



In Your Words Report

A Summary of Draft Regional Land Use Plan Engagement and Feedback

August 2022

Photo: Yukinobu Yamamoto

Produced by



**Dawson Regional
Planning Commission**

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

EXECUTIVE SUMMARY

In June 2021 the Dawson Regional Planning Commission released a Draft Regional Land Use Plan for the Dawson Region. A public engagement campaign was launched on June 15, 2021 and ran until November 1, 2021. It was the second major engagement campaign the Commission have undertaken as a part of the planning process. The main objective for this round of public engagement was to gather information, reactions, and thoughts on the Draft Plan to inform the development of the Recommended Plan.

WHAT DID WE DO?

During the roughly 5-month engagement period, the Commission and staff put extensive effort into reaching a variety of community members, stakeholders (Plan Partners), First Nations, and other organizations to ensure a broad spectrum of input on the Draft Plan was received, and people were able to easily express their thoughts and concerns.

Recognizing the difficulties of community participation due to the constraints of work seasons, COVID-19 restrictions and other barriers to accessibility, the Commission held a wide range of events and opportunities for participation. This included meetings and workshops that were designed to promote small group conversations; these were offered in-person and online on multiple dates and at different locations. Meetings varied in style: some were sometimes technical, or topic-focused, while others were more focused on Traditional Knowledge or community gathering. In addition, staff and Commission held individual meetings with stakeholders and First Nations, provided a survey (both online and paper), accepted written and oral submissions, and used social media, household mailers, and an engagement-specific website to connect with people.

RESULTS

Overall, the Draft Plan was received well. It was acknowledged that the Commission was trying to create a plan that offered compromise and balance in the Planning Region. The Commission received:

- Over 250 letters and emails from the public, including 60+ submissions from Tr'ondëk Hwëch'in citizens.
- Over 20 submissions from Plan Partners
- 80+ survey responses
- 40+ meetings with stakeholders

Parties

Tr'ondëk Hwëch'in Government

The main priority expressed by the Tr'ondëk Hwëch'in Government was to ensure that the Recommended Plan align with Chapter 11 of the Tr'ondëk Hwëch'in Final Agreement. The feedback was centered around six themes they want to see addressed further in the Recommended Plan.

Government of Yukon

The Government of Yukon's feedback was also centered around six themes: the designations of land management units and their boundaries, cumulative effects management, wetlands, culture and heritage, MMIWG2S+, and implementation.

Engagement Highlights

Implementation of Plan: Feedback indicated a need for more clarity and direction, including processes for monitoring, adaptive management and measuring plan success.

Key Species: Caribou, moose, and salmon were raised as an ongoing concern for their cultural and ecological importance.

Mineral Development: The importance of the mineral industry to the Regional and Territorial economy was emphasized. The main comments received were in relation to the potential for critical minerals, access to claims, lack of certainty for operators, the need for reclamation guidance, and available land for exploration.

Protection and the Special Management Area 2 (SMA 2) land designation:

Many were concerned that the SMA 2 designation did not offer enough protection and therefore it was not an effective tool to achieve protection objectives. The amount of protection was the predominant theme in the feedback, and opinions varied widely. Many suggested there was too much land 'off-limits' to industry, while others believed the Draft Plan did not do enough to protect the land, water and animals.

Stewardship: The concept of stewardship and 'On the land we walk together' / Nän kāk ndä tr'ädäl, was met with overwhelming positivity. The need for the distinction between stewardship as an ancestral responsibility and as a broader community concept was highlighted.

Sustainable Economy: The importance of the agricultural and tourism economies was discussed, especially surrounding issues of food security, and coordinated mixed land use (e.g., farming and mining).

Traditional knowledge and values: The importance of including traditional knowledge and values was broadly expressed. This inclusion not only refers to the Recommended Plan, but also in the ongoing monitoring and assessment activities and research recommended in the Draft Plan, and in any further subregional planning that is recommended by the Commission.

Wetlands: Feedback centered on the need for absolute protection of wetlands, and concerns surrounding thresholds of development in some wetlands and wetland types. Wetland thresholds in particular were a huge concern for the placer mining industry.

NEXT STEPS

The Recommended Plan will be released by the Parties in Fall 2022. Chapter 11 of the First Nation Final Agreements provides direction as to how the Parties must proceed with Consultation following the submission of a Recommended Plan by a Planning Commission.



Commission members Alice McCulley and Angie Joseph-Rear at the Draft Plan launch

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LIST OF ACRONYMS

CE	Cumulative Effects
ISA	Integrated Stewardship Area
LMU	Land Management Unit
NAR	Northern Access Route
SMA	Special Management Area (1 or 2)

LIST OF ORGANISATION ACRONYMS

Many organisations that provided feedback to the Dawson Regional Planning Commission are listed in this report using acronyms. This list provides their full name.

DDRRC	Dawson District Renewable Resources Council
YCS	Yukon Conservation Society
WCS	Wildlife Conservation Society
CPAWS	Canadian Parks and Wilderness Society
KPMA	Klondike Placer Miners' Association
YCM	Yukon Chamber of Mines
YPA	Yukon Prospectors Association
PCMB	Porcupine Caribou Management Board
YSSC	Yukon Salmon Sub-Committee
WWF	World Wildlife Fund
YFWMB	Yukon Fish and Wildlife Management Board
Y2Y	Yellowstone to Yukon Conservation Initiative

Photographs with individuals other than Commission members and staff have been blurred to ensure privacy. If you have any concerns about any of the photographs in this document, please contact dawson@planyukon.ca.

INTRODUCTION

NÄN KÄK NDÄ TR'ÄDÄL: ON THE LAND WE WALK TOGETHER

The Commission and staff would like to express their sincere thanks to community members, Tr'ondëk Hwëch'in citizens and Plan Partners and everyone else who participated in the Draft Plan engagement. All the input received has been carefully considered by the Commission and staff and has helped develop a Recommended Plan that the Commission feel truly meets their vision of "Nän käk ndä tr'ädäl: On the Land We Walk Together".

In the Yukon, regional land use planning is a process outlined in Chapter 11 of the Umbrella Final Agreement. The Dawson Regional Land Use Plan is the third to be produced after the North Yukon and Peel Watershed.

Tr'ondëk Hwëch'in and the Government of Yukon (the Parties) established the Dawson Regional Planning Commission (the Commission) to develop a Recommended Plan for the Dawson region. As part of this process, the Commission released a Draft Plan in June 2021 and actively sought public input and feedback to determine if they were on the right track.

Public engagement is an essential part of developing a regional land use plan, and it required dedication and commitment from the Commission and its staff. Importantly, the time Yukon residents and Plan Partners spent providing feedback to the Commission cannot be understated. The Draft Plan received an overwhelming response and a range of different perspectives. The Commission thanks all those who participated and appreciates the respectful nature of the dialogue and the willingness of Dawson stakeholders to listen to each other throughout the planning process.

This summary is neither exhaustive nor reflective of the Commission's priorities for the development of the Recommended Plan. The Commission has prioritised transparency throughout the planning process and as such, all of the feedback the Commission received during Draft Plan Public Engagement is available on its [website](https://dawson.planyukon.ca/index.php/publications/public-feedback)¹ and is available for anyone to review.

¹ <https://dawson.planyukon.ca/index.php/publications/public-feedback>

ENGAGEMENT STRATEGY – WHAT DID WE WANT TO FIND OUT?

VISION

This is the second major engagement period the Commission has undertaken as a part of the planning process. The first occurred between October 2019 – January 2020. During this time the Commission sought input on the issues and interests that the community and Plan Partners felt were most important, and for feedback on their Plan Goals and Vision. They used this feedback to create the Draft Plan, which was the focus for this round of engagement.

As a part of the Draft Plan feedback phase, the Commission's main goal for the engagement was to inform Recommended Plan development. The Commission were committed to listening to all concerns and aspirations and reflecting as many as they could in the Recommended Plan.

This Draft Plan was the Commission's best attempt at balancing cultural, economic and environmental values with an eye to their vision: On The Land We Walk Together / Nän Käk Ndä Tr'ädäl". Thus, public engagement activities focused on the following, overarching question:

Thinking of community needs today and future generation needs tomorrow, are we on track?

OBJECTIVES

The Commission had specific objectives in mind when developing their engagement strategy:

- To fulfill obligations to undertake regional land use planning under Chapter 11 of the Tr'ondëk Hwëch'in Final Agreement (THFA) in a manner that is respectful and collaborative.
- To design and implement a meaningful, constructive, and objective-driven process.
- To provide participants safe in-person and online engagement options recognizing that different people have different needs and preferences.
- To ensure people with a diverse range of perspectives who live in and use the region have the opportunity to voice their perspectives.

- To champion the purpose and benefit of regional planning in the Dawson Region.
- To congregate people to navigate complex issues, consider trade-offs, and help the Commission find a path forward by supporting empathy, capacity and community.
- To evaluate the Draft Plan’s attempt to balance cultural, economic and environmental values with an eye to their vision “On the land we walk together / Nän kāk ndä tr’ädäl”.

ENGAGEMENT METHODS – HOW WE REACHED OUT

The Commission released the Draft Plan and launched their public engagement campaign June 15 2021, and this ran until November 1, 2021². The Commission and its staff put extensive effort into reaching a broad range of stakeholders to ensure that the Draft Plan received input from as many people and organisations as possible. Everyone was invited to participate as the Commission wanted to ensure the Dawson community and Yukoners alike would see themselves reflected in the Recommended Plan. [Appendix 1](#) (page 51) is a timeline of all the events and meetings the Commission and staff hosted or attended.

