

**Kusawa Park Draft Park Management Plan:
Written Submissions - Spring 2015 – and park steering committee (SC) response**

Comment #	Written Submission	Steering Committee (SC) response The Park Management Committee (PMC) to be struck upon approval of the park plan is also referenced in this column
Organisations		
Carcross/Tagish Renewable Resources Council		
1	The Kusawa Lake area is a priceless cultural and natural heritage for all Yukoners. In general the proposed guiding management principles and supporting background information and analysis is comprehensive and through the Committee is to be congratulated for a job well done.	No change to plan
2	While the protection of cultural and ecological values in the area for the long term is paramount, the current high level of use by Yukoners for camping, hiking, fishing and hunting and outdoor recreation needs to be a major component of the plan. In particular, the management plan needs to encourage and facilitate the continuation of low intensity backcountry and wilderness uses by Yukoners, as well as, higher intensity camping and recreational use in the road assessable areas. This would involve the use of focused and ongoing educational and monitoring approaches to the management of low intensity uses, especially in more remote and backcountry areas with more formal regulation, if and when necessary.	Comments are consistent with the approach in the management plan. No change to plan
3	A key factor is the 12km access road from the Alaska Highway. Significant improvements to the Kusawa Road such as paved access would be a game changer, as it would bring in a lot more RV and motorized use and non-resident traffic to the area. Thus any improvements to the access road should not be considered without a full environmental assessment of long-term direct and indirect impacts and consequences to park values and users.	There are no plans to pave Kusawa Lake Road. No change to plan
Canadian Parks and Wilderness Society - Yukon Chapter		
1	Overall, CPAWS Yukon is pleased with the Draft Park Management Plan. In particular we are pleased to see that the guiding principles of ecological integrity and First Nations homeland cannot be compromised and that they will take precedence over other values when a conflict arises. These principles need to be further strengthened by providing working or operational definitions for key concepts such as “ecological integrity”, “First Nation homeland”, and “two ways of knowing”. Such definitions will assist the Park Management Committee in the future when applying the principles to challenging or difficult management decisions.	The PMC can follow up with “...working or operational definitions for key concepts such as “ecological integrity”, “First Nation homeland”, and “two ways of knowing” are defined by the respective principles. No change to plan
2	The clarity and quality of the maps included with the plan will need to be improved, especially the ones showing detailed information such as Map 2 (Kusawa Administrative Plan) and Map 6 (Kusawa Park Routes and Trails).	Plan amended: Map 2 is available at www.kusawapark.ca Map 6 is dated and has been deleted from the plan.

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3	The draft plan reflects a consensus between YG, CA, C/T and KDFN's, which is encouraging given the many challenges and difficulties facing YG in its current relations with YFN's. Should these positive working relations continue and result in a recommended plan that is approved, the process