

Peel Regional Land Use Plan Final Consultation

What we heard report

Prepared for the Senior Liaison Committee
Prepared by Stantec

Date: February 18, 2019



202 – 107 Main Street, Whitehorse, YT Y1A 2A7





Table of Contents

EXECUTIVE SUMMARY	I
ABBREVIATIONS	IV
1.0 INTRODUCTION	1
1.1 OVERVIEW	1
1.2 WHY ARE WE HERE?	1
1.3 CONSULTATION METHODOLOGY	3
1.3.1 Community Meetings	3
1.3.2 Stakeholder Meetings	3
1.3.3 First Nation Government Submissions	4
1.3.4 Questionnaire.....	4
1.3.5 Formal Written Submissions.....	4
1.4 SPECIAL NOTES ABOUT THE ENGAGEMENT PROCESS	4
1.4.1 Canadian Parks and Wilderness Society Campaign.....	4
1.4.2 Woodbridge High School, Irvine California	5
1.4.3 Potential for Duplication of Input.....	5
2.0 CONSULTATION DETAILS	6
2.1 COMMUNITY MEETINGS.....	6
2.2 STAKEHOLDER MEETINGS	14
2.3 GOVERNMENT AND OTHER FEEDBACK.....	22
2.4 YUKON LAND USE PLANNING COUNCIL SUBMISSION.....	23
2.5 PUBLIC SUBMISSIONS.....	23
2.5.1 Questionnaire.....	23
2.5.2 Formal submissions	28
3.0 WHAT WE HEARD	29
3.1 SUPPORT FOR THE FINAL RECOMMENDED PLAN	29
3.2 LAND USE DESIGNATIONS.....	30
3.2.1 Conservation Areas.....	30
3.2.2 Integrated Management Areas	34
3.2.3 Overall Areas	35
3.3 LANDSCAPE MANAGEMENT UNITS.....	36
3.3.1 General	36
3.3.2 LMU #3 Central Ogilvie	36
3.3.3 LMU #4 West Hart River	36
3.3.4 LMU #5 Blackstone River.....	36
3.3.5 LMU #6 Hart River	37
3.3.6 LMU #7 Dalglish Creek	37
3.3.7 LMU #8 Wind and Bonnet Plume Watersheds	37
3.3.8 LMU #13 Peel Plateau West	37
3.3.9 LMU #15 Peel Plateau East	37
3.3.10 LMU #16 Jackfish Creek Lakes.....	38
3.4 GENERAL MANAGEMENT DIRECTION	39



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

3.4.1	Environment.....	39
3.4.2	Social (Heritage and Culture).....	41
3.4.3	Economy.....	41
3.5	CUMULATIVE EFFECTS INDICATORS.....	48
3.6	PLAN IMPLEMENTATION AND REVIEW.....	49
3.6.1	General.....	49
3.6.2	Variances, Amendments, Reviews and Conformity Checks.....	50
3.6.3	Ongoing Reporting and Monitoring.....	50
3.6.4	Comments About Protected Areas.....	51
3.6.5	Existing and Future Mineral Claims.....	52
3.7	SUPPORT FOR FIRST NATION ACTIVITIES AND INTERESTS.....	53
3.8	PROCESS COMMENTS.....	54
3.8.1	General Regional Planning Comments.....	54
3.8.2	Comments on the Previous Peel Planning Process.....	54
3.8.3	This Consultation Process.....	55
3.9	OTHER COMMENTS.....	57
3.9.1	Comments about Mapping, Naming and Data.....	57
3.9.2	Document Improvements.....	57
4.0	CONCLUSION.....	58

LIST OF APPENDICES

APPENDIX A	COMMUNITY MEETING NOTES
APPENDIX B	STAKEHOLDER MEETING NOTES
APPENDIX C	STAKEHOLDER SUBMISSIONS
APPENDIX D	GOVERNMENTS AND OTHER FEEDBACK
APPENDIX E	QUESTIONNAIRE
APPENDIX F	FORMAL SUBMISSIONS



Executive Summary

This report presents a summary of the input received during the final round of consultation with affected communities, stakeholders and the public on the Peel Watershed Regional Land Use Plan held in October and November 2018. This Plan, once adopted, will provide direction for managing land and resources in the Peel Watershed.

Chapter 11 of the Yukon First Nation Final Agreements sets out a process for affected First Nations and Yukon government to work together on regional planning. For the Peel watershed planning region, the land use plan was developed jointly by five Parties: The Government of Yukon, First Nation of Na-Cho Nyäk Dun, Tr'ondëk Hwëch'in, Vuntut Gwitchin First Nation, and the Gwich'in Tribal Council.

The Parties appointed a Planning Commission to develop the Plan and work got underway in 2004. In 2009 the Commission released a Recommended Plan and after significant consultation with the public, a Final Recommended Plan was issued in 2011. First Nations supported the Final Recommended Plan, but the Government of Yukon did not. In January of 2014 the Government of Yukon rolled out a Peel Watershed Regional Land Use Plan for non-settlement land that differed significantly from the Commission's Final Recommended Plan. Shortly thereafter the First Nation Parties to the Peel Plan challenged the Government of Yukon's Plan in court, asserting that the Government of Yukon had not followed the land use planning process set out in Chapter 11 of the Final Agreements.

For the next four years the Peel litigation wound its way through the courts. In December of 2017, the Supreme Court of Canada settled the issue. The Court quashed the Government of Yukon Plan and directed the Parties to return to the final consultation and approval stage of the process. Further, the Court directed the Parties to host a final round of community consultation and consider any minor modifications to the Plan that might be required to reflect changing circumstances. In 2018, all five Parties signed a letter of understanding that confirms a commitment to work collaboratively to complete, approve and implement a Regional Land Use Plan for the Peel Watershed that reflects the objectives of the Final Agreements.

Each of the Parties selected someone to represent them on the Senior Liaison Committee, a group tasked with carrying out the community consultation according to the direction from the Supreme Court of Canada. At the time the report was written, this committee included Tim Gerberding representing First Nation of Na-Cho Nyäk Dun and Tr'ondëk Hwëch'in; Darius Elias representing Vuntut Gwitchin First Nation; Stephen Charlie representing the Gwich'in Tribal Council; and Stephen Mills, the Deputy Minister of Energy, Mines and Resources and John Bailey the Deputy Minister of the Department of Environment representing Yukon government.

In July 2018, Stantec was hired by the Senior Liaison Committee to organize, advertise and facilitate the final round of consultation and prepare a What We Heard Report that will summarize all the input received. It will then be up to the Senior Liaison Committee to consider the input from stakeholders and the public. The next step will be for the Parties to consult with each other to consider what changes they would like to see to the Plan. Following this, the Parties will work together to approve and implement a Final Peel Watershed Regional Plan.

During the consultation period meetings were held in eight affected communities Old Crow, Dawson City, Mayo, Whitehorse, Aklavik, Tsiigehtchic, Fort McPherson and Inuvik with a total of approximately 350 people attending. There were twelve meetings stakeholder meetings and written submissions provided by two additional groups.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

In addition to these meetings listed above, 2,046 people completed questionnaires and 628 written letters were received. From this high level of participation, it is apparent the outcome of the Peel Watershed planning process is important to Yukoners, residents from the affected communities, and others around the world.

The following provides a summary of the most prevalent comments.

1. There was **support for the Final Recommended Plan**, for this final opportunity to provide comments, and for the collaboration that is currently being demonstrated by the Parties. In the questionnaire, 32% did not recommend any changes to the Plan. Respondents commented the Final Recommended Plan is the outcome of much collaboration, engagement and compromise and represents a balanced view. Many people feel this process has gone on long enough and are ready to see the Plan implemented.
2. The most prevalent comment heard through all the consultation was a desire to see more protection of the watershed. Approximately 1,815 of the total public comments received expressed a desire to have **more protection of the watershed**. This represented 64.5% of the total comments received. Respondents feel that the protection of this vast and pristine wilderness is important in a global, national and local context. People want to protect this area because of its valuable habitat, threatened species and to support First Nations traditional uses.
3. There was a very high prevalence of comments expressing a desire to have the full **80% Conservation Area protected through permanently**; removing the Interim Protection and changing the Wilderness Areas to Special Management Areas. This preference was echoed through the questionnaires and formal submissions with 1116 comments, representing 40% of total comments. Respondents commented that permanent protection will open additional funding opportunities, allow for more robust land management and provide certainty for all, including those with an economic interest in the region. Permanent protection will mean that future governments will not be able to open the Peel region up to development.
4. Written comments and questionnaires were also received from stakeholders and the public who would like to see **more area opened for resource development**. This view was expressed in approximately 3.3% of the total comments received. Respondents brought up the high mineral importance and potential of the area and pointed to the importance of mining to the Yukon economy.
5. Through all consultation methods we received many comments about **implementation**. People had questions and concerns about how the protected areas would be planned and managed, how existing mining claims would be addressed, how planning recommendations would be prioritized, and who would be responsible for various implementation tasks. There is support for a detailed implementation plan that specifies resources, timelines, and responsible parties. Respondents asked for clarity on how plan amendments, variances and conformity checks would be done and recommended appointing a separate body to take on the implementation of the Peel Plan.
6. There was **support for First Nation inherent rights** in this area. Continued access to the land for traditional activities, and the ongoing protection of the ecosystems are important. For the Gwich'in people the Peel watershed provides a connection to the past, a current livelihood and a way to teach their children about their way of life. It is important to many people that final decisions reflect First Nation wishes. Also, collaboration between Indigenous and non-indigenous people through this planning process is a move towards reconciliation.
7. There were comments about specific Land Management Units (LMU). Respondents wanted to see higher level of **protection in the Hart River** area LMU #6; this area contains an important tributary to the Peel and valuable winter habitat for the Porcupine Caribou Herd. Respondents would like to see more environmental



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

protection of the Peel Plateau West, LMU #13; this area contains unique wetlands underlain by permafrost, valuable, sensitive caribou habitat and several rare species. Also, the area is of cultural importance to the Gwich'in people. Respondents would also like to see more environmental **protection in the Jackfish Lake area**, LMU #16; this area contains many important wetlands, is used by migratory birds and is valuable habitat for the Boreal Caribou Herd.

8. We received many comments and questions about how the **planning for the new protected areas** would be done. Many respondents expressed concern about how wilderness tourism would be managed to ensure ongoing protection of the area. Also, it will be important for First Nations to play a key role in park planning, research and enforcement.
9. Many comments and questions were received about **existing mining claims** in the proposed protected areas. Respondents wanted clarity on how development might be allowed to proceed while still meeting the goals and intent of the Plan. Comments were received both for and against compensating existing mineral claim holders.



Abbreviations

ATV	All-Terrain Vehicle
DUC	Ducks Unlimited Canada
FNNND	First Nation of Na-Cho Nyäk Dun
GTC	Gwich'in Tribal Council
IMA	Integrated Management Area
KPMA	Klondike Placer Miners Association
LMU	Landscape Management Unit
NWT	Northwest Territories
ORV	Off-Road Vehicle
PCMB	Porcupine Caribou Management Board
SARA	<i>Species at Risk Act</i>
SMA	Special Management Area
TIA Yukon	Tourism Industry Association of the Yukon
TOYA	Trails Only Yukon Association
TH	Tr'ondëk Hwëch'in
UFA	Umbrella Final Agreement
VGG	Vuntut Gwitchin Government
WMAC	Wildlife Management Advisory Council
WTAY	Wilderness Tourism Association of the Yukon
YESAB	Yukon Environmental Socio-Economic Board
YG	Yukon government
YLUPC	Yukon Land Use Planning Council



1.0 INTRODUCTION

1.1 OVERVIEW

This report presents a summary of the input received during the final round of community consultation on the Peel Watershed Regional Plan held during October and November 2018. During the consultation period there were eight community meetings and twelve meetings with stakeholder groups. In addition to these meetings, 2,674 people completed questionnaires, or submitted emails or letters, First Nation governments and citizens submitted feedback, and stakeholders provided written comments. From this high level of participation, it is apparent that the conclusion of the Peel Watershed planning process is very important to the affected communities, and to the public, in Yukon, the Northwest Territories and around the world.

This report provides both a summary of the broad direction provided by the input and includes all the specific comments and recommendations that respondents contributed.

1.2 WHY ARE WE HERE?

Chapter 11 of the Yukon First Nation Umbrella Final Agreements sets out a process for affected First Nations and Yukon Government to work together on regional planning. The Peel Watershed Planning Region is a 67,431 square kilometer area in northern Yukon. The headwaters of the Peel River are in the Ogilvie Mountains on the western side of the planning area and the river flows north to the McKenzie River delta. The watershed is drained by six major rivers, the Snake, Wind, Bonnet Plume, Hart, Ogilvie and Blackstone. These rivers flow through diverse landscapes, from high rugged mountains to flat taiga forest. The region has no permanent residents, few roads and limited development, and a wilderness character different from most watersheds of similar size.

The Peel Plan was developed jointly by five Parties: The Government of Yukon, First Nation of Na-Cho Nyäk Dun, Tr'ondëk Hwëch'in, Vuntut Gwitchin First Nation, and the Gwich'in Tribal Council. In 2004, the Parties appointed the Peel Watershed Planning Commission, who would oversee the planning process and the completion of the Plan. In 2009 the Commission released a Recommended Plan and after significant consultation a Final Recommended Plan was released in 2011. First Nations supported the Final Recommended Plan, but the Government of Yukon did not. In January of 2014 the Government of Yukon rolled out a Peel Watershed Regional Land Use Plan for non-settlement land that differed significantly from the Commission's Final Recommended Plan. Shortly thereafter the First Nation Parties to the Peel Plan challenged the Government of Yukon's Plan in court, asserting that the Government of Yukon had not followed the land use planning process set out in Chapter 11 of the Final Agreements.

The Final Recommended Plan reflected an attempt by the Commission to find a balance between long term environmental protection and allowing some resource development. First Nation Governments supported the Final Recommended Plan, but the Government of Yukon did not. In January of 2014, the Government of Yukon produced a Peel Watershed Regional Land Use Plan for non-Settlement land that differed from the Commission's Final Recommended Plan. Shortly thereafter the First Nation Parties to the Peel Plan challenged the Government of Yukon's Plan in court, asserting that the Government of Yukon had not followed the land use planning process set out in Chapter 11 of the Final Agreements.

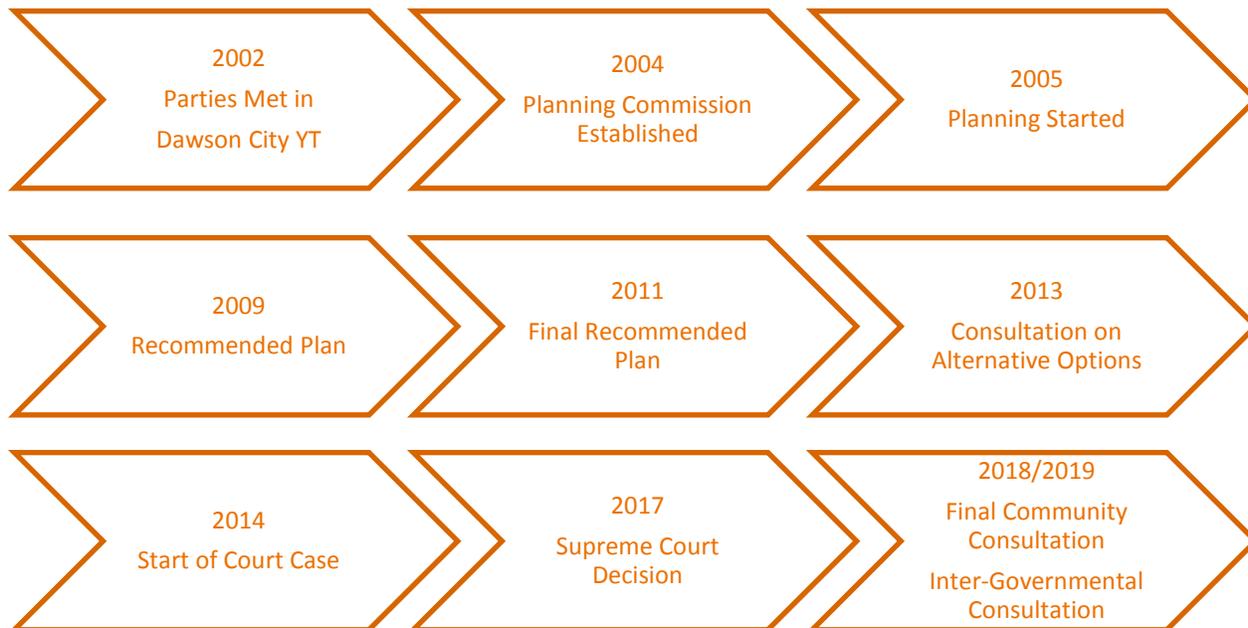


PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 1.0 Introduction
February 18, 2019

For the next four years the Peel litigation wound its way through the courts. In December of 2017, the Supreme Court of Canada settled the issue. The Court quashed the Yukon government's Plan and directed the Parties to return to the final consultation and approval stage of the process. Further, the Court directed the Parties to host a final round of community consultation and consider any minor modifications to the Plan that might be required to reflect changing circumstances. In 2018, all five governments signed a letter of understanding committing to work collaboratively to complete, approve and implement a Regional Land Use Plan for the Peel Watershed.