COMMUNITY CONVERSATIONS

Event	Location	Attendees	Date
Tea Circle Chats	City of Dawson	12	October 12, 2021
Community Conversations	City of Dawson	30+	October 13, 2021
Community Conversations	Mayo	8	October 14, 2021
Community Conversations	Whitehorse	30+	October 19, 2021
Tr’ondëk Hwëch’in & Commission Gathering	City of Dawson	20+	October 20, 2021

In October, the Commission and staff held multiple events designed to engage with people and organisations interested in the future of the Dawson region.

- Events were designed to be accessible and welcoming, and suitable for all.
- There were no theatre-style presentations: - instead Commission members and staff sat at small tables and had conversations.

² While officially DRPC Draft Plan Public Engagement had a November 1st cut-off, if the Commission received input or a request to meet after this date it was accommodated.

- Posters and Draft Plan facts and information were posted around the room for anyone to review.
- Events were held in Dawson, Mayo, and Whitehorse to reach a broad audience.

Inclusivity was a priority for the Commission, especially to ensure that Dawson residents and Tr'ondëk Hwëch'in citizens had ample opportunity to voice their thoughts and concerns. In particular, two events were held with Tr'ondëk Hwëch'in citizens in mind:

Tea Circles: Held one afternoon in Dawson and primarily advertised to citizens as the Commission were advised smaller events would feel more comfortable. During this session, staff facilitated discussions that allowed citizens to engage with both the Commission and plan partners.

Citizen and Commission Gathering: Organised by Tr'ondëk Hwëch'in Government, several Commission members and a staff member attended to listen to citizens and explain more about their reaction to the Draft Plan and answer questions; it was an open forum. Some citizens came to express opinions, others came to learn more about the plan; all came to listen and learn.



DRPC Commission Member Dan Reynolds and Planner Nicole Percival host a Tea Circle



DRPC Senior Planner Tim Sellars talking to Community Conversation attendees



Community Conversations advertising in Mayo



Whitehorse Community Conversations

PUBLIC WORKSHOPS

Event	Location	Attendees	Date
Wetlands	Online	20+	August 4, 2021
Wetlands	City of Dawson	20+	August 4, 2021
Conservation Zones	Online	20+	August 5, 2021
Conservation Zones	City of Dawson	20+	August 4, 2021
Future Planning Areas	City of Dawson	20+	August 5, 2021

In August 2021, to kick off in-person engagement, the Commission held five public workshops in Dawson in addition to an online engagement platform to gather initial feedback on the Draft Plan and start discussions. Commission members attended all sessions.

- The workshops were not technical and were open to everyone.
- Designed so that participants could discuss issues with each other and learn about the different perspectives that exist for certain issues.
- The topics covered included: Wetlands, Conservation Zones, and Future Planning Areas.

Wetlands and **Conservation Areas** used the following format:

- Online sessions were facilitated by an external contractor, John Glynn-Morris, and in-person by Commission staff.
- Staff provided an overview of the Draft Plan and then participants were split into breakout groups to discuss their initial impressions. Each group then was invited to feedback to everyone else.
- The workshop topic was introduced, and breakout groups had a discussion before providing a summary to the main group.

For **Future Planning areas**, a charette style approach was utilised.

- Participants were invited to discuss whether this was the right approach for each future planning area (Klondike Valley, Dempster Highway Corridor and Yukon River).
- The session was supported with large maps that allowed individuals to interact directly, marking key areas, values, and issues.



August Summer Workshop – Large Group Discussion



August Summer Workshop – Breakout Group

TECHNICAL WORKSHOPS

Event	Location	Attendees	Date
Cumulative Effects	Whitehorse	30+	September 28-29, 2021
Wetlands	City of Dawson	30+	October 27, 2021

Two technical workshops were held in Fall 2021 to tackle topics that the Commission needed direct input on. The topics, cumulative effects and wetlands, had many conflicting values and issues associated with them, and the Commission wanted to invite plan partners to participate, listen to each other and help formulate ideas and solutions that could be utilised in the Recommended Plan.

Technical workshops were not open to the public but summaries of each were made available immediately after on the DRPC website.



DRPC Planner Nicole Percival and YLUPC Senior Planner Sam Skinner leading the Cumulative Effects Technical Workshop in Whitehorse

FORMAL WRITTEN SUBMISSIONS AND PRESENTATIONS

The bulk of feedback was received following Draft Plan public engagement in the form of written submissions, including formal documents, emails, and surveys. The Commission also received several presentations in 2022 from Industry Plan Partners as new information became available.

The Commission received:

- Over 250 letters and emails from the public³, including 62 submissions from Tr'ondëk Hwëch'in citizens
- Over 20 submissions from Plan Partners

The volume of responses received was welcomed by the Commission as it showed how engaged people were with the Regional Planning process and the Draft Plan.

SURVEY

A survey was developed in collaboration with Tr'ondëk Hwëch'in and Government of Yukon to ensure that it was accessible and easy to understand. The survey acknowledged that not everyone would have read the Draft Plan and each section

³ Not including Plan Partners

of the survey provided a plain language summary. The survey was available both online and in paper format – see [Appendix 3](#) (page 55) for a copy of the survey.

MEETINGS

Commission staff spent most of the summer engaging with a range of stakeholders including Plan Partners and Affected First Nations to ensure that the Draft Plan was well publicised, and that anyone with questions or concerns were able to have direct input. Over 40 meetings were held, and summaries can be found on the DRPC website (except for when attendees opted not to share information).

WEBSITE

The DRPC website was used extensively to share public engagement summaries. Meetings and events were summarised and posted on the website, except for meetings that occurred in presentation format, or when attendees opted not to share information.

MAILERS

All households in the City of Dawson, Whitehorse, and surrounding communities received a mailer from the Commission outlining the process, and what to expect. These were sent in advance of the Draft Plan's release to increase awareness of the process. Later in the summer, Commission staff mailed a copy of the Draft Plan Highlights to all residents in Dawson. This included information about upcoming Community Conversations.



Household mailer sent to households in multiple Yukon communities

Artwork by Yukon Graphic Recording

SOCIAL MEDIA AND LOCAL ADVERTISING

The Commission and staff used social media in a limited but targeted way. Updates and events were posted to Facebook and local advertising was used to boost event coverage and attract people who may not have been aware of planning activities or the Commission. This helped reach a broader audience and increased awareness of the regional planning process.

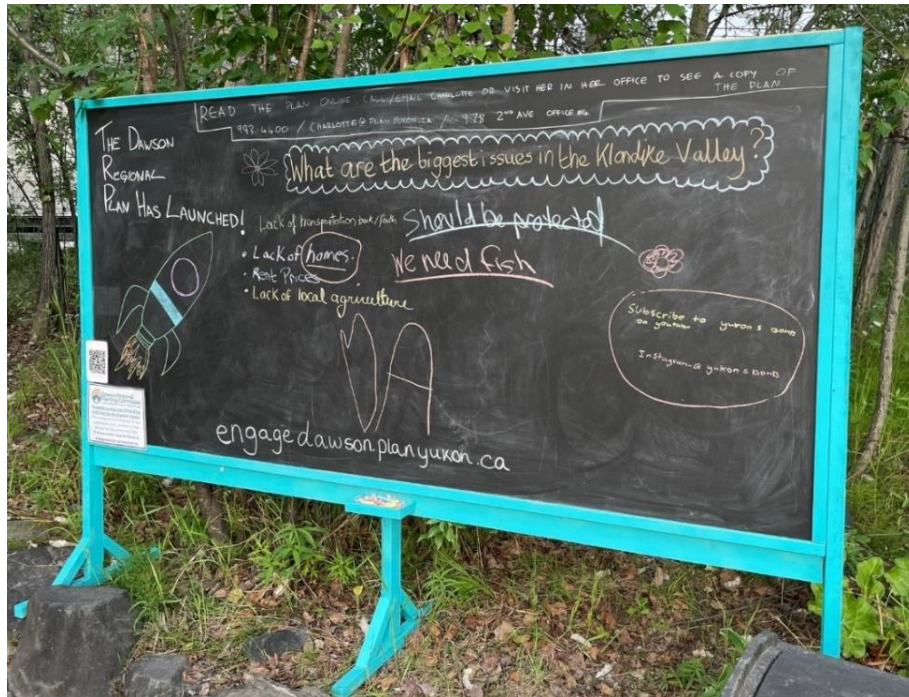
POP-UPS & BLACKBOARD ENGAGEMENT

During Draft Plan engagement, Commission staff hosted ‘pop-up’ events in the garden adjacent to the office. Anyone passing by could stop to learn about the Draft Plan, ask questions and take Highlights or Summary documents with them. Additionally, three events for Tr’ondëk Hwëch’in citizens were held. These were held at C4 (a subdivision on Tr’ondëk Hwëch’in Settlement Land), outside the DRPC office and in the Tr’ondëk Hwëch’in administration building.

Finally, the Commission employed a community-based method of engagement via a blackboard. Each week a new question was posed to Dawson residents to get them thinking about the issues in the region and promote the Commission’s work.



DRPC Planner Charlotte Luscombe hosting a Pop Up



Blackboard Engagement

GOLDFIELDS TOUR

The importance of mineral exploration and development in the Dawson Region was highlighted during the first rounds of engagement. The KPMA, a plan partner, invited the Commission and staff to visit some placer mining sites in LMU 12 – East. It was an opportunity to talk to those working in the industry, learn more about placer mining and strengthen relationships.



KPMA Placer Mining Tour with Commission members Debbie Nagano and Alice McCulley

ENGAGEMENT MATERIALS

Draft Plan

The main item used for engagement was the Draft Plan itself. This document was the culmination of two years of planning work, including multiple public meetings, technical working group sessions and field trips. Key topics and concepts in the Draft Plan were highlighted during meetings with Plan Partners, and they informed community events. For example, during Community Conversations, the topic of Wetlands was an option attendees could select for table discussion. The Draft Plan itself also had multiple 'call-out' boxes where the Commission actively sought input as they needed help and direction for certain issues.

