prior to receiving permits?
- Participants suggested that if proponents are required to create wetland reclamation plans to mitigate adverse effects under the Plan, implementation guidance will be required. Some broad scale mapping exists but may not be specific enough to fully understand the overlap of a project with wetlands and mitigate the adverse effects identified.
- A need for wetland inventory to ensure assessments are accurate was mentioned by participants (p. 101, policy recommendation #52.)
- Wetland mapping and categorization may need to consider climate change – some wetlands may change (bog, fen, marsh) classification due to climate change.
- Participants noted that the Recommended Plan does not include cumulative effects indicators for water or fish.
- Participants also noted that placer operations are currently not required to provide pre- and post-season reports. This is data that could be used to build up

a database across the region. There are currently no reporting requirements throughout a project that would enable a database to keep track of placer activity. Any data reporting that does happen is not consistent or standardized. Proponent information is not submitted in the same format and so using this for a regional database is not currently possible.

Clarity

Participants noted that greater clarity is needed within the Plan. Participant comments were categorized in the three following areas:

1. Clarity of process
2. Clarity of roles and responsibilities
3. Clarity for proponents

It should be noted that there is some overlap, and some items may fit into more than one category.

1. Clarity of process:

- Some participants commented that there is a need for greater clarity at the adequacy review stage of the YESAB process and how the Recommended Plan would apply. Specifically, YESAB assessors need to better understand how disturbance thresholds in the Recommended Plan could be applied during the adequacy of a project proposal. Currently, YESAB would receive this information during the Seeking Views and Information stage and would not have the opportunity to consider it during adequacy determination.
- Participants noted that disturbance levels may increase while a project proposal is undergoing assessment, and the Recommended Plan may need to account for this possibility.
- It is not clear to participants what should be done during implementation while data remains unavailable, such as publicly available, extensive wetland mapping. This type of data is required to assess projects and determine conformity, but is not currently available, and is cost and labour-intensive to confirm and keep current.

- If disturbance of wetlands is to be monitored annually, participants suggested that it should be clear who will be responsible for surveying and reporting on disturbance. If the proponent is responsible, that will need to be made clear and a process for this reporting may need to be established.
- Where the Recommended Plan identifies conflicting values within an LMU, for example, moose and mining, participants commented that it is not clear how values should be considered and prioritized during assessments or conformity checks.
- If YESAB introduces terms to ensure a project conforms to the plan, there is no conformity check at this stage of the current process to ensure the new terms accomplish this.
- Decision bodies may vary terms and conditions to the extent that a project no longer conforms to the plan. If a decision document were to substantially alter a project, it was noted by some participants that it is not clear how this would be accounted for, given that the conformity check would already have taken place.
- Some participants noted that the Plan may not have considered evidence in the YWB process. Furthermore, YWB legislation does not have consideration of land use plan conformity and is not something they assess at the adequacy stage. It is not clear whether YWB is bound to consider land use plans and whether YWB is considered a signatory to them.
- Participants commented that there are currently no cumulative effects thresholds set for water, particularly around flow, quality, and sedimentation but the Commission recommends the Parties develop them. If this were to occur, a mechanism may need to be created to allow regulators to consider thresholds when assessing a project.

2. Clarity of roles and responsibilities:

- Some suggested that the Commission's role in the preliminary stages of the implementation process needs to be clarified. The Recommended Plan advises that the Commission should be part of the implementation committee but does not specify how they will be involved in this working group, and what responsibilities or tasks they expect to undertake.

- A need to clarify who, whether proponent or government, must do the required mapping was noted by participants. If proponents are expected to generate mapping, how could this be collected and used to create baseline data.
- A need to clarify who confirms the accuracy of wetland mapping was also identified by participants.
 - If proponent is responsible, clarify whether they need qualified professional or registered professional biologist to perform this.
- The plan requires wetland mapping and reclamation plans. It is not clear which body determines if wetland mapping and reclamation plans are adequate, as YESAB does not currently do this, and the Commission does not have the technical expertise.
- A need to clarify who approves an access management plan (YESAB or the Parties) was noted by participants. For example, in some LMUs (LMU 1: Tthetäwndëk (Tatonduk) and LMU 7: Wehtr'e (Antimony), the access management plan should be considered jointly by the Parties, but we need to clarify this for other areas.
 - If joint approval by both Parties is required, what is the mechanism for joint review and approval, and how is the decision communicated?

3. Clarity for proponents:

- Some participants suggested that the complex direction and the 154 recommendations in the plan make it difficult for proponents, as well as regulators, to ensure the plan is being followed and they have captured all plan directions.
- Clarity for proponents on what additional requirements will now be needed within a project proposal. This will help proponents to understand feasibility and cost.
- Clarity for proponents on what is required of them at each stage of the assessment process.
- More specificity around conformity checks would help the proponent understand how conformity is determined.