Each of the Parties selected someone to represent them on the Senior Liaison Committee, a group tasked with carrying out the community consultation according to the direction from the Supreme Court of Canada. At the time this report was written, this committee included Tim Gerberding representing First Nation of Na-Cho Nyäk Dun and Tr'ondëk Hwëch'in; Darius Elias representing Vuntut Gwitchin First Nation; Stephen Charlie representing the Gwich'in Tribal Council; and Stephen Mills, the Deputy Minister of Energy, Mines and Resources and John Bailey the Deputy Minister of the Department of Environment representing Yukon government.



Peel Planning Process Timeline

- In July 2018, Stantec was hired by the Senior Liaison Committee to organize, advertise and facilitate the final round of consultation and prepare a What We Heard Report to summarize all the input received. It will then be up to the Senior Liaison Committee to consider the input from stakeholders and the public. The next step will be for the Parties to consult with each other and to consider what changes they would like to see to the Plan. Following this, the Parties will work together to approve and implement a Final Peel Watershed Regional Plan.



1.3 CONSULTATION METHODOLOGY

It was important to the Parties that the consultation process be inclusive and transparent. To achieve this, a variety of methods were offered to the public, people from the affected communities and stakeholders to contribute their comments. Input was received through eight community meetings, twelve stakeholder meetings, an online and paper questionnaire, email submissions, and paper letters. A website was created (www.finishthepeelplan.ca) to present background information, provide information about the community meetings, host the online questionnaire and provide a form for online submissions.

The Senior Liaison Committee issued a joint press release on September 24, 2018 kicking off the process and emphasizing their commitment to working together. The first community meeting was held in Old Crow on October 2, 2018 and the final stakeholder meeting was held on November 28, 2018. The various engagement methods are further detailed in Section 2.0 Engagement Overview with summaries of the input collected using each method.

1.3.1 Community Meetings

Community meetings were hosted in four Yukon communities, Whitehorse, Old Crow, Mayo and Dawson City and the four Gwich'in communities in the Northwest Territories, Aklavik, Tsiigehtchic, Fort McPherson and Inuvik. The Inuvik meeting was originally scheduled for October 23 but needed to be rescheduled to November 22nd due to weather in Aklavik.

Following advice from the Parties, the meetings were set up to encourage attendance and feedback in each community and varied slightly from place to place. Six display panels, a large map, maps of each Land Management Units, copies of the Plan and a summary document were made available at the community meetings to provide information about the existing Plan. Various representatives from the Parties attended the community meetings, along with Yukon government staff from the Energy, Mines and Resources Department and the Department of the Environment. During each meeting, representatives of the Parties provided opening comments and Lesley Cabott and Zoë Morrison from Stantec delivered a half-hour presentation. After the presentation the meeting was opened to questions and comments. Stantec's Jamie Davignon was responsible for taking notes. In some communities, an open house provided an opportunity for the public to review information, ask questions and provide input in an informal setting. A brochure and a paper version of the questionnaire were also available at each meeting.

1.3.2 Stakeholder Meetings

Creating an opportunity for stakeholder groups to provide direct input through specific meetings was important to the Senior Liaison Committee. Initially 21 groups were contacted by email and offered the opportunity to set up a specific meeting. During the process several additional groups reached out to Stantec and asked to be included as a stakeholder. Meetings were organized with all interested groups, and 2 stakeholder meetings were held in total.

During these meetings, Stantec provided a brief presentation about the process to date, explained the existing plan and allowed attendees opportunities to ask questions and provide feedback. The results of each meeting are described further in Section 2.2 Stakeholder Meetings. Meeting notes are included in Appendix B. Formal stakeholder submissions are found in Appendix C.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 1.0 Introduction
February 18, 2019

1.3.3 First Nation Government Submissions

One First Nation government provided feedback regarding the Plan. This feedback will be considered separately from stakeholders or members of the public. All feedback received that is not from stakeholder groups or the public is summarized in Section 2.3 Government and Other Feedback, with copies of all submissions included in Appendix D.

1.3.4 Questionnaire

As further described in Section 2.4.1 Questionnaire, a questionnaire was provided as a way for the public to provide input. An online version was available on the website and paper versions were available at the community meetings. CPAWS and YCS also made paper copies of the survey available at a series of public events they hosted through October and November 2018.

The questionnaire was available from September 24 until November 30, 2018 and a total of 2,046 completed questionnaires were received. We received approximately 170 paper questionnaires; each response was digitized so that the results could be considered together. MS excel was used to compile and analyze the questionnaire results.

The questions were simple and focused on recommended updates to the Final Recommended Plan. A copy of the questionnaire and the results is provided in Appendix E Questionnaire Results.

1.3.5 Formal Written Submissions

As further described in Section 2.4.2 Formal Submissions, a total of 628 written submissions were received from members of the public, people who are not pre-identified as part of a specific stakeholder group or representing a government. These were received as either paper letters, online submissions, or personal emails. A redacted version of all formal submissions has been included in Appendix F Formal Submissions.

1.4 SPECIAL NOTES ABOUT THE ENGAGEMENT PROCESS

Over the course of the engagement period, there were several processes undertaken by others that could have impacted the input received. The ones that our team knew about are described below. All input, regardless of how it was received, was given the same consideration.

1.4.1 Canadian Parks and Wilderness Society Campaign

Both CPAWS and YCS have been involved in the Peel Watershed planning process for many years. In October and November 2018, CPAWS and YCS undertook a campaign to encourage people to get involved in this engagement process. They jointly took out newspaper ads, made direct calls to members, distributed posters and hosted eight public events in Whitehorse and community meetings in Inuvik, Fort McPherson, Tsiigehtchic, Old Crow, Mayo and Dawson. This outreach campaign was undertaken independently by CPAWS and YCS and the Parties and the Senior Liaison Committee were not involved.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 1.0 Introduction
February 18, 2019

Through this campaign, CPAWS and YCS encouraged people to support the Final Recommended Plan, but with some modifications. CPAWS and YCS encouraged the public to change the 25% interim protection to permanent protection to bring more certainty to the region giving the Peel 80% permanent protection.

Approximately 170 paper questionnaires were collected at their events and delivered directly to Stantec by their staff. Some community members expressed confusion about which events were public and which had been hosted by CPAWS and YCS.

1.4.2 Woodbridge High School, Irvine California

Stantec received an email from a teacher at Woodbridge High School in Irvine, California who presented a unique situation. The class was studying the Porcupine Caribou Herd and Arctic National Wildlife Refuge and the teacher asked her 110 students to each provide a comment about the Peel River Watershed Land Use Plan as a class assignment. These comments were submitted using the website input form and were included with the formal written submissions. It is possible to identify some of the emails that were submitted by students, but 25 emails were received from the school's email address domain. It can be assumed that some students used their private email addresses.

1.4.3 Potential for Duplication of Input

It is recognized that throughout the consultation process, there was potential for input duplication. At the launch of the online questionnaire, respondents were only allowed to complete one questionnaire from each IP address; however, this restriction was quickly removed following the community meeting in Old Crow. During this meeting, a resident offered to help complete surveys for others using a computer at the Yukon College Old Crow campus; as such, the one-submission per computer restriction was removed. It was possible for people to submit both multiple copies of the questionnaire and formal email submissions from several different email addresses.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

2.0 CONSULTATION DETAILS

The following sections details each method of consultation used in the engagement process, along with an overview of the feedback received.

2.1 COMMUNITY MEETINGS

Date	Location	Format	Number of Participants
October 2, 2018	Old Crow Community Centre	Vuntut Gwitchin Government staff and leadership lunch 12:00 - 1:00 pm Community dinner 5:00 - 7:00 pm	~58
October 4, 2018	Whitehorse Kwanlin Dün Cultural Center, Multi-purpose room	Open House 12:00 - 8:00 pm Presentations at 12:30 and 6:30 pm	~98
October 10, 2018	Dawson City Tr'ondëk Hwëch'in Community Hall	Open House 4:00 pm - 8:00 pm Presentation at 6:30 pm	~44
October 12, 2018	Mayo Community Hall	Open House 4:00 - 8:00 pm Presentation at 6:30 pm	~47
October 22, 2018	Aklavik Sittchinli Complex	Community dinner with presentation 6:00 - 8:00 pm	~17
October 24, 2018	Tsiigehtchic Tsiigehtchic Gymnasium	Community dinner with presentation 5:00 - 7:00 pm	~14
October 25, 2018	Fort McPherson Community Hall	Community dinner with presentation 6:00 - 8:00 pm	~66
November 22, 2018	Inuvik* Midnight Sun Complex, Community Lounge	Community dinner with presentation 6:00 - 8:00 pm	~5

**This meeting was originally planned for October 23 but was delayed because of bad weather.*

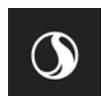
Old Crow

October 2, 2018

Attendees ~58 people in total

On October 2nd, Stantec hosted a lunch for Vuntut Gwitchin Government staff and leadership from 12:00 pm to 1:00 pm and a community dinner from 5:00 pm to 7:00 pm. Darius Elias representing Vuntut Gwitchin Government and Jim Bell, from Yukon government Energy Mines and Resources, were in attendance. This was the first meeting of the final round of consultation. It was clear from the opening remarks by Chief Charlie and Darius Elias, that the outcomes of this planning process are important to the people of Old Crow, that they are proud of the work that Vuntut Gwitchin Government has done on this Plan and were pleased to be involved in a collaborative process. This opening meeting set the positive tone for the consultation process.

During the lunch meeting, it was noted that the Boreal Caribou Herd is now recognized under the *Species at Risk Act* (SARA). This caribou herb was previously thought to be found only west of the planning area, but caribou have now



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

been tracked moving through Landscape Management Unit (LMU) 16 and migrating across the northern portion of the planning area. It was also noted that the Vuntut Gwitchin Government traditional territory border has changed (not officially) to remove the area of overlap with Tr'ondëk Hwëch'in Traditional Territory. This means that now only LMUs 5, 6, and 7 are within Vuntut Gwitchin Government territory. A community member requested that Senior Liaison Committee member Darius Elias provide updates from the other community meetings. The Yukon College computer and staff were offered to help community members and elders participate by completing the online questionnaire. Approximately 28 Vuntut Gwitchin Government staff and leaders attended the lunch meeting.

The Boreal Caribou Herd migration was also mentioned during the dinner meeting; it was noted that the herd is travelling from LMU 16 towards LMU 14, west across the planning region. It was recommended that a conservation plan for the herd be developed. Other caribou herds also use LMU 5, 7, 10 and 12 for their wintering grounds. Some community members had concerns about how the grandfathered mineral claims would be managed. There were concerns voiced about how climate change would impact the area, including the potential release of methane and mercury from melting permafrost. The continuous monitoring of hydrology and permafrost degradation was recommended, to better understand the changing conditions of the planning region.

Community members would like to see the headwaters of the Peel River protected to avoid impacts downstream. Tourism has increased in the planning area over the last decade, with approximately 300 people per year travelling on the Wind River. It was recommended that regulations be set for access permits, similar to the Chilkoot Trail, to limit the number of people within the region at any given time. Approximately 30 community members attended the dinner meeting.



Community lunch in Old Crow, October 2, 2018



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

Whitehorse

October 4, 2018

Attendees ~98 people in total

On October 4th Stantec hosted a full day open house in Whitehorse with presentations at 12:30 pm and 6:30 pm. Various representatives from Yukon government, along with Darius Elias, Vuntut Gwitchin Government representative and Angie Joseph-Rear, a Tr'ondëk Hwëch'in representative, were in attendance.

Approximately 50 community members attended the lunch meeting. A community member noted the importance of the Aberdeen Canyon to the area and traditional and cultural uses of the wilderness. Several attendees noted that the 25% Wilderness Area (WA) designation was a compromise made during the planning process and that 80% of the area should be permanently protected under the Special Management Area (SMA) designation. Since the original Plan was completed, First Nation heritage and culture legislation has been passed by both First Nation of Na-Cho Nyäk Dun and Tr'ondëk Hwëch'in and this should be reflected in the Plan. It was recommended that a buffer zone between planning regions be established. Future technologies and industries must be considered when reviewing the Plan (i.e. Dempster Highway fiber optic cable line and fracking).

Concerns about implementation and how variances, reviews, and amendments were going to be considered were mentioned, along with the request for more clarity on the implementation process. Several people had concerns about how tourism access would be managed. A community member advised that Yukoners should learn from the Peel Watershed planning process and take those learnings into consideration when completing the next regional land use Plan.

Throughout the afternoon, about 12 community members attended the open house and had one-on-one discussions with Stantec and Government of Yukon representatives. Discussions were focused on impacts of tourism and prohibiting motorized boat use on tributaries. There was a comment that there should be no compensation for existing claims, especially the claims staked after the start of the planning process and prior to the moratorium being set.

The evening meeting had approximately 36 community members in attendance, along with Yukon government, Vuntut Gwitchin Government and Tr'ondëk Hwëch'in representatives. Concerns were raised about how the Boreal Caribou Herd and Dempster Highway fiber optic cable would be considered. Questions were raised about how existing mineral claims would be addressed and how claims would be worked in the future. Several people recommended changing the area designated as WA to SMA.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

Dawson City

October 10, 2018

Attendees ~44 people in total

On October 10th, Stantec held an open house in Dawson City from 4:00 pm to 8:00 pm. Yukon government representatives, Jerome McIntyre and Jim Bell from Energy, Mines and Resources, and Jen Meurer from Environment were in attendance, along with Tim Gerberding representing First Nation of Na-Cho Nyäk Dun and Tr'ondëk Hwëch'in, and Darius Elias representing Vuntut Gwitchin Government. Overall there was support for the 2011 Final Recommended Plan. The plan that the Peel Commission recommended was based on Yukoner and First Nation's input and priorities. Many community members and Tr'ondëk Hwëch'in elders would like to see 100% protection in the planning area, but with compromise on both sides, they think that 80% is fair. Many people mentioned the importance of water, and the protection the water in the headwaters of the Peel Watershed for future generations.

Mayo

October 11, 2018

Attendees ~47 people in total

On October 11th, Stantec held an open house from 4:00 pm to 8:00 pm in Mayo. Yukon government representatives, Jerome McIntyre and Jim Bell from Energy, Mines and Resources, and Jen Meurer from Environment were in attendance, along with Tim Gerberding representing First Nation of Na-Cho Nyäk Dun and Tr'ondëk Hwëch'in, and Darius Elias representing Vuntut Gwitchin Government.

Many of the elders were missing from the meeting as they were attending Transboundary Agreement meetings in Fort McPherson. First Nation of Na-Cho Nyäk Dun is currently working on a sub-regional plan for the Beaver River Watershed, which is south of the Peel Watershed. Attendees recommended that the moratorium on the existing mineral claims should not be lifted until the implementation plan is in place. Many community members agree with the long-term objective of the Plan to return all lands to their natural state. Discussions were held on the recommendations in the Plan about wetlands, air access, and off-road vehicle (ORV) access. A community member recommended only access by horseback should be allowed. It is important to people that local knowledge be integrated in to the Plan review through collaboration between the First Nations and Yukon government. Several people recommended changing LMU 6 and 4 from WA to SMA.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

Aklavik

October 22, 2018

Attendees ~17 people in total

On October 22nd, Stantec held a community dinner in Aklavik from 6:00 pm to 8:00 pm. Yukon government representatives, Roy Neilson and Jerome McIntyre from Energy, Mines and Resources, and Brian Johnston from Environment were in attendance, along with Angie Joseph-Rear, representing from Tr'ondëk Hwëch'in and Stephen Charlie representing the GTC. The overall feel of the meeting in Aklavik was positive. Many people are concerned about their ongoing ability to use the area traditionally for trapping and gathering purposes, even once the area is protected as an SMA. They also expressed concerns about the fact that, although not covered under the Yukon Umbrella Final Agreement, they still have the right to be involved in ongoing planning and management of the area and need to have an opportunity to provide comments on development proposals.

Concerns were also expressed about the effects of upstream development on the community's primary water source. Community members recommended changing LMU 13 and 15 (with their Primary Use Area) and LMU 7 (within their Secondary Use Area) to a higher level of protection. In section 19.1.8.a of the Gwich'in Final Agreement, the GTC has rights to have water which are on, or flow through, or are adjacent to Gwich'in lands, remain substantially unaltered in quality, quantity and rate of flow. It was recommended that a water strategy be implemented in the region to protect the water.



Stephen Charlie speaking at the meeting in Aklavik, October 22, 2018



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

Tsiigehtchic

October 24, 2018

Attendees ~14 people in total

On October 24th, Stantec held a community dinner in Tsiigehtchic from 5:00 pm to 7:00 pm. Yukon government representatives, Roy Neilson and Jerome McIntyre from Energy, Mines and Resources, and Brian Johnston from Environment were in attendance, along with Angie Joseph-Rear, representing Tr'ondëk Hwëch'in and Stephen Charlie representing the GTC.