Maps

Maps are a powerful visual aid that the Commission and its staff used extensively throughout Draft Plan engagement. Printed maps of the Land Designation System were made available at every public event and the whole map package (including GIS data files) were available to view and download on the DRPC website.

Highlights Version

At only six pages, the Draft Plan Highlights introduced the planning region, highlighted the main issues the Commission wanted feedback on and introduced people to the Land Management Designation system. The Highlights were mailed to every resident in Dawson.

Summary Version

A summary of the Draft Plan was developed to provide an easy-to-read version for non-technical experts. This used plain language and was provided at community events and workshops.

Cumulative Effects Illustrations

The Commission contracted the services of Yukon Graphic Recording to provide an artistic interpretation of the different development threshold levels outlined in the Draft Plan for a non-technical audience. These illustrations are provided in [Appendix 2](#) (page 54).

Video Presentation

A PowerPoint presentation of the Draft Plan was recorded and posted online. This provided an oral and visual option for individuals to interact with the Draft Plan.

ENGAGEMENT ANALYSIS

It was important to the Commission and to staff that every single submission received be read and carefully analyzed. Using specialist qualitative research analysis software, staff reviewed each submission line-by-line and coded responses against topics. Coding allowed staff to 'label' quotations and helped them identify themes and relationships. This feedback was then presented to the Commission during working sessions and was a fundamental part of the decision-making process.

As part of analysis, the Commission received five form letters that were sent by multiple respondents. Each of these letters were reviewed once, taking care to make note of additional individual comments. The Commission carefully considered the content of the letters, not the number of copies received. These letters were from the following groups:

- Tr'ondëk Hwëch'in Citizens
 - General Recommendations
 - Climate Change
 - Water Preservation and Protection
 - Wetlands Protection
- CPAWS letter 'All My Vision'
- Industry letter 'Commission Draft Plan'

Copies of each can be found in [Appendix 5](#) (page 96).

A full description of the coding methodology will be provided in the upcoming Methods Report.

ENGAGEMENT LIMITATIONS

POTENTIAL FOR DUPLICATION OF INPUT

Throughout this process, individuals and organisations were able to contribute multiple times through different methods e.g., they could submit a survey, attend a meeting, and send an email. The Commission also did not restrict how many online surveys could be submitted from a single IP address.

COVID RESTRICTIONS

Throughout the engagement process there were ongoing concerns with regards to COVID-19 which added additional challenges to the planning and format of public engagement events.

GAPS IN RESPONDENT DEMOGRAPHICS

Although the Commission tried to create an inclusive and accommodating process, we recognise that some sectors of the Dawson community were not able to fully participate:

- **Youth:** Attracting youth participants was difficult and represents a significant gap despite staff and Commission members attending Tr'ondëk Hwëch'in Youth Council as well as giving a presentation at Robert Service School.
- **Seasonal workers:** The intention of a five-month engagement period was to ensure as best as possible that seasonal workers would have opportunities to participate either in person or online. The Commission recognises that summer is the busiest period for those working in mining, agriculture, tourism, etc. The Commission sought to meet with industry representatives as well as attending specific events where they might engage directly with people such as the KPMA Annual General Meeting (2021).

ENGAGEMENT RESULTS

This section of the report reviews feedback and provides a summary as well as direct quotes from all the different inputs we received.

- The Parties
 - Tr'ondëk Hwëch'in
 - Government of Yukon
- Affected First Nations
 - First Nation of Na-cho Nyäk Dun
 - Vuntut Gwitchin First Nation
- Other First Nations
 - White River First Nation
- Plan Partners
- General Feedback: Questions from the Commission
 - Overall impressions of the Draft Plan
 - Special Management Area 2 land designation
 - Cumulative effects indicators and framework
 - Access
 - Wetlands
 - Land Stewardship Trust
- General Feedback: Additional topics
 - Stewardship

- Key Species
- Sustainable Economy

THE PARTIES

Tr'ondëk Hwëch'in

“Tr'ondëk Hwëch'in would like to thank the Dawson Regional Planning Commission (the Commission) for their hard work reaching this important milestone. We are encouraged by the efforts made by the Commission to strike a balance between competing and conflicting land uses and perspectives in this complex planning region. Additionally, we are happy to see many of the recommendations of the Draft Plan reflect a collective vision that is based on a sustainable approach to development within the Dawson planning region. The Draft Regional Plan (Draft Plan) is a good start towards meeting the objectives of Chapter 11 of the Tr'ondëk Hwëch'in Final Agreement (THFA or Final Agreement).”

Tr'ondëk Hwëch'in recognised the Commission's work in producing the Draft Plan, acknowledging their efforts to strike a balance between competing and conflicting land uses. Their feedback was grounded in the voices of Tr'ondëk Hwëch'in citizens and specific guiding documents, including the THFA, Dënezhu Dätr'inch'e and the draft Tr'ondëk Hwëch'in Land Vision. Feedback was centred around six themes:

1. **Alignment with the Tr'ondëk Hwëch'in Final Agreement:** Tr'ondëk Hwëch'in emphasized that the Recommended Plan should more explicitly consider the distinct values of Tr'ondëk Hwëch'in and how their culture is reflected in the region. Further, they emphasized the importance of the traditional economy, and of recognising and promoting Tr'ëhudè in the Recommended Plan. They advised settlement land requires more focused consideration, and the importance of land-based learning and Dënezhu ways and knowledge should be emphasized.
2. **Protection of High Conservation Areas:** Tr'ondëk Hwëch'in did not support SMA 2 areas and wanted to see all of them legally designated as per Chapter 10 of the Tr'ondëk Hwëch'in Final Agreement. Additionally, they recommended greater protection for waterways, advised that fen development thresholds in wetlands should be limited to 25% and wetland buffers be established, and that to truly protect permafrost, new roads and trails should avoid such areas. Finally, the protection of caribou habitat was emphasized, particularly for the Fortymile, Clear Creek and Hart River herds.

3. **Sustainable Development on the Working Landscape:** Tr'ondëk Hwëch'in advised that the language in the Recommended Plan should be strengthened to better reflect the definition as per the THFA. They wanted to see the CE framework recommend indicators that are appropriate and reflect the social and cultural values of Tr'ondëk Hwëch'in. Moreover, CE thresholds need to be set so that key values are not undermined. They would like greater clarity around how adaptive management will be applied during implementation and advised that monitoring of all Plan components will be required. Finally, they would like to see greater protection for high value agricultural land.
4. **Climate Change and Tr'ondëk Hwëch'in Rights and Interests:** Would like to see more robust recommendations to address climate change, including how different values could be affected. The Recommended Plan needing to acknowledge how climate change will affect Tr'ondëk Hwëch'in way of life was emphasized, and they advised climate change could be a reason to review and adapt the Plan.
5. **Joint Management and the Concept of Stewardship:** Tr'ondëk Hwëch'in were pleased to see Stewardship emphasized in the Draft Plan as it is an important concept that is central to Tr'ondëk Hwëch'in worldview. However, they want to see the Recommended Plan better align with how they understand Stewardship, noting that "Stewardship is about responsibility and obligation – take care of the land and it will take care of you; take from the land only what you need and leave the rest for future generations." They also would like to see more around how Stewardship as a guiding principle directed the Plan's recommendations. Distinguishing between Stewardship and specific values was also highlighted.
6. **Future Planning Areas and Adequate Interim Protection:** Tr'ondëk Hwëch'in advised that they have management and stewardship responsibilities for the lands and resources within their Traditional Territory, suggesting that the Recommended Plan "should bring clarity to the importance of shared management and implementation by consistently reflecting this as a goal of the Plan." They want to ensure Tr'ondëk Hwëch'in Citizens can meaningfully participate in the management and care of public resources, on both Crown and Settlement Land. Further, they advised Chapter 6 - Implementation of the Recommended Plan should ensure joint management responsibilities are emphasized.

Government of Yukon

“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... 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.”

Government of Yukon commended the Commission for developing a Draft Plan that aimed to balance the many interests in the region. Government of Yukon staff across all departments reviewed the Draft Plan, and their feedback was detailed and comprehensive.

Feedback was centred around six themes:

1. Designations and Land Management Unit Boundaries

- a. **SMA 2:** Concerned about designation as the intent remains unclear and current legislation will not allow for protection as envisioned. Also, these areas would not count towards Federal protection targets.
- b. **Existing claims:** Unclear how claims in protected areas could be developed or accessed. Suggested moving some claim blocks into adjacent LMUs.
- c. **Critical minerals:** A major concern as the Yukon is part of national strategies and critical minerals are essential for development of clean energy solutions.
- d. **Yukon River Corridor:** Access to other LMUs off the Yukon River is important, for mineral development and for tourism. Suggested designating it as an ISA 1 so that development can proceed while still protecting other values.
- e. **Caribou:** Fortymile summer range is not adequately captured in LMU 18, and the Clear Creek herd should be protected with a boundary extension of LMU 7.
- f. **Land Management Unit Adjacency:** The adjacency of LMUs should be better considered in the Recommended Plan. A and p ‘tiered approach’ to designation was proposed

- g. **Tombstone – Ddäl ch’ël:** Appreciated the Draft Plan’s reference to the existing management plan, and that it counts towards the overall protected area of the region.
- 2. **Cumulative Effects:** Appreciated the Commission’s work but would like to see greater clarity in the Recommended Plan. They identified several issues they felt needed addressing including linking linear density and surface disturbance with ecological values, development of socio-economic indicators and the development of values-based reclamation guidance.
- 3. **Wetlands:** Encouraged the Commission to use draft wetlands policy when developing the Recommended Plan and were encouraged to see reference to the mitigation hierarchy. They do not support the Draft Plan’s direction for LMU 19 or region-wide thresholds for wetlands. They also advised that previously permitted and licenced activities need to be grandfathered.
- 4. **Culture and Heritage:** Advised that the Draft Plan’s assumption that management practices for heritage and cultural resources are adequate is not accurate. They advised that more proactive surveys would better align with Chapter 13, and that the significance of culture and heritage with respect to Chapter 13 needs to be better reflected in the Recommended Plan.
- 5. **MMIWG2S+:** Government of Yukon were pleased to see this issue highlighted and further, would like to see proponents partner with the signatories of the *‘Changing the Story to Upholding Dignity and Justice: Yukon’s Missing and Murdered Indigenous Women, Girls and Two-spirit People Strategy’*.
- 6. **Implementation:** Government of Yukon would like to see greater clarity for implementation as well as a single implementation committee identified. They also do not support the establishment of new bodies.

