



November 1, 2021

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

Dear Dawson Regional Planning Commission:

RE: Draft Plan, for the Dawson Planning Region

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

The Government of Yukon commends the Commission for developing a Draft Plan which aims to balance the many values in the region. A few examples of this work include:

- An approach that acknowledges the major values and issues that exist in the region, for instance, wetlands, cumulative effects and economic interests.
- Innovative ideas on how to deal with complex issues such as the division of land management unit designation in Land Management Unit 23 Fortymile Caribou Corridor.
- Consideration of the importance of the issue of Missing and Murdered Indigenous Women, Girls and Two-Spirited People and the link to land use.
- Clarity on the individual values which are being considered in each land management unit.
- An innovative writing style, including questions where the Commission is hoping to gain additional direction. Examples of this include inclusion of stories on what the area means for people, or direct questions related to reclamation.

In our view there are also some key aspects of the Draft Plan that can be improved and require some attention by the Commission prior to the submission of the Recommended Plan. This letter details the key issues the Government of Yukon recommends the Commission address when drafting the Recommended Plan which are listed as numbers 1-6 (below).

One overarching theme of the Government of Yukon's comments on the Draft Plan is the need for clarity. Clarity will provide certainty to industry, for conservation, for regulators during implementation, for traditional uses, for residents of the Yukon and for visitors. Another theme that is woven throughout Government of Yukon's comments is change, and in particular climate change.

Climate change is and will continue to impact the Yukon and the Dawson region. Detail regarding the six key themes the Government of Yukon recommends the Commission address when drafting the Recommended Plan are presented below.

### **1. Designations and Land Management Unit Boundaries**

The Government of Yukon has several concerns with land use designations. As you have been previously made aware, we also have concerns with many land management unit boundaries in terms of legal description to ensure these boundaries are able to be recognized through existing legislation. The Technical Working Group is working with the Commission on this issue.

#### Special Management Area II

We have numerous concerns with the Special Management Area II designation. This designation lacks clarity in intent, does not allow for land to be protected under existing Yukon legislation, and cannot contribute or be counted towards the federal and international initiative on conserving percentages of land for conservation, such as 25 per cent by 2025. It is also unclear how existing mineral claims will be accommodated, and there is uncertainty how surface access will be allowed to existing claims. For the reasons cited, the Government of Yukon recommends not using the Special Management Area II designation within the plan. Rather, areas currently designated as Special Management Area II should either be redesignated to Integrated Stewardship Area I or Special Management Area (equivalent to Special Management Area I in the Draft Plan).

#### Existing Claims

With regards to existing claims, we have the following concerns:

- While the Draft Plan acknowledges that existing mineral claims should be honoured, it is important that how these claims could be developed be considered.
- For example in the case of Land Management Unit 7, there are a significant number of claims that would not be developed to their full potential due to the current proposed designation as Special Management Area II.
- Also for Land Management Unit 7, access off of the Dempster Highway to these claims (e.g., Antimony Mountain) should be accommodated as it would create the least amount of impact on the landscape. The Government of Yukon is very aware of the tourism impact that such roads may have on viewscapes along the Dempster Highway.
- For similar access related concerns, we are of the view that the existing claims in the northern portion of Land Management Unit 22 Scottie Creek Wetlands should be removed from the boundaries of this land management unit. Instead it should be included in Land Management Unit 21 White Tădzan dĕk. This change would have minimal impact on the integrity of the wetlands, which supports the management intent.

### Critical Minerals

Critical Minerals are a major concern for the Government of Yukon as they provide much needed resources as we shift to a renewable energy economy, supported in the Government of Yukon's 'Our Clean Future'. Government of Yukon has supported national strategies and agreements in order to insure that these minerals that can assist in the clean energy industry are viable<sup>1</sup>. These known mineral deposits would need access in order to be successful. For example, the cobalt mineral deposit in Land Management Unit 1 North Tthetäwndëk would need reliable access, in order to develop the cobalt deposit in the future. Any provision of access corridors should consider the important sheep habitat in this area as well.

### Yukon River Corridor

As the Draft Plan states, Land Management Unit 3 Yukon River Corridor Chu kon'dek is a major transportation corridor used by tourists, industry and wildlife. Restricting access along this corridor, including barge landings, greatly limits the ability for land management units west of the river to, citing the Draft Plan, "ensure sustainable development" (pg. 155) to occur. Development cannot occur in land management units 17, 20, 21 and 23 without allowing for future access across or via the Yukon River. Land Management Unit 3 talks about tourism in its management intent yet it is not listed as an objective. This is an oversight for considering the major tourism activities along the river, both currently and into the future. For this reason and due to our concerns related to the Special Management Area II designation noted above, we recommend that Land Management Unit 3 Yukon River Corridor be designated as Integrated Stewardship Area I. An Integrated Stewardship Area I designation would limit development, yet encourage tourism, and allow for well controlled access points along the river. New access points would ensure planned development in the southern portion of the region can continue based on the management intent expressed in land management units.

### Caribou

The Draft Plan notes the importance of the Fortymile and Clear Creek caribou herds. However, the Fortymile caribou summer range was not adequately captured in the boundary of Land Management Unit 18 Matson Uplands.

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<sup>1</sup> Yukon has endorsed the Canadian Minerals and Metals Plan (CMMP), is a member of the Critical Minerals Value Chain working group (which arose from the CMMP action plan) which all ties into Canada's agreement with the US.

- The Joint Action Plan on Critical Minerals Collaboration between Canada and the United States was finalized January 9, 2020. This collaborative agreement is linked to the actions arising from the Canadian Minerals and Metals Plan, which has been endorsed by the Yukon government.
- One of the actions arising from the Canadian Minerals and Metals Plan guides cooperation and joint initiatives in areas such as industry engagement and support; securing critical minerals supply chains; improving information sharing on mineral resources and potential; and cooperation in multilateral forums and with other countries.
- As part of our Action plan commitment, the Yukon government is an active member of the Canada Federal-Provincial-Territorial working group on Critical Mineral value chains and is working on developing a Yukon Critical Minerals Inventory that is expected to be released in November 2021.

The northern and eastern boundary should be expanded to abut the existing mineral claims. In addition, Land Management Unit 23 Fortymile Caribou Corridor should be extended east to the 60 mile road to ensure that the summer range of this caribou herd is protected. Industrial road use within Land Management Unit 23 can be managed by seasonal closures to ensure caribou populations are conserved while still allowing for industrial development. To ensure the protection of the Clear Creek caribou herd which is listed as a Species of Special Concern under the federal Species at Risk Act, Land Management Unit 7 Upper Brewery/Hamilton should be extended south along the Draft Plan boundary into Land Management Unit 8 Lower Brewery/Hamilton, to the extent of the core range. Data on both of these herds as well as input from the Technical Working Group can be used to aid the Commission to determine these boundary changes.

#### Land Management Unit Adjacency

How adjacent land management unit designations interact with each other on the landscape also could have more consideration. For example, Land Management Unit 21 White Tädzan dëk, as an Integrated Stewardship Area I is between an Integrated Stewardship Area III (Land Management Unit 17 Sixtymile Khel dëk) and a Special Management Area II (Land Management Unit 22 Scottie Creek Wetlands). The Government of Yukon would like to see a tiered approach used, such as splitting Land Management Unit 21 into north and south land management units. A logical split would start where the Ladue River meets the United States border, then running easterly along the Ladue River until it meets the White River, then continuing easterly along the White River until it meets the Yukon River. The designation of the northern portion of this new land management unit should be Integrated Stewardship Area II, while the southern portion should stay Integrated Stewardship Area I. This split and designation “stepping” allows for a more gradual threshold gradient on the landscape. It would also allow for further exploration of an important prospective area north of the Ladue and White rivers.

#### Tombstone – Ddäl ch’ël

As noted in your draft plan, Tombstone Territorial Park - Ddäl ch’ël is a protected area established pursuant to Schedule A of Chapter 10 of the Tr’ondëk Hwëch’in Final Agreement and represents significant First Nation cultural history and value, as well as being important to all Yukoners. The park is managed according to the Tombstone Territorial Park Management Plan, and we support that the Commission consider this management plan as per section 5.4 of the Commission Terms of Reference, when developing the regional land use plan. We also agree with you that the park, which makes up approximately 5.3 per cent of the total planning region, be recognized as part of the total land protected under the Dawson Region Land Use Plan.

