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Dawson City YT

Debbie Nagano

Chair

Dawson Regional Land Use

Planning Commission

Re: Recommended Dawson Regional Land Use Plan

Dear Jacob,

The Yukon Conservation Society (YCS) is a grassroots environmental non-profit organization, established in 1968. Our mission is to pursue ecosystem well-being throughout the Yukon and beyond, recognizing that human well-being is ultimately dependent upon fully functioning healthy ecosystems. We pursue this mission through a broad program of conservation education and analysis, including input into public policy and regulatory processes.

In light of this mandate, we have closely followed the development of the Dawson Regional Land Use Plan (DRLUP) since before the original Commission was appointed in 2014, and offer the following comments on the Recommended DRLUP (Hereafter: The Plan)

Executive Summary

- Make explicit the intent of the Plan to preserve and restore Biodiversity, aligned with Canada's biodiversity commitments
- Modify some Land Management Units so that there are areas where the footprint of disturbance is reduced.
- Management plans that include regulations should be developed for all LMUs, including ISAs as well as SMAs.



- Fen wetlands are as irreplaceable and valuable as bogs and should therefore also be 100% protected
- LMU 7, Wehtr'e (Antimony) should be a Special Management Area (SMA), i.e., a protected area, to ensure *connectivity* is preserved between currently protected Tombstone Park and the Tintina Trench recommended protected.
- LMU 9, Clear Creek should be scheduled for sub-regional planning to address the existing high level of disturbance and its ecological overlap with the Northern Tutchone planning region.
- LMU 19, White River should become an SMA to protect its extensive wetlands and connect to the SMA LMU 20, Scottie Creek Wetlands
- LMU 21, 40 Mile Caribou Corridor should have far less industrial activity permitted in order to be consistent with its name and with the needs of caribou: YCS preferred approach is that the Caribou Corridor be fully protected.

Introduction

Please convey, on YCS's behalf, our sincere appreciation to the DRLUP Commission and Staff for the staggering amount of work they have put into the Plan, particularly in how they carefully considered and incorporated responses to the Draft DRLUP.

There is much to like in the Plan, in particular the improved focus on conservation, caribou and wetlands and what amounts to the best effort we have seen to date to articulate a robust approach to Cumulative Effects (CE) Assessment.

However, there are places where YCS finds that the Plan misses the mark, or stops just before crossing the finish line and it is in these places that we focus our comments; that we do not comment on the majority of the Plan should be considered our endorsement of it.

The context for these comments has to include the rapidly worsening Biodiversity Crisis. 70% of all wildlife has vanished since 1970¹ and the loss is continuing at a rate of 2.5%/yr. Unless this trajectory changes soon, humanity is facing a world largely depleted of wildlife within 40 years, comfortably within the life spans of many of us. Accordingly, initiatives such as the Dawson Regional Land Use Plan bear an extra responsibility to ensure that nothing in this plan will make this crisis worse. To that end, the Plan concept of Stewardship is very valuable, and it is clear

¹ <https://phys.org/news/2022-10-wildlife-populations-fallen-years-wwf.html>

that the spirit and intent of the Recommended Plan does hold both Community, and Ancestral Stewardship to heart. These comments do offer some suggestions where conserving and restoring biodiversity can be improved and enhanced.

General Approach

Land Use Planning as a discipline is well respected and it takes considerable training to become a certified planner. Therefore, it is not surprising that conventional approaches to land use planning inform the structure of this Plan. Chapter 11 Regional Land Use Plans are quite different to most other plans. Therefore, applying conventional thinking to this plan may not be the best approach. For example, the plan can be viewed as having been done ‘upside down’: Consider how Land Management Units (LMUs) designated as Special Management Areas (SMAs) are intended to become some sort of protected or conserved area and that management plans (including regulations) for each SMA will be worked out by the parties subsequent to the adoption of the Plan. This means that the protected areas will, paradoxically, have more management than will unprotected areas, areas where industrial development can take place. It remains unexplained why all LMUs, and in particular Integrated Stewardship Areas (ISAs) do not have management plans and associated regulations. Regulations arising from LMU management plans would make implementation of the Plan much easier and more transparent. YCS therefore suggests that management plans that include regulations be developed for all LMUs, including ISAs as well as SMAs.