AFFECTED FIRST NATIONS

Two Yukon First Nations have overlapping Traditional Territory within the Dawson Region and so as per Chapter 11, the input of Affected First Nations was essential to the planning process.

First Nation of Na-cho Nyäk Dun

“FNND would like to applaud the Commission for its hard work and for releasing the Draft Plan. This is a critical milestone towards fulfilling the critical promise of land use planning in Chapter 11 of the Final Agreement.”

As an “Affected First Nation”, FNNND expressed interest in participating in the Senior Liaison Committee and Technical Working Group, and outlined several topics of concern for the Commission to consider moving forward:

- Alignment of the Plan with FNNND’s aboriginal and treaty rights and incorporation of FNNND knowledge into the Plan.
- Climate change: more proactive and concrete measures.
- Protection of important areas: all SMAs should require maximum conservation, and water/waterways and wetlands, caribou and salmon and their habitats should receive more attention.
- Stronger integration of stewardship and sustainable development concepts into the Plan, and more explicit measures to bolster a cumulative effects framework.
- Specific concerns for several LMUs (7, 8, 9, 10, 11, 12, and 19) and management of the Dempster and Klondike Highway corridors.
- Land use conformity, even while the Plan is still in draft form.
- Plan implementation and review of the Plan as a “living document”.
- A moratorium on development until Chapter 11 regional land use planning has been completed in FNNND’s entire Traditional Territory.

Vuntut Gwitchin First Nation

“As a plan that is contiguous with the two previous regional plans that addressed Vuntut Gwitchin First Nation...Traditional Territory, we have several interests in the Dawson Plan relating to the holistic connections between our planning regions...”

The Vuntut Gwitchin Government outlined nine major concerns with the Dawson Plan based on its close connections with both the Dawson and North Yukon Regional Land Use Plans:

- Porcupine Caribou Herd protection, management, and research.
- Watersheds, their interconnectivity, and the potential impacts of industrial development.
- Climate change resilience: VGG has declared a state of climate emergency.
- Sustainable development, especially oil and gas development in the Eagle Plains and Kandik Basins.
- Cumulative effects management: consistent thresholds across different regional land use plans.
- Inclusion of VGFN knowledge and concerns in Dempster subregional planning.

- Potential incompatibility of different management intents and thresholds between adjacent LMUs in the DRLUP and NYRLUP.
- Incorporation of Vuntut Gwitchin place names and traditional knowledge.
- Plan Implementation, Evaluation and Review.

OTHER FIRST NATIONS

White River First Nation

“We feel that the plan fails to recognize the importance of the planning region to WRFN’s past, current, and ongoing ties to the landscape”.

In their submission, they included examples of where the Commission could include White River First Nation in their recommendations and highlighted their history and current use of certain areas.

White River First Nation provided recommendations regarding:

- LMUs 3, 20, 21, and 22.
- Suggestions for reorganization of LMU specific summaries.
- Feedback regarding cumulative effects indicators and framework.
- Development of a fen threshold.
- Comments regarding sub-regional plans.

They also re-submitted their Conservation Priorities Assessment that was received by the Commission on February 3, 2021:

“We are pleased to see some of our conservation priorities being address [sic] in this version of the draft”.

PLAN PARTNERS

The Draft Plan would not have been possible without the participation of the DRPC’s Plan Partners. During every stage of the planning process, the Commission have communicated with Plan Partners, keeping them informed of meetings and opportunities for engagement. The range of different knowledge and experience that Planning Partners have added to the planning process is immense, and the Commission welcomed their input and perspectives.

The Commission received over 20 responses from Plan Partners, and the following section of Engagement Results summarises what we heard from the formal written submissions received from Plan Partners in response to the Draft Plan. Written submissions are all available on the DRPC website.

BEACONS Project – University of Alberta/Yukon University

“The success of the Dawson Plan to maintain healthy lands and waters within Integrated Stewardship Areas...will likely rely on adaptive management.”

The BEACONS Project suggested that the Plan contain a description of how adaptive management works, and key elements required for implementation, as well as identification of ecological benchmarks classified as Special Management Area 1.

Given the uncertainty of climate change they proposed that refugia and corridors be explicitly identified/monitored and classified as Special Management Area 1, and that the Dawson region’s contribution to climate change resilience in the north be considered.

Canadian Parks and Wilderness Society – CPAWS

“While we think the draft plan is a good start towards securing a healthy future for the Dawson Region, we also see parts that must be changed for the plan to align with sustainable development.”

CPAWS’ major recommendations for consideration include:

- Ground the plan in sustainable development, not ‘balance’.
- Provide enduring protections for the Fortymile caribou herd by protecting the entirety of the herd’s core range in the Yukon.
- Remove Special Management Area 2 as a designation option.
- Ensure the Cumulative Effects Framework will work to sustain ecological and cultural values.
- Establish meaningful protection for wetlands.
- Better protect the Klondike Plateau ecoregion.

Canadian Wildlife Service - CWS

“ECCC-CWS is pleased to see that, overall, the conservation priorities we identified are reflected in the draft Plan and Land Management Unit (LMUs) designations in the draft Plan.”

CWS’s conservation priorities for the region include high elevation habitat, the Scottie Creek wetland complex, and the Tintina Trench. They also proposed:

- Integrated management strategies that ensure land use activities avoid detrimental effects on Bank Swallows and other migratory birds.
- Protection of areas where plant species of Special Concern occur.

- Consideration for the Yukon South Beringia Priority Place initiative and Canada's Conservation Targets.

Conservation Klondike Society - CKS

"The Commission should use traditional knowledge and conservation science to set limits that ecosystems can tolerate... All aspects of the plan need to prioritize the health of lands, waters and wildlife."

CKS highlighted that "Tr'ondëk Hwëch'in conservation priorities call for 60% protection of the Dawson region, 3.5% is not enough!" They recommended:

- Upgrading conservation areas with weak protection to Type 1 special management areas.
- Protection of critical habitats.
- Consideration of the importance of traditional foods and sustainable agriculture.
- Limits on development in sensitive areas.

Dawson District Renewable Resources Council – DDRRC

"In general, we think the plan is a good start towards identifying and accommodating the needs of all land users within the Planning Region. We support the concept of stewardship even in areas where industrial development is permitted. We understand the challenging task of balancing ecological, socio-cultural, and economic interests and appreciate the immense efforts made by the Commission to accommodate and engage with all members of the public affected by this initiative."

The DDRRC raised concerns regarding the development of new access and the resulting cumulative effects on key species, and gaps in the Plan's implementation process. They brought forward specific recommendations for key species including caribou and salmon, traditional economy, and wetland conservation areas.

Ducks Unlimited Canada - DUC

"We are not opposed to development and understand that resource extraction industries are important to both the local and global economies. However, we believe it is possible for these industries to be undertaken in a manner that maintains the ecological values that wetlands and other ecosystems currently provide."

DUC provided recommendations specific to:

- Management objectives and how they relate to policy.
- Development in bogs marshes and fens in LMUs.
- Carbon stored in fens and how that relates to climate change goals.
- Buffers around wetlands to ensure protection from development.
- Clarification of the intent of Wetlands of Special Importance.
- Adoption of no-loss of wetland values for areas designated as Wetlands of Special Importance.
- Designations and management intent for specific Special Management Areas and LMUs.
- Cumulative effects thresholds for ISA units.
- Guidance around offsetting activities.

Fish and Fish Habitat Protection Program – FFHPP

“FFHPP seeks to conserve existing fish and fish habitat resources, protect these resources against future impacts and restore fish habitat. Overall, our review found that the draft Plan aligns well with these goals”.

FFHPP provided specific comments relating to fish and fish habitat, and the Fish Habitat Management System for Yukon Placer Mining. Recommendations were provided on sections of the plan pertaining to:

- Surface disturbance.
- Water indicators.
- Cumulative effects framework discussion.
- All-season surface and water access.
- Forestry.
- Aggregate resource extraction.
- Salmon.
- The Fortymile River.
- Regional indicators for sustainable development.

Friends of Dempster Country - FoDC

“...FoDC believes that with adaptive management designed to mitigate the disturbance of what is already happening on the land and by employing the ‘precautionary principle’ the Recommended Dawson Regional Plan could go a long way...”

FoDC advocated for:

- The region north of the Tintina Trench to be designated as a Conservation Area.
- Change Special Management Area 2 designations to Special Management Area 1 in LMUs 1, 4, and 7.
- Allowance for forestry and fuel wood harvesting in LMU 6 under a Special Management Area 1 designation.
- Direction for making future Plan revisions if the Brewery Creek heap-leach operation expands.
- Protection of key habitat for the Clear Creek Caribou Herd in LMU 9.
- Inclusion of activity in the Dempster Highway Corridor in disturbance thresholds for cumulative effects management in adjacent land units.