## **2. Cumulative Effects**

The Commission’s work to begin to address cumulative effects management in the Draft Plan is notable. We commend your work on this complex and challenging area.

The Government of Yukon views cumulative effects management as a foundational framework for this plan, providing the opportunity to guide the management of the working landscape in the Dawson Region in a more sophisticated manner. Nevertheless, there remains a need for more clarity in the Commission's proposed approach to cumulative effects management. This will need to be addressed prior to plan implementation. We suggest the Commission address the following specific concerns in the next version of the plan:

- Link linear feature density and surface disturbance thresholds to priority ecological values, specifically moose, caribou and water/aquatic systems using best available information.
- Further develop the socio-economic indicators in the Draft Plan to inform cumulative effects management. This will help to balance industry interests and social needs.
- Linear feature density and surface disturbance thresholds should reflect best available mapping, which the Government of Yukon will provide in the spring of 2022.
- Develop values-based reclamation guidance in an adaptive management context.

The Government of Yukon acknowledges that the Commission's work to develop the Draft Plan is at the forefront of the cumulative effects discussion in the territory. Building these tools and approaches will support ongoing growth and development in those areas identified by the Commission as integrated stewardship areas, while respecting the important ecological and social values in these working landscapes.

Accordingly, the Draft Plan's cumulative effects framework should include a strong adaptive management approach. This will support an iterative process to improving and adapting the proposed thresholds as we address knowledge gaps, advances in technology, and share information among key partners involved in implementing the proposed approach, including industry. As we gain familiarity and knowledge with the proposed model, we have confidence that other tools (e.g., Yukon *Environmental and Socio-Economic Assessment Act*, management plans) will help assess proposed projects and developments in the Dawson Region.

### **3. Wetlands**

The draft territory-wide wetlands policy was released for public review and comment in October 2021 and is expected to be finalized and adopted in the spring of 2022. This is about the same time that the Recommended Plan will be presented to the Parties. We encourage you to take this policy into consideration as you develop the Recommended Plan. The Government of Yukon will inform the Commission of any significant changes to the draft territory-wide wetlands policy which arise through public engagement and consultation.

The Government of Yukon appreciates the Commission's efforts to build off of the interim approach for placer mining and wetland reclamation in the Indian River, and efforts to align the Draft Plan with a previous draft of the territory-wide wetlands policy. Specifically, we are encouraged to see reference to application of the wetlands policy's mitigation hierarchy when managing human impacts on wetlands, and the identification of wetland complexes in the Dawson Region as wetlands of special importance.

The Government of Yukon supports the Commission's identification of Scottie Creek as a wetland of special importance, and its protection within a special management area designation. The Government of Yukon questions the identification of the Upper Indian River wetlands (Land Management Unit 19) as a wetland of special importance. This land management unit is an important culturally significant area for Tr'ondëk Hwëch'in; however, Land Management Unit 19 is a working landscape where much of the area is already under mineral claims. Our suggested alternate approach is to designate Land Management Unit 19 as an Integrated Stewardship Area I, as this would allow the existing claims to be developed up to established surface disturbance and within wetland thresholds. The Integrated Stewardship Area I designation will provide adequate guidance to ensure cultural values are maintained on this working landscape. In addition, the south-west boundary of Land Management Unit 19 should be altered slightly to recognize the exiting claims and values.

The Government of Yukon does not support the establishment of wetland avoidance thresholds across the entire planning region. The Recommended Plan should include wetland avoidance thresholds for bogs and fens in specific land management units where wetland values are present, or development interests are putting pressure on the land management units wetlands. Specific land management units include land management units 11, 12, 19 and 21. We are also of the view that Land Management Unit 12 could be split into two halves, running north-east to south-west, to ensure thresholds can be implemented equitably as both halves would be designated Integrated Stewardship Area 4. Within these land management units, bog avoidance thresholds should be 100 per cent, and fen avoidance thresholds should be set at a level appropriate to the level of current and potential future disturbance, but not exceeding 50 per cent protection. All other wetland classes can be more successfully reclaimed, and no specific avoidance thresholds should be set for these classes in the Recommended Plan. The territory-wide wetlands policy's mitigation hierarchy should be referenced as the appropriate guidance and tool for managing wetland impacts for wetlands without specific avoidance thresholds, and for all wetlands in other integrated stewardship areas.

The Recommended Plan should specify the baseline state of wetlands as were present on the landscape in 2022, but should be revisited during a subsequent plan review to account for natural shifts in wetland distribution.

Previously permitted and licenced works must be grandfathered and allowed to proceed; however, their wetland impacts will be counted as changes from the baseline state for all future projects during the Plan compliance review.

Specific wetland avoidance thresholds are not required for special management areas, as these areas and the wetlands within them, are effectively protected through this land designation.

#### **4. Culture and Heritage**

The Draft Plan seeks to ensure management practices for heritage resources are met. The Draft Plan appears to assume existing management practices are adequate and effective; however, this is not universally true.

Specific management practices mentioned include:

- the continued use of heritage and historic resource surveys. Current surveys are triggered by assessment processes, meaning heritage resources are identified in areas proposed for development. A more robust and proactive survey approach will better align with Chapter 13, though will require resources and close collaboration with First Nations governments;
- avoidance or minimized land use impacts in the vicinity of identified heritage and historic resources;
- reporting of any heritage and/or historic resource within an affected First Nation's Traditional Territory to their heritage departments and to the Government of Yukon;
  - Supporting collaboration with First Nations governments on heritage legislation, regulation and policies to ensure management practices for heritage resources are met.
  - The Draft Plan should recognize the "Memorandum of Understanding Regarding Collaborative Management of Heritage (2019)" signed by Government of Yukon, Council of Yukon First Nation and 11 Self Governing First Nations.
  - Generally, the significance of culture and heritage resource and their relationship to Chapter 13 of the Tr'ondëk Hwëch'in Final Agreement needs to be better reflected in the plan.
- use of Hän names and phrasing for place names in the Plan and items stemming from the Draft Plan.
  - The Draft Plan should recognize the Geographical Place Names process set out in Chapter 13.

#### **5. MMIWG2S+**

In December, 2020, *Changing the Story to Upholding Dignity and Justice: Yukon's Missing and Murdered Indigenous Women, Girls and Two-spirit People Strategy* was released. A number of actions in this strategy relate to resource (extraction) decisions, including:

- 3.4 Resource Extraction and Major Infrastructure Projects: Eliminate violence related to development projects in both workplaces and communities. Increase the workforce capacity, mitigate negative impacts, and improve the positive benefits for Indigenous women and Yukon communities.
- 3.5 Workplace Physical, Psychological and Cultural Safety: Improve the physical, psychological, cultural, and spiritual safety of all Yukon workplaces for Indigenous women, girls and Two-spirit+ people.
- 4.4 Yukon Environmental and Socio-economic Assessment (YESA): Implement culturally relevant, gender-balanced analysis in the YESA Act processes.
- 4.8 MMIWG2S+: Implement culturally relevant, gender-balanced analysis in the YESA Act processes.

As previously stated, the Government of Yukon is very pleased to see this issue raised in the Draft Plan. However, the policy recommendation in the Draft Plan should be extended beyond “the Parties”. We invite proponents to partner with the signatories of this strategy when considering these important actions.

For additional information and other potential actions, follow this link: [wd-yukons-missing-murdered-indigenous-women-girls-two-spirit-people-strategy.pdf](#)

## 6. Implementation

The Draft Plan has over 200 recommendations and action items on a wide variety of land-based topics. This number of recommendations and action items will be challenging to successfully implement in the 10-year proposed review period. Furthermore, many of the recommendations do not clearly align with management objectives, may not be at an appropriate scale, and may not be in the Parties' jurisdiction. In order to deal with this issue the Government of Yukon recommends the Technical Working Group go through the Draft Plan and calibrate each recommendation based on the following criteria:

- Clarity
- Reasonably implementable
- Within the Parties' jurisdiction
- Align with objectives in the plan
- Appropriate scale of a regional plan

Calibrating recommendations using the above criteria would not be focused on the appropriateness of any particular recommendation, but whether the recommendation can be effectively implemented. The benefits of this type of exercise has been demonstrated through the Peel Regional Land Use Plan and the work of its implementation committee.