Cumulative Effects Framework

The first observation we have is that the Framework presented in the Plan is the best effort we know of to elucidate Cumulative Effects in the Yukon to date.

A major concern at YCS is that the Scenario Analysis of Surface Disturbance does not properly include a *reduction* of disturbance, it considers low growth and high growth scenarios, however this is a reactive approach that omits the possibility of *degrowth*², a reduction of disturbance. While the Framework does acknowledge that when the quantum of disturbance exceeds the precautionary threshold, that disturbance should curve back down to below precautionary levels, it provides no guidance about how that could happen, neither does the Plan itself. Ultimately, if we do not want accumulating disturbances to eventually cover the entire landscape, we shall have to, sooner or later, place limits to the growth of disturbance. **Why not now, while disturbance is still relatively modest**, compared to most of the provinces? There are LMUs where disturbance is already too high for some values, in particular LMU 9, Clear

² <https://www.weforum.org/agenda/2022/06/what-is-degrowth-economics-climate-change/>

Creek, where the Clear Creek Caribou Herd have already been pushed out of some Wildlife Key Areas by too much mineral development and current linear disturbance density exceeds the precautionary threshold³. To make matters worse, the Framework acknowledges that our ability to monitor increases in disturbance activity and effects lags actual disturbances and effects by several years. Decisions around approval of projects could therefore be made erroneously, resulting in thresholds being exceeded. The Framework needs a mechanism to bring new disturbance levels back to sustainable levels.

This points to an additional problem with the Cumulative Effects Framework, that it sets thresholds based not on ecological or social values, rather it accommodates industrial values, i.e., mineral exploration and development values. Some parts of the planning region have a lot of disturbance: the above-mentioned Clear Creek area, but also LMU 11, the Goldfields and LMU 8 Brewery Creek. There is no reason (other than it is hard to define) that industry proponents here should not be **required to reclaim and restore previous disturbances** in order to acquire social and legal licence to disturb additional land.

Growth and degrowth

We live, and by extension this plan exists, in a society that assumes that a growing economy and a growing population are desirable outcomes. Numerous public policies are designed to foster growth. However, while growth is essential to achieve our potential, in the natural world, it is always limited. We see it in our own bodies that grow to an adult size and then stop growing- unless something goes wrong and a cancer develops.

Similarly, we see natural systems balance each other to ensure that one system does not grow unchecked at the expense of others- as in where wolves and caribou balance each other's numbers so that they do not over stress the land. Similarly, it is most likely that the natural checks and balances on the planet will eventually put an end to unchecked human population and economic growth, however, a tremendous amount of harm could be done before we are put back in our place.

A Regional Land Use Plan should address the sum of development judged desirable in the planning region, and to a certain extent, through the application of thresholds, it does. In some parts of the region, it is easy to see that the land has already been subjected to too much

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https://static1.squarespace.com/static/6009a9b2949f23737ee418af/t/62704c064f29ba2ae02c49de/1651526664719/YCS_CCCHReport_V2.pdf

stress; the lower Klondike valley and the Indian River valley are good examples. In conclusion, areas that are already over stressed would benefit from restoration, from reduced disturbance.

Therefore, YCS recommends that the DRLUP include areas where the footprint of disturbance should be reduced.

Connectivity

The key concept of connectivity is noted in General Management Directions as a priority and as a Plan Ecological Goal, to connect areas of key habitat with consideration for climate driven changes in habitat. Habitat connectivity is included as an objective for Grizzly Bears.

Connectivity is mentioned three times in the intent statement, for LMU 1. Connecting existing Alaskan and Yukon protected areas is listed as a rationale for the designation of LMU Tatonduk as an SMA. Similarly, both ecological and cultural connectivity are rationales for LMU 4, 15Mile, becoming an SMA, and again, to connect existing SMAs. The concept appears dozens of times in the Plan, and has its own definition, so it is safe to say that connectivity is important to the Plan.

Therefore, it is puzzling that some major opportunities for connectivity are missed and some SMAs are isolated islands in a sea of LMUs where industrial activity is intended.