Language

- Wording in rationale for designation in LMU 7 is left over from the Draft Plan designation as a Special Management Area 2, which makes it sound like it is protected when it is not.
- The Special Management Direction “no new access” in LMU 7 is a holdover from the Draft Plan.
- There was some confusion around the term “access management plan” in the Recommended Plan, as participants noted this term is used elsewhere for a different kind of access management plan and could cause confusion.

Implementation Challenges Identified

Implementation challenges are areas, directions or recommendations of the Recommended Plan, which may create issues for the Parties during implementation. Inevitably, there is some overlap between gaps and implementation challenges, as gaps in the plan or challenges in the process will directly affect the implementability of the Recommended Plan. This list is not exhaustive, but includes challenges identified by participants through the scenario exercise.

Implementation challenges

A summary of Participant comments and discussion regarding conducting conformity checks is as follows.

- Up to this point, regional planning commissions have stopped operating after a plan is approved for their region and have therefore been unable to conduct conformity checks. The Recommended Plan, Tr'ondëk Hwëch'in Final Agreement (THFA), and YESAA all indicate that the Commission will continue to operate and to perform conformity checks. The structure, process, and funding for an ongoing commission have not been determined but are being explored.
- Conformity checks currently take place early in the assessment process, during the Seeking Views and Information stage, which presents difficulties for accurately determining conformity.
- There are several opportunities for a project to “fall out” of conformity following the submission of an official ‘conformity check’. For example: Terms and Conditions may change during the Decision Document phase. YESAB terms and conditions should bring a project into conformity, but a term or condition that is added could be varied or removed at the Decision Document phase, after which there is no conformity check.
- Conformity checks currently take place at the Seeking Views and Information stage simultaneously with other comments, such that the conformity check process itself cannot benefit from seeing project comments prior to issuing a determination.

- There is no opportunity for dialogue between the Commission and proponents, First Nations, and others. The Commission is not able to incorporate effects into conformity. Proponents may want to conform but do not understand how. Conversations between the Commission and proponents could resolve this issue. However, some participants expressed concern that ongoing, or iterative conformity checks along with back and forth between the Commission, affected First Nations, other commenters, adds time to the process and uncertainty for proponents.
- Participants suggested that there is a need to establish whether conformity checks will be iterative or not. Certainty and consistency of process is essential.

General implementation challenges

- Regulators and decision bodies will need guidance on how to proceed while data is not available. The approved plan is expected to be implementable on day one.
- Project conformity cannot be determined without the required data. Participants commented that there is some uncertainty around reclamation plans, e.g., if they are a requirement for assessing certain projects, and what the roles and responsibilities are. YESAB does not ask for reclamation plans or review them as a part of their process.
- It is not clear who would review and determine whether a reclamation plan is sufficient.
- Participants suggested a need to clarify the Commission's role beyond conformity checks and detail how, and if, they will be involved with other aspects of plan implementation.
- The Yukon Water Board (YWB) does not have explicit legislation, policy direction or processes in place to assess whether a project meets conformity. The board is an administrative tribunal, therefore, evaluation reports, decision documents, supplementary materials and all other evidence are used in the decision-making process. The YWB cannot contravene a decision document or any terms or conditions which it includes.
- The YWB currently does not have a process for incorporating or assessing cumulative effects.

- Participants suggested a need to clarify whether the YWB is bound to a land use plan in their regulatory board's decisions. Currently, the YWB only reviews the evidence before them.
- Participants commented that there are currently no cumulative effects considerations for water.
 - Disturbance data is not available and there currently is not a database specifically for placer. Quartz operations are required to provide disturbance data as a part of their permit, but placer permits do not currently include such a provision.
 - Participants noted that there is currently no system in place for tracking disturbance to support the cumulative effects framework.

Conclusion

The scenario exercise encouraged participants to explore their roles and responsibilities in an informal, discussion-based format. Participants approached the exercises in a collaborative and open way which was essential to their success. The lessons learned and insights gathered from the scenario exercises are invaluable to the creation and implementation of an effective land use plan for the Dawson region.

The scenarios provided an opportunity for the Parties, assessment bodies, proponents, and regulators to share knowledge, collaborate, and gain a broader understanding of each other's roles and processes. In addition to gaps in the Recommended Plan, the scenario exercise identified implementation issues. Although these issues may not be problems with the Recommended Plan itself, addressing them may require modifications that improve its implementability and compatibility with existing processes. Some of the implementation challenges identified apply when trying to implement any regional plan and are not specific to the Dawson Regional Land Use Plan. Identifying such challenges reveals opportunities to resolve persistent issues and pre-empt similar problems in future regional plans.

This exercise was an effective way to identify potential issues that exist or could arise while implementing a version of the plan and address them appropriately. Not all challenges identified can be addressed within the plan, and some may need to be resolved through additional actions. The gaps identified through the exercise will support the Parties in their assessment of the Recommended Plan and areas which may need to be clarified, strengthened or otherwise modified.