The Draft Plan also recommends the establishment of additional groups which would assist with implementing the Plan such as the Land Stewardship Trust or the Klondike Highway Corridor Advisory Committee. It is recommended that the Draft Plan identify a single committee comprised of Parties' representatives, similar to the North Yukon and Peel Regional Land Use Plan implementation committees. This would provide coordination and common oversight for effective implementation. If the implementation committee determines additional committees or working groups are needed, they can be established as appropriate.

The aforementioned 6 issues are the key issues the Government of Yukon has identified with the Draft Plan at this initial stage in the planning process and that we are asking the Commission to consider as it drafts its Recommended Plan.

In addition to these 6 issues, we have also collated the observations and comments of our planning practitioners, scientific and technical staff that reviewed the Draft Plan. We are pleased to also provide these for your consideration, and our officials will follow up with you in the week ahead to provide three additional documents, specifically:

- A table which outlines specific considerations related to details in the Draft Plan;
- A track changes version of the Draft Plan that provides corrections and other various editorial comments and errors which were identified;
- An Ease of Use document which provides suggestions on how the Commission can make the document clearer and easier to use. This feedback is based on experience with implementing other regional land use plans.

These three documents provide additional comments for the Commission to consider, and our staff will be happy to meet with the Commission to walk through these documents to discuss any questions or concerns you may have, and in particular to clarify how these comments reinforce or add to the 6 main issues we have provided in this letter.

Yukon Government recognizes there are other perspectives that will need to be taken into consideration as the process proceeds. It is understood and recognized that there will be a wide variety of comments and perspectives the Commission will be considering when developing the Recommended Plan.

White River First Nation has asserted rights in the southern portion of Dawson Region. The Government of Yukon has signed a consultation protocol with White River First Nation and have met with their technical staff regarding the Draft Plan. We encourage the Commission to engage with White River First Nation to hear their views on the Draft Plan.

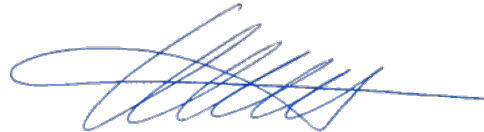
The Government of Yukon looks forward to continuing to work with Tr'ondëk Hwëch'in, the Commission, White River First Nation, other Yukon First Nations, stakeholders, as well as the public in the planning process outlined in Chapter 11 of Tr'ondëk Hwëch'in Final Agreement. These continuing conversations on the overarching plan concepts, for example land management unit identification and designations, may result in changes to the Government of Yukon's views regarding aspects in the Draft Plan and/or Recommended and Final Recommended Plans as they are developed.

The Government of Yukon would be happy to make a presentation on this package to the Commission after the November 1, 2021 submission deadline. Please contact the Government of Yukon Technical Working Group members to arrange for a meeting date.

Sincerely,



John Streicker  
Minister of Energy, Mines and Resources



Nils Clarke  
Minister of the Environment

cc: Chief Joseph, Tr'ondëk Hwëch'in  
Lois Craig, Yukon Land Use Planning Council  
Chief Chasse, White River First Nation  
Manon Moreau, Deputy Minister Environment  
John L. Bailey, PhD., Deputy Minister Energy, Mines and Resources

Encl: Specific Considerations Document  
Track Changes Document  
Ease of Use Document

## Draft Dawson Plan Comments

Plan Section	Issue	Pg.	Comment
(1.7) Plan Goals	Reclamation	9	Reclamation doesn't restore natural integrity, it shifts to a new normal
(1.7) Plan Goals	Reclamation	9	Use value driven reclamation (i.e. reclamation is determined by what values are present in the area) or use term 'effective habitat restoration', including clear guidance and monitoring
(1.7) Plan Goals	Climate Change	9	Climate change-related goals are stated but very little actual plan recommendations to achieve them
(1.7) Plan Goals	Reclamation	9	Reclamation without value consideration could have unintended negative effects (i.e. re-contouring and willow invasion)
(1.6) Vision Statement and Guiding Principles	Economic	16	Plan states that there are two kinds of economic activities, but by this measure there should be three kinds (1. activities that do not degrade the land, 2. the activities degrade the land, but the land can recover, and 3. the activity degrades the land and the land can not recover) the 3rd kind needs to be added, stating: development activities that degrade the land and that the land cannot recover from.
(1.6) Vision Statement and Guiding Principles	Reclamation	16	Plan has base assumption that all land can potentially fully recover after mining (or other economic activity), but this is not true. Reclamation is better than not reclaiming, and can lead to an alternate state, but it will never be the same.
(1.6) Vision Statement and Guiding Principles	Fish	18	Aquatic conservation should consider freshwater fish; considering salmon alone does not also cover freshwater.
(1.6) Vision Statement and Guiding Principles	Connections to adjacent	19	Alaska's Upper Yukon Area Plan should be listed, and considered: <a href="http://dnr.alaska.gov/mlw/planning/areaplans/up_yukon/">http://dnr.alaska.gov/mlw/planning/areaplans/up_yukon/</a>
(1.6) Vision Statement and Guiding Principles		20	Species at risk are largely ignored in the plan. Beyond this vague reference to them as a value there is little discussion beyond that, and no further specific guidance.
(1.7) Plan Goals		21	Plan should consider climate driven shifts in habitat in this section.

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Plan Section	Issue	Pg.	Comment
(1.7) Plan Goals		21	Lack of reference to climate change mitigations throughout the plan
(3.2) Land Use Designation System	SMAs	30	No agency responsible for development of SMAII Management Plans, as recommended. Enforcement, resources and capacity are not present to implement SMAs.
(3.2) Land Use Designation System	ISAs	30	Mining activities are confined to small, well-explored areas, which limits future exploration potential.
(3.2) Land Use Designation System	ISAs	30	Confusion about how cumulative disturbances and cumulative effects interact. Clear definition of each of these concepts should be provided.
(3.2) Land Use Designation System	ISAs	30	Highway corridor areas 1km on both sides of highway is too wide to concentrate disturbances effectively, and could adversely impact migratory species like caribou.
(3.2) Land Use Designation System	SMAs	30	Clarity needed on whether existing mineral rights allow for change to existing activities (i.e. could a current exploration program become a mine?)
(3.2) Land Use Designation System	SMAs	30	SMA II is not a viable designation- Either transform SMA II to SMA I, or turn them into ISA I. This way they are either protected areas or not, and this would provide additional clarity.
(3.2) Land Use Designation System	SMAs	30	Interim withdrawals under SMA II are challenging to renew- elsewhere similar designations have proven to be an ineffective management tool, as they leave portions of the landscape in legislative limbo.
(3.2) Land Use Designation System	ISAs	32	ISA Table should relate to Table 3-2.
(3.2) Land Use Designation System	Thresholds	32	ISA 3 and 4 thresholds do not meet their stated management intent. Descriptive language (conservative, Low, etc...) does not align with the thresholds, which represent the highest levels of development.

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(3.2) Land Use Designation System	SMAs	33	unclear how SMA Thresholds add to management direction. Provide rational for why the plan need thresholds in SMAs.
(3.2) Land Use Designation System	SMAs	33	Under SMA I, the plan should be explicit around how existing claims in SMA I should be managed.
(3.5) Cumulative Effects Management	Reclamation	35	Effective reclamation strategies should be defined/discussed in the plan. What constitutes effective reclamation is unclear.
(3.5) Cumulative Effects Management	Thresholds	35	Cumulative effects system needs to be implementable.
(3.5) Cumulative Effects Management	Thresholds	35	Cumulative effects, wetlands, and surface disturbances require accurate baseline data.
(3.4) General Management Direction	Management Direction	35	Figure 3-1 management framework requires a link between the goal and objective. The example used assumes a link between maintenance of ecological integrity and surface disturbances that is not present.
(3.5) Cumulative Effects Management		35	Overarching approach to CE appears to centre around reclamation as a means to stay within/below/reduce level of SD. This is problematic, as reclamation likely doesn't recover the original value of the area.
(3.5) Cumulative Effects Management		35	Focus is on tracking surface disturbance, not actually cumulative effects. Clarify that surface disturbance is used as a tool or proxy for cumulative effects in this section.
(3.5) Cumulative Effects Management	Reclamation	36	Implementation will need to track reclaimed areas and reclaimed areas should not be removed from disturbance thresholds until the reclamation is deemed adequate
(3.5) Cumulative Effects Management	Thresholds	36	Cumulative effects, wetlands, and surface disturbance indicators should be linked to specific management objectives.
(3.5) Cumulative Effects Management	Thresholds	36	This plan should target future disturbances to previously disturbed areas.