YCS suggests that if LMUs 7, 19 and 21 became SMAs, then SMAs 10, 16 and 20 would no longer be isolated and wildlife would be better able to migrate and adapt to the changing climate. It should be noted that these areas already have interim protection from minerals disposition, or have very minimal development footprint or prospects. Please see the map in the appendix for an illustration of how connectivity can be achieved.

Adaptive Management

The Commission has taken a smart approach here. It is allowing for future developments in Cumulative Effects management to be incorporated. It acknowledges that the indicators it uses (linear and areal disturbance) are inadequate and that ecological, cultural, social and even economic indicators should be developed. YCS expanded at length on the need for these additional indicators in its submission on the Draft Plan. A copy of these specific comments can be found in the Appendix.

Overlay areas

This is an interesting approach to integrating conservation for a particular value (caribou or wetlands) into management directions for an ISA. However, it is not clear that using

management direction will be sufficient to protect caribou (or wetlands) in the explicit absence of legal protection. Given that caribou (and wetlands) are being lost across the country, and the planet, the directions should be tougher. There could be, for example, a directive that the precautionary principle should be rigorously applied and thus **if the value might be affected by an activity, the value should take precedence.**

Land Management Units

YCS has provided extensive comments on the direction for each LMU in our comments on the draft Plan, and we are pleased that the Commission included many of them in this Plan. YCS does have additional comments on some LMUs, primarily intended to help bring the Plan into a more coherent whole.

LMU 3: CHU KON DĚK (YUKON RIVER CORRIDOR) The LMU is recommended for future planning. There is a lot to be said for the creation of a Yukon River Park that would extend from the Alaska border up to the headwaters in Chilkoot Trail National Historic Site. It would doubtless be managed as a multi-use park, similar to Thousand Islands in Ontario. The salient point being that it should be **managed for its immense ecological and cultural and heritage values**, while allowing for its traditional use as a transportation corridor for both humans and wildlife.

The creation of a Yukon River SMA would contribute towards meeting Canada's Aichi target of protecting 30% of its water by 2030. While this plan is only concerned with that portion of the corridor that lies within the planning region, YCS agrees with and endorses the recommendation to manage the corridor as a whole, and to grant the Yukon River personhood status. YCS is unsure if the Yukon River Corridor should undergo subregional planning or if it should be treated as any other LMU. However, if the recommendation to withdraw the LMU from minerals dispositions until the parties agree is accepted, YCS agrees with delaying the determination of the designation of the LMU until subregional planning is complete. YCS would prefer that this LMU become an SMA, which would allow for a certain amount of additional planning as a management plan is developed during Plan implementation.

LMU 7: WEHTR'E (ANTIMONY) The LMU description (conservation area) and management directions (preserve caribou, connectivity with protected areas) are consistent with SMA status. In addition, it connects existing and recommended SMAs with the SMA LMU 10 Tintina Trench. It would be consistent and logical to make this LMU an SMA.

LMU 9: CLEAR CREEK The intent for the LMU is to conserve key caribou habitat and allow for development, primarily placer and quartz exploration and mining.

The eastern boundary of the LMU is the boundary of the planning region and reflects political consideration rather than ecological values; if the LMU were drawn with more of an ecosystem lens, it would extend into the (thus far unplanned) Northern Tutchone Planning Region. YCS recommends that the LMU be redrawn to fit with ecological features, despite extending beyond the current DRLUP boundaries.

The current level of surface disturbance in the LMU is 1.67%⁴, which is already above the ISA 4 precautionary level (1%) and projections out 20 years range from 2.28% - 3.38%. These levels risk exceeding the ISA 4 Cautionary level of 3% and approach the critical level of 4%. Any consideration of the thresholds for the various ISA levels should consider how thresholds were set in the North Yukon and Peel Watershed Regional Land Use Plans, which similarly considered thresholds crafted for the conservation of caribou. Both these plans set the critical level for IMA 4⁵ at 1%. **YCS concludes that the ISA thresholds for the DRLUP were set not in order to protect caribou, or other biodiversity values, but to accommodate current levels of industrial disturbance, with room for even more disturbance in the near future.**

The current level of disturbance is sufficient to render at least parts of the LMU unsuitable caribou habitat, and this is reflected in the observation that the Clear Creek Caribou Herd have been pushed off significant portions of their historic range, including significant Wildlife Key Areas. YCS agrees that limited and well managed industrial activity can co-exist with the continued presence of caribou, so long as key habitat is avoided. However, it appears that the ISA 4 thresholds as stated in the Plan are not consistent with this desirable situation.

