

January 3, 2020

To: Dawson Land Use Planning Commission

Re: Dawson Region Land Use Plan engagement submission

Dear Commission Members,

The Canadian Parks and Wilderness Society, Yukon Chapter (CPAWS Yukon) thanks the Commission for the opportunity to provide input at this stage of the Dawson Region land use plan. This letter includes our key recommendations for the Commission as they begin to develop the plan.

CPAWS Yukon believes one of the Commission's most important tasks is developing a plan that honours the Umbrella Final Agreement's vision of sustainable development (Section 11.1.1.6). Although sustainable development is sometimes a buzzword, it is clear from Chapter 11 of the UFA that it means development "that doesn't undermine the social and ecological systems that our communities depend on."

Given this task, CPAWS Yukon strongly supports the visions the Commission has put forward for the region, the process, and the plan. We feel these vision statements reflect what is needed to secure a sustainable future for the Dawson Region. In particular, we are pleased that the vision for the planning process includes sustainable development as a principle.

Our recommendations for the plan are listed below.

**Recommendation 1: Place a moratorium on mineral staking while the plan is being developed.**

Placing a temporary pause on mineral staking while developing a plan is good planning practice. Doing so in the Dawson Region will minimize future land use conflict and provide the maximum number of planning options, especially relating to limits on disturbance and the size and location of conservation areas. Thousands of claims were staked in the Peel Watershed while planning was ongoing, and now a cloud of uncertainty regarding compensation hangs over the region. Most recently, a December 30, 2019 *Whitehorse Star* article noted, "A handful of companies the Star has spoken with over the months and years have indicated they will pursue legal action if they don't receive compensation [for their claims in the Peel]."<sup>1</sup> Much of the uncertainty, and

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<sup>1</sup> <https://www.whitehorsestar.com/News/staking-moratorium-extended-in-peel-watershed>

potential future legal costs, could have been avoided if a staking moratorium was introduced at the onset of planning in the Peel.

CPAWS Yukon urges the Commission to recommend a moratorium on mineral staking while the Dawson Region plan is under development. The Commission could also consider recommending a moratorium on other land dispositions that will make planning similarly challenging.

**Recommendation 2: Protect large, interconnected areas to sustain the region’s ecological integrity and cultural heritage.**

Conservation science suggests that, in general, protecting 25% to 75% of a given region is needed to sustain biodiversity and ecological processes<sup>2</sup>. These figures are substantial but not arbitrary; they are based on studies of what it truly takes to sustain wilderness as we know and value it, which includes thriving populations of wild species, a full spectrum of native ecosystems, and ecosystems that are resilient to environmental change.

As a buffer against uncertainty and recognizing the limits of human knowledge, conservation scientists suggest managing at least half of a given region for conservation.<sup>3</sup> To meet the bar of sustainable development set by the Umbrella Final Agreement, and secure the Dawson Region’s ecological integrity and cultural heritage, CPAWS Yukon recommends that the Commission aim to apply a conservation designation to about half of the Dawson Region.

It is worth answering the question, why bother with such an ambitious target when large parts of the Dawson Region exist as wilderness? Well, the same was once true for many places to the south, including now-industrialized landscapes in British Columbia and Alberta. But, like in the Yukon, wilderness in these places was abundant but not endless, and certainly not immune to the march of development over the span of decades. Wilderness, wild species and the ways of life attached to them were diminished and even lost. Many people from the south now flock to the Yukon, seeking the wilderness that was lost in other places. By aiming to conserve considerable parts of the Dawson Region, the Commission has the opportunity to develop a plan that truly balances economic viability with the viability of the region’s social, cultural and ecological systems.

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<sup>2</sup> Noss, R. & Cooperrider, A. Y. (1994). *Saving Nature’s Legacy: Protecting and Restoring Biodiversity*. Island Press, Washington, DC.

<sup>3</sup> Noss, R., Dobson, A., Baldwin, R., Beier, P., Davis, C., Dellasala, D.,...Tabor, G. (2012). Bolder Thinking for Conservation. *Conservation Biology: the Journal of the Society for Conservation Biology*. 26, 1-4. 10.1111/j.1523-1739.2011.01738.x.