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Plan Section	Issue	Pg.	Comment
(3.5) Cumulative Effects Management		36	Consider providing specific reclamation direction for each LMU. In relation to the discussion box: The three considerations require clarity to achieve reclamation, goal of reducing Surface Disturbance. Point 1: describes “vegetation growth over 1.5m” – no description of what vegetation means. This could be met with invasive or disturbance species (fireweed, alder, sweet clover, etc.), with no indication of actual recovery. Clarify if the 1.5m regrowth need to happen over the entire area, or just in one spot. Point 2: Good management direction when thinking about impacts on streams/water/fish, but provides inadequate guidance on recovery of terrestrial habitats. Requires assessment of pre-disturbance runoff and sediment loading. Point 3: Contouring only—no vegetation recovery, or even discussion of soil recovery. If plan wants to keep reclamation as pathway to address Cumulative Effects, then recovery/reclamation needs to focus on recovery of pre-disturbance (or native) vegetation to a similar ecosystem that was there before. (Also similar hydrological functions as before). This is likely not feasible within 10-20 years post reclamation.
(3.5) Cumulative Effects Management	Thresholds	37	Linear density monitoring imagery requirements need to consider implementation, including cost and capacity requirements.
(3.5) Cumulative Effects Management	Thresholds	38	Link 'other indicators' to LMU management direction, including considerations for Caribou, Water, Moose.
(3.5) Cumulative Effects Management	Thresholds	38	Water Resources Branch proposes standardized water quality indicators (Water Quality Objectives & EQS) for water under 'other indicators'.

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(3.5) Cumulative Effects Management	Thresholds	38	Water Resources Branch total suspended solids (TSS) is proposed as a water indicator (Compliance Monitoring and Inspections already does this in some places).
(3.5) Cumulative Effects Management	Thresholds	38	Water Resources Branch proposes stream connectivity as an indicator of water under 'other indicators'.
(3.5) Cumulative Effects Management	Thresholds	39	New requirements for proponents (creating proposals, reporting, estimations of disturbance, etc.) should ideally be simple and standardized.
(3.5) Cumulative Effects Management		39	Mine licences are for 10 years, so the lag between permitting disturbance and actual disturbance can be up to 10 years. And there are 10 years of pre-plan disturbance that may be permitted already.
(3.5) Cumulative Effects Management	Thresholds	40	New cumulative effects monitoring system proposed is prohibitively complex to develop and administer.
(3.5) Cumulative Effects Management	Project Assessment	40	Clarity needed on policy recommendation to consider a separate worksheet or application- if this is in addition to YESAB application consider whether this is conforming to existing regulatory framework.
(3.5) Cumulative Effects Management	Thresholds	40	3.5.3 Cumulative effects framework section needs to include a user friendly framework to facilitate implementation. The framework itself should be clear in how it is to be used.
(3.5) Cumulative Effects Management	Thresholds	40	Remove precautionary threshold - unnecessary
(3.5) Cumulative Effects Management	Thresholds	40	Researching the status of the values at risk is insufficient - need to research link between disturbance and the value, and the role that reclamation could play in mitigating that
(3.5) Cumulative Effects Management	Thresholds	40	If other indicators end up being used (e.g. water), then reconsider threshold levels
(3.5) Cumulative Effects Management	Thresholds	41	YG is working to gain required data on disturbance levels. This data should be available in spring 2022.

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(3.5) Cumulative Effects Management	Reclamation	42	Existing disturbances in SMAs can still be reclaimed.
(3.5) Cumulative Effects Management	Thresholds	42	Other indicators (section 3.5.1.3) are not clearly defined anywhere. Clearly define how do the other indicators interact with the surface disturbance and linear density indicators. Consider putting this under the cumulative effects framework.
(3.5) Cumulative Effects Management	Thresholds	42	Provide rationale for why the thresholds are set where they are. Describe how cumulative effect thresholds relate to other indicators.
(4) General Management Direction	Management Direction	46	SMA and LMU designations do not provide clarity and certainty on what lands are accessible to mineral exploration and development.
(4) General Management Direction	Reclamation	46	Value-driven reclamation objectives should be included and defined under this plan.
(4) General Management Direction	Minerals	46	Recommendation to support Yukon Mineral Development Strategy asks parties to support a strategy that is outside the scope of regional planning. (policy Recommendation 11)
(4.1) Sustainable Economy		50	Throughout the plan there is reference to “key areas”, “key wildlife habitats”, etc. Clarify that these are intended to be reference to Wildlife Key Areas Inventory.
(4.1) Sustainable Economy	Access	50	Consider applying an ORV management area under the lands act to control recreational ORV Use
(4.1) Sustainable Economy	Corridor Areas	51	The recommendation to establish a Klondike Highway Corridor Advisory Committee raises implementation concerns. Implementation of the plan should be left up to the implementation planning committee, which could consider the most appropriate implementation strategy, and decide whether additional committees are warranted.



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Plan Section	Issue	Pg.	Comment
(4.1) Sustainable Economy	Management Direction	51	Creation of an advisory committee for the creation of an interpretive plan- there is an existing interpretive plan (North Klondike Interpretive Plan 1996, updated 2004) that is not recognized. Clarify if this policy recommendation is to create a different plan or update the existing plan.
(4.1) Sustainable Economy	Corridor Areas	51	1km corridor on either side of highway allowing for disturbance is too wide. A narrower corridor should be explored. Particularly of concern on top of the world highway.
(4.1) Sustainable Economy	Access	53	Appears that there is a conflict between recommended management practice c and d. Multi-party use of trails seems incompatible with timely decommissioning.
(4.1) Sustainable Economy	Wildlife	53	Management practices for existing roads/ road development should mention effects on migratory routes, specifically on Caribou. New road development should include mitigations on caribou migratory routes as well as seasonal considerations.
(4.1) Sustainable Economy	Access	53	It is proposed to route roads through dry south facing slopes. South facing slopes are where the majority of the rare and endemic species in the region are found.
(4.1) Sustainable Economy	Access	54	Recommended action to develop and implement a framework for the tracking and monitoring of access development and reclamation activities poses significant implementation challenges, including prohibitive cost and capacity.
(4.1) Sustainable Economy	Access	54	Winter access only is an appropriate policy recommendation to mitigate impacts of these access points (protecting ecological values, wildlife, reducing fragmentation). Access points must be maintained.
(4.1) Sustainable Economy	Access	55	Research recommendation on conducting a baseline study for linear disturbance is unclear- does this recommendation refer to surface disturbance, or linear density? More explanation on this recommendation is needed to understand how to implement.

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(4.1) Sustainable Economy	Access	55	Recommended action on tracking and monitoring of access development should include considerations on impacts to heritage values, heritage routes, cultural landscapes, heritage resources, etc..
(4.1) Sustainable Economy	Access	55	ORV definition in plan includes snowmobiles. This is not consistent with YG ORV regulations.
(4.1) Sustainable Economy	Access	56	Policy Recommendation about public input for ORV management areas supports an ability of an RRC to consult on and implement ORV regulations- is this a policy recommendation or recommended action? Unclear what the Commission is asking here
(4.1) Sustainable Economy	Management Direction	56	Significant challenges to implementing Recommended Management Practice a. Permafrost presence, road exposure, etc.. May be possible to accommodate in some places, but be impractical in others.
(4.1) Sustainable Economy	Access	56	Recommended management practice C poses a challenge to closing roads/trails and implementing reclamation.
(4.1) Sustainable Economy	Access	57	Air Access management practice (a) is not enforceable. YG does not have the regulatory authority to restrict airspace. Consider removing management practice (a).
(4.1) Sustainable Economy	Water Access	57	Add to key planning issues under 4.1.2.5 water access: bank/shore degradation as well as downstream sedimentation (cumulative). These impacts on riparian zones and wetlands can cause significant impacts. Clarify if ISA I Designations allow for development of new water access points.
(4.1) Sustainable Economy	Access	57	Water access planning issues does not discuss riparian areas or buffers along rivers/streams
(4.1) Sustainable Economy	Water Access	58	Consider adding a timeframe for spawning and incubation of fish, so as to provide clarity on when construction of stream crossings is to be prohibited.