Klondike Active Transport and Trails Society – KATTS

“...the Draft Plan makes a good start at recognizing the importance of non-motorized trails but can be improved to better ensure that our trails and travel routes are respected and protected for future generations.”

KATTS outlined the numerous important benefits to society that trails provide:

- Cultural, health; social; economic; education; community identity and pride; environmental sustainability; connection to the land; inspiration and joy; and legacy for future generations.
- Recommendations were made on how to better build these value sets into specific sections of the Draft Plan.

Klondike Placer Miners’ Association - KPMA

The KPMA has proven our ability to evolve, learn and grow; we have practical on-the-land experience; we understand the important stewardship role we plan on the land we work; and most importantly, we want to do a good job. But we cannot be expected to work to a standard that hasn’t been set yet (there is no approved wetland reclamation plan, there is no final Wetland Policy, there is no modern Placer Act), and we do not believe a Precautionary Approach is a fair or reasonable response to all issues in front of the Commission. We also appreciate you must respond with a balanced recommendation to these contestable issues, and we’ve made some recommendations of our own for you to consider adopting.

The KPMA's "key take-home messages", in addition to comments on specific LMUs include:

- The addition of reclamation into all aspects of the Plan, including the cumulative effects framework.
- Recognition of placer miners as taking a stewardship role in their work.
- Designating Special Management Area II areas as either Special Management Area Is or ISAs.
- Offsetting disturbance values with reclamation.
- Avoid recommendations that create unnecessary reporting/additional bureaucracy.
- Use the Fish Habitat Management System as a guide.
- Use the offsetting principle for wetlands and be clear in determining simple wetland thresholds.
- Ensure access to mineral claims that are 'allowed' in the Plan is maintained.
- Change management directions related to timing windows so they are more adaptable to the actual presence of species and not a date on a calendar.

Porcupine Caribou Management Board – PCMB

"The Board appreciates the...Commission's work on...[the Plan] to date and we note the inclusion of important concepts such as zones of influence, cumulative effects, key migration routes, critical pinch points and caribou habitat requirements."

The Board suggested that the Plan reference the Porcupine Caribou Management Agreement as the source of guiding principles regarding the Porcupine Caribou herd and provided comments specific to LMUs that overlap with the herd's range.

They also highlighted concerns regarding Special Management Area designations, development density, winter roads, cumulative effects, sub-regional planning for the Dempster Highway, and expressed interest in providing direction and identifying gaps to support the Recommended Plan's implementation.

Yellowstone to Yukon – Y2Y

"[the Commission should] re-examine what balance and sustainability mean given climate change, biodiversity loss and the sacred cultural connections to the land held by the Tr'ondëk Hwëch'in."

Y2Y provided comments that reflect suggestions to support:

- Increasing the amount of large interconnected protected areas

- Conservation of cultural heritage including lands and wildlife for Indigenous Peoples that have overlapping traditional territories in the planning region
- Cumulative effects management in the draft plan should to be reviewed
- Protection of the Fortymile caribou herd is a critical goal

Yukon Environmental and Socio-economic Assessment Board – YESAB

“YESAB applauds the work of the DRLUPC and the effort taken to inform environmental and socio-economic assessment in the Dawson regional land use planning area”.

YESAB’s comments focused on ensuring references to YESAB and the environmental and socio-economic assessment process in the Recommended Plan are portrayed accurately.

Yukon Chamber of Mines - YCM

“YCM supports the draft plan’s priority to value heritage and habitat areas for conservation, however, industry currently working in the region would like to also see the plan preserve the ability for industry to continue to work in areas that are economically important today and in the future. [They] believe that establishing relevant and reasonable habitat disturbance thresholds and concurrent reclamation practices for the 3 proposed ISA classes will be critical.”

The Chamber would like to see more of a focus on environmental stewardship rather than outright land withdrawals: “When exploration and mining is done responsibly and in stewardship and partnership, the economic benefits for the community are substantial”.

They provided feedback relating to implications to existing claims and projects in LMUs where there was industry activity: 1, 3, 4, 6-13, 15-23, and commented that managing and implementing the plan will be difficult.

Yukon Fish and Wildlife Management Board – YFWMB

“In keeping with our mandate to conserve fish, wildlife and their habitats in Yukon, we acknowledge that the planning process was challenged by the extensive developments within the planning area already in place, but wish to express that our primary interest is to preserve Conservation as is laid out in the First Nation Final Agreement. This includes the harvesting rights of First Nations within the Traditional Territory and as such, the Board supports Tr’ondëk Hwëch’in’s conservation priorities for the Dawson Region, and commend the First Nation for putting the health of the lands, waters, wildlife and people foremost within the Dawson Region Plan.”

They provide specific recommendations regarding:

- Land use designations
- Disturbance thresholds
- Management of the Fortymile caribou herd
- ORV use
- River travel restrictions
- Stewardship.

GENERAL FEEDBACK: QUESTIONS FROM THE COMMISSION

Impressions of the Draft Plan

During the engagement process the Commission wanted to know what people generally thought of the Draft Plan. What did people like? What did they feel was missing or what would they change? They also had some specific questions for the Parties and public. These specific questions were identified as call-out boxes in the Draft Plan and highlighted in the survey and the topic of workshops and gatherings.

The following section gives a brief overview of what we heard and provides a selection of quotes that expressed some of the thoughts and ideas that were shared during the engagement on the Draft Plan.

What did people generally like about the Draft Plan?

Overall, the Draft Plan was received well. Many responses recognized the hard work that the Commission had done to develop the Draft Plan and noted that it was clear that the Commission were trying to achieve some balance between the environmental, socio-cultural, and socio-economic values in the Region.

"I recognize the challenges in making a plan to suit everyone and I appreciate the effort and open mindedness of the commission in listening to everyone." (Survey Response (661))

"I think you are heading in the right direction with all of this (a difficult task indeed) and I'd like to pass along my thanks to the people involved for sticking with it and hearing all sides of the debates." (Survey Response) (663)

The support for the concept of Stewardship and 'On the land we walk together' / Nän kāk ndä tr'ädäl as underlying concepts in the Plan was overwhelmingly positive.

"The Plan is to be applauded for its approach to and enthusiasm for a strong Stewardship element in the Plan. It explicitly calls for options to instill a sense of stewardship in all users." (Plan Partner Response) (YCS)

"I like the want/drive for everyone to work together...I like the understanding that we need to be thinking of future generations, our children." (Survey Response) (718)

"It is encouraging that the guiding principle of the plan is about stewardship and respect." (Survey Response) (644)

The Precautionary Principle was one of the concepts that was met with mixed reviews. Generally, the more conservation focused responses were supportive of the use of the principle in the Draft Plan, whereas others felt that it was unnecessarily restrictive.

"The application of the precautionary principle invites humility into decision-making by registering with decision-makers the magnitude of getting it wrong." (Plan Partner Response) (Y2Y)

"The YWPA would prefer that the underlying philosophy of the plan be focused on how to use the land within the Dawson planning region for the benefit of the community. This will require a shift in approach to assessing the acceptability of the resource sector...The precautionary principle starts from the premise that the resource sector is going to do harm so make them prove that they will not harm the land before they can proceed. This needs to change." (Plan Partner Response) (YWPA)

What were some of the areas of improvement or gaps that people would like to see addressed in the Draft Plan?

Echoing the responses that were received during the 2019/2020 public engagement sessions, the main issue for the region was by far the amount of land that was protected and the amount of land available for exploration and industrial development.

"Protect more than 3.8% of the area; with Canada's commitment 30% by 2030 we should do better." (Survey Response) (632)

"It should be noted that by exploring and mapping most all of the land it would result in possibly 5%-10% of the land requiring more advanced exploration, and then less than 1% of the ground being mined. Maybe 90% or more of the land does not require advanced exploration and thereby is automatically 'protected' from advanced exploration and mining. The low-impact prospecting should be allowed on most all of

the land as it does minimal or no damage to the land, flora and fauna, as all other low-impact activities on the land are allowed.” (Plan Partner Submission) (YPA)

“Industry needs clearly defined areas where we can and cannot work – the current Draft Plan does not provide the necessary certainty.” (Public Submission) (008)

Other areas of improvement will be considered in more detail in following sections.

Special Management Area 2 land designation

The Draft Plan introduced the concept of Special Management 2 Areas. This was a new type of designation where the intent was for high conservation and long-term maintenance of wilderness character. The important difference between these areas and the Special Management Area 1 areas was that there would be no legal designation for them as protected areas.

The Commission, as part of engagement, asked the public and plan partners directly what they thought about this land designation, by asking: ‘How do you feel we should approach these areas in the Recommended Plan?’