Therefore, if we wish to eat our caribou cake and have our industrial cake too, we need to reduce the level of disturbance that exist in the LMU. Disturbance is, of course, only crudely measured by surface and linear disturbance; the type and timing of activity are also important, among other things such as changes to access for traditional pursuits. YCS acknowledges that dialing back activity and disturbance is not something that plans typically undertake, and there are few if any templates for doing so. The consideration that the LMU fails to fully encompass the geographic extent of the ecosystem at risk adds to the complexity and challenges of accomplishing a truly sustainable LMU.

⁴ <https://dawson.planyukon.ca/index.php/publications/recommended-plan/3681-exploring-the-cumulative-effects-of-future-land-use-in-the-dawson-planning-region/file>

⁵ IMA, Integrated Management Area and ISA have much in common, and YCS is of the opinion that we can legitimately use the terms interchangeably in this particular context.



Therefore, **YCS recommends that this LMU be set aside from the Final Recommended Plan and instead be assigned to sub-regional planning** that includes the First Nation of Na-Cho Nyak Dun and the remainder of the LMU 9 ecosystem. In the meantime, the special management directions should remain in place with the additional directive that **no net additional disturbance take place until sub-regional planning has concluded.**

LMU 17: NÄN DHÒHDÄL (UPPER INDIAN RIVER WETLANDS) The stated intent of the Plan for the LMU is protection of the function of the wetlands in the LMU. The Plan suggests that reducing the pace and scale of disturbances while ensuring excellent reclamation standards are met will achieve this goal.

Excellent protection of wetlands will typically include protection of a buffer zone, to ensure hydrological connectivity is retained. The size and shape of the buffer will depend upon the type of wetland and the geology and topography of the landscape within which it sits. The Upper Indian River Stewardship Plan should include buffers around wetlands.

The Plan acknowledges that restoration of both bogs and fens is effectively impossible. The Plan protects bogs in the LMU, but allows for half of fens to be mined. Given the fact that fens are characterized by water moving through them, disturbing half of a fen is likely to affect the remainder of it, because of alterations to hydrology. Therefore, **YCS recommends that fens be 100% protected.**

The current level of surface disturbance is estimated at 0.25%, which is the precautionary level for ISA 1. However, this LMU is withdrawn from staking and additional disturbance is not compatible with wetlands protection. The critical level of disturbance for ISA 1 is also 0.25%, therefore it seems logical to assign this LMU to be an ISA 1. It has to be recognized that the critical level of disturbance for ISA 2 is 1%, a quadrupling of the amount of disturbance from the current level. Surely quadrupling the disturbance does not align with the intention of the Commission. **YCS recommends that LMU 17 be designated ISA 1.**

LMU 19, TÄDZAN DĚK (WHITE RIVER): This LMU should be designated as an SMA instead of an ISA 1. The area is important for the Fortymile Caribou for travelling through on their way to reclaim their summer range in in the Dawson Range to the south. Any disturbance that they might encounter as they feel their way south over paths not travelled in decades could prove catastrophic for their future prospects to access more vital summer range. If we need a

Fortymile Corridor in LMU 21 (see below), we need it for the rest of their journey too. Further rationale for making the LMU an SMA include that minerals prospectivity is low in the LMU and that the Ladue wetlands have been recommended as Wetlands of Special Importance. Scottie Creek SMA is isolated from the other wetlands in the LMU.

LMU 21, WĒDZEY TAY (Fortymile Caribou Corridor) The management intent for this LMU is to preserve habitat requirements and migration routes for the Fortymile Caribou Herd, in alignment with the SMA WĒdzey Nāhuzhi (Matson Uplands). To this end, the Plan recommends against quartz mining and exploration in the LMU until such time as both Parties agree otherwise. In addition, the LMU is designated as a Caribou Stewardship Overlay Area. In 3.2.4.1, Caribou Stewardship Area, it is explained that ‘The intent of these [caribou stewardship] areas is protection of the caribou population and habitat...’