At the meeting in Tsiigehtchic, a few community members were confused as they thought the meeting held the previous week with CPAWS was the final consultation meeting. Overall there was support for the Plan and the process. Community members would like to continue to be consulted on any development that occurs within the planning region. They also requested a yearly update on the implementation at the GTC Annual General Assembly. Questions were raised about how Traditional Knowledge was integrated into the Plan and how it would be kept up to date. A community member recommended a change to the designation of LMU 16 to Conservation Area. There was a recommendation that mining companies be asked to post a bond to pay for clean-up. Community members had concerns about the head waters of the Arctic Red River as there is no protection plan; the area falls under General Use in the Gwich'in Settlement Area Land Use Plan.



Lesley Cabott speaking in Tsiigehtchic, October 24, 2018



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

Fort McPherson

October 25, 2018

Attendees ~66 people in total

On October 25th, Stantec held a community dinner in Fort McPherson from 5:00 pm to 8:00 pm. Yukon government representatives, Roy Neilson and Jerome McIntyre from Energy, Mines and Resources, and Brian Johnston from Environment were in attendance, along with Angie Joseph-Rear, representative from Tr'ondëk Hwëch'in and Stephen Charlie representing the GTC. The meeting in Fort McPherson was well attended with approximately 66 community members. The community met earlier in the day to discuss the message they wanted to deliver at the meeting and chose a representative to do so.

The overall message from the community is that they have been consulted on this Plan many times and they want to be listened to. Many people are frustrated with the process and felt like they were repeating themselves. The Peel watershed and its protection is vital to the past, present and future of the people of Fort McPherson. Families need to be able to continue to use the area for traditional activities and teach future generations how to live off the land. They would like the region to be 100% protected and not allow any type of industrial development. They recommended adding additional protection to LMU 7 as it has hydroelectric potential and is part of GTCs Secondary Use Area.



Community members reviewing the Peel map, Fort McPherson October 25, 2018



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

Inuvik

November 22, 2018

Attendees ~5 people in total

A community dinner was held in Inuvik on November 22nd from 6:00 pm to 8:00 pm. Yukon government representatives Roy Nielson from Energy, Mines and Resources and Krysti Horton from Environment were in attendance along with Stephen Charlie representing the GTC. The main message from this meeting was like others in that the preference was to have 100% of the region protected from any development. The land is important to the Gwich'in people – they want to ensure that there are no down upstream impacts that will affect their communities. It is important the land remain pristine for future generations to ensure continued harvesting and trapping on the land. It was noted that all documents produced through this process should be accessible for community members and elders. Some Gwich'in elders cannot access a computer to provide input to the survey or understand the documents; consideration should be taken on translating documents to Gwich'in. There were concerns about the clean-up of existing claims and oil/gas exploration and a recommendation that companies should provide bonds before beginning work.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

2.2 STAKEHOLDER MEETINGS

A total of twelve stakeholder meetings were held. At these meetings, Stantec staff provided information about the Final Recommended Plan and the consultation process to date. This was followed by an informal discussion where stakeholders were encouraged to provide recommended changes for the Parties to consider. Below is a list of meetings held and a summary of the discussions. Written submissions can be found in Appendix C Stakeholder Submission.

Date	Stakeholder Group	Meeting Location	Number of Stakeholder Participants
October 9, 2018	Dawson City Chamber of Commerce	Dawson City Downtown Hotel	1
October 15, 2018	Yukon Chamber of Mines	Whitehorse Stantec office	2
October 16, 2018	Ducks Unlimited Canada	Whitehorse Stantec office	1
October 16, 2018	Wilderness Tourism Association of the Yukon	Whitehorse Stantec office	2
October 18, 2018	Yukon Fish and Wildlife Management Board	Whitehorse Gold Rush Hotel	12 (Approximate)
October 19, 2018	Canadian Parks and Wilderness Society and Yukon Conservation Society	Whitehorse Stantec office	4
October 19, 2018	Klondike Placer Miners Association	Whitehorse Stantec office	1
October 30, 2018	Midnight Sun Outfitting, Alan Young	Whitehorse Stantec office	1
October 30, 2018	Tourism Industry Association of the Yukon	Whitehorse Stantec office	2
October 31, 2018	Trails Only Yukon Association	Whitehorse Stantec office	2
November 22, 2018	Chance Oil and Gas Ltd.	Whitehorse Stantec office	3
November 27, 2018	Porcupine Caribou Management Board	Whitehorse Stantec office	3

In addition to the stakeholder groups detailed below which were engaged throughout this process, the following groups were contacted by Stantec but did not wish to meet.

- Mayo Renewable Resources Council
- Dawson Renewable Resources Council
- North Yukon Renewable Resources Council
- Yukon Outfitters Association (members will provide input through website)
- Silver Trail Chamber of Commerce



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

- Canadian Association of Petroleum Producers

Several groups did not respond to either emailed letters and/or phone calls; thus, meetings were not held with these groups.

- Yukon Chamber of Commerce
- Whitehorse Chamber of Commerce
- First Nation Chamber of Commerce
- Yukon Prospectors Association
- Yukon Trappers Association

Two other stakeholder groups, the Yukon Fish and Game Association Yukon First Nations Culture & Tourism Association provided letters but did not request a meeting. Letters can be found in Appendix C.

Dawson City Chamber of Commerce

October 9, 2018

Attendees Mark Mather, President Dawson Chamber of Commerce; Zoë Morrison, Stantec

We were unable to meet with the whole Dawson City Chamber of Commerce Board, but had an informal meeting with the group's President, Mark Mather. His perspective is that oil and gas exploration along the Dempster Highway has not, to date, benefited Dawson businesses very much. He believes there is support for some mineral development, if it does not negatively impact the wilderness. Tourism, and increasingly wilderness tourism, are providing long-term benefits to local businesses and access to unspoiled wilderness is required. The number of travelers along the Dempster Highway has been increasing, as have the visitors to Tombstone Park. These visitors often stop in Dawson twice; once on each leg of the journey. Mark believes that it will be important to ensure that increased levels of visitors to Tombstone Park do not negatively impact that area. Also, as resource development moves ahead, it will be important to ensure that we are prepared to deal with potential risks such as changing permafrost, accidents, or changing use of habitat. Mark forwarded information about this engagement process on to the rest of the chamber members and encouraged them to provide comments.

Yukon Chamber of Mines

October 15, 2018

Attendees Samson Hartland and Heather Burrell, Yukon Chamber of Mines; Jamie Davignon and Zoë Morrison, Stantec

On October 15th Stantec met with two representatives from the Yukon Chamber of Mines; Samson Hartland the Executive Director and Heather Burrell a member of the Board of Directors. Multiple areas of importance were noted and include: Nadaleen River, Tiger Gold Deposits, Wernecke Breaches, and the Michelle Property. Since this Plan was drafted, there has been continued work in these areas, and more is being learned about the significant mineral deposits in the area.

Concerns were expressed regarding the Plan's limits to access to mineral claims. With no new roads being allowed in the Conversation Areas, it will be difficult to continue with exploration and development of the claims. Without reasonable access, there is most likely no potential for development. Attendees also expressed concern about the potential expense of compensating holders of claims in Conservation Areas that are to be grandfathered. De-listing



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

roads and trails from the *Highways Act* also increases the inaccessibility to existing and potential claims. It will be difficult to develop in the Integrated Management Areas that are land-locked by Conservation Areas.

Ducks Unlimited Canada (DUC)

October 16, 2018

Attendees Jamie Kenyon, Ducks Unlimited Canada; Jamie Davignon and Zoë Morrison, Stantec

On October 16th Stantec met with Jamie Kenyon, Conservation Programs Specialist with Ducks Unlimited Canada (DUC). Prior to meeting with Stantec, Jamie Kenyon had discussions with his board members and he was able to present us with a list of concerns. DUC is a science-based organization that works on wetland and duck habitat restoration. They have been involved in both the North Yukon Plan and the Peel Plan, with a focus on wetland preservation. Jamie had questions about how new, and proposed future, Yukon government legislation would be integrated into the Plan (i.e. Wetland Policy and Off-Road Vehicle Regulations). DUC recommends updating the definitions of wetlands and off-road vehicles to match the formal Yukon government definition. The designation of LMU16 was designated as an SMA in a previous draft of the Plan; DUC has concerns about why it was changed as the area is mainly wetlands and development may be unrealistic. DUC supports Research Recommendation #5 about completing a survey of wetlands prior to any new major developments taking place. DUC also recommends including a Water Management Plan in the implementation process to guide how water is expected to be used and address cumulative impacts. The Water Management Plan would take into consideration availability of water due to permafrost depths and water budgets and would be very useful to complete for IMAs before development is allowed. DUC had questions on how the existing mineral claims will be managed and what will the SMAs look like after implementation. Overall, DUC supports the Plan.

Stakeholder submission A letter from the DUC has been included in Appendix C Stakeholder Submissions.

Wilderness Tourism Association of the Yukon (WTAY)

October 16, 2018

Attendees Kalin Pallett and Kelly Fraser, WTAY; Jamie Davignon and Zoë Morrison, Stantec

On October 16th at 2:00 pm, Stantec met with Kelly Fraser (manager) in person and Kalin Pallett (president) via teleconference. The Wilderness Tourism Association of the Yukon (WTAY) had several concerns including:

- the impacts that noise from fly-overs could have on local wildlife and on the region in general;
- the process and timelines for the review of the WAs;
- the potential impacts of a scenario where a large mineral deposit was found on the border of an IMA and SMA;
- difficulties with remediation and how it will be enforced; and
- the lack of options for land tenure to support wilderness tourism.

The WTAY recommends that the 25% WA should be designated as SMA. The area designated WA leaves uncertainty for wilderness tourism and associated businesses. WTAY recommends the full 80% designated as permanent protection as this aligns with Canada's environmental protection goals, furthers First Nation reconciliation, and supports wilderness tourism. Also, Yukon government is in the process of developing a Tourism Development Strategy and 80% permanent protection in the Peel would further the goals outlined in this document.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

WTAY requested a second public consultation session be held in Whitehorse because the notice period for the first meeting was thought to be too short. WTAY is looking forward to seeing this Plan adopted and moving on to the implementation phase. WTAY recommended the Trails Only Yukon Association (TOYA) should be contacted as a stakeholder group as they deal with land management, access concerns related to ORVs and ATVs, and the preservation of the landscape.

Stakeholder submission A letter from the WTAY has been included in Appendix C Stakeholder Submissions.

Yukon Fish and Wildlife Management Board (YFWMB) October 18, 2018

Attendees FWMB Board Members John Burdek, Dave Andrew, Ron Chambers, Danny Cresswell, Michelle Dawson-Beattie, Dennis Dickson, Shirley Ford, Carl Sidney, Ken Taylor, Frank Thomas and Blanche Warrington; FWMB staff Graham Van Tighem, Tecla Van Bussel, Diane Sheldon; Jennifer Meurer, Yukon government; Jamie Davignon and Zoë Morrison, Stantec

On October 18th at 2:45 pm, Stantec met with Fish and Wildlife Management Board Members. Jennifer Meurer from Yukon government Environment was also in attendance. The Board had questions about how existing mineral claims would be addressed and if new claims were going to be allowed. They recommended that the Plan should support the goals and activities of horse-based outfitters who operate in the planning area.

They had questions about existing wilderness tourism operators and if they'll have any restrictions. One board member recommended that there should be no tourism in the region and the area should be left for the wildlife. The Board may send a letter directly to the Minister with their recommendations. Overall, there is support for the Final Recommended Plan from 2011.

Canadian Parks and Wilderness Society (CPAWS) and Yukon Conservation Society (YCS) October 19, 2018

Attendees Chris Ryder and Randi Newton, CPAWS; Mike Walton and Julia Duchesne, YCS; Jennifer Meurer, and Mike Etches, Yukon government Environment; Jamie Davignon, Lesley Cabott, and Zoë Morrison, Stantec

On October 19th at 10:00 am, Stantec met with representatives from CPAW and YCS; Jennifer Meurer and Mike Etches from Yukon government Environment were also in attendance. CPAWS recommends 80% full protection as was shown in the early Recommended Plan, by converting the areas designated as WA to SMA. They advised the addition of the WA into the 2011 Plan reflected a request from Yukon government, and was not a response to comments from Yukoners and affected First Nations. The change from interim to permanent protection would be a step towards reconciliation and would acknowledge the views and recommendations of First Nations and Yukoners.

As wilderness tourism increases, the operators become more dependent on the region and the full 80% protection would provide certainty for wilderness tourism businesses. Also, there is funding available through the Federal Government's Pathway to Target 1 program and the Indigenous Guardians Program. An area must have permanent protection, and associated regulations and enforcement, to be eligible for this program, and areas designated as WA would not qualify. Because park planning can take a long time, it is recommended that the legislation designating the protected areas be passed as soon as the Plan is adopted.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

If the WA designation is not going to change, CPAWS recommends a change in the language from 'interim' to 'long-term' protection. This would provide increased certainty and would ensure that the WAs would not be reviewed on a fixed schedule. This would mean that the timing of the review could be initiated by the First Nation governments.

CPAWS recommends that language should be added to the Plan to allow for small scale protected areas to be designated within the IMAs. They also recommend that the moratorium on existing mineral claims be kept in place until an implementation plan for the existing mineral claims has been developed. CPAWS recommends a very detailed implementation plan be developed that shows how the plan can be varied, amended and reviewed. The low level of detail in the North Yukon Plan's Implementation Plan made implementation more difficult. CPAWS recommends an independent third-party oversight of the implementation to ensure that it is consistent and conforms with the intent of the Plan. An independent implementation coordinator could be hired to be the Plan's champion.

YCS voiced concern about the ever-increasing rate of biodiversity loss. There is emphasis globally on biodiversity loss and the importance of landscape scale protection. There is also new research and information available about the negative impact of roads. As such, careful consideration should be taken when developing roads and assessing the cumulative effects. At the federal level, the Government of Canada is investing in conservation through new tools and funding including Indigenous Conservation and Protected Areas.

Also, landscape level connectivity needs to be considered, with a focus on ensuring that there is habitat connection between SMAs, especially between the smaller units. Links between this Plan and ongoing Yukon government processes (for example the grizzly bear management, wetlands, off-road vehicles, Yukon Parks Strategy) should also be considered.

YCS recommends 80% protection, quickly passing the protected area legislation, and a continuation of the moratorium on new mineral claims until an implementation plan is finalized. The implementation section of the Plan should comment on the prioritization of the Research Recommendations. Also, First Nation presence on the land will be key to effective implementation of this Plan.

Stakeholder submission Letters from both CPAWS and YCS have been included in Appendix C Stakeholder Submissions.

Klondike Placer Miners Association (KPMA)

October 19, 2018

Attendees Jonas Smith, Klondike Placer Miners Association (KPMA); Roy Neilson and Jennifer Russel, Yukon government; Tim Gerberding, Senior Liaison Committee; Jamie Davignon and Zoë Morrison, Stantec

On October 19th at 1:30 pm, Stantec met with Jonas Smith, the Executive Director from the Klondike Placer Miners Association. Roy Neilson, Jennifer Russel for Yukon government and Tim Gerberding, representing Tr'ondëk Hwëch'in and First Nation of Na-Cho Nyäk Dun on the Senior Liaison Committee, were also in attendance. The KPMA has no specific interest in the area; they are however very interested in the process for future land use planning. The Executive Director had concerns about how existing mineral claim owners were going to keep their claims active and working and follow the Plan recommendations. He also had questions about the version of the Plan recommended by the Yukon government in 2013 and wondered if the input from that consultation process would be considered during this process.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

The Executive Director also voiced concerns about the cost of this process, the cost to implement the Plan and wondered if the public truly understands the financial implications. The potential cost of compensating the mineral claim holders to needs to be considered. There may be potential for First Nations in the area to be partners in future mineral or oil and gas projects. Feasible and reasonable access to the region for development is a concern; under the Final Recommended Plan development may not be economically, logistically or technically feasible. The impacts of this Plan on the potential development in neighbouring areas, such as the Nadelene Range to the south, need to be considered.

Alan Young, Midnight Sun Outfitting

October 30, 2018

Attendees Alan Young, Midnight Sun Outfitting; Jamie Davignon and Zoë Morrison, Stantec

On October 30th at 10:00 am, Stantec met with Alan Young from Midnight Sun Outfitting. Mr. Young and his family operate an outfitting company at Hart Lake in the Peel Watershed. Mr. Young recommends the 80% Conservation Area be fully protection; the WAs should be designated as SMAs. From previous experience, Mr. Young says that large management areas work better to provide real long-term protection compared to smaller ones. He recommends changing LMU 4 and LMU 6 to SMAs and changing the boundary between LMU 4 and 6 to run through Davidson Pass. It is a natural boundary and easier for the public to distinguish. Mr. Young has noticed an increase in tourism since the start of the Peel Watershed planning process; it is important to manage the area properly to maintain the wilderness value of the area. As he is often out on the land in the region, he has noticed illegal activity and areas that need to be cleaned up. The 80% protection was a promise made by the current Liberal government.

Stakeholder submission An e-mail which provides more feedback from Alan Young has been included in Appendix C Stakeholder Submissions.