Several responses acknowledged the Commission’s attempt to balance and meet the many different regional interests with the SMA 2 designation:

“Although SMA 2 don’t offer full protection, I applaud the commission in trying to conserve. I appreciate that the northern part of the planning region has more SMA 2s, that offer somewhat protection, and are all connected.” (Survey Response) (689)

“I strongly support your vision for the North SMA II “The future of the area will look similar to how it is today” and in particular, your rationale for establishing it: “...enable landscape connectivity between Yukon-Charley National Preserve in Alaska....” This would allow wildlife habitat connectivity from the Peel River on the east through the Dawson planning area, all the way to the extensive protected areas in eastern and northeastern Alaska.” (Public Submission) (014)

Many were concerned that the SMA 2 designation would not offer enough protection, and many wanted these areas to become SMA 1 areas:

“Not enough protection. My first impression makes me question the efficacy and commitment of protection in SMA 2s.” (Survey Response) (636)

“I wish the SMA 1 area was large like the SMA 2 area. I also wish the SMA 2 was fully protected like SMA 1 if SMA2 became fully protected I wouldn’t feel a need for SMA 1 to be larger.” (Survey Response) (718)

"SMA-2 is a gutless way to make it look like public lands are protected but still allow the industry to spoil them. ='flexibility'" (Survey Response) (668)

We also heard concern about how much of the region had this designation and that too much was now off-limits:

"I have one question. On the areas marked as SMA II - Dawson city to the Alaska border. There's a great chunk that's on the right hand side or the left of the Yukon River that is recommended to permanently take it out of staking. I just like to let the Commission know that I truly believe the vast amount of minerals in this vast area of square miles of 1000s of 1000s of square miles of resources, I'd like to know if the Commission would take into consideration the value of those resources that you 're going to try to take off the map here. ... Because we seriously have to look at this. As much as I love this land for what it is, I still truly feel it works for everybody's interests." (Public Response) (080)

Finally, a lot of submissions felt the designation would not work in practice as the Commission intended. Implementation of this designation was a concern we heard from many perspectives:

"SMA 2 is giving a false hope that development can occur, when in a placer context it will essentially shut the operator down. ... There should only be areas that are deemed for protection or areas that are deemed to allow varying levels of development." (Survey Response) (698)

"Because SMA 2s would not receive legal protection or management plans, most of the proposed management directions associated with them are unlikely to occur because there will be no government body legally responsible for implementation of the management direction." (Plan Partner) (CPAWS)

"SMA 2's allow industrial development within existing mining claims and winter roads, and don't seem to have any future management planning. These combined leave these areas up for unmanaged development and leave Tr'ondëk Hwëch'in without decision-making input, which to me is problematic and goes against the whole intent of Chapter 11." (Survey Response) (635)

"Clarify the management intent of SMA II to articulate the vision more clearly for these regions including what activities are permitted and why certain legal designations are not adequate." (Plan Partner) (Ducks Unlimited)

Cumulative effects indicators and framework

The Draft Plan recommended cumulative effects thresholds for surface disturbance and linear density. The Commission recognized that there were unanswered

questions regarding the cumulative effects framework. During the engagement process the Commission held CE focused workshops and meetings, survey questions, and sought feedback through the call-out boxes in the Draft Plan.

The Parties suggested that the Commission should establish a broad cumulative effects framework that can be worked out more specifically by the Parties during implementation.

Recommendations from the Cumulative Effects Workshop included:

- Recognition that surface disturbance and linear feature density are reasonable indicators.
- Indicator thresholds should be linked to values and their management objectives.
- Management objectives need to be broader and more holistic (e.g., harvest levels maintained, healthy population, restore historic population levels, expanded range, habitat availability and connectivity).

Party feedback specific to Cumulative Effects

- The disturbance and linear feature density thresholds should be linked to values (i.e., caribou).
- Socio-economic values, and socio-cultural values are very important and should be further developed in the Recommended Plan.
- Government of Yukon will provide new linear feature density and surface disturbance data in the Spring of 2022.
- Reclamation: develop values-based reclamation guidance in an adaptive management context.
- Additional indicators: establish appropriate and additional indicators for the Dawson planning region, including those that better reflect TH social and cultural values (harvesting and hunting, and measurable indicators of climate change, like permafrost and wildfires).
- Threshold levels: set levels that do not undermine the key values of the region, such as moose, caribou, salmon, water, and to accept that these values might not be the same throughout the planning region.
- Clarity: provide clarity around the overall cumulative effects framework.

Plan Partner and public feedback specific to Cumulative Effects

There was a need for more transparency and clarity as to how the thresholds were established for the Plan and questions about the current surface disturbance data that was used to determine thresholds.

"It is unclear if the Cumulative Disturbance Thresholds are based off ecological derived habitat needs or are more arbitrary management thresholds." (Survey Response) (713)

"If current disturbance levels are not defined, how can thresholds be proposed for each land management unit, especially if the thresholds are arbitrary management levels." (Public Submission) (018)

"The plan is unclear in how it arrived at the currently proposed LUDs [land use designations] and associated cumulative thresholds." (Public Submission) (062)

There were also some questions about the effectiveness of linear feature density and surface disturbance as CE indicators in the Plan. Also highlighted was the gap of how reclaimed land is dealt with in the framework.

"The amount of human caused linear disturbance is not a good surrogate for impact of resource development activities on the environment especially if measures are undertaken to minimize impacts and good reclamation is undertaken." (Public Submission) (020)

"To consider cumulative effects of the placer industry on the Land Use Plan, it is vital that reclamation be included as an indicator to effectively consider and manage the past, present and future impacts of placer mining on the landscape." (Plan Partner Submission) (509)

There were many questions about how the CE framework would be implemented and who would do the work. Additional bureaucracy and barriers to the permitting and licensing process were of concern.

"Who is responsible for keeping track, for doing the measuring and what happens when a threshold is passed?" (Public Submission) (053)

Access

Access is a broad and complicated topic in the planning region. Access is needed for economic development, recreation and to participate in traditional economic activities. However, access can also be a detriment to the things that are valued on the land including wilderness and ecological connectivity. The effects of access on animals (particularly grizzly bears and caribou) were of particular concern. The Draft Plan made many recommendations surrounding access, especially in the

Special Management Directions and recommendations for Management Plans for some LMUs.

*"...additional roads and trails mean I am able to access farther on the land for harvesting, however more roads and trails also undermines the things I am going out to harvest...So, it is a balancing act that must be carefully managed." (Survey Response)
(603)*

Party feedback specific to Access

The Government of Yukon provided the following for the Commission's consideration.

- In SMA 2s there is uncertainty how mineral claims will be accessed
- Access off the Dempster to the claims in LMU 7 should be permitted. Acknowledging the impact that roads would have on the viewscape for tourism.
- Need reliable access to critical mineral deposits (for example in LMU 1 & 7)
- Water access via or across the Yukon River is needed in order to ensure that sustainable development can occur in the adjacent LMUs. Controlled access points should be established along the Yukon River Corridor

Tr'ondëk Hwëch'in provided the following for the Commission's consideration:

- Eliminate the distinction of SMA1s and SMA2s and *"To recommend that all SMAs are to be permanently withdrawn from any new industrial land use and surface access, and that they are intended to become legally designated as protected areas with subsequent management plans"*
- They also emphasized that it is *"...important for the Recommended Plan to reflect the various rights and obligations Tr'ondëk Hwëch'in has with respect to Settlement Lands, such as those related to water and access..."*
- Additional feedback included suggestions to
 - Prevent loop roads that increase predation and hunting
 - Additional monitoring in areas of increased access
 - Carefully consider the impacts that the NAR will have on the southern portion of the region.
 - Be aware that poor planning of access on the Yukon River may negatively impact the tourism/wilderness values.

Plan Partner and public feedback specific to Access

There was concern about new roads and trails opening new areas to use and development and what the implications of this may be.

*“Once you ‘open it up’ [provide access into an area] you open up everything else.”
(Community Conversation Mayo)*

“An important issue is the heavy use of the goldfield roads for hunting by people from outside the region. Are TH families getting enough wild meat?” (Public Submission) (056)

It was asserted that past and current cultural ties to the Yukon River for Yukon First Nations cannot be understated. The Dawson Region is important for harvesting, traveling, traditional activities, and across the territory, the land is deeply rooted in First Nations’ history.

“The Yukon River Corridor was a lifeline for travel for Yukon First Nations people. It connected people across the territory and allowed for people to travel great distances easily. Our members talk about rafting the Yukon River Corridor all the way to Dawson...The Yukon River also allowed nations to come together to celebrate and gather each year.” (White River First Nation Submission)

Access by river (particularly the Yukon River) was cited as essential access route for tourism, cultural used, recreation and industry).

Co-ordination of access into areas relayed to the Commission many times. Opportunities for strategic access would reduce the overall need to create more trails and roads.

“As other industries develop access into this land use zone there may be opportunity for the utilization of timber resources. The high cost of road construction for small volumes of timber limits the wood products industry’s ability to economically operate. New access may create an opportunity to gain better utilization of forest resources and restrictions placed on this land use designation should be kept to a minimum.” (Plan Partner Submission) (YWPA)

The implications of climate change and access infrastructure was also a topic of concern by many. The expense of infrastructure repairs with melting permafrost and increased rainfall, but also the possibility of a bridge across the river at Dawson.

“With the increasing likelihood of the rivers not freezing in future (or at least ice conditions and crossing being unstable or unreliable) the requirement for a bridge to West Dawson or Sunnydale becomes more of a necessity” (Public Submission) (Taggart).

Wetlands

During Draft Plan Engagement, the Commission held a technical workshop and community meetings on Wetlands in addition to targeted questions in the Draft Plan and on the survey. There was a lot of feedback for the Commission to consider. One of the main areas of focus for the Commission was the question of development thresholds in different wetland types in the region and identifying wetlands of 'special importance' for protection.

Party feedback specific to Wetlands

The Government of Yukon provided the following for the Commission's consideration. There was support for:

- The wetland mitigation hierarchy concept.
- Scottie Creek as a wetland of special importance (WSI).

However, Government of Yukon also:

- Questioned identification of Upper Indian River wetland as a WSI.
- Did not support a region-wide wetland avoidance threshold. Avoidance thresholds could apply in some LMUs (11,12, 19 & 21). Suggested thresholds of no development in bogs and 50% in fens. Other wetland types can be reclaimed and thus no thresholds are necessary.
- Suggested that baseline data should be as of 2022, and all wetlands to be avoided in SMAs

Tr'ondëk Hwëch'in provided the following for the Commission's consideration:

- Identified Clear Creek, Indian River, Scottie Creek, and Flat Creek as wetlands to protect.
- Wetlands should be kept intact; they are critical areas for traditional use and economy.
- No more than 25% of fens should be disturbed. They are important for climate change mitigation, and they are irreplicable.