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(4.1) Sustainable Economy	Water Access	58	If Construction of stream crossings is prohibited during spawning/incubation periods, definition on which species this applies to is needed, as the spawning/incubation timelines for different species varies broadly.
(4.1) Sustainable Economy	Water Access	58	Additional Focus on Freshwater Fish is needed, as they are predominately affected during construction/stream crossings/freshwater activity. Lack of information about freshwater fish impacts.
(4.1) Sustainable Economy	Agriculture	59	Consider changing Recommended Management Practice (a) to be applied in specific LMUs, so that the high agriculture value areas receive the intended management direction. Unclear where this management practice applies spatially.
(4.1) Sustainable Economy	Forestry	59	Consider adding to Policy Recommendation on collaborative efforts that when land is cleared for agricultural purposes, this clearing can contribute to merchantable timber. Forest operators would likely be interested in timber from agricultural land clearing activities.
(4.1) Sustainable Economy	Culture/ Heritage	61	Does 'Signage' apply to interpretive signage, or is this also signage identifying settlement lands, highway signage, etc...? Clarify.
(4.1) Sustainable Economy	Access	61	Discouraging aerial flights is not within the regulatory authority of the Parties, or the Commission. Remove Recommended Management Practice (a).
(4.1) Sustainable Economy	Culture/ Heritage	61	Research Recommendation on tourism co-management in LMU 4 should be expanded to contemplate how heritage resources can be protected.

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(4.1) Sustainable Economy	Outfitting	62	Under 4.1.5- the objective may fetter the minister's authority under the Wildlife Act. Outfitter 'Rights' are established through a statute by way of their concession certificate and their operating certificate, which the Minister has the ability to apply conditions to either. (e.g. Quotas), and the ability to revoke a concession. The current language could be interpreted to maintain certificate conditions as they exist today, consider revising language.
(4.1) Sustainable Economy	Outfitting	62	Policy Recommendation 50 and Research Recommendation 51 assert outfitting 'rights' should remain as they are, but this conflicts with the Minister's authority under the Wildlife Act. Outfitters don't have 'rights', they hold operating certificates on a concession, which authorize them under the wildlife act. The certificate can be revoked, and does not constitute a 'Right'.
(4.1) Sustainable Economy	Agriculture	62	The Klondike Valley has little, if any land that could be developed for agricultural use. Some small-scale infill may be possible, but due to the developed/disturbances in the Klondike valley this area has limited agricultural potential.
(4.1) Sustainable Economy	Agriculture	62	No mention of the 1988 Klondike Valley Land-Use Plan. This plan identifies key constraints on agricultural development in the Klondike region that this plan could evaluate.
(4.1) Sustainable Economy	Agriculture	62	Accessible areas of crop capable land are found in LMUs 11 and 12 along the highway corridor. For large-scale producers, these are the areas that are most viable. Consider adding Agriculture to the economic values of these LMUs
(4.1) Sustainable Economy	Agriculture	62	Farmland can be developed on the land following forestry logging operations, which would promote collaborative uses of land.

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(4.1) Sustainable Economy	Agriculture	64	High support for the research recommendation to identify class 3 - 5 agricultural lands within the planning region- this should be done prior to further sub-regional or local area planning.
(4.1) Sustainable Economy	Residential Development	65	Policy Recommendation about residential, commercial, industrial devt. contemplates targeting development. This seems to be too specific for a regional level plan.
(4.1) Sustainable Economy	Water	65	Policy recommendation (wellhead protection plan) seems to be too detailed and specific for a regional plan recommendation.
(4.1) Sustainable Economy	Forestry	66	Fuel abatement should be discussed in this section- how can other activities (forestry, land clearing from agricultural land, etc..) contribute to forest fire breaks? The document mentions that the Dawson Region has high forest fire risk, and this section should propose solutions.
(4.1) Sustainable Economy	Forestry	66	We are very near the completion of an annual allowable Cut, which will set a limit on the allowable greenwood harvest in the region. This may be a management solution for section 4.1.7. This can be provided by YG once completed.
(4.1) Sustainable Economy	Forestry	71	Recommendation to adapt Goldfields THP to develop a more effective framework for use of fuelwood within existing mineral tenure poses an implementation challenge, as YESAB has not accepted the terms for this that have previously been submitted. Communication between mineral and forestry industries poses another implementation challenge. The Placer Act also allows the use of timber for mining use, and we can't strip miners of rights to use timber on their claims unless they volunteer it. We would need to develop a framework with Minerals to implement

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(4.2) Ecological Integrity and Conservation	Wildlife	71	Non-First Nation peoples do not rely on wildlife in the same way First Nations people do, rather it is a privilege to hunt or trap wildlife. Also First Nations hunting is constitutionally protected.
(4.1) Sustainable Economy	Access	72	Collaboration between aggregate extraction, mining, and road development should be encouraged, as this could minimize ground disturbances.
(4.2) Ecological Integrity and Conservation	Wildlife	72	In the Recommended Management Practices for caribou it would be helpful to have various habitat areas identified for individual LMUs and have specific timing windows for avoiding activity identified for each, instead of a general reference to Map 4.
(4.2) Ecological Integrity and Conservation	Wildlife	72	For key planning issues for woodland caribou add: Recourse extraction activities as well as their associated road and seismic networks impact habitat and make caribou more susceptible to predation, particularly by wolves.
(4.2) Ecological Integrity and Conservation	Wildlife	72	Under Caribou Objectives there is a key piece missing around managing to maintain/increase caribou populations - otherwise there is no link among monitoring of caribou, surface disturbance, and land use decisions.
(4.2) Ecological Integrity and Conservation	Wildlife	72	In the Recommended Management Practices for caribou It is not clear how wintering and calving habitat would be protected.
(4.2) Ecological Integrity and Conservation	Wildlife	72	Under Caribou Objectives key migration routes and summer habitats need to be maintained. As summer habitat has been identified as the key limiting factor for this herd and disruption of migratory pathways has been shown to lead to herds collapse.

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(4.2) Ecological Integrity and Conservation	Wildlife	72	In the Recommended Management Practices for caribou E (trails section) include another point about “bisect corridors” that talks to not expanding existing trails to a standard that allows for significant increases in traffic quantity or size to avoid significant expansion of the existing trail network within the Fortymile Caribou summer range.
(4.2) Ecological Integrity and Conservation	Wildlife	72	In the Recommended Management Practices for caribou consider additional tools beyond Zone of Influence to define safe operating distances.
(4.1) Sustainable Economy	Access	73	Clarity required around the intention for the Yukon River Corridor is needed to project impacts on mineral development, access, and barging.
(4.1) Sustainable Economy	Growth	73	Inaccessibility of high mineral potential lands west of Yukon River (LMU3) will not reach the economic goals in LMUs west of the river, access needs to be maintained.
(4.1) Sustainable Economy	Growth	73	LMU 21 has a ISA I designation, which may limit the ability to access the significant molybdenum and copper deposits in this area. Access restrictions may restrict exploration.
(4.2) Ecological Integrity and Conservation	Wildlife	73	In the Research Recommendations for Caribou suggest clarifying that mitigations to address disturbance to FMCH should be designed to maintain migration routes and should consider annual environmental and climatic effects on route use by the herd.
(4.2) Ecological Integrity and Conservation	Wildlife	74	The Moose Policy Recommendation will be difficult to implement as the Goldfields roads are public. There may be challenges with enforcement capacity.