Tourism Industry Association of the Yukon (TIA Yukon)

October 30, 2018

Attendees Neil Hartman and Blake Rogers, TIAY; Jamie Davignon and Zoë Morrison, Stantec

On October 30th at 11:00 am, Stantec met with Neil and Blake from the Tourism Industry Association of the Yukon (TIA Yukon). TIA Yukon is an umbrella organization for the tourism industry. They support the 2011 Final Recommend Plan but would like to see a greater certainty in the WAs and 80% of the region permanently protected. The Dempster Corridor and the Wind and Snake Rivers have experienced increased tourism in the last few years which can negatively impact the area and disrupt wildlife. The Peel Watershed is important for tourism in the Yukon and, if done properly, can be a sustainable industry. The branding and marketing for the region focusses on quality over quantity. Tourism is growing steadily and provides economic stability whereas resource-based development is more volatile.

Pristine areas are even more rare now than they were 10 years ago when the Plan was being developed. Establishing the area as a park would increase awareness internationally, resulting in a positive impact for tourism. TIA Yukon recommends changing the name of the region to something more descriptive and attractive.

Stakeholder submission An e-mail from Blake Rogers has been included in Appendix C Stakeholder Submissions.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

Trails Only Yukon Association (TOYA)

October 31, 2018

Attendees Vern Peters and Tony Grabowski, TOYA; Jamie Davignon and Zoë Morrison, Stantec

On October 31st at 10:00 am, Stantec met with Vern and Tony from Trails Only Yukon (TOYA). TOYA is an association that advocates for land preservation and responsible trail access. There are few areas in the world like the Peel Watershed and we should act as custodians of the land. TOYA is in support of the 2011 Final Recommended Plan. Even remote areas are starting to see damage. Clarify existing trails and prohibiting ORV use in fragile landscapes will be increasingly important.

Big game hunters from outside the Yukon are paying high prices for trip and outfitters are feeling pressure to ensure visitors have successful hunt, which is leading to more ATV and ORV use. TOYA believes that outfitting should be done through traditional ways, using horses. Increasing the accessibility to the region can also result in overharvesting. ORVs should only be allowed on designated trails. Yukon government seems willing to regulate hunting by limiting permits but should also consider how to limit access. Training should be provided for ORV users to teach respect for the land and the identification of sensitive land. Simple, clear regulations should be developed to enforce ORV policy.

Stakeholder submission A letter from TOYA has been included in Appendix C Stakeholder Submissions.

Chance Oil and Gas Ltd.

November 22, 2018

Attendees Greg Charlie, Cindy Dickson and Richard Wyman, Chance Oil; Zoë Morrison, Stantec

Chance Oil and Gas Ltd. has participated in previous Peel planning processes under their old name, Northern Cross Ltd. Chance Oil has several oil leases in the Eagle Plains Sedimentary Basin. All the Significant Discovery License areas and part of another are within LMU 7 and are designated as Integrated Management IV, as are portions of two other Exploration Permits. Further, there may be a portion of one Exploration Permit that falls within LMU 6, a Conservation Area. There has been oil and gas exploration in the area, but there is still lots to learn about the resources in this region and Chance believes that there may be significant deposits.

Reasonable access is of concern because once production testing is underway, all-season roads will be required. Also, the cumulative effects threshold seems arbitrary, both for length of road and area of disturbance. New techniques are constantly evolving to mitigate environmental impacts and it is not clear that the thresholds set in this Plan are relevant and will have the desired effect.

Chance Oil has several other oil and gas leases within the North Yukon Planning Area. Implementation of the adopted regional Plan in that region has not always been smooth, and at times, YESAB is not clear on how to implement the policies of the North Yukon Plan. Also, when the Dempster Highway Corridor Plan is developed, it will need to consider the policies and land use designations of the North Yukon Plan; the Corridor Plan will need to fit with the policy direction of all relevant regional plans. Setbacks from wetlands should be consistent across various plans and policy documents, otherwise it creates a difficult environment for businesses.

Stakeholder submission E-mails and a letter from Richard Wyman, President of Chance Oil and Gas Limited has been included in Appendix C Stakeholder Submissions.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

Porcupine Caribou Management Board

November 27, 2018

Attendees Deana Lemke, Joe Tetlich, and Matt Lemke, Porcupine Caribou Management Board; Jamie Davignon, Stantec

The Porcupine Caribou Management Board's (PCMB) input was based on their mandate to protect the Porcupine Caribou herd and its habitat. They recommended that their input be considered at a higher level than just a "stakeholder". The representatives noted the PCMB was formed prior to the settlement of Final Agreements. The Board representatives recommended contacting the North Slope and Northwest Territories Wildlife Management Advisory Council (WMAC) for their input. The Board said that they will be submitting a letter to the Ministers responsible in NWT, Canada and Yukon. The PCMB considers the 2011 Final Recommended Plan a compromise and supports the Plan. The Board would like to be consulted once the minor modifications have been determined.

Stakeholder submission Letters from the PCMB have been included in Appendix C Stakeholder Submissions.



2.3 GOVERNMENT AND OTHER FEEDBACK

Tetlit Gwich'in Council

A letter was received from the Tetlit Gwich'in Council and Designated Gwich'in Organization in Fort McPherson. This letter describes their desire to create an Indigenous Park and have, "the watershed to remain as the Creator left for us to look after so many generations ago." The Indigenous Park would be monitored by youth and elders, with no mining and no road access. The letter states that at minimum they would like to see the entire 80% Conversation Area protected using the SMA designation and they do not find the three IMA designations acceptable. There was also opposition to uranium and coal mining in all areas.

A copy of this letter is provided in Appendix D.

Elders Statement

A combined statement was received from First Nations elders from Na-cho Nyäk Dun, Tetlit Gwich'in, and Tr'ondëk Hwëch'in. This document is the work of a group of elders who came together at the Peel Watershed Gathering in February 2007 and is not an official statement from their First Nation governments.

The statement expressed a desire to see the watershed protected with specific notes requesting the entire 80% Conversation Area protected using the SMA designation at a minimum with no mining permitted. A copy of this statement is provided in Appendix D. The letter states:

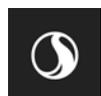
"We want our people to protect the Peel Watershed, which means the Watershed remains as it was created, with a high level of protection for the land and water and our heritage, and all living things, where we can continue to practice our traditional way of life and care for the land, water, air, wildlife, and medicinal plants."

Tr'ondëk Hwëch'in Citizen Letters

To encourage its citizen to get involved, Tr'ondëk Hwëch'in created form letters for citizens to sign and submit. There were three different versions of this letter, one that requested that 100% of the planning area be preserved permanently, one that requested that the 25% slated for interim protection be changed to permanent protection and one that recommended adopting the Final Recommended Plan as it is.

In total, 78 form letters were received; a breakdown of the responses received is below with examples of the letters provided in Appendix D.

Submissions	Content
56	<i>The Peel Watershed should be completely protected. The Peel Watershed Final Recommended Plan should be changed to permanently protect 100% of the watershed.</i>
14	<i>I support 80% permanent protection of the Peel Watershed. Interim protection for 25% of the watershed leaves it vulnerable to future industrial development. The Peel Watershed Final Recommended Plan should be changed to permanently protect the 25% of the watershed that only has interim protection.</i>
8	<i>I support the Peel Watershed Final Recommended Plan. This Plan was produced after years of careful research and consultation, and it is a compromise between many different visions for the Peel Watershed.</i>



2.4 YUKON LAND USE PLANNING COUNCIL SUBMISSION

The Yukon Land Use Planning Council (YLUPC) submitted a formal letter to the engagement process which includes specific comments on the Plan's details. Primarily the comments were referencing how the Plan will be interpreted and implemented: needing clarity in the text regarding which of the policy and research recommendations are being accepted/rejected, more reflection of the parties' roles and responsibilities, and more details about how the Plan can be amended in the future. Where appropriate, these comments have been integrated into the summary of what we heard in Section 3.0.

The copy of this letter is provided in Appendix D.

2.5 PUBLIC SUBMISSIONS

2.5.1 Questionnaire

As described in Section 1.3 Consultation Methodology, a formal questionnaire was prepared to gather feedback from those unable to attend a community meeting. The questionnaire was available for completion online at [<https://www.surveymonkey.com/r/finishthepeelplan>] from September 5 to November 30, 2018. Although 170 respondents completed a paper copy of the questionnaire, all input was entered into the online form for consistency and data management purposes.

The overall response rate to the survey was good with a total of 2,046 questionnaires completed. Following the questionnaire's closure on November 30, all submissions were exported from the website and inputted into a master spreadsheet. The responses were then reviewed for content and categorized for quantitative review.

A redacted copy of all submissions received has been provided in Appendix E.

2.5.1.1 Format

The questionnaire had four questions:

1. Are there any parts of the Final Recommended Plan that you believe should be changed at this time?
 - a. Answer format: Yes or No
2. If yes, please tell us what parts of the Final Recommended Plan you think should be updated.
 - a. Answer format: Open-ended response.
3. Is there anything else that you would like us to consider as we finalize the Regional Land Use Plan for the Peel Watershed?
 - a. Answer format: Open-ended response
4. Where do you live?
Answer format: Multiple choice (list of community meeting locations) or other with open-ended response

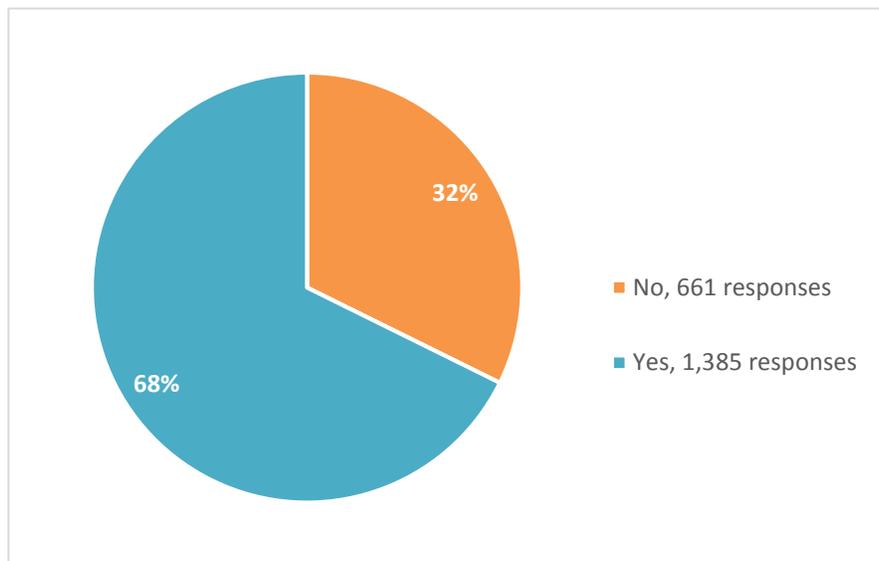
Although questions 2 and 3 were intended to be different, the responses they generated were very similar; as such, their results have been combined in Section 2.3.3 Combined Summary for review purposes.



2.5.1.2 Overview of Results

Due to the high volume of responses received through the questionnaire, what is included below should be considered a high-level overview of the responses gathered with only the top three response categories discussed.

Question 1: Are there any parts of the Final Recommended Plan that you believe should be changed at this time?



Total responses: 2,046

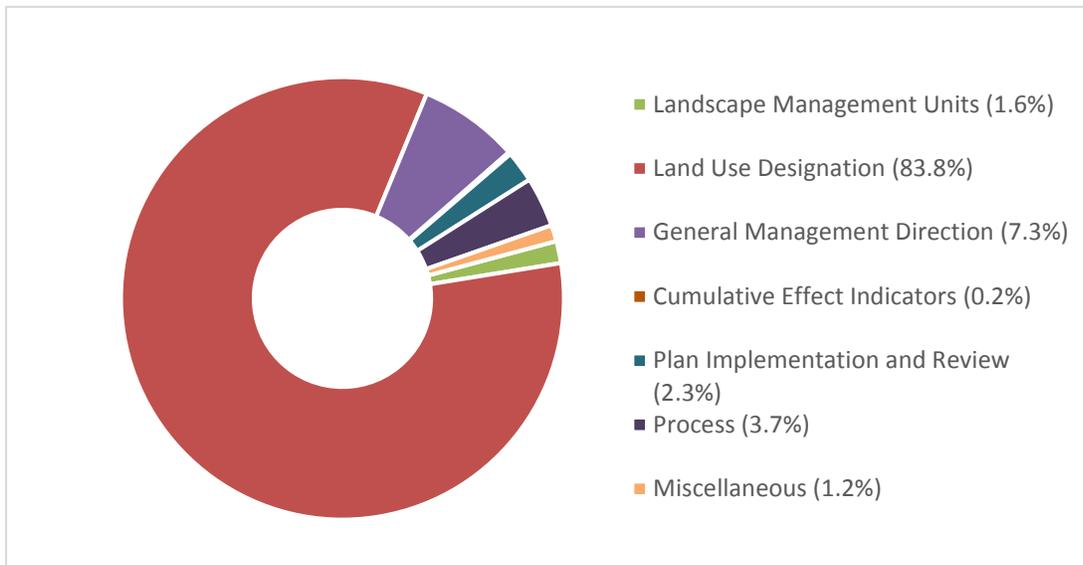
- If respondents answered Yes to this question, they were redirected to Question 2.
- If respondents answered No to this question, they were redirected to Question 3.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

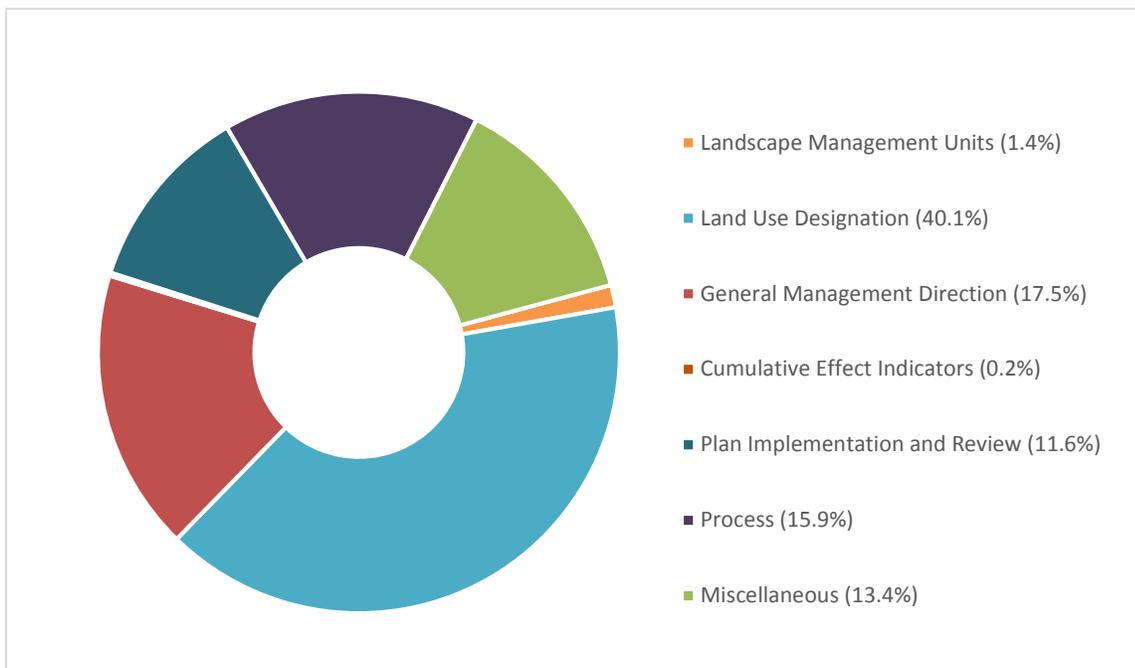
Section 2.0 Consultation Details
 February 18, 2019

Question 2: If yes, please tell us what parts of the Final Recommended Plan you think should be updated.



Question 2 - Total Responses: 1,177

Question 3: Is there anything else that you would like us to consider as we finalize the Regional Land Use Plan for the Peel Watershed?



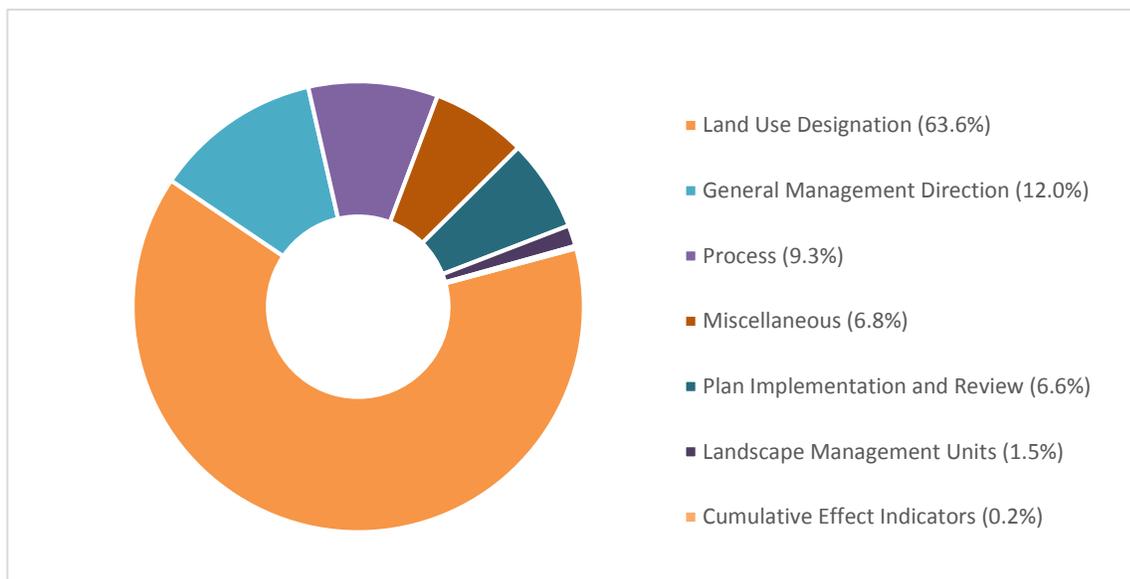
Question 3 - Total Responses: 1,008



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

Question 2 & 3 Combined: Due to the similarities between the responses in Question 2 and Question 3, a combined summary of these two questions' results has been provided below with a focus on the top three most prevalent theme categories: An individual breakdown of each question is provided in Appendix E.