However, the thresholds for disturbance are set at ISA 2, which means that up to 0.5km/km² of linear disturbance could take place. Unfortunately, this level of disturbance is not compatible with continued presence of caribou. The density of similarly migratory caribou populations near Prudhoe Bay, Alaska, are demonstrated to decline with increasing road density. Road densities up to 0.3 km/km² reduced caribou density by 63%, while road densities ranging from 0.6 - 0.9 km/km² reduced caribou density by 86% (Nelleman and Cameron 1998).

YCS is aware that there are existing disturbances in this LMU, and that the current level of disturbance, plus a certain amount of additional disturbance over 20 years has been the framework used to determine the ISA level in an LMU⁶. However, this is, with respect, not how one accommodates the primary value in this LMU, this is how one accommodates disturbances.

According to the Plan’s Cumulative Effects appendix, the current level of disturbance in the LMU is 0.3km/km² and the critical level of disturbance for ISA 1 is 0.25km/km². This is a difference of only one half of one tenth of one percent. The LMU could, especially given the withdrawing of quartz development, **be designated ISA 1**, and special management direction given to reclaim disturbances until the ISA 1 threshold is reached. In general terms, we have to have a mechanism to shrink our disturbance footprint, because if we allow it to continue to grow indefinitely, we will eventually have disturbed 100% of the landscape. Therefore, in accordance with the precautionary principle, we should consider **reducing the footprint** in

⁶ <https://dawson.planyukon.ca/index.php/publications/recommended-plan/3681-exploring-the-cumulative-effects-of-future-land-use-in-the-dawson-planning-region/file>



some LMUs, and this LMU should be, given its value to caribou, be the poster child for footprint reduction.

The LMU is almost bisected by an extension of LMU 15, Sixty Mile, ISA 3. If ISA 2 is probably not compatible with unhindered caribou movement and grazing, then ISA 3 is even less suitable. The extension should be reassigned to LMU 21 and zoned accordingly. Please see our attached map in the appendices.

It is useful here to quote verbatim from the Cumulative Effects Framework Appendix: *Recent research on the Fortymile caribou herd has also focused on the influence of available summer range on caribou density, as managers have been concerned the herd was approaching carrying capacity on their summer range* (Fortymile Harvest Management Committee 2020). Since the most recent population estimate of ~84,000 caribou in 2017, the herd has undergone a decline with causes symptomatic of limitations affecting summer carrying capacity (Fortymile Harvest Management Committee *in prep*). **As a result, maintaining current summer range is critical for this herd, meaning that any loss of summer range availability will result in a reduction in the size of the Fortymile caribou herd.**

To meet the herd's harvest management plan objectives of continued use and expansion into historic range, human activity should be managed to allow for the full use of existing summer ranges in Yukon, including migration into and out of those ranges. Based on current research, the loss of either of these components will reduce in the herd's size and as a result, a reduction in herd distribution, which ultimately limits the ability of Yukoners to access this herd.

YCS therefore recommends that critical level of disturbance in LMU 21 should be reduced to a level compatible with unhindered migration by and use of Fortymile Caribou. YCS suggests that ISA 1 could meet this threshold, especially if the ISA is withdrawn from all new land disposition, i.e., Placer in addition to Quartz mining dispositions, however, to be consistent with the value of protecting summer range for the Fortymile Caribou Herd, **the LMU would be much better suited to be an SMA.**

Implementation

YCS joins the Commission in its desire to see a DRLUPC remain in place to champion the plan and guide implementation. The considerable amount of work to be done in sub-regional planning makes this idea even more useful. Even more importantly, it appears that YESAA stipulates a role for planning commissions in performing conformity checks (<https://laws->



lois.justice.gc.ca/eng/acts/Y-2.2/FullText.html).⁷ Given that YESAA has its roots in the constitutionally protected Final Agreements, it may be unconstitutional not to retain the DRLUPC.