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(4.1) Sustainable Economy	Culture/ Heritage	74	Policy Recommendation 68- requiring proponents of large scale projects to conduct traditional use impact studies- this will require significant capacity from TH. A framework for identifying 'key-use areas' will be needed. We will need additional guidance on what activities or conditions will trigger this requirement.
(4.1) Sustainable Economy	Culture/ Heritage	74	Buffers from settlement land parcels may restrict important development areas. Some settlement land parcels are very large, and the traditional use values may not extend over the entire parcel. Consider applying a buffer from areas of identified traditional values instead of the entire settlement land parcel.
(4.2) Ecological Integrity and Conservation	Wildlife	74	The Moose Policy Recommendation doesn't address industrial disturbance of moose concentrations.
(4.2) Ecological Integrity and Conservation	Wildlife	75	Salmon are DFO's jurisdiction
(4.2) Ecological Integrity and Conservation	Wildlife	76	In the Recommended Management Practices for salmon it will be difficult to assess conformity to "Avoid or minimize adverse effects of large-scale industrial and/or infrastructure projects within river corridors" without an environmental assessment.
(4.2) Ecological Integrity and Conservation	Wildlife	76	In the Recommended Management Practices for salmon determining what is a 'significant' water withdrawal volume is not a simple question. There is no flow needs policy in the territory like there is in BC for instance. Perhaps being able to define what a significant withdrawal would be need to be included in the recommendations section below.



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(4.2) Ecological Integrity and Conservation	Wildlife	76	Salmon management practice B is not specific. No definition of riparian buffer size or setbacks, only “where possible”—what does that mean and who determines if it is possible?
(4.2) Ecological Integrity and Conservation	Wildlife	76	Salmon management practice specific to “large scale” activities. Does the need to minimize adverse effects on river corridors not apply to small projects?
(4.2) Ecological Integrity and Conservation	Wildlife	77	Does the salmon Research Recommendation to " Developing a publicly available aquatic inventory of streams, rivers, and tributaries in areas that have not been mined, to ascertain if salmon habitat or freshwater fish habitat is likely to be at risk if developed" extend to wetlands?
(4.2) Ecological Integrity and Conservation	Wildlife	79	Recommended Management Practice for Grizzly Bears overlaps with a Wildlife Act mandate and is better suited to environmental assessment recommendations.
(4.2) Ecological Integrity and Conservation	Wildlife	79	The Other Fish and Wildlife Section leaves out a section on small game harvest species including game birds, hare and ground squirrels
(4.2) Ecological Integrity and Conservation	Wildlife	80	Resident Fish Species Research Recommendation will be expensive to implement
(4.2) Ecological Integrity and Conservation	Wildlife	81	The migratory bird research recommendation is an expansion of the WKA inventory (which currently doesn’t track species not under territorial management authority).
(4.2) Ecological Integrity and Conservation	Wildlife	81	Aquatic and ecological communities is missing from the Species at Risk and Endemic Species section
(4.2) Ecological Integrity and Conservation	Wildlife	81	Migratory birds management practices A and B imply much stricter restrictions than are described in the plan for relevant areas. E.g., no work in Tintina Trench.

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(4.2) Ecological Integrity and Conservation	Wildlife	81	some SAR and endemics are under territorial management authority, so recommended management practice a needs to be broadened beyond CWS guidance
(4.2) Ecological Integrity and Conservation	Wetlands	83	<p>Wetland inventory will be required to appropriately implement this plan. This is costly and time consuming. The plan also places all of the burden of generating this inventory on government Has the Commission explored the possibility of proponents aiding in some costs of wetland inventory work specific to their claim block?</p> <p>As above, application of thresholds at LMU scale may lessen the costs by essentially not requiring detailed/local wetland inventory work to more precisely define wetlands within each claim block.</p> <p>This cost is an issue for Wetlands Policy implementation as well. A management board submission will be included with the policy approval, which will seek funding support to complete some inventory work.</p>

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(4.2) Ecological Integrity and Conservation	Wetlands	83	<p>Evaluating wetlands avoidance thresholds at the LMU scale creates a potentially challenging regime. It is somewhat of an unfair approach, allowing current and near-future development to operate largely without any restrictions, while future developments may be significantly limited. Additionally, it can result in substantial wetland losses in parts of an LMU (e.g., all fens in IR area could be lost and still meet a 60% fen protection target at LMU scale). If LMUs were drawn based on watersheds, this may not be an issue.</p> <p>Also worth noting that applying thresholds at LMU scale is likely easier to manage, and will require less costly mapping products.</p>
(4.2) Ecological Integrity and Conservation	Wetlands	83	<p>In SMA 2s, such as LMU 19, there can be significant overlap of wetlands and existing claims. It is not clear how grandfathered claims will impact wetlands, as LUP mitigations may not apply to activities in those areas. In some SMAs there are access restrictions which may make it impossible to do additional work on existing claims, however, this isn't the case for all (again e.g., LMU 19), where contiguous existing claims could allow access to virtually the entire area.</p> <p>SMA 2s that have been identified as "Wetlands of Special Importance" do not provide sufficient wetland protections to meet the minimum standard set out in the draft wetlands policy</p>

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(4.2) Ecological Integrity and Conservation	Wetlands	85	Currently, the policy recommendation that no development of undisturbed fens is permitted in ISAs that have specific management direction written in the Landscape Management (LMU) tables reads as though no development is permitted in undisturbed fens that have management direction, but the next policy recommendation (Within most of the ISAs, development is to be permitted in fens up to a certain threshold per LMU. This threshold is discussed below and will be set in the Recommended Plan) wording seems to contradict this.
(4.2) Ecological Integrity and Conservation	Wetlands	85	There are currently no plans to include the offsetting of residual wetland impacts in the mitigation hierarchy
(4.2) Ecological Integrity and Conservation	Wetlands	85	In relation to the policy recommendation that within most of the ISAs, development is to be permitted in fens up to a certain threshold per LMU, the current regulatory approach is at the claim block scale. Difference in scale of application could pose issues
(4.2) Ecological Integrity and Conservation	Wetlands	85	Mitigation hierarchy should also include the intent to learn more about wetlands i.e. wetland mapping, education.

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(4.2) Ecological Integrity and Conservation	Wetlands	85	Rather than set thresholds by class or variable protections by class, would like to see clear management intent for a particular wetlands complex (e.g. as is done for Scottie creek, upper Indian river). Identify/recommend the key wetlands for WSI or other protection, and have clear management intent (conservation, vs development) to guide the direction. Mining around a bog can still drain the bog... Preserving uplands fens would meet the landscape goal but real interest/intent may be to protect a valley bottom. Some worry here that the there draft thresholds may in fact undermine the plans own objectives. Because of the limited wetlands mapping, the full impact of the protection targets in this draft plan are unknown in LMUs where sustainable development is a stated goal. (e.g.. Fortymile and 60mile. )
(4.2) Ecological Integrity and Conservation	Wetlands	85	While the policy recommendation that "No development is to be permitted* in undisturbed bogs and marshes throughout the region" does not apply to existing permits, it is difficult to evaluate the extent of the impact this recommendation may have on existing mineral tenure holders given lack of baseline data suitable for this analysis (note: there is no mechanism to retroactively apply conditions to a licence).
(4.2) Ecological Integrity and Conservation	Wetlands	86	Does the policy recommendation mean that no new work permits/licences will be issued until we have an inventory? This needs to be made clear.
(4.2) Ecological Integrity and Conservation	Wetlands	86	The Indian River approach allows work in 60% of fens.