Question 2 and 3 Combined - Total Comment Responses: 2,185

Top Theme Categories, Subcategories, and Preferences

1. Land Use Designation (1,390 comments, 63.6% of total)
 - Conservation Areas (1,314 comments, 60.1% of total)
 - » Request for 80% of the Plan Area be protected using a Special Management Area (804 comments, 36.8% of total)
 - » Request for 100% of the Plan Area be protected using a Conservation Area (290 comments, 13.3% of total)
2. General Management Directions (262 comments, 12.0% of total)
 - Economy (210 comments, 9.6% of total)
 - » None, less, or limited economic development (105 comments, 4.8% of total)
 - » More development (54 comments, 2.5% of total)
3. Process (203 comments, 9.3% of total)
 - Decision making (66 comments, 3.0% of total)
 - Support the 2010 Recommended Plan (49 comments, 2.2% of total)

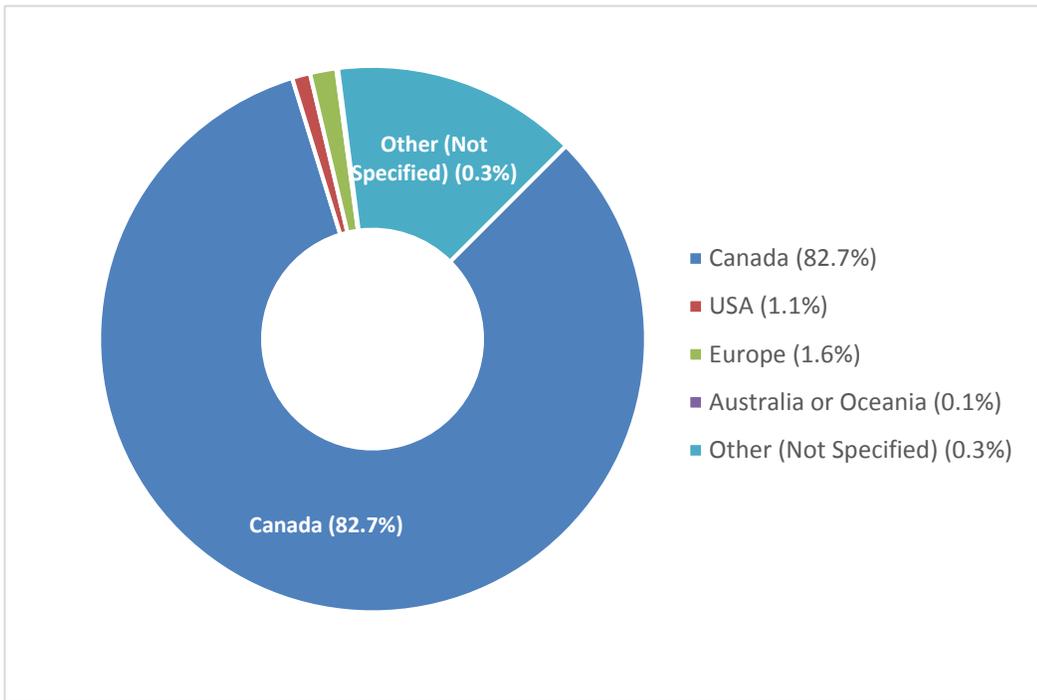


PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

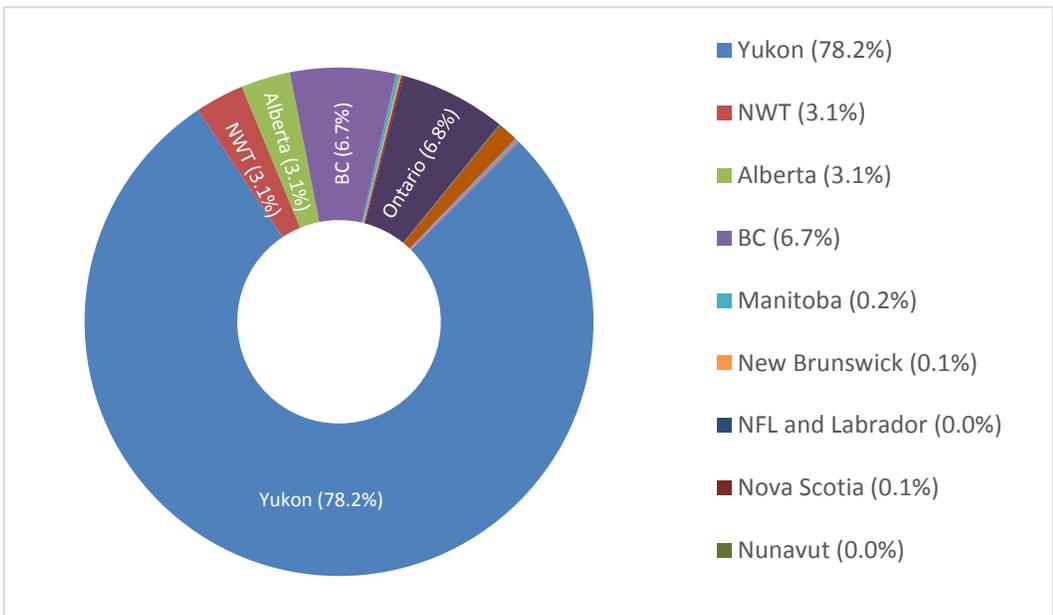
Section 2.0 Consultation Details
 February 18, 2019

Question 4: Where do you live?

As shown in the figure below, 82.7% of the location responses received for this question were from Canada. Of the Canadian responses, the majority were from Yukon (78.2%). A further breakdown of the location responses can be found in Appendix E.



Question 4 - Total responses: 2,046



Question 4 - Total Canadian Location Responses: 1,698



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 2.0 Consultation Details
February 18, 2019

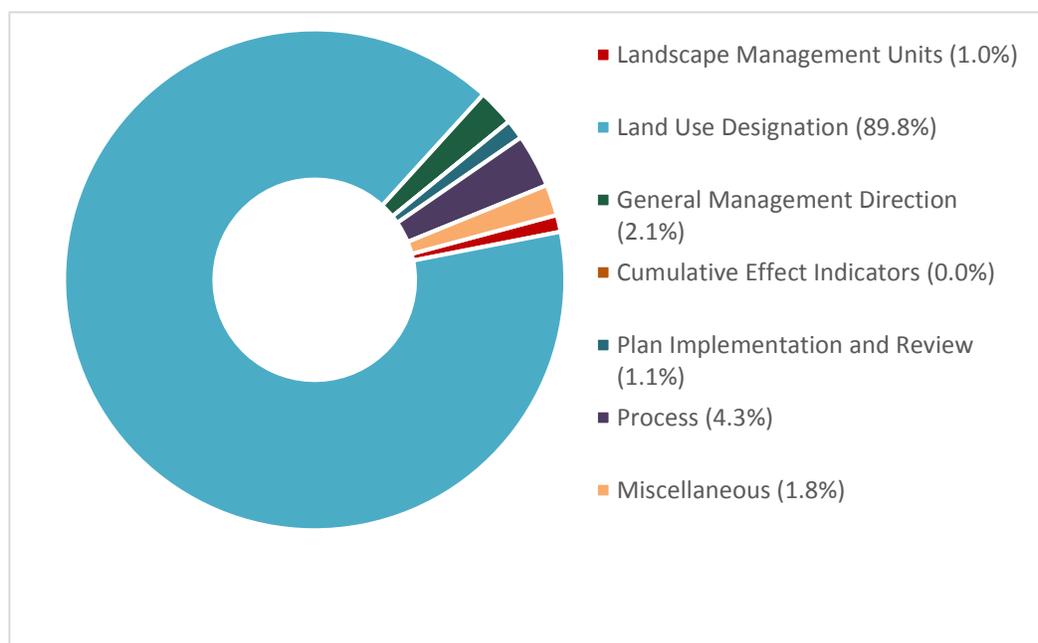
2.5.2 Formal submissions

In total, 628 formal submissions were received from the public. These submissions were submitted either from the project website link or were emailed directly to Stantec staff. This number includes the 78 form letters that were received from Tr'ondëk Hwëch'in citizens. All submissions were saved, reviewed for content, and inputted into a master spreadsheet for quantitative review.

A redacted copy of all submissions received has been provided in Appendix F.

2.5.2.1 Themes

As shown in the figure below, 90% of the comments received were regarding the Land Use Designation System.



Total responses: 628

The comments received primarily reflected a desired to see more of the Peel regional under environmental conservation (497 comments) with the majority recommending the Wilderness Areas be changed to Special Management Areas (312 comments). The second highest occurrence of comments was requesting the entire Peel region be identified as a Conservation Area (130 comments).



3.0 WHAT WE HEARD

In this section of the report, feedback from all sources and consultation methods is organized according to the sections of the Final Recommended Plan for ease of review. The written comments that we received, either through questionnaires, emails or letters, are included as appendices to this document. A high-level summary is provided in Section 4.0 Conclusion.

Throughout this section of the report, when percentages of respondents are given, these numbers include both survey responses and email submissions. When considering these numbers, it is important to remember the factors related to the engagement process that are listed in Section 1.4. For example, it was possible for respondents to provide more than one submission. Also, CPAWS and YCS were running a simultaneous campaign encouraging people to request that 80% of the watershed be permanently protected.

3.1 SUPPORT FOR THE FINAL RECOMMENDED PLAN

In the questionnaire, 32% of respondents said that they do not want to see any changes to the Plan. Also, approximately 1.5% of the total public comments received were expressing specific support for the Final Recommended Plan as written. These are the specific comments:

- Generally, the Plan's proposed land use designations and policies are in line with its core principle of sustainable development.
- The Plan was the result of significant public engagement and is the outcome of a collaborative process.
- The Plan reflects a clear message from people that wildlife and habitat in the region are of the highest value, while allowing some resource development is also important.
- The area designated for interim protection reflects the understanding that future generations may have different values and interim protection provides flexibility for future decision-makers.
- No changes should be made to the Plan as it is balanced and already reflects significant public engagement and represents a compromise.
- The Plan was developed following the Umbrella Final Agreement process and should be supported.
- WA areas could be developed in the future if Canada needs more sources of oil and gas.
- For a long time now First Nations have made their connections to the Peel Watershed very clear and Yukon government has betrayed First Nations and the Umbrella Final Agreement by failing to adopt the original Plan. To begin to reconcile this relationship, the government could start by honouring the democratic planning process, respecting the cultural connections that First Nations have to the land, and moving forward in the spirit of respect and reconciliation.



3.2 LAND USE DESIGNATIONS

3.2.1 Conservation Areas

In the Land Use Designation System, areas designated SMA and WA are together called Conservation Areas. The amount of land designated as Conservation Area was the element of the plan that received the most comments. There was an overall desire to have more protection of the watershed through either the general Conservation Area designation or use of the SMA designation. Approximately 1,815 of the total public comments received were expressing a desire to have more protection of the watershed which represents 64.5% of the total comments received.

Many respondents had comments about the general importance of protecting the Peel watershed, provided reasons for protecting 100% of the watershed, and reasons for changing the interim protection to permanent protection. Each of these has been reported separately, even though this has led to some repetition.

General support for conservation in the Peel Watershed

- The Peel is a globally significant watershed that provides a massive reservoir of wilderness, undisturbed habitat and biodiversity and there are few opportunities world-wide to provide this scale of protected area. The Peel also provides a connection to key habitat both to the north and south including Arctic National Wildlife Refuge and the Yukon to Yellowstone corridor.
- Since the Plan was completed there are fewer and fewer places around the world that can be considered 'pristine wilderness' and are truly untouched. This has subsequently raised the value of the Peel from an ecological viewpoint and increased its value both for Yukoners and visitors and alike.
- The Peel watershed is the Traditional Territory of four First Nations who have been stewards of the Peel for thousands of years and continue to depend on its plants, animals and medicines. With many sacred sites throughout the region, the Peel is integral to their cultural heritage.
- Many of the elders who were involved with this process from the beginning and have spoken up for the protection of this area have now passed away and we should not forget their voices as we finalize this Plan.
- The Peel is an unique and beautiful area and the mountains, lakes, and rivers need to be preserved.
- Once development takes place there is no way to repair the damage to the landscape and bring back the fauna and flora. Once habitat is disturbed, other species may move to the area, leading to ecosystem-wide impacts.
- This is one of the last untouched wilderness areas in the world and it should be kept as pristine wilderness for future generations to experience.
- The current regulatory regime is not adequate to protect fragile areas.
- In protecting this area, Yukon has the chance to be an environmental leader.
- Protecting a large area such as the Peel will provide a useful benchmark to help understand the impacts of climate change, protect biodiversity and support threatened species that have valuable habitat in this region.
- Environmental degradation, urbanization, glacial melt, wildfires, destructive mining practices and the damming of rivers elsewhere makes the protection of the Peel even more important.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

- Communities near the region depend on the land, water and animals; if mining is not done properly and the landscape is polluted, people will be negatively impacted.

Recommended change: 80% permanent protection

As previously identified, the most comment response received during all forms of the consultation process was a desire to permanently protect 80% of the region. This preference was expressed through the questionnaires and formal submissions with 1,116 comments, representing 40% of total comments received. This was also the position of many of the stakeholder groups and First Nation citizens that were involved in the engagement process.

Reasons given for this suggested change are:

- Permanent protection could provide access to funding opportunities for management and monitoring, such as through the federal Pathway to Target 1 and Indigenous Guardians Programs which provides funding for First Nations people to be trained and employed to monitor and manage land.
- Many citizens of affected First Nations want 100% of the area protected; permanently protecting 80% of the area represents a compromise and is a move towards reconciliation and renewed relationships with Indigenous peoples.
- First Nations have a deep connection to this area and depend on the land, water, animals, and medicinal plants to provide a connection to the past, a current livelihood and way to teach their children traditional ways. The Peel region provides a deep connection to the past and is key to history, cultural and traditional activities.
- First Nations inherited this land from their ancestors and plan to protect it for future generations.
- There is no scientific basis for selecting the areas for interim protection; the SMAs and WAs all have high wilderness values and should be protected.
- Uncertainty about how and when the interim protection will be reviewed could impact all those who use the area.
- Mining could lead to pollution of the area's lands and waters, with potentially very harmful impacts throughout the area. Roads will destroy habitat and threaten local wildlife species.
- Land management of the interim protected areas will be difficult without the tools that come with permanent protection.
- The economic value of mineral extraction has been exaggerated.
- Permanent protection will provide certainty for wilderness tourism operators, traditional users of the land, outfitters and others trying to make a living in the area.
- Many people believe that the Plan already designates 80% of the area for permanent protection.
- Development in Yukon, especially in the resource sectors, has continued since this planning process got underway, resulting in less land available for wildlife and increased fragmentation of the landscape resulting in isolated populations of species.
- Permanent protection will give certainty to NWT residents living downstream in the Peel Watershed that they will have access to traditional activity, food security, sustainable economic activities and continued clean water.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

- The Yukon tourism industry is a steady and reliable contributor to Yukon's economy, provides local jobs and it relies on intact wilderness to draw visitors and provide high quality experiences.
- It has been shown that larger protected areas work better than small ones for preserving environmental integrity.
- Since the Plan was completed, species diversity is already decreasing in the Peel and across Yukon.
- Permanent protection will benefit all caribou herds that use this area.
- Protecting 80% permanently provides a good balance by allowing some economic development while preserving the overall ecological integrity of the area.
- Governments elsewhere are rolling back environmental protection measures. Permanent protection will mean that future governments cannot undo the protection here.
- Protecting 80% of the area now will mean that our children will not need to fight for the protection of the Peel.
- Interim protection was provided in the Coastal Plain of the Arctic National Wildlife Refuge. The Arctic Refuge was protected but the 1002 lands were not given the same protections. This compromise solution left the future of the 1002 lands and the Porcupine Caribou Herd in the hands of future politicians, resulting in four decades of uncertainty, political drama, and endless campaigning from the Gwich'in and conservation groups.
- The 80% protection was a promise made by the current Liberal government.

The Final Recommended Plan holds at its core the Statement of Intent, which recognizes the significant influence that development has on ecological integrity. YCS argued that, given the pace of change in Yukon in terms of population, resource development, species at risk and loss of ecological integrity, the change of designation from interim protection to permanent protection should not seem like a large change.