The Dawson Region is home to many ecologically and culturally valuable areas and features that are deserving of protection. A short list includes:

- **Habitat, corridors, and migration routes** for species like caribou, grizzly bears, wolverines and migratory birds. Managing interconnected areas for conservation allows animals, as well as their genes, to move and ensures their populations will continue to thrive.
- **Connected areas that will allow native species to move, adapt and survive in the face of climate change.** This is a priority in Yukon Government’s *Our Clean Future Draft Report*<sup>4</sup> (Action 94) and aligns with the *Draft Yukon Parks Strategy*<sup>5</sup> (Strategic Action 5.2: Develop a Parks System Plan).
- **Areas adjacent to existing protected areas**, such as Tombstone Territorial Park, Fishing Branch Habitat Protection Area, Yukon-Charley Rivers National Preserve in Alaska, and future protected areas in the Peel Watershed.
- Significant, representative areas within the **Yukon Plateau-North, Klondike Plateau, and Yukon Plateau-Central ecoregions**. Ecoregions are nature’s neighbourhoods: each sustains a different ecological community. A goal of Yukon’s *Parks and Land Certainty Act* is to protect representative core areas within the territory’s twenty ecoregions. Ecoregion protection is also a key part of developing the territory’s parks system in the *Draft Yukon Parks Strategy*.
- **Waterways, wetlands, and riparian areas** provide important ecological functions and resilience to climate change. This includes the Yukon River corridor, as well as the Ladue, White, Sixty Mile, Forty Mile, Indian, North and South Klondike, Tatonduk, Kandik, Miner and Whitestone Rivers.
- **Rare species and ecosystems.** The Dawson Region’s Beringian landscape supports rare and endemic species.
- **Intact boreal forest.** Areas free from habitat fragmentation are increasingly rare. The boreal forest provides essential habitat and can mitigate the impacts of climate change.
- **Areas identified through Tr’ondëk Hwëch’in’s Land Stewardship Framework project.** Tr’ondëk Hwëch’in First Nation has stewarded the Dawson Region since time immemorial and the Land Stewardship Framework project is an important extension of that relationship.

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<sup>4</sup> Available at <https://yukon.ca/sites/yukon.ca/files/env/env-our-clean-future-draft.pdf>

<sup>5</sup> Available at <https://yukon.ca/sites/yukon.ca/files/env/env-draft-parks-strategy.pdf>

**Recommendation 3: In areas where development is allowed, set thresholds on disturbance to ensure development remains sustainable.**

CPAWS Yukon recognizes that development and resource extraction are important parts of the region's economy, a way of life for some, and that parts of the Dawson Region will continue to support significant amounts of development. At the same time, if these activities place too much pressure on the land, they can transform ecosystems, and cause the loss of species and the ways of life tied to wild places. Setting limits on disturbance will ensure development activities are compatible with the plan's vision for a rich cultural legacy and a healthy environment.

CPAWS Yukon recommends that the plan for the Dawson Region includes limits on disturbance, similar to those applied to Integrated Management Areas (IMAs) in the North Yukon Plan and Peel Watershed Plan. These thresholds should be adapted to the landscape, wild species, and industries of the Dawson Region.

Setting limits on disturbance in areas where development is permitted is a useful tool for addressing the human-caused dimensions of cumulative effects. We recommend that the Commission seek out traditional and scientific knowledge to set limits that will sustain the things that people care most about, like healthy wildlife and fish populations.

In particular, we recommend considering the habitat and connectivity needs of caribou, given their ecological and cultural importance in the region. We also recommend incorporating the needs of grizzly bears. The recently released *Conservation Plan for Grizzly Bear in Yukon* states that land use planning processes must “explicitly identify and consider the habitat needs of grizzly bears” (pg. 17) and “Consider grizzly bears in land allocations and land use planning, including the cumulative effects of land developments and furthering road networks” (Recommended Action 2.4, pg. 18).

Future generations in most other places have already lost the chance to enjoy wildlife, hunt, trap, and fish the way that their parents and grandparents did. This chance was largely lost due to habitat loss, fragmentation, and increased access. The Dawson Region has the opportunity to do things differently. The plan can set out a balance between development and conservation based on what it will take to sustain the things that people value.

CPAWS Yukon recognizes that development is subject to regulation and environmental assessment in the territory. However, these tools can only adequately address cumulative effects if there are thresholds setting out what environmental changes are acceptable. Places that have tried to manage development project-by-project, rather than with a big picture, forward-looking approach have seen wildlife populations decline and disappear.

In addition to thresholds, we recommend that the Dawson Plan include cumulative effects indicators and a commitment to monitoring and adaptive management to ensure thresholds on development are working as intended. Protected areas, where development is not permitted, can function as “benchmark areas” to help land managers determine if changes to the landscape are human-caused.

**Recommendation 4. Protect wetlands, especially bogs and fens that take thousands of years to form.**

The region includes many important wetland ecosystems, including peatlands in the Indian River Watershed, as well as wetland complexes in the Clear Creek and Scottie Creek area.

Development is particularly transforming the Indian River Watershed, and replacing peat wetlands with shallow water ponds. CPAWS Yukon recommends that the plan protect remaining intact wetlands in the Indian River Watershed to keep the ecosystem from complete ecological and hydrological transformation. We also recommend that the Commission consider protecting a significant portion of the region’s other intact wetlands.

Thank you for considering this submission.

Sincerely,

Randi Newton  
Conservation Manager, CPAWS Yukon