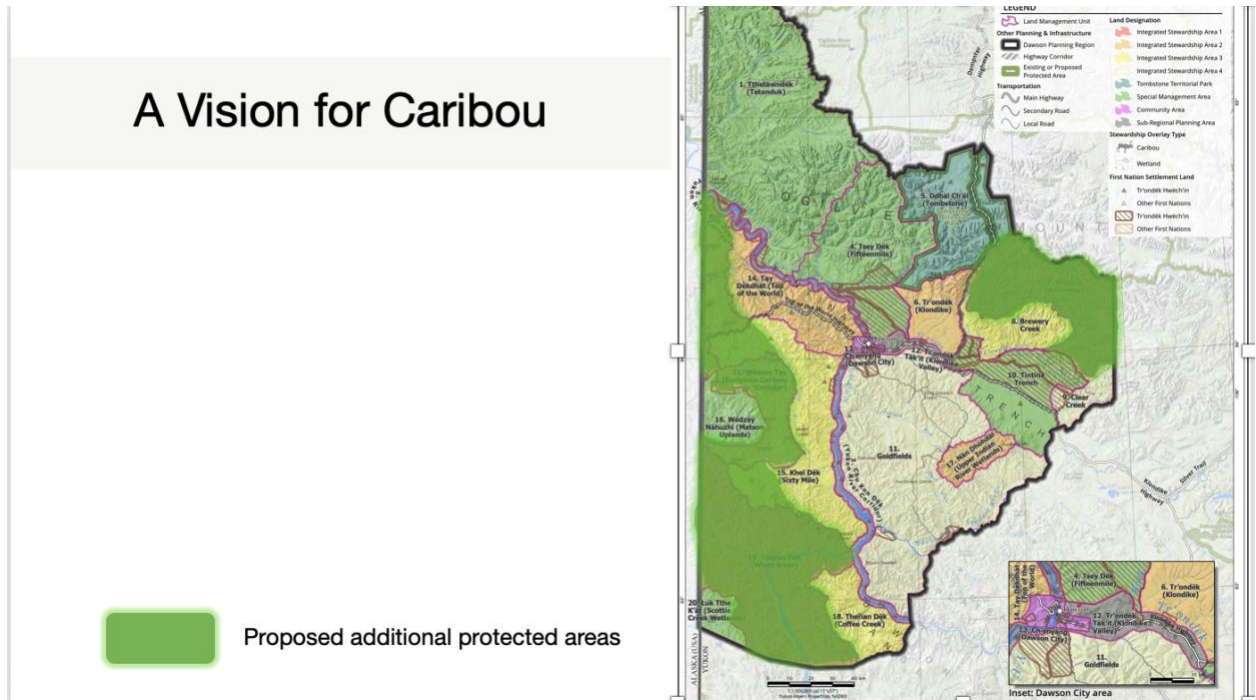
Regards,

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⁷ **44 (1)** If a regional land use plan is in effect in a planning region established under a final agreement, a designated office, the executive committee or a panel of the **Board shall**, when conducting an assessment of a project proposed in the planning region, **request the planning commission** established under the final agreement to advise it as to whether the project is in conformity with the regional land use plan, unless such a request has already been made in relation to the project.

Appendices:

Appendix One:



A map showing YCS's recommendations for LMUs 7(Antimony), 19(White River) and 21 (Forty Mile Caribou Corridor)and portions of LMU 15(Sixty Mile). Source: DRLUPC with modifications by YCS.

Appendix Two:

YCS discussion of a cumulative effects approach.

Suggested framework:

The Commission held a very useful workshop on determining a Cumulative Effects Framework to use in the Plan. Unfortunately, this framework is not available in the Draft, however YCS does have some suggestions for inclusion in the Framework:

- Use caribou. Caribou are very sensitive to disturbance, thus make good indicators. Plans elsewhere in Canada have almost uniformly failed to adequately protect caribou



habitat and migration routes resulting in lamentable declines and extirpation of caribou.