CPAWS gave several reasons why moving to 80% permanent protection can be considered a minor change, and these are provided in full in their letter found in Appendix C. First, the Supreme Court of Canada ruling directs Yukon to give "full and fair consideration" to views expressed during the consultation; as there was support for 80% or 100% protection in previous consultations this view needs to be fully considered now. Second, section 11.6.3.2 of the Final Agreements allows Yukon to make modifications to the Final Recommended Plan that are based on those it proposed earlier in the process; as such moving to 80% protection would be going back to an option that was considered earlier. Thirdly, the Supreme Court points out that under section 11.6.3.2, Yukon cannot change the Plan so significantly as to effectively reject it; moving to 80% protection would not be a rejection as it is not changing the amount of protection, just the status of this protection. Lastly, the Supreme Court says that Yukon can only depart from positions it has taken earlier in the process in good faith and in accordance with the honour of the Crown. Given that the vision of 100% permanent protection for the region expressed by the First Nations Parties, restoring 80% permanent protection would be in good faith and in full accordance with the honour of the Crown.

If areas designed as WA are not changed to permanent protection, both CPAWS and YCS recommended that the protection provided in the WA be changed from 'interim' to 'long-term'. Additionally, they recommend designating WA areas as Wilderness Management Areas under the *Environment Act*. These changes would provide greater certainty and avoid the need for costly and time-consuming reviews. The changes would also enable appropriate planning that would maintain the cultural, wilderness and recreational values in these areas. An additional benefit of this modification is that it would be eligible for funding through the various federal programs.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard
February 18, 2019

Recommended change: 100% protection of the Peel Watershed

The second-most prevalent comment heard throughout the public comment submission process (questionnaires or formal submissions) was a desire to see 100% of the watershed protected through Conservation Area designation. This preference was expressed with 420 comments, representing 15% of total comments received.

Stakeholder and government opinions are not included in the above percentages. The Tetlit Gwich'in, for example, feel that any level of industrial development is not compatible with maintaining this area in its pristine and natural state. In their letter, they also state that the watershed should remain as the Creator left it for them to look after. It is the local First Nations people who live in the area who will be most impacted by natural or human-caused changes in this area.

Other reasons given for protecting the entire planning area are:

- Wildlife and habitat are being threatened across the globe and the Peel watershed provides crucial habitat for species threatened by climate change and habitat loss.
- It is impossible/very difficult to repair an ecosystem once it has been damaged by mining. There is already enough/too much mining taking place in the Yukon.
- All caribou herds are vulnerable or in trouble and roads and habitat fragmentation are to blame.
- Activity taking place in the area will have a direct impact on all downstream waterways and those who live there and depend on the fish and wildlife.
- Free entry mineral staking, trapping, farming and settlement of alienated huge tracts of lands and limited First Nations access to their Traditional Territories; protecting 100% of the Peel would begin to make up for the historical theft of Indigenous lands and be a move towards reconciliation with Indigenous people.
- It would show that Yukon government has heard the voices of Youth of the Peel, First Nations, environmental NGOs, thousands of Yukon residents and people from around the world.
- It would demonstrate world climate leadership; the area provides a vast vegetated area that can be considered as carbon sink.
- Full protection of the area will ensure that no new roads are built and world-wide roadless areas are declining. New roads have significant impacts including the destruction of forests, fragmentation of habitat, pollution, splintering of animal populations, species decline, poaching, and the introduction of deadly pests.
- Protecting this area's land and water will protect the future of the generations to come.
- This is God's country and should not be changed.
- This watershed is the northern anchor to the wildlife corridor that runs from Yellowstone to Yukon.
- The Peel Watershed, and traditional lands in general, are the most important tool of survival for the Gwich'in people across the region.

Recommended change: Alternative protection/development ratios

Respondents had other ideas about the amount of the planning area that should be protected. The following scenarios were each recommended by one or two people:



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

- 90% of the area should be protected.
- 77% permanent protection.
- 75% permanent protection, 5% IMA and 20% interim protection.
- 70% permanent protection, 20% IMA and 10% interim protection.
- 60% permanent, 20% IMA and 20% interim protection.
- 60% protection, 40% open for development.
- 50% protection, 50% open for development.
- Follow the Brundtland Commission and protect only 12% of the area.
- There should be no Conservation Areas in Peel Watershed.

3.2.2 Integrated Management Areas

Recommended change: More areas open to development

Throughout consultation, it was heard that many people were concerned with the amount of protection proposed in the Final Recommended Plan due to a perceived negative impact on existing and future economic opportunities. These comments were expressed in a variety of different ways and represented approximately 3.3% of the total comments received. There were approximately 25 questionnaires and 15 written submission supported more mining, exploration and development in the area.

Much of the focus surrounding economic development was related to mineral and oil and gas resources; however, several comments were gathered regarding a desire to see more ecologically-sensitive tourism and enhanced rules surrounding big game outfitting.

Reasons given for opening more areas up for development were:

- The Yukon Geological Survey, the Geological Survey of Canada, as well as other academic groups have all completed new research showing the high mineral importance and potential of this area.
- The designation of large areas with high mineral potential as off-limits to mining is economically short-sighted and fails to consider the difference between modern mining and exploration and practices from 60 years ago.
- Regional planning must be responsible, evidence-based and informed by science. The economic impacts of withdrawing this much land from potential development have not been carefully considered.
- Closing areas to mining stifles economic development, keeps Yukon dependent on transfer payments from the south, prevents the territory from becoming financially self-sufficient and may lead all levels of government to raise taxes.
- The extreme and unnecessary level of protection will destroy the ability of entrepreneurs and investors to earn and reasonable living and will end up setting the standard for future land use processes.
- First Nations should be made aware of the potential value of the mineral resources on their lands so that they can also reconsider their past positions on land use designations.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

- More areas should be open for development to allow for flexibility to development in areas that make ecological, financial and logistical sense.
- New mineral potential and petroleum maps should be developed and access to these areas should be allowed.
- More area should be open for mining because the cost of compensation for expropriation, indirect or otherwise, could cripple our economy.
- Modern techniques for mining can be used without harming the environment, takes up a tiny fraction of the overall area, and can have very little negative impact on the land.
- Closing the area off to mining means that it becomes a playground for the wealthy with very little benefit to communities.
- Everyone wants to use the products of mining and people need to be open to this happening in the Yukon. If we do not allow mining here, we are giving in to not-in-my-backyard attitudes.

Recommended change: Allowing small protected areas within IMAs

It was recommended that language be added to the Plan that allows small scale protected areas to be implemented within the IMAs. IMAs include several ecologically and culturally valuable areas, including wetlands, key wildlife habitat, wildlife corridors, and archaeological sites. In many cases these values would be most efficiently protected through protected areas (as opposed to project review through YESAB). The Plan should be modified to acknowledge that protected areas are a land management tool that could be considered within IMAs. This would provide land managers with flexibility to respond to changing conditions.

3.2.3 Overall Areas

Given the high ecological and cultural value of existing Conservation Areas, re-designation should not be done as a trade, where land from Conservation Areas elsewhere in the region is designated as IMA.



3.3 LANDSCAPE MANAGEMENT UNITS

There were several recommendations that focused on specific LMUs. Throughout the public comment submission process, **the Hart River LMU was the most frequently mentioned with a total of 24 comments expressing a desire to have the area protected through a SMA designation.**

3.3.1 General

- Boundaries for LMUs that follow heights of land are difficult to follow when you are out on the land; consider boundaries that follow creeks or rivers instead as they are easier for people to identify.

3.3.2 LMU #3 Central Ogilvie

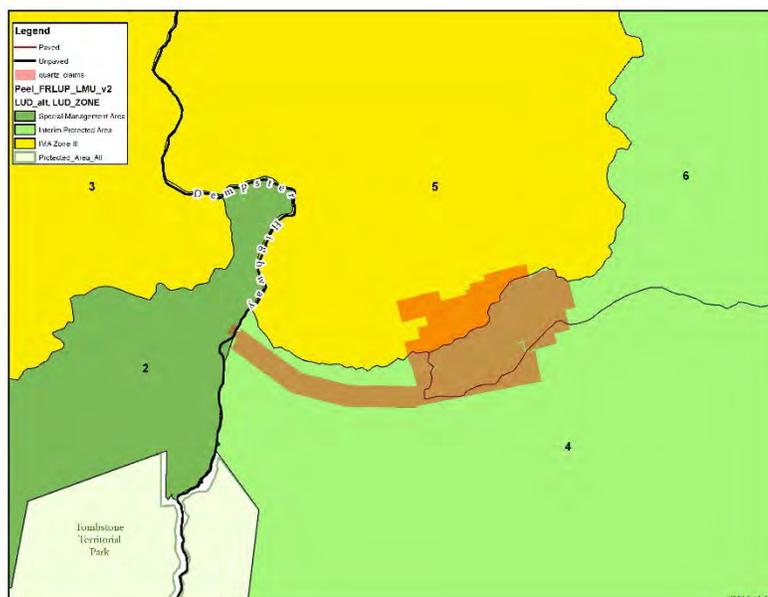
- This IMA should be changed to SMA. This is one section of the watershed that is visible from the road and readily accessible to visitors and Yukoners. From this perspective, it needs to be protected and should not be transformed by industrial development.

3.3.3 LMU #4 West Hart River

- This is valuable habitat, with rivers draining into the Hart River and should be switched from WA to SMA.
- This area should remain a WA under interim protection as it is close to the Dempster Highway and mineral extraction may make sense here in the future.
- The boundary between LMU #4 and LMU #6 should run through Davidson Pass and should follow either trails or water courses as this would make it easier to identify than the current boundary which follows the height of land.

3.3.4 LMU #5 Blackstone River

- The southern boundary of LMU #5 should be shifted to the south so that the entire mineralization at Silver Range Resources' Michelle Property is within the IMA Zone III. This would involve shifting the boundaries of LMU 4 and 6, both designated WA, further south and increasing the size of LMU #5. See map.
- Two possible access routes have been proposed for the Michelle Property. One runs basically due west to the Dempster Highway, through the area currently designated WA. The second loops to the north, running the area designated IMA III and is much longer. Moving the boundary of this LMU to the south would allow for the first access corridor, which is



Map of claims provided by Silver Range Resources Ltd



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

shorter and preferred by Silver Range Resources.

- This IMA should be changed to SMA. This is one section of the watershed that is visible from the road and readily accessible to visitors and Yukoners. From this perspective, it needs to be protected and should not be transformed by industrial development.
- The Blackstone Valley and river should be protected.

3.3.5 LMU #6 Hart River

- Throughout the public comment submission process, the Hart River LMU was the most frequently mentioned with a total of 24 comments expressing a desire to have the area protected through a SMA designation.
- This area provides wintering grounds for the Porcupine Caribou herd and disturbance here could reduce their numbers and threaten the herd.

3.3.6 LMU #7 Dalglish Creek

- This LMU should be protected as it is within the Gwich'in Tribal Council's secondary use area. There is hydroelectric potential, but this should not be allowed.

3.3.7 LMU #8 Wind and Bonnet Plume Watersheds

- The western boundary of this LMU should follow water courses rather than the height of land as these will be easier for people to identify when they are out on the land.

3.3.8 LMU #13 Peel Plateau West

- This area contains wetlands that are unique, underlain by permafrost and extremely sensitive. Rare plant species are also found here. Any development will result in further loss of permafrost, accelerated erosion and thaw slumps. The designation should be changed to WA or SMA.
- This area supports biologically unique at-risk populations of Dolly Varden, populations of all three eco-types of at-risk caribou (Boreal, Mountain and Barren-ground) and a host of other large and small mammals as well as spawning and wintering habitat for a dozen fish species harvested by the Gwich'in. This area is also of cultural importance to the Gwich'in people, many of whom used this area as a respite and refuge during periods of residential school persecution. The biological and cultural heritage of this area must be respected by making this an SMA.
- Development in this area can lead to the collapse of ice-rich permafrost terrain because of removal of insulating vegetation leading to increased sediment concentrations and loading of nutrients, metals, and contaminants in rivers and streams. Even seismic lines less than 1.5 m wide will have the potential to lead to terrain collapse in this area.

3.3.9 LMU #15 Peel Plateau East

- This area contains wetlands that are unique, underlain by permafrost, extremely fragile and are home to rare plant species. The designation should be changed to WA or SMA.



3.3.10 LMU #16 Jackfish Creek Lakes

- The Boreal Caribou Herd has been added to list of threatened species under *Species at Risk Act* since the Final Recommended Plan was completed. The Boreal caribou range extends from the NWT into the Yukon, through the northeastern portions of the Peel Watershed and have been tracked moving through LMU #16 and heading across the northern portion of the planning area. LMU #16 is currently designated as IMA Zone II, but was designated as an SMA in previous versions of this Plan. As critical caribou habitat, this area should be designated as an SMA or at least an WA.
- The existing wetland inventory of this area shows that this LMU is nearly 22% wetlands and Ducks Unlimited Canada believes that this estimate may be low. The Plan states that this LMU has high potential for water bird habitat. Given the density of wetlands in this area, and the fact that the Plan recommends that all permanent infrastructure be at least 100 m from wetland and riparian areas, this area will be difficult to develop.
- For migratory birds, the central and northern portion of the Peel Plateau and the Fort McPherson Plain are important habitat due to the density and extent of wetlands. Waterfowl, boreal shorebirds, grebes, loons, cranes and wetland songbirds, including some migratory bird species at risk, use this habitat for nesting, molting and feeding during migration. Jackfish Lake is the only one of five important wetland areas in this region that is not in a WA or SMA. The designation of this area should be changed to protect this important habitat.
- This area contains wetlands that are unique, underlain by permafrost and extremely fragile and are home to rare plant species. The designation should be changed to WA or SMA.
- A change in the designation of this area should not result in removing any areas from the Conservation Areas elsewhere.



3.4 GENERAL MANAGEMENT DIRECTION

This section summarizes what we heard about the general management direction provided in the Plan. We have included both comments that are general in nature and recommendations to change specific policies. Comments and recommendations have been organized by theme to make this section more readable.

3.4.1 Environment

Environmental protection

- Landscape connectivity is a priority for the Final Recommended Plan and should be done through the establishment of wildlife corridors in the IMAs.
- Allow for the creation of smaller specific conservation areas within IMAs.
- Protect headwaters of all the rivers, as any development that happens there will have impacts downstream.
- Protect the valleys in the Wernecke Mountains, the Aberdeen Canyon and the Peel Canyon.
- Up to date climate change and permafrost science needs to be considered when making management decisions, especially in areas where the terrain is fragile. High risk or fragile permafrost areas need to be identified and considered.
- Create wildlife corridors under or over the roads.
- Landscape level connectivity needs to be considered, with a focus on ensuring that there is habitat connection between SMAs, especially the smaller units.
- Protected areas need buffers to prevent pollution from development in adjacent areas.
- Full protection of the SMAs means no outfitters, no tourism, no permanent camps; any other approach will favour one industry over another.
- The Plan should consider how users of the Peel region will be impacted by natural disasters, climate change and wildfires.
- Respondents identified that a discussion about the impacts of climate change, or climate change resiliency tools, were missing from the Plan. Methane and mercury may be emitted from melting permafrost caused by climate change.
- There was a desire to see the preservation and protection of biodiversity addressed directly in the Plan.

Protection of caribou habitat

- Review new information produced by the federal government regarding Boreal Caribou Herd and their critical habitat. This information should influence landscape-scale connectivity and conservation planning in the Peel Plan.
- The 2012 Recovery Strategy for the Boreal Caribou Herd describes critical habitat and provides direction to maintain 65% of these areas in an undisturbed state. It has been determined that currently the amount of disturbance in the Yukon's portion of this range is below the 35% disturbance management threshold.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

- The Government of Canada, Yukon government, First Nation of Na-Cho Nyäk Dun, and GTC are working on a draft conservation agreement for Boreal Caribou. This agreement is intended to state the commitments of the parties until the Peel Plan is finalized and implemented. In the long term, the Peel Plan should provide tools to address gaps in the protection of critical caribou habitat.
- The Boreal Caribou Herd use the northeastern section of planning region (portions of LMUs 13, 14, 15, and 16). Ideally, no new linear infrastructure should be developed within the herd's range. This would mean re-designation of portions or all of LMUs 13, 15, and 16 from IMAs to either SMA or WA. This should not be done if it means re-designating other areas from SMA or WA to IMA as conservation gains for the caribou would not be very significant. Maintaining the Conservation Areas now identified in the Plan as complete hydrographic units is a higher conservation priority than re-designation of IMA LMUs for boreal caribou conservation.
- Areas that are important migration corridors and wintering grounds for the Porcupine Caribou Herd are very important and should be protected. Development along the Dempster Highway (LMUs #1 through #7) needs to be permitted along after consideration for the herd's habitat and migration routes.
- Caribou are affected by human disturbance. This Plan as written will destroy a valuable ecosystem and food source to countless people.