Plan Partner and public feedback specific to Wetlands

The following are some points that reflect the main concerns of the public and stakeholder feedback:

Protecting wetlands does not necessarily have to mean that development activities cannot occur, but it must be mitigated and, in some cases, restricted.

"We believe that maintaining wetland values can be done in a manner that still allows for responsible and ethical development activities to occur through implementing the mitigation hierarchy with a goal of no-net-loss of wetland values." (Plan Partner Submission) (DUC)

There were many who shared and promoted the work that is currently being undertaking by the mining industry in wetland restoration, and that water is also being adequately protected through other existing regulations such as the waterboard, DFO and YESAA. It was suggested that the real problem for industry is that there are inconsistent policies and expectations for wetland reclamation. There is a desire for clear guidance.

"We believe the conversation on wetlands is actually: 'is placer mining allowed to disturb wetlands or not?'" (Plan Partner Submission) (KPMA)

"Creation of wetland restoration policies outlining acceptable industry practices are required to provide a clear path for economic development in regions within, and proximal to wetlands (i.e., placer mining, road management). Policies concerning wetland restoration should be consistent regardless of LUD and should be standardized for consistent stewardship in the Planning Region and follow sound scientifically based criteria for the restoration of wetland function and habitat." (Survey Response) (716)

In the letters received by Tr'ondëk Hwëch'in citizens it was expressed that water (and wetlands are life and should have increased protection. Disrupting wetlands releases CO² which will have implications for climate change. The coordinated letters stated that no more than 25% of fens should be disturbed and supported protection of the Upper Indian River, and Scottie Creek wetlands. They are culturally and ecologically important places.

"All wetland is important and we need to protect as much of it as possible in its intact state." (Tr'ondëk Hwëch'in citizen form letter)

The input was divided with regards to implementing a threshold for development in wetlands. Many felt that restricting industry in this way would have devastating effects on the placer mining industry, and not allowing mining in the Upper Indian River LMU would create conflict.

"I dislike the approach to wetlands. It values conservation over industry (when it is only in areas that placer mining occurs that this approach would be used) is too complex and is too strict to see industry succeed in the future. The current approach will seriously harm industry and will create massive negative cumulative effects on the community as

a result: businesses shut down, less workers, less infrastructure into existing businesses as people and money leave the area.” (Survey Response) (699)

On the other hand, there was a lot of support for some restriction of development in wetlands, albeit recognizing that it is socio-culturally and ecologically complicated.

“Retain the commitment to no development in bogs and marshes in all LMUs and fens in select LMUs”. (Plan Partner Submission) (DUC)

“I recognize we need to balance our hopes but the value of carbon sink like a fen cannot be overstated in the midst of our current climate crisis.” (Survey Response) (701)

As was demonstrated at the community meetings and workshops there were generally two predominant responses to the wetland issue that were *values-based*:

1. The ecological and socio-cultural value of an intact wetland:
 - a. To mitigate climate change (CO2 release and habitat resilience).
 - b. Unknown impacts to ecosystems and permafrost that sustain damage.
 - c. Intrinsic value of wetlands and traditional use and economy.
2. The socio-economic value of the gold found in wetlands.
 - a. Industry supports the community and the Yukon (employment, family).
 - b. Cultural elements and history of industry.

Where these two opposing views often came together was on the topic of reclamation. There is a strong desire from industry to do good reclamation and there were many examples shared from other jurisdictions that have effective systems in place (for example Alaska). There was a general acknowledgement that the wetland may not be able to be restored to its original form and function, but what replaces it still has value for human use and ecological function. Although there is a strong desire to see wetlands protected, in cases where this is not possible, everyone wants to see good, values-based reclamation take place.

Land Stewardship Trust

Overall, there was broad support for the Land Stewardship Trust concept. We heard from a lot from people who already consider themselves stewards, and how much they appreciate and value the Dawson region.

“I think the Trust sounds great, I like the idea of outing for children/youth and providing educational/research opportunities. Funds helping encourage/support industry stewardship is great because taking care of the land and the earth is most important of all. If you're going to use the land to make 'money' reclamation is important, without the

earth there would be no need to make money because we wouldn't exist.” (Survey Response) (718)

“Great idea, it would be great to be able to have a stewardship fund that allows more people to get out onto the land. As well as it would be great to clean up some of the legacy sites with this fund, that being said I believe that if the placer miners are given time to continue mining more and more of these sites will be cleaned up by them, even if we were not the ones to create them.” (Survey Response) (698)

GENERAL FEEDBACK: ADDITIONAL TOPICS

Stewardship

The Commission introduced the concept of stewardship to show the importance of everyone’s responsibility to the land. The intention in the Draft Plan was to create a sense of community stewardship where all users of the land have shared responsibility to the land. It was an effort to change the conversation to acknowledge that land planning is about our ‘relationship’ with the land, and that the relationship is reciprocal.

The feedback we received suggested that many in the region consider themselves stewards of the land and they support the Commission’s approach. Something we frequently heard is stewardship approaches can vary depending on experience and perspective.

Importantly, the feedback that was received by Tr’ondëk Hwëch’in highlighted that a clear distinction was needed to differentiate between stewardship as it is lived and practiced as an ancestral responsibility by Tr’ondëk Hwëch’in and the concept of community stewardship that applies to everyone more broadly.

Here is some of what we heard about Stewardship in the Draft Plan:

“The land insures our survival. You have to look after the land, you have to look after the animals. The land is our heritage: because we use it, because it is everything, everything comes from the land. Keep your land clean, keep your animals, they are your friends. You look after them, they look after you. You look after your water, land, trees, you look after the land, you respect it. That’s our spirituality.” (NND Response)

“...I connect to the land with the idea of a land use plan in the sense that the land gives myself and family the ability to make a living. Year after year which is sustainable. Having a vibrant community requires people to make a decent living so they can support the community. I take care of the land by not polluting and respecting the wildlife also

using the land. Responsible placer mining is simply a land use that allows for one to make a honest living in order to support his family and community.” (147:69 – Survey)

“Placer miners, by and large, believe we are already stewards of the land. ...We are eager to work at stronger demonstrations of placer mining stewardship, but concrete language around what that means for our industry (i.e. what reclamation standards are acceptable) is necessary for widespread adoption.” (Plan Partner Submission) (KPMA)

“As co stewards of this land, we must respect and allow Tr’ondëk Hwëch’in leaders and elders to take us on a necessary path of truth, reconciliation, land reclamation, environmental restoration, and healing together. We are late to this, and the time to make things right is now.” (Public Submission) (036)

Water and waterways

There was a sense from the public and Parties that there was not enough emphasis on the importance of water and rivers in the Draft Plan.

“I do not think that the Draft Plan ensures effective protection of our waterways. (Letter Submission) (049).

“The river is busier than ever and unsustainable tourism is as much an issue as mining” (Survey Response) (603)

“River corridors don’t appear to have any particular protection.” (Survey Response) (605)

Sustainable Development and Balance

Sustainable development as defined in Chapter 1 of the Tr’ondëk Hwëch’in Final Agreement is defined as ‘Beneficial socio-economic change that does not undermine the ecological and social systems upon which communities and societies are dependent’.

“Typically, ‘balance’ is achieved at the expense of ecological conservation and socio-cultural preservation. This idea is at the heart of the now discredited ‘three -legged stool’ of planning, where the three legs are environment, society and economy.” (Plan Partner Submission) (YCS)

“We suggest removing references to ‘balance’ in the plan, and instead ensuring the plan reflects sustainable development or, if that is not the case, being clear where economic development has been prioritized at the risk of undermining ecological and social systems.” (Plan Partner Submission) (CPAWS)

Climate Change

Overall, the Parties, and many members of the public felt that the Draft Plan needed to integrate the concept of climate change into the Plan more.

“Addressing climate change is an opportunity to help readdress some of the societal and governance issues we face in the north. The Plan doesn’t emphasize enough the disproportionate impacts of climate change in the north; nor adequately records that the effects on governments and residents are multiplied by the inherent vulnerabilities, and logistics of isolation, of living in the north.” (Public Submission) (057)

Mineral Development

Mineral development, understandably, attracted a lot of feedback in the Draft Plan. There was a lot of concern that the Draft Plan would not only impact the mineral industry economically, but culturally as well. Mining has been part of the Dawson region’s history for over 100 years, and the way of life and culture that has developed is important to many residents and families in the Dawson Region.

Tr’ondëk Hwëch’in emphasized the need to truly assess the limits of what the land can sustain:

“In order to determine where acceptable limits of Sustainable Development lie, an analysis is required on the economic benefits, costs, and impacts on broader values such as government finances, the environment, social and community values, and Indigenous Values ... The Commission must consider not just the value of materials produced by mining, but the full range of costs and benefits, including ecological, social, and community costs, as well as who benefits and who shoulders the costs.”

Government of Yukon highlighted the importance of critical minerals and access:

“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. These known mineral deposits would need access in order to be successful.”

We heard a lot about how important mineral development is to the region’s economy, and to the territory. There was concern that the Draft Plan could reduce certainty and make it more difficult for Industry to continue.