- Francis and Hamm 2011 provides a great foundation for further discussion.
- Thresholds can be perceived as limits to development rather than ways to manage environmental change. Of course, managing involves limits, but we always have limits - currently we call them permits. Consistent thresholds can provide 'certainty'. Another way to view the threshold approach is that it regulates the pace of development i.e., if a disturbance is considered restored, there is scope for additional disturbance. At the risk of giving forestry some credit, that industry tries to ensure that logging rates match regeneration rates. Well implemented disturbance thresholds can encourage excellent restoration. This restoration can lead to further development opportunities.
- Thresholds cannot be based only on science; they must take into account social values, public policy, and traditional and local knowledge.
- Thresholds work best when they are developed and used to manage negative effects of human activities, not stop resource development.
- Thresholds work best when they are part of a cumulative effect's assessment and management framework.
- "Technically defensible": thresholds must reach agreement and reflect the best available local and traditional knowledge and science. *Until recently, threshold development has been stalled at this first stage because the use of thresholds generates much technical debate and controversy.*
- 'Politically acceptable': thresholds must be socially acceptable and appropriate. This does not happen on its own and generally requires: a clear management vision; involvement and support of all residents, managers, and resource users; a clear understanding of likely benefits and costs; political and community support; and adequate time and resources. *Land use planning processes are the most effective way to achieve this.*



- ‘Administratively efficient’: implementation requirements must be directly evaluated and addressed when developing thresholds. *This includes: existing legal requirements; administrative processes and procedures; project-specific impact management tools; decision rules; and monitoring, enforcement and reporting requirements.*
- In addition to caribou, other useful indicators are moose, salmon, water, air, soil permafrost, geo-morphology, biodiversity and fire regimes.
- Indicators related to caribou, and moose:
 - Population size
 - Population health
 - Population change rate
 - Predator/prey relationship
 - Demography
 - Cow/calf ratio
 - Calf survival
 - Sex ratio
 - Recruitment rate
 - Pregnancy/parturition rates
 - Summer range quality
 - Access to high quality range
 - Availability of high-quality range
 - Availability of high-quality habitat
 - Connectivity of habitats
 - Availability of wildlife for harvest



- Catch Per Unit Effort
- Harvest rate
- Distribution of harvest
- Quality of harvested meat
- Quality of harvest experience
- Widespread presence of wildlife on the landscape
- Indicators related to Salmon and Water:
 - Water quality
 - Sediments
 - Metals
 - Nutrients
 - Suspended solids
 - Dissolved Organic Carbon
 - Rate of flow
 - Including seasonal patterns
 - Ability to exercise traditional harvest
 - Return to commercial harvest
 - Benthic health
 - Flooding
 - Stream temperature
 - Withdrawal amount



- Riparian health
- Rearing habitat availability
- Fluvial geomorphology changes (both natural and anthropogenic)
- Salmon spawning areas
- IK of quality and quantity
- Ability to pass on IK
- IK of usage patterns
- IK of taste
- Ichthyophonus
- Surface disturbance and Linear Density make useful indicators because they are readily:
 - Mappable
 - Cheap to quantify
 - Straightforward to apply
 - Simple to understand
 - Restorability is measurable
 - Work with permitting process
 - We have some experience with it
 - There is a body of science related to them
 - Enforceable
 - Scalable



- Applies to multiple values
- Applies to multiple land activities.
- Can save vast reclamation costs
- Imposes limits on activities
- Further Cumulative Effects Framework (CEF) considerations:
 - If the plan cannot complete a CEF, leave solid recommendations in the plan to guide the successor to the Commission
 - Test drive the CEF prior to implementation
 - Be aware that this plan will be a template for future plans
 - Leave space for new land uses
 - Ensure CEF recommendations meet the obligations in the FAs
 - Be aware that CE limits can lead to erosion of Indigenous rights
 - Carefully consider language around Plan review
 - Ensure Commissioners are present at these workshops
 - Dream small...for realistic implementation
 - Take a precautionary approach if CE indicators are not fully developed.
 - Ensure the intent of the Plan is clear.
 - Recognize importance and challenge of CE and Adaptive mgt, and that it is an iterative process.
 - Consider how to build community support for CEF through actions such as Community Based Ecological Monitoring and other monitoring efforts
 - Balance social, environmental and economic interests.



- Identify the builders of the framework once the Commission has developed the architecture of it.
- Develop a CEF manual
- Meet with/involve YESAB