Water and aquatic habitats

- The previous version of this Plan called for a Water Management Plan for the entire region; but this was removed in the Final Recommended version. It may not be necessary to complete these plans for the whole area, but it would be beneficial to complete Water Management Plans for any IMA prior to industrial development being allowed as properly managing water is critical to achieving the goals of the Plan.
- Climate change could mean that future planning around water becomes increasingly necessary.
- The size of setbacks required between new development and wetlands should be consistent across various plans and policy documents, otherwise it creates a difficult environment for businesses.
- Ensure consistency between this Plan and Yukon's Wetland Policy currently under development.
- The Government of Yukon has adopted the Canadian Wetland Classification System that includes a formal definition of wetlands; this Plan should use this definition to avoid confusion. Other related definitions may also need to be updated, for consistency.
- Water quality, quantity and flow must be maintained in perpetuity as stated in the Tetlit Gwich'in Comprehensive Land Claim.
- Upstream water quality is very important any negative impacts would directly impact water quality in Aklavik and Tsiigehtchic.
- No damming should be allowed in the region.
- More clarity is needed on how water will be managed.
- Headwaters of any river in the planning area should be protected.
- No development within 500 m of any water sources.
- Create 2 km buffers along all rivers to protect birds and wildlife.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

- Water is very important to the local First Nations. It is vital to the survival of people, fish and wildlife. Water is sacred, alive, and is key to healing.

3.4.2 Social (Heritage and Culture)

Heritage and historic resources

- Many ancestors of the Gwich'in people are buried along the rivers and tributaries in this watershed. Gravesites need to be identified and preserved.
- Due to gravesites, any level of industrial development in this area is unacceptable.
- Since the development of the Final Recommended Plan, the First Nation of Na-Cho Nyäk Dun and Tr'ondëk Hwëch'in have passed Heritage Acts. Throughout the Plan, these Acts should be referenced and cited alongside the Yukon's *Historic Resources Act* and the Final Agreements as legislation relevant to heritage resource identification and management in the area.
- Plan Section 2.5 does not include comprehensive heritage management planning. The section references cultural landscapes, but the document does consider cultural landscapes to be a discrete category for which management strategies should be developed.
- Application of appropriate cultural landscape valuation and management would be appropriate to all areas, not just those with federal or other levels of designation.
- National Historic Site designation is a commemorative designation, offering no legal protection or management requirements for protection of recognized heritage values; this fact should be reflected in Policy Recommendation 7. Policy recommendations may also be expanded to include reference to a type of designation that does provide a level of protection, rather than just commemoration.
- Names of historic sites may have changed and should be updated.
- First Nations may want to build permanent structures in their camps to take future generations out on the land to teach about this area. This will be important if the ATAC road in Stewart River area to the south is developed.
- Consider heritage designations for places such as the Peel River Canyon.
- Youth and elders need to be present in the watershed as cultural guardians.
- Appendix B, Table B-2 on reference materials should better reflect current, relevant documents on heritage best practices.

3.4.3 Economy

Road access

- De-listing roads and trails from the *Highways Act* makes access to existing and potential claims even more difficult.
- Feasible and reasonable access to the region for mineral development is a concern; under the Final Recommended Plan development may not be economically, logistically or technically feasible.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

- Motorized traffic (including ORVs) is not consistent with the vision of this Plan, and could led to significant impacts on wilderness and wildlife through vehicle tracks, marked-up alpine areas, proliferation of ORV trails, noise, over-harvesting, litter and loss of habitat.
- Roads should be allowed.
- Visual impacts of the roads should be considered during the approval process.
- Road reclamation needs to be well thought out and those who build them need to be held responsible. Road reclamation needs to be monitored to ensure that it is happening properly.
- If public money is used to build a road, it should be open to the public.
- The Wind River Trail should be allowed to stay open for vehicle use.
- Winter use of the Wind River Trail should be allowed.
- Roads need to be allowed and open for all to use so people can enjoy and use the area.

Off-road vehicles (ORVs)

- Recommendation 11 should be changed from allowing ORV on existing trails in WA to not allowing ORVs on existing trails. ORVs are not compatible with the goals of the Plan's Conservation Areas. Also, it will be difficult to define an existing trail, and there are already many existing tracks even through tundra.
- There must be a framework (and restrictions) for the use of ORVs for industrial uses to ensure that wilderness is maintained.
- Provide clarity regarding the term ORV; specifically, whether this term includes snowmobiles or not.
- Snowmobiles should be prohibited like ORVs because they damage the landscape.
- Snowmobiles should be restricted, and use should be reviewed based on snow pack and animal migrations.
- Allowing access by snowmobile is important to Yukoners.
- Training and courses should be provided for ORV users in the area to teach respect for the land and how to identify sensitive areas.
- Previously disturbed trails should be designated for ORV use only if they are not adjacent to critical wildlife habitat or fragile landscapes.
- Ensure consistency between this Plan and the ORV legislation. Simple, clear regulations should be developed to enforce ORV-related policy in the Plan.
- Allow motorized access for recreation.
- Current and future motorized travel of any type should not be allowed on the Hart River Road. Visitors who come to Tombstone do not want to see ORVs on trails within or near the park. Existing trails need to be remediated.



Access by air and water

- Existing airstrips could be shut down and cleaned up.
- No jet-boats should be allowed.
- Motorized boats should be allowed on the Peel River, but not on tributaries.
- Airplanes and helicopters can have a significant impact on wildlife and need to be carefully managed.
- All roads, trails and airstrips in the SMA should be reclaimed immediately.
- The Plan should consider impacts of fly overs on wildlife, visitors and other people using the area.
- Motorized watercraft on all the rivers should be banned, except for the Peel River, which is often used by the local First Nation people for subsistent uses and harvesting activities. All other rivers deserve to be protected from motor boats to preserve the health of the aquatic eco-system and maintain the enjoyment of visitors of the area.

Dempster Highway

- When the Dempster Highway Corridor Plan is developed, it will need to consider the policies and land use designations of the North Yukon Plan.
- The Dempster Highway Corridor Plan should also consider how industrial development might impact tourism and should be written to protect the area so that visitors can experience the wilderness from the edge of the road. It should not be allowed to become something like the road to Prudhoe Bay.
- Traplines along the Dempster need to be protected.
- Fiber optic line along the Dempster should also be considered.
- The Dempster Highway should be closed to provide more space for caribou. Access could be moved to the east near the Mackenzie where it doesn't cross a major herd of migratory animals. This action could help grow the caribou herd exponentially. As the herd grows in 50-100 years there maybe upwards of 500,000 thousand animals in the herd and people can harvest accordingly so it does not become too massive. This is key for future generations to really prosper and succeed by living a cultural lifestyle from the land.
- Dempster Highway Corridor Plan needs to be sure not to pit one industry against another (tourism versus resource development).
- Dempster Highway corridor is adjacent to and included in areas that are important for Tr'ondëk Hwëch'in traditional and subsistence uses, so it is imperative that the sub-regional planning process for the Dempster corridor is done in full partnership with the affected First Nations, and all decisions must be in full partnership with them.
- A one-kilometer buffer is needed along the Dempster Highway to encourage animals to cross the highway to access their favored habitats rather than avoiding it due to hunting pressures. The Hart River herd is under increased stress as it is due to the increased traffic going to Tuktoyaktuk.
- Dempster Highway tourism needs to be managed so the area is not damaged.



Mineral exploration and development

- There are concerns how existing mineral claim owners will keep their claims active and working, while also following the Plan recommendations.
- Need to carefully consider the impacts of this Plan on potential mineral development in neighbouring areas, such as the Nadaleen Range to the south. It is recommended that detailed studies be conducted on the resources within the Peel to allow some level of exploration in areas where there is access to key deposits.
- Mining must not result in the pollution of the Blackstone and Ogilvie Rivers as this could have significant downstream impacts.
- Since the Plan was completed, industry has identified Carlin style gold deposits which were previously poorly identified.
- There is new information about mineral potential at Nadaleen River, Tiger Gold Deposits, Wernecke Breaches, and the Michelle Property that was not considered when this Plan was completed.
- Uranium, coal bed methane development or fracking should not be allowed anywhere in the watershed as this type of development could have implications for generations to come.
- Policy 21, regarding coal bed methane development may be outdated given Yukon's moratorium on hydraulic fracturing.
- The Plan's access management regime isolates key mineral resources, making some areas, like the Goz Deposit, practically impossible to access. In general, within the Peel boundary, access for the development of mineral resources will be very difficult and investment in these areas has been curtailed even in IMAs.
- Mines are generally built bigger than required and developed in a wasteful manner. Clean mining sounds good but may not actually be possible.
- The entire area should be exempt from mining and exploration.
- A properly remediated exploration or mining camp is perfectly acceptable. We shouldn't let the ills of 30 and 40 years ago drive our opinions today regarding camp or mine closure. The jobs created are well paying in comparison to supposedly low impact tourism ones, and not everybody can, or wants to, work for a government.
- Mining claims made while the Plan was in progress should be rejected.
- Some tweaking of the IMA boundaries could result in more logical access to existing claims.
- Consider who the jobs are for when approving development. Will local people be employed? Does the community want these jobs?
- Mining projects the First Nations are working on should not be allowed within the Peel.
- Before mines are permitted, it needs to be very clear who is responsible for the clean-up.
- When mining is allowed, only foreign companies benefit. Development of the area by foreign companies should not be allowed.
- There is support for Yukon mining, but not in this area.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

- Unemployment in Yukon is at an all-time low; we do not need more jobs.
- Closing vast areas to mining would mean loss of jobs.
- Partnerships between Yukon government and First Nations should consider development and access for mining in across the territory.
- The *Quartz Mining Act* needs to be reviewed and updated.

Oil and gas resources and development

- Any extending testing and longer-term oil and gas developments in this area will involve the construction of permanent road access and processing, storage and transportation facilities. As such, reasonable, year-round access will be required.
- No detrimental oil and gas development should be allowed in this region.
- Oil and gas exploration and development should no longer be needed as we move to renewable energy sources.
- Oil and gas development should not be allowed within 10 km of rivers.
- Need to consider what the impacts of an oil spill would be in this area.
- Natural Gas piped or trucked out of the Peel versus trucking from the south could save money, create jobs and reduce environmental impacts.
- Developing Yukon oil and gas is a way to reduce dependence of foreign companies and federal transfer payments and increase self-sufficiency.

Development guidelines

- Mining should be done by rigid airships.
- Resource extraction should be kept to the smallest footprint possible.
- Ensure that adequate road and site development standards are in place before development is allowed.
- A sizeable bond should be posted prior to any development to pay for future clean-up.
- There should be zero tolerance for dumping any mining waste or tailings into natural water bodies.
- Any mining done in this area needs to be done responsibly, with zero impact on Conservation Areas.
- We need to drastically change the way mining is carried out so that there is no negative legacy left behind.
- Reclamation plans should be required before development can proceed in the IMAs.
- Any proposed development should use renewable energy sources.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard
February 18, 2019

Tourism and recreation

- Growing wilderness tourism visitors provide increasing business to Dawson; need to make sure that wilderness is maintained.
- Economic development in this area should focus on tourism rather than mining as it is sustainable, stable and provides more local benefit.
- Tourism needs to be carried out sustainably. Making a park could potentially increase visitors, need to ensure that area is well managed.
- Impacts from wilderness tourism need to be considered. Overflights for tourism have the same impact as overflights for mining.
- Tourism operators should be required to get permits, just like any other type of development and the permit system must be fair.
- The focus should be on sustainable four-season tourism.

Outfitting and hunting

- Outfitting should continue to use traditional methods; not use ORVs in sensitive habitat, even if under pressure to deliver successful hunts.
- Only horseback operations should be allowed.
- All hunting activities by outfitters should be prohibited.
- No trophy hunting, bear hunting or wolf hunting should be allowed.
- Outfitters should be better managed and be required to get permits, just like any other type of development.
- Hunting by plane should not be allowed.
- Outfitting should not be allowed in SMAs.
- Hunting needs to favour Yukoners and not people from other places.
- Outfitting permits should be revoked, and they should be compensated as these uses are not compatible with protected areas.
- Ensure that non-Indigenous users can still access the land for hunting, fishing and recreation.

General land use

- When interim protection comes up for re-consideration only a small amount of the total WA area (20%) should be open for development.
- WA areas should be an ecological reserve with 100% protection meaning no hunting, no mining, no guiding, etc.
- Need to ensure that a diversity of low impact land uses are maintained so the maximum number of people can benefit from this area.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

- Consider rotating the lands; once resources have been extracted, reclaim the area and then move on to other uses.
- A buffer should be considered around the edge of the entire planning area.
- There should be options for infrastructure along the rivers.
- Need to consider wildfire prevention and containment in this area.



3.5 CUMULATIVE EFFECTS INDICATORS

There were several comments about the cumulative effect's indicators.

- Section 3.4 is targeted primarily to ecological indicators, with some relevance to disturbance of archaeological or paleontological resources. Heritage resources and values, like ecological resources and values, are susceptible to cumulative impacts. It would be appropriate to revisit and revise the listed indicators to ensure they are appropriate for monitoring and management of cumulative impacts related to all relevant heritage resources and heritage values.
- Cumulative effects thresholds established for the IMAs are not an effective way to protect habitat (especially for caribou), as these thresholds do not have a regulatory backbone and do not apply to linear features such as trails or seismic lines less than 1.5 m in width.
- Cumulative effects thresholds seem arbitrary, both in terms of length of road and area of disturbance. Industrial practices to mitigate environmental impacts are evolving and it is not clear that disturbance measures defined almost a decade ago will have the desired effects. They should be revisited and potentially updated.
- It is necessary to recognize that in the resource sector, exploration and development activities are connected to geological opportunities not geographic characteristics. Restricting surface impacts could impair resource opportunities. A better approach may be appropriate management plans governing things like access, impact monitoring and reclamation rather than applying rigid measures such as area of impact limits.
- Recovery of human-caused surface disturbances needs to be broadened to allow for all Canadian water quality health, Canadian air quality health, and Indigenous-community-decided standards to be met. Only using increased run-off and sediment loading to measure background levels will not account for all the contaminants (metals and nutrients) that can be released into waterways because of human caused surface disturbance.
- Waterway downstream disturbance (both through surface and ground water) also needs to be added to cumulative effects indicators as these are rapid ways that cumulative effects can be carried across land use units and past the borders of the planning region.
- Cumulative disturbance thresholds for IMAs are not an effective way to protect habitat as they do not have a regulatory backbone and do not apply to linear features such as trails, or seismic lines less than 1.5 m in width.



3.6 PLAN IMPLEMENTATION AND REVIEW

Many of the comments expressed through the consultation are focused on implementation. Attendees at the public meetings and stakeholders frequently asked questions about how the Plan would be implemented.

3.6.1 General

- This Plan should be adopted as soon as possible; it is time to move on to implementation.
- The current section on implementation lacks the detail needed to achieve the Plan's vision. The implementation chapter and/or implementation plan needs to be robust and detailed and should include who will be responsible, timelines, funding source, and a process for reporting.
- Parties need to write the implementation plan together and those involved need to have adequate funding.
- An Elders Advisory Committee should be formed so that Elders can continue to provide direction on the protection of this area. Also, First Nations Youth should be involved in protecting this area through implementing the Plan.
- The implementation plan should include prioritized actions and set out which policy and research recommendations are to be tackled first.
- Commit to tracking and reporting on implementation progress. This information should be available online and should include progress on research recommendations, sub-regional planning and planning and SMAs. It should also provide information on the current levels of surface disturbance in the IMAs.
- Commit to independent and ongoing oversight and reporting. This could be the Planning Commission, a newly created body, or an independent implementation coordinator hired to be the Plan's champion. A new body should include representatives from each of the Parties to guide implementation and further collaboration.
- The role of the Yukon Land Use Planning Council needs to be clarified.
- Local and Traditional Knowledge need to be incorporated into the implementation process.
- The final Plan and any implementation documents should more fully address the heritage aspects of LMUs including monitoring and protection.
- Yukon government should be completely transparent about how implementation is to take place.
- Need to be clear about the timelines for interim protection as this is an opportunity to increase or decrease the amount of protection.
- According to the YLUPC, priorities for implementation should be:
 - Preparation of an Order-In-Council for a land withdrawal for the Conservation Areas;
 - Costing the resources requirements;
 - Developing and implementing a strategy for dealing with the existing mineral claims in the conservation areas;
 - Identifying the appropriate type of SMA to meet the Plan's goals;



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

- Defining a conformity check process;
 - Clarifying the process for variances and amendments; and
 - Implementing the other policy, research and monitoring recommendations.
- The submission from the YLUPC also provides a list of the policy and research recommendations that they believe will be most expensive.

3.6.2 Variances, Amendments, Reviews and Conformity Checks

- Develop a process for plan variance, amendment and review. This includes what changes are considered an amendment, the process for considering and approving changes, and the level of public consultation involved in reviews, amendments, and variances.
- The YLUPC should be listed as the agency responsible for conformity checks and monitoring (instead of just a potential body as currently worded). YLUPC would provide thorough third-party review.
- If the YLUPC cannot take on this role, then the next best alternative is a body comprised of all Parties so that all interests and vision that have influenced the development of the Plan can be brought together again to assess future condition.
- It is not appropriate for a single Party, such as Yukon government to be given sole responsibility for conformity because of the serious potential for bias and lack of objectivity on the part of only one Party.
- The Planning Commission to be re-established to oversee Plan variance/amendment and review. They have in depth knowledge of the area while producing the Plan.
- Need to consider if the YLUPC is the right body and have enough resources to perform the conformity checks.
- Without a planning commission in place the YLUPC has been taking on a role in checking conformity. The Parties need to examine how Chapter 11 and Chapter 12 of the Umbrella Final Agreement and the YESAA legislation are implemented and provided direction to the YLUPC.