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(4.2) Ecological Integrity and Conservation	Wetlands	86	Applying wetland thresholds at the LMU scale differs from the Indian River Interim Approach which establishes thresholds per claim block. A per LMU approach would be easier to manage but result in a “first come, first serve” state and essentially prohibit placer mining when thresholds are met.
(4.2) Ecological Integrity and Conservation	Wetlands	86	Will be challenging to enact a baseline as per plan based on a specific time, not pre-disturbance level. Also, this ignores natural change in wetland area (and change due to climate change).
(4.2) Ecological Integrity and Conservation	Wetlands	87	Scottie Creek and Upper Indian River Wetlands of Special Importance – Plan’s mitigations are not consistent with draft wetlands policies guidance (which is more stringent).
(4.2) Ecological Integrity and Conservation	Wetlands	88	Establishing a wetland inventory will be challenging and may take a long time to complete.
(4.2) Ecological Integrity and Conservation	Wetlands	88	LMU 19 should be ISA 1 or 2, not an SMA II, to honor existing placer interests
(4.2) Ecological Integrity and Conservation	Wetlands	88	plan has no guidance on buffer size or application.
(4.2) Ecological Integrity and Conservation	Climate Change	90	Recommended management practice c is too detailed, better suited to EA or regulatory recommendation
(4.2) Ecological Integrity and Conservation	Climate Change	92	consider addition of regeneration rates of permafrost in reclaimed areas to the permafrost research recommendations.
(4.2) Ecological Integrity and Conservation	Climate Change	92	consider addition of exploring techniques for encouraging potential re-establishment of permafrost to permafrost research recommendations

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(4.2) Ecological Integrity and Conservation	Climate Change	92	consider addition of water quality (including mercury contamination) to permafrost research recommendations
(4.3) Culture and Heritage	Culture/ Heritage	94	under 4.3.1 it may be useful to acknowledge the 2019 MOU regarding collaboration in Heritage Management that both YG and TH are parties to.
(4.3) Culture and Heritage	Culture/ Heritage	94	Significant' heritage resources is not an accurate way to identify heritage resources. Heritage resources (those defined within the YG Historic Resources Act and those included in the TH Heritage Act) are protected regardless of perceived 'significance'.
(4.3) Culture and Heritage	Culture/ Heritage	97	Land Use Plans can not limit subsistence harvesting activities, so management practice (a) is redundant.
(5) Landscape Management Units	LMUs	101	Special Management Direction 4. consider removing this entirely. Mentions that non conforming uses require a plan variance or amendment. This should simply state that winter road access is not allowed- don't invite plan variance or amendment as a feasible avenue for temporary winter road development.
(5) Landscape Management Units	SMA's	106	SMA II for LMU 3 is problematic. Barging study requirement needed. SMA II does not allow road access, therefore can't feasibly use river as transportation corridor (can't build road from dock to ISA 3 and 4 areas adjacent.)
(5) Landscape Management Units	Sub-Regional Planning	107	Sub-regional planning will be complicated and may require lengthy timelines.
(5) Landscape Management Units	SMA's	109	Plan is unclear on what is allowed in SMA's. E.g. "other land use rights recognized" - what does recognized mean - allowed?
(5) Landscape Management Units	SMA's	109	How this LMU may be implemented and whether co-management is considered can be determined by the Parties in implementation.

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(5) Landscape Management Units	LMUs	113	LMU 6 states an intent to protect lynx, but boundary as drawn may not include lynx refuge (it could be partially within LMU 13).
(5) Landscape Management Units	Forestry	114	Happy to see forestry values noted and prioritized in LMU 6, but saw logs should be focus, not commercial fuelwood.
(5) Landscape Management Units	LMUs	116	Remove critical minerals area from SMA designation (i.e. put in LMU 8 which is ISA 3).
(5) Landscape Management Units	Thresholds	116	LMU 7's "limited" development vision and ISA 1 threshold do not match with significant existing amount of mineral claims.
(5) Landscape Management Units	Wildlife	117	Existing claims are extensive, so by protecting them it is difficult or impossible to also achieve protection of LMU 7 key habitat.
(5) Landscape Management Units	Living Document/Plan Review	119	LMU 8 is shown as ISA 3, but all-season roads not allowed without Plan variance or amendment. Problematic for implementation.
LMUs	Wildlife	119	The designation of LMU 8 with the Clear Creek caribou range don't seem to provide adequate limits on development to avoid negative cumulative effects on caribou. Suggest extending the boundary of LMU 7 into LMU 9 to better protect the key habitat area there.
(5) Landscape Management Units	Access	120	Lack of all-season road access in LMU 8 may hinder (otherwise well accounted for) ability for Brewery Creek mine to be productive in future.
(5) Landscape Management Units	Culture/ Heritage	121	Yukon Ditch has first portion in LMU 8 but also LMU 4, 10, 13. Ditch represents potential opportunity for interpretation / tourism.
LMUs	Wildlife	122	Explore management directions for seasonal activities to avoid negative effects on Clear Creek Caribou herd.



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(5) Landscape Management Units	Thresholds	123	ISA 4 designation for LMU 9 allows too much development to also achieve stated goals for caribou habitat protection. Suggest dropping threshold (i.e. re-designating to lower number ISA) as better alternative to caribou management as suggested.
(5) Landscape Management Units	Growth	126	No existing forestry in LMU 11. Limited future forestry, unless a fire occurs. Plan recommendations to protect "continued growth of fuelwood activities" are overstated.
(5) Landscape Management Units	Fish	129	LMU 12 inventory mentions freshwater fish! - consider adding to all sections.
(5) Landscape Management Units	Forestry	129	Forestry not mentioned in LMU 12 despite having 6 of region's 10 active THPs in this LMU. Is Forestry important in this region or not? Not mentioned in management direction.
(5) Landscape Management Units	Culture/ Heritage	130	LMU 12 has not just Gold Rush mining history - also corporate (YCGC) and contemporary mining history to interpret.
(5) Landscape Management Units	Minerals	131	LMU 13 has significant placer gold resources, so mining should be at least mentioned as a land use.
(5) Landscape Management Units	Residential Development	132	A local area plan for LMU 13 would be a better tool for this scale of planning. It would help to address issues such as the development of new residential planning. Community Services is examining work such as this.
(5) Landscape Management Units	Wildlife	132	LMU 13 significantly overlaps lynx refugium yet has no interim direction - needs to be there, especially considering other development pressures in the region.
(5) Landscape Management Units	Fish	133	SMD does not follow DFO timing windows for redds and fresh water spawning.
(5) Landscape Management Units	Management Direction	136	Onerous SMD for industrial pursuits to notify rights holders annually of upcoming activities. Many notifications are already required when activities commence, annually would be restrictive and reduce industry certainty.

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(5) Landscape Management Units	LMUs	138	Sixtymile boundary amendment should be to Sixtymile road. Areas west of this are critical for FMCH. An IMA III is not compatible. Reclamation in area should focus on supporting caribou, otherwise reclamation to willows is also lost habitat.
(5) Landscape Management Units	Management Direction	139	SMD needed to maintain winter habitat for FMCH and Nelchina, as in this area it is some of the best in the Yukon.
(5) Landscape Management Units	LMUs	140	Matson boundary should be amended to incorporate habitat that is not currently staked. Critical caribou habitat eventually should be protected once they are assessed under SARA, as well as to meet obligations to THFA and to provide certainty to industry as developing in summer range will be onerous.
(5) Landscape Management Units	LMUs	143	Amend boundary to follow height of land that encompasses Wounded Moose Creek. Remove this high mineral potential region from northwestern portion of LMU 19.
(5) Landscape Management Units	Wetlands	143	Enabling mineral development and avoiding wetland impacts are difficult outcomes to achieve under SMA2 designation. No disturbance of fen, marsh and bog will halt most future activity in area, but is unclear on grandfathered activities.
(5) Landscape Management Units	Wildlife	147	Caution against development footprints going up into alpine and ridge system to ensure access to caribou summer ranges.
(5) Landscape Management Units	Access	150	significant copper and molybdenum deposits in area. Access to area should be maintained and defined to ensure critical minerals may be accessed.
(5) Landscape Management Units	SMAs	152	High placer potential coming off the uplands which will not effect wetlands below in terms of surface disturbance, recommend changing boundary of Scottie Creek (LMU 22) to remove area of high placer potential.
(5) Landscape Management Units	Reclamation	155	Reclamation references lichen regrowth. This will require guidance. Regrowth takes a long time and likely not possible within project management timeframe.