“It is important that the Commission consider and analyze the serious implications on the exploration and mining industry if some of the proposed conditions, restrictions and

thresholds in the Dawson Regional Draft Plan are implemented...If the incentive and ability to prospect and open mines down the road becomes uncertain then the effect on the personal lives of families and the economy would be great.” (Plan Partner) (YPA)

“Ninety percent (90%) of placer mines are family owned and operated. The amount of documentation that is already provided from one family business is immense. License and permit applications and reports are only the start, and even with these submissions – what happens with the information? ...Nothing seems to be done with endless information gathering.” (Plan Partner) (KPMA)

“Sustaining a healthy mineral industry is key for the economic security of the Planning Region as its single largest economic sector. While this natural resource has been developed in the region for over a century, many placer deposits have been depleted in the heavily developed areas. While there are opportunities to reclaim and restore these historically disturbed areas, the industry will continue to move into adjacent prospective areas that share the same geologic settings. This movement into adjacent areas needs to be accommodated to allow for a healthy placer mining industry and regional economy.” (Survey Response) (716)

“The mineral industry is the largest single non-government economic driver in the region, a complete freeze during Plan approval and implementation would have serious economic consequences. Responsible continued economic development should be able to continue during this time.” (Plan Partner) (TruePoint Exploration)

“I care about mining and want it to be effective. Placer mining a creekbed over tens of square kilometers and for the sake of removing a few hundred thousand ounces is incredibly ineffective. In comparison the Victoria gold mine is set to produce 200,000 ounces of gold per year of a much smaller footprint. Focus on what is an effective use of land resources in mining and metals.” (Survey Response) (649)

We also heard a lot about how the Draft Plan does not do enough to protect land from future development, and whether mining can be considered a sustainable activity:

“Can a mine that permanently alters the landscape by changing wetlands into uplands and ponds really not be undermining ecological systems? There are economic activities from which the land cannot recover, at least not in any meaningful timescale. This concern might result from the omission of the term ‘sustainable’ from the bullet on economic activities. A more complete sentence would go on to acknowledge that not all economic activities are sustainable.” (Plan Partner) (YCS)

“Accessing the gold most often requires removal of vegetation, re-routing of drainages, and exposure of large amounts of over-burden. When the vegetative cover is complex wetlands (such as fens) or old forest stands, the original ecosystem cannot recover (with or without human action) within a period of time allowing for cultural continuity. Similarly, changes to water flow regime and quality are irrecoverable because they spread downstream and are progressive through time as different placer operations take place.” (Plan Partner) (WCS)

“It's problematic that mining claims get to pre-empt land use planning decisions (e.g. if you've staked a claim you are allowed to disturb a land that otherwise would be protected). Most of this problem falls at the feet of YG, but the Commission should do what it feels is best for the land, and not let fears over mining claims water down stewardship and sustainability.” (Survey Response) (677)

“Be bold and make hard decisions honoring the UFA and TH's Final agreements, but also to choose protection over mining. Industry will adapt with whatever circumstances are thrown at them as that is what people and the economy does - they adapt. But wildlife and the environment are too sacred and fragile when asked to share with widespread disturbances.” (Survey Response) (687)

Key Species

Caribou

Caribou are a culturally and ecologically important species in the region, and many respondents felt the Recommended Plan should do more to protect caribou.

“I Fear that we will look back and wonder why we chose the short-term benefits of a mine over a caribou herd.” (Public Submission)

“There needs to be a large amount of land protected for these animals to have a good fighting chance at survival. I do not think placer mining is all negative, I do agree that it is important to our economy. That said, we do not need to be disturbing and destroying any more wetlands, river corridors, caribou habitat and important ecosystems than we already have.” (Public Submission)

Here is some of feedback received about caribou:

- Linear density in the Draft Plan is too high to sustain caribou populations.
- The Clear Creek herd needs to be better protected.
- The problem with the caribou does not stem from mining activity but hunting.

Moose

“The harvesting of moose in our traditional areas allows for members to connect to their families and traditional ways.” (WRFN Submission)

Here is some of feedback received about moose:

- Suggested more use of traditional land management practices, such as trapping wolves to help moose populations.
- Seasonal road closures are a problem for industry.
- Limiting industry or halting activity during rutting periods is a serious limitation for mining operators.
- Increased industrial activities is causing moose to become contaminated and not suitable for harvest.
- Moose like reclaimed areas – placer mines make moose habitat.
- Industry trails and roads provide access for harvest.

Salmon

"We miss the king salmon"

Here is some of the feedback we received about salmon:

- Salmon are culturally and ecologically a very important species in the region
- The waterways need to be protected to promote healthy salmon habitat to encourage the return of healthy salmon populations to the region.
- Generally, the public were supportive of the Draft Plan's proposals for salmon but some did not believe that the Draft Plan goes far enough to protect them.

Grizzly and Black Bears

"Road density is an important metric to consider in the conservation and management of grizzly bears...road densities greater than 0.6km/km² are associated with decreased grizzly bear densities." (Plan Partner Submission) (CPAWS)

Largescale connectivity is extremely important for bears, and large areas must be protected for them.

Sustainable Economy

Agriculture

"We need to consider food security moving forward into the future...We need to focus on a new system of agriculture that works with the land and not against it." (Plan Partner) (Conservation Klondike)

"The KPMA supports mineral and agricultural industries being encouraged to collaborate on projects, and that directions have been given through the Draft Plan to support this dual land use." (Plan Partner) (KPMA)

"I fully support the encouragement of a sustainable local agriculture industry and the objectives the commission has drafted. I would add that sustainable agriculture has the potential to be an active agent in reclaiming previously impacted areas, therefore the lands identified as potentially useful for agriculture can be greatly expanded (without impacting wilderness areas)." (Public Submission) (043)

Here is some of the feedback received about agriculture:

- Food security is very important, particularly in relation to climate change and access to new agricultural land.

- The potential impact agriculture could have on other values (such as salmon habitat and ecological integrity) should be considered before new dispositions are allocated.
- Lots of support for more land multi-use, such as with placer mining.
- Some concern about how agricultural activity will be monitored to ensure environmental standards are upheld.

Tourism

“Who in their right mind is going to travel here to look at a wasteland? People, for the most part travel up here, mining is part of it, but it's not all of it. People come here to enjoy the nature, the culture, our clean water, and the environment that we have intact. And there's a value to that.” (Public Submission) (240)

“The river is busier than ever and unsustainable tourism is as much an issue as mining.” (Survey Response) (701)

“I am happy that some areas should remain open to developments like mining and tourism, but the health of the ecosystems needs to be prioritized where these activities take place too.” (Public Submission) (052)

“Trail systems help people, local and visitors, experience and learn about the land who might not otherwise.” (Survey Response) (663)

Here is some of the feedback received about tourism:

- Economic importance of tourism was emphasized and should be promoted. New infrastructure will also be needed as part of this.
- Tourism will be an important part of achieving the Plan's sustainable development goals. Tourism needs to be promoted in a sustainable way.
- Concerns about the region's wilderness character and ensuring the environment is looked after and tourists are respectful.

LAND DESIGNATION SYSTEM

The Draft Plan had two types of designation, SMA and ISA, which were then subdivided according to an LMU's specific values, priorities and permitted level of development. Each LMU received a significant amount of feedback, and a detailed summary of what we heard can be found in [Appendix 4](#) (page 55). The Commission and staff anticipated that the land designation system would receive a lot of attention, and it is where we found perspectives most polarised.

The feedback for each LMU was used throughout the development of the Recommended Plan. Staff provided summaries in options papers that the

Commission were able to review and consider as they made decisions through consensus about designations, special management directions and key values to highlight in their intent statements.

IMPLEMENTATION

How the Plan will be used and implemented was something we heard concern about frequently during public engagement. A lot of feedback indicated a need for more clarity and direction, including processes for monitoring, adaptive management and measuring plan success. The use of traditional knowledge to inform implementation was shared and will be very important for adaptive management and climate change. We also heard that people wanted to continue being involved and how important it is to have collaboration with the Parties and with each other.

“...we encourage the Commission to make explicit the joint implementation of the Plan through collaborative decision-making processes and the shared management of public lands and resources.” (Tr’ondëk Hwëch’in Draft Plan Response)

“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.” (Government of Yukon Draft Plan Response)

“It should be noted that revision of the Plan periodically and in light of new information is not synonymous with adaptive management. Adaptive management frameworks, including critical targets, metrics, and monitoring, must still be initiated through Plan recommendations. Periodic review of the Plan must evaluate the efficacy of adaptive management implementation in light of the most recent data and information.” (First Nation of Na-Cho Nyäk Dun Draft Plan Response)

“Without an ongoing planning commission, no one government department or management body has the role of “plan champion” during implementation. Maintaining momentum, engagement, and understanding of plan implementation can be challenging.” (Vuntut Gwitchin Government Draft Plan Response)

“We support the concept of adaptive management, however we caution the Commission that it can lead to endless feedback loops in the bureaucratic systems. Governments are already working at capacity, and should the Commission choose to recommend

significant adaptive management structures, we strongly advise these recommendations include clear ways for existing roles within the large government body to do this work. We do not need an additional department to govern the same few people trying to make a living.” (Plan Partner) (KPMA)

“Implementation needs to involve industry and community transparency to be successful. Industry has proven through the robust environmental review process (YESAB) that development can coexist with environmental and socio-economic values being respected. As clearly demonstrated by Yukon companies, pro-active partnerships and engagement with First Nations and communities, the use of innovative technologies to mitigate potential effects of exploration, mineral development and mine production show the mining industry’s preparedness to take on, with partners, positive environmental land stewardship.” (Plan Partner) (YCM)

NEXT STEPS

RECOMMENDED PLAN RELEASE

The Recommended Plan will be released by the Parties later in 2022 once they have agreed how and when public consultation will be undertaken. Chapter 11 of the First Nation Final Agreements provides direction as to how the Parties shall proceed following the submission of a Recommended Plan by a Planning Commission.