3.6.3 Ongoing Reporting and Monitoring

- A plan is needed for how ongoing monitoring and reporting will be provided.
- First Nation presence on the land will be key to effective implementation of this Plan. This could come under the federally funded Indigenous Guardian program.
- Recommendations on continuous monitoring, such as hydrology and permafrost degradation, should be put in place to monitor the changing conditions of the planning region.
- The monitoring program may need to be adjusted as impacts of climate change are seen in the region.
- There should be support of first nations youth and elders to monitor the environment and preserve heritage sites. People carrying out these roles should be paid for their work.
- IMAs need to be periodically reviewed to make sure that allowed uses are not leading to unacceptable levels of destruction.



3.6.4 Comments About Protected Areas

- The legal park designations should be in place soon after the Peel Watershed Regional Land Use Plan is approved. Doing so will allow First Nations and Yukon government to spend the time required to complete management planning, while ensuring that that these areas are protected.
- The new park should have a better name than the Peel; something more descriptive and attractive and cultural relevant.
- The Tetlit Gwich'in would like the SMA to become an Indigenous Park like the Dehcho process, with the management plan being created by a joint committee made up of First Nations and other levels of government. This Indigenous Park should be monitored by youth and elders and should have no road access and no free entry mining.
- The *Navigable Waters Act* may impact eco-tourism.
- New protected areas should be federal/national park, that way First Nations people in Yukon and NWT can work together.
- All uses other than subsistence users should be required to get a permit; in recent years the area is over used and is no longer real wilderness.
- New parks should be run by affected First Nations.
- Gwich'in and the Federal government should manage the Peel park.
- Outfitters and tourism operators should not be allowed to operate in SMAs or should be required to get a permit.
- Need to make sure that people can continue to live on the land and carry out traditional activities; a park with strict rules could make this impossible.
- Concern about whether traditional activities such as hunting, and trapping will be allowed in the new SMA. The Gwich'in Tribal Council is concerned about their traditional use right as they do not fall under the Umbrella Final Agreement.
- Concern about how the Gwich'in in the NWT will be involved/consulted on SMA planning as they do not fall under the Umbrella Final Agreement.
- Tourism to the area is increasing, with the Wind river seeing approximately 300 people a year. The area needs to be properly managed; consider regulating access similar to the Chilkoot Trail.
- SMA management should consider:
 - How tourism operators will be permitted;
 - Pit toilets at well used wilderness tourism locations;
 - Limiting party size and achieving reasonable trip spacing;
 - Prohibiting jet boats on the tributary rivers;
 - Achieve a light management touch with no warden or patrol cabins, no motor vehicles or helicopters for park staff and no "improved" campsites like they did in Nahanni National Park;



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

- Within reason all visits must be leave-no-trace;
- Educating visitors on low impact camping and the importance of this area; and
- How trails and garbage in the area will be cleaned up.

3.6.5 Existing and Future Mineral Claims

At every community and stakeholder meeting, participants asked about how existing mineral claims would be addressed. Below, the specific comments and recommendations have been listed.

- The Gwich'in Tribal Council, and specifically people in Fort McPherson, Aklavik and Tsiigehtchic, would like to be notified about any potential mining development in the area. Clarity on notification through the YESAB process is needed.
- The moratorium on staking and development within the Peel Watershed, including IMAs, should be extended until a detailed Implementation Plan is released.
- Need to provide clarity on how grandfathered claims will be addressed. This includes if and how compensation will be provided and what happens if a claim holder dies.
- Any oil, gas and mining claims staked during the planning process should not be allowed to be developed.
- Companies have invested in claims with the understanding that existing claims will be honoured. However, without continued cooperation and consideration to roads and other infrastructure development, claims will become worthless. This could result in financial loss for companies and a lack of trust in Yukon government. Adequate consideration should be given to these existing mineral claims and the potential financial losses. Claims should be continued and certainty for ongoing investment or claim holders should be fairly compensated for real and potential losses that will be incurred.
- Upholding current claims should only be done if there is a strong agreement across communities that this is wanted and there is a benefit, and that consultation of current communities, scientific research/experts, and policy research provides an agreement that the activities will be sustainable and directed land parcels used and indirectly impacted land parcels used can be reclaimed.
- All existing claims should be bought out or cancelled. All exploration areas should be fully reclaimed.
- Existing oil and gas claims should be allowed to continue development; if not they need to be compensated for costs and possible damages.
- All claims staked since the start of the planning process must be revoked with compensation equivalent to the monetary value spent on the claims. There should have been a staking moratorium before the planning process started as many new claims were likely staked in hopes of a cash grab for the perceived value.
- Ask the foreign conservation lobby groups to pay the costs of expropriation.



3.7 SUPPORT FOR FIRST NATION ACTIVITIES AND INTERESTS

Comments were received through all sources supporting First Nation activities and interests in the Peel watershed and in the planning process.

- The Indigenous people of the Peel Watershed have used and protected this area for thousands of years. They know how it moves, they know what it needs, and they can see how it changes. They have signed land claims, have inherent rights and should be able to make final decisions on this Plan.
- This consultation process is an opportunity to align the Plan with the vision of First Nations and Yukoners and meaningfully advance reconciliation.
- The Gwich'in Tribal Council treaty and inherent rights must be recognized throughout this process, and they must have unfettered access to their homelands now and in the future. Also, the Gwich'in Final Agreement states that water that flows on or through their land should remain unaltered.
- Working with Yukon First Nation partners is extremely important and only a Plan that aligns with the wishes of the First Nations should be adopted.
- First Nations people have been living in this area for thousands of years and need to be able to continue to practice their traditional way of life including hunting, fishing, trapping and caring for the land, water, air, animals and medicinal plants.
- The landscape is a big part of the First Nations heritage, as stories of their environment go back generations.
- The Gwich'in people of Fort McPherson have a deep connection to the Peel watershed area. Being on the land is about a healthier lifestyle, where people are healthy and happy. This area needs to be protected so that they can teach their children to live on the land, and to preserve traditional ways and knowledge.
- This area is sacred; there are physical, cultural and spiritual benefits to be gained from spending time on the land.
- There are hundreds of First Nations cabins along the river, they need to be registered and protected so that they can continue to be used for traditional uses by future generations.
- Governments continue to colonize First Nations and have not followed treaties or listened to what First Nations people have to say.
- The Gwich'in Tribal Council does not fall under the Umbrella Final Agreement, and there was concern about how consultation would take place and how their inherent traditional rights will be protected in both their primary and secondary use areas.
- Affected First Nations should have veto rights over any planned usage including resource exploration and extraction.
- Affected First Nations in the region should have veto rights to any changes or amendments made to the Plan in the future.
- Need to educate people on First Nations final agreements, treaty rights and the importance of this area as traditional territory.
- The views of the Dene and the Takudh people should also be considered.



3.8 PROCESS COMMENTS

3.8.1 General Regional Planning Comments

Several respondents connected this process with the future and importance of regional planning in the territory. Specific comments and recommendations are:

- Government of Yukon should review the regional land use planning process and move towards an approach that is evidence-based, transparent and holistic. We need a system that considers all aspects of land use, including economic.
- Plans should be written in plain language; documents may need to be translated to be understood.
- Assurance is needed that the Government of Yukon will move forward with other regional plans in good faith. We do not want to see the past repeated, resulting in another court case.
- Future adjacent regional plans should consider the land use designations of this Plan and work to make activities compatible along the boundaries.
- The planning processes need to reflect the wishes of the people.
- The regional planning process allows for lobbying by pro-protection associations which are well financed from outside or international interests.
- Other planning processes should not be put on hold while we finish this one.
- Need to reflect on the Peel process, identify what we learned and use these lessons to move forward.
- Land use planning should not be protected area planning; this is better done through the land claims process.
- Yukon government needs to change the way they are involved in planning so that they do not end up with a Final Recommended Plan that does not meet their needs.
- The appointment of the planning commission needs to be a transparent process.
- Regional plans need to have professional planners representing each of the parties fairly.
- The Peel is an unbalanced Plan that should not be used as a template for other Plans.
- The court case has made it clear to the Parties that they are bound by the regional planning process and need to work together.

3.8.2 Comments on the Previous Peel Planning Process

The following comments were received about the previous Peel planning processes:

- The entire process was not conducted in good faith and Peel planning process should be restarted.
- The original Plan did not include proper consultation with business and development interests.
- Yukon government as primary land manager, should never have allowed a plan that they could not accept get so far along in the process; this ended up with a lot of tax payers money wasted on the court case.



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

- The original planning commission was not balanced and did not represent the voices of the mining community.
- This was a protectionism plan not a management plan from day one with influences from worldwide environmental lobbyist groups that have poisoned the process. It is not fair to the future generations of the Yukon that want to have jobs and put food on their tables to put such a wide blanket over such a large area of vast potential. If need be this Plan should be thrown away and started over.
- It is important that all comments and opinions are listened to and included in final documents. It may be that groups with feedback differing from the desired direction might have been largely ignored. The original planning process may not have been honest or fair. The public may not have read and considered all versions of the Plan. Also, many Yukoners do not rely on a conventional economy and this can skew viewpoints.

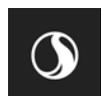
3.8.3 This Consultation Process

There were several comments about the current planning process. These are listed below.

- The public information provided through this process may lead the Parties, under the Senior Liaison Committee, to make changes to the Final Recommended Plan and there should be an opportunity for the public to review and comment on these changes before they are finalized.
- The input received during previous rounds of consultation should be reconsidered at this time.
- People would like the What We Heard report to include specific input from stakeholder groups; this would make the process more transparent.
- People feel that they are repeating themselves and that the government is continuing to ask the same questions and is not listening to what they are saying.
- It should be easier for people to provide comments.
- Ensure the Yukon government adopts the Plan now and does not derail the process.
- The survey is terrible, not robust and difficult to use.
- Thank you for taking the time to do this consultation and for listening to the views of all.
- Saying that 20% of the area is open for development is misleading; due to the cumulative effects thresholds, less than 5% of the IMAs actually could be developed.
- Not requiring people to provide their name on the survey makes the process vulnerable to corruption.
- It is important that all Parties, and especially Yukon government, proceed with the views of the Supreme Court of Canada's decisions in mind. This will provide a path to renewed relationships between First Nations and non-First Nation Yukoners. Some of the key points made by the Supreme Court of Canada in this December 1, 2017 decision are quoted below:

"As expressions of partnership between nations, modern treaties play a critical role in fostering reconciliation. ... Negotiating modern treaties, and living by the mutual rights and responsibilities they set out, has the potential to forge a renewed relationship between the Crown and Indigenous peoples" (1)

"The Umbrella Final Agreement is a model for reconciliation. This framework establishes institutions for self-government and the management of lands and resources. The Final Agreements falling under the Umbrella



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 3.0 What We Heard

February 18, 2019

Final Agreement are intended to foster a positive and mutually respectful long-term relationship between the signatories..." (10)

"... it is a clear objective of Chapter 11 to ensure First Nations meaningfully participate in land use management in their traditional territories.... (47)

"Barry Stuart, the Chief Land Claims Negotiator for the Yukon Territorial Government, explains that it was more important to First Nations that they be able to meaningfully participate in land use management in all of their traditional territory than to acquire vast tracts of their traditional territory as settlement lands..." (46).



3.9 OTHER COMMENTS

In this section detailed comments about the Plan are listed. This includes recommendations to update data, maps and information as well as suggested improvements to make the document more readable.

3.9.1 Comments about Mapping, Naming and Data

- Vuntut Gwitchin Government traditional territory border has changed (not officially) to remove the area of overlap with Tr'ondëk Hwëch'in territory. This means that now only LMUs 5, 6, and 7 are within Vuntut Gwitchin Government traditional territory.
- Maps in the Plan should show land use planning designation for adjacent plans if they have been completed.
- Where appropriate, traditional First Nation names of the places, mountains and rivers should be used. The Geographic Place Names Board, as well as individual First Nations, may be able to assist with this.
- New traditional knowledge needs to be updated when the Plan is reviewed.
- Baseline information and data needs to be updated.

3.9.2 Document Improvements

- Proper page numbers should be added.
- The Plan should be written in simple language.
- Map 2: Landscape Management Units and Land Use Categories should identify “Conservation Areas” in the legend.
- Much of the context and explanation section at the front (letter of transmittal and forward) should be removed.
- To simplify the zoning, the Overlay Zones should be removed. The Dempster Corridor should be made an IMA zone or sub-regional planning area and the Major river Corridors should be part of the General Management Direction.
- Re-introduce the concept of “Objectives” to the Plan’s Results-based Management Framework to bridge the higher-level goal statements with specific strategy and implementation recommendations.
- Ensure all policy recommendations are included in Policy Recommendation boxes.



4.0 CONCLUSION

The commitment of the Senior Liaison Committee members to a transparent and collaborative process set a positive tone that was reflected throughout the consultation process. Yukon government staff and members of the Senior Liaison Committee provided excellent support by attending meetings and answering questions and emphasizing the collaborative spirit.

The following list provides a summary of the most prevalent comments that we heard through all sources. The written comments that we received, either through questionnaires, emails or letters, are included as appendices to this document.

1. There was **support for the Final Recommended Plan**, for this final opportunity to provide comments, and for the collaboration that is currently being demonstrated by the Parties. In the questionnaire, 32% did not recommend any changes to the Plan. Respondents commented the Final Recommended Plan is the outcome of much collaboration, engagement and compromise and represents a balanced view. Many people feel this process has gone on long enough and are ready to see the Plan implemented.
2. The most prevalent comment heard through all the consultation was a desire to see more protection of the watershed. Approximately 1,815 of the total public comments received expressed a desire to have **more protection of the watershed**. This represented 64.5% of the total comments received. Respondents feel that the protection of this vast and pristine wilderness is important in a global, national and local context. People want to protect this area because of its valuable habitat, threatened species and to support First Nations traditional uses.
3. There was a very high prevalence of comments expressing a desire to have the full **80% Conservation Area protected through permanently**; removing the Interim Protection and changing the Wilderness Areas to Special Management Areas. This preference was echoed through the questionnaires and formal submissions with 1116 comments, representing 40% of total comments. Respondents commented that permanent protection will open additional funding opportunities, allow for more robust land management and provide certainty for all, including those with an economic interest in the region. Permanent protection will mean that future governments will not be able to open the Peel region up to development.
4. Written comments and questionnaires were also received from stakeholders and the public who would like to see **more area opened for resource development**. This view was expressed in approximately 3.3% of the total comments received. Respondents brought up the high mineral importance and potential of the area and pointed to the importance of mining to the Yukon economy.
5. Through all consultation methods we received many comments about **implementation**. People had questions and concerns about how the protected areas would be planned and managed, how existing mining claims would be addressed, how planning recommendations would be prioritized, and who would be responsible for various implementation tasks. There is support for a detailed implementation plan that specifies resources, timelines, and responsible parties. Respondents asked for clarity on how plan amendments, variances and conformity checks would be done and recommended appointing a separate body to take on the implementation of the Peel Plan.
6. There was **support for First Nation inherent rights** in this area. Continued access to the land for traditional activities, and the ongoing protection of the ecosystems are important. For the Gwich'in people the Peel watershed provides a connection to the past, a current livelihood and a way to teach their children about their



PEEL REGIONAL LAND USE PLAN: FINAL CONSULTATION – WHAT WE HEARD

Section 4.0 Conclusion
February 18, 2019

way of life. It is important to many people that final decisions reflect First Nation wishes. Also, collaboration between Indigenous and non-Indigenous people through this planning process is a move towards reconciliation.

There were comments about specific Land Management Units (LMU). Respondents wanted to see higher level of **protection in the Hart River** area LMU #6; this area contains an important tributary to the Peel and valuable winter habitat for the Porcupine Caribou Herd. Respondents would like to see more environmental **protection of the Peel Plateau West** LMU #13. This area contains unique wetlands underlain by permafrost, valuable, sensitive caribou habitat and several rare species. Also, the area is of cultural importance to the Gwich'in people. Respondents would also like to see more environmental **protection in the Jackfish Lake area**, LMU #16; this area contains many important wetlands, is used by migratory birds and is valuable habitat for the Boreal Caribou Herd.

7. We received many comments and questions about how the **planning for the new protected areas** would be done. Many respondents expressed concern about how wilderness tourism would be managed to ensure ongoing protection of the area. Also, it will be important for First Nations to play a key role in park planning, research and enforcement.
8. Many comments and questions were received about **existing mining claims** in the proposed protected areas. Respondents wanted clarity on how development might be allowed to proceed while still meeting the goals and intent of the Plan. Comments were received both for and against compensating existing mineral claim holders.

We appreciate the time that members from the affected communities, other Yukoners and those living outside the Yukon and affected communities contributed by attending meetings, writing emails, and completing questionnaires. The high level of input received highlights the importance of the Peel Watershed and the Plan. Thoughtful responses by members of the public and stakeholders have provided recommendations on how the Plan should be modified and implemented.

We submit this report to the Senior Liaison Committee, who will consider the comments together and work towards achieving a shared position on what minor modifications should be made to the Final Recommended Plan before it is adopted. Government to government consultation will be the last step before the Plan is adopted.