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(6.4) Plan Conformity	Monitoring/ Compliance	163	Triage concept may be helpful to deal with capacity challenges but unclear how it would work / potential problems.
(6.5) Plan Amendment and Review	Living Document/Plan Review	167	The Peel Plan Implementation Committee is currently finalizing a process for plan variances and amendments. Lessons from that process could help develop section 6.5 further to a Recommended Plan. Recommended action on page 167 should be removed as we are learning with the Peel, errors are sometimes made and minor variances are needed soon after plan approval (mapping data errors for example).
(6.6) Plan Revisions	Thresholds	168	Consider 42 forestry indicators currently used by FMB
(7) References	Forestry	172	Include Forest Resources Management Plan
(5) Landscape Management Units	Living Document/Plan Review	117	LMU 7 allowing surface access from Dempster only "through Plan variance or amendment" is a problem. Access to the significant number of claims off the Dempster should be accommodated as it would create the least amount of impact on the landscape.
(3.2) Land Use Designation System	SMA's	33	SMA II will not count towards national protected areas strategy.
(3.2) Land Use Designation System	SMA's	33	SMA II do not provide the necessary certainty to mineral claim holders. If access is not provided to claims, then they are not feasible to work.
(5) Landscape Management Units	LMUs		SMA II designation will not meet the criteria for protected areas, and will not meet the goals set out for LMUs with this designation which are identified for protection.
(5) Landscape Management Units	Project Assessment		Ensure plan is clear how its management directions guide / interact with project assessments.
	SMA's		Lack of clarity/certainty provided around mineral extraction in SMA II.

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(4.3) Culture and Heritage	Culture/ Heritage		Recommend regional scale mapping for heritage potential.
(4.3) Culture and Heritage	Culture/ Heritage		The plan needs a single broader statement on trails to recognize their importance and impact.
(4.3) Culture and Heritage			Recognize provisions of Chapter 13 of the TH and Umbrella Final Agreements, including that it already has a process to rename places. Change the place name recommendation to refer to that process and associated roles.
(6.3) Landscape Management Unit Designations	LMUs		Plan should provide LMU- Specific management direction for tourism operators including information on where prohibitions on tourism activities exist.
(2.5) Economy	Economic	27	For the planning region, 27% of adults reported being employed in the tourism sector. This compares to 10% for Yukon overall.
(2.5) Economy	Culture/ Heritage		Define 'remote' and 'wilderness character' as they relate to tourism in the Dawson Region
(3.4) General Management Direction	Management Direction		Develop management guidelines for preservation of defined 'wilderness character' and 'remoteness'.
(4.1) Sustainable Economy	Management Direction	61	Define if expansion or modernization of existing airstrips will require a plan amendment, or if this is permissible under the plan's management direction.
(4.1) Sustainable Economy	LMUs	62	Agriculture-specific direction should support the expansion of agricultural lands in LMU's suitable for Ag. Growth. This is a key limiting factor to the industry's growth.
(5) Landscape Management Units	Access	129	LMU 8: Lower Brewery/Hamilton – surface access should not require a plan amendment, as it is designated ISA III.
(5) Landscape Management Units		129	Recommendation 2 – this would be hard to achieve in any proposed large-scale development. Suggesting a re-word here

## Draft Dawson Plan Comments

Plan Section	Issue	Pg.	Comment
(6.1) Plan Implementation		175	The implementation section appears overly prescriptive in some areas.

## Suggested Edits for Plan Ease of Use

This document suggests a number of edits, additions, or deletions to the Draft Dawson Regional Land Use Plan that would increase the document's clarity and certainty, and increase the ease of use during implementation. These suggestions are detailed below in five categories:

1. Glossary
2. Plan organization and text
3. Maps
4. Tables
5. Figures

**1. Glossary:** A glossary is required as there are many terms used throughout the plan that would benefit from definition to improve clarity throughout the document. The "track changes" version of the Draft Plan provided with the Government of Yukon's submission to the Dawson Regional Planning Commission ("the Commission") highlights the locations of these terms to aid in the process of glossary creation. Some of these terms require spatial definition and would be well served to be defined on a map (identified below):

- Adequate land base
- Areas of high ecological or socio-cultural value (please identify on a map, as well as in the text)
- Areas with concentrations of wetlands (please identify on a map, as well as in the text)
- Consultation
- Critical
- Cumulative disturbance
- Cumulative effects
- Ecological connectivity
- Ecological integrity
- Ecosystem services
- Engagement
- Field verified
- High concentrations of small-scale disturbance (please identify on a map, as well as in the text)
- High densities of placer mining activity (please identify on a map, as well as in the text)
- High quality habitat (please identify on a map, as well as in the text)
- High standards of restoration
- High traditional use value (please identify on a map, as well as in the text)
- Identified fish migration routes (please identify on a map, as well as in the text)
- Important ecological services

- Industrial land use
- Important mineral dispositions (please identify on a map, as well as in the text)
- Key areas (please identify on a map, as well as in the text)
- Key habitats (please identify on a map, as well as in the text)
- Key use areas (please identify on a map, as well as in the text)
- Key wildlife habitat (please identify on a map, as well as in the text)
- Landscape connectivity
- Large scale advanced exploration and mining
- Large scale project
- Linear density
- Linear disturbance
- Loop road
- Major infrastructure
- Migratory bird high concern (please identify on a map, as well as in the text)
- Northern Mountain Caribou
- Post-rut habitat areas (please identify on a map, as well as in the text)
- Reclamation
- Restoration
- Restricted industrial land use
- Robust reclamation
- Sensitive over-wintering habitat for salmon (please identify on a map, as well as in the text)
- Sensitive sheep habitats (please identify on a map, as well as in the text)
- Significant habitat (please identify on a map, as well as in the text)
- Significant water withdrawal
- Spawning habitat for salmon (please identify on a map, as well as in the text)
- Special management conditions
- Special management directions
- Surface access
- Surface disturbance
- Sustainable economic development
- Sustainable development
- Suitable
- Wetlands
- Woodland Caribou

## 2. Plan Organization and Text:

- Move “how the plan is organized” section above the “how to use this plan” section.
- Remove repetitive language throughout the document.
- Number general management directions (policy recommendations, research recommendations and recommended actions) and list them together in an appendix.
- Avoid duplication of management practices in land management unit descriptions and body of text.
- The plan, Section 2 in particular, is lacking in references.
- Add the percentage of the region that the area represents to each land management unit description.
- Change “Yukon Government” to Government of Yukon throughout the text.
- Section 6 does not need to re-state information about SMAs/ISAs/etc. but could simply refer to earlier sections.
- Replace the word “consultation” to avoid confusion with the legal use of the term in Final Agreements, legislation and common law (i.e., the Crown’s legal duty to consult). “Engagement” is an effective alternative.
- Confirm that web addresses are up-to-date.

## 3. Maps:

- In general, maps have very similar colours making them hard to distinguish.
- Map 2: interim and permanent SMA II designations should be coloured differently.
- Map 5: Change the colour of the paleontological sites symbol as it is hard to differentiate between the symbols for Settlement Land.
- The map in Figure 1-1: use a different colour for the roads, add a legend and north arrow, make place name text bigger, show the context with the other planning regions (show other planning regions), don’t replicate in Figure 2-1.
- Identify areas where new road or trail development should be avoided or minimized as part of the Recommended Management Practices for caribou in a map.
- Provide an ecoregions map that highlights which ecoregions are currently protected within Yukon's protected area system and which ecoregions should be protected to meet ecoregion protection goals. The Government of Yukon could provide this if the Commission does not already have a copy.
- Identify on a map where "key caribou pinch point along major routes and ridge" are located.
- If possible make land management unit-specific maps in colour to aid in their interpretation, plus add major creek names to those that don't already have them.



#### 4. Tables:

- ISA table (3-1) should include the number value for each threshold in the description column instead of repeating the text from management intent for clarity and to avoid confusion.
- SMA table (3-1) should explicitly state development thresholds for clarity and to avoid confusion instead of using vague wording. It would work to add a reference to the table and page number where these can be found given that they differ between land management units.
- When a table carries on to an additional page, the title should be repeated on the new page.
- In the table at the start of Section 5 that breaks out the area and percentage of the region that area represents, make community area and Tombstone separate items in the table instead of grouping them together. Add total area to the table.
- Fix Table 6-1 numbering.

#### 5. Figures:

- Figure 4-1 is confusing. Some explanation of what the graph is saying should be given here. Consider revising the x axis label for clarity. It appears biased in focusing on impacts on placer, rather than impacts on wetlands. It would be more informative to the conversation to show the cumulative impact of all wetlands management directions to claims (no mining in bogs, marshes and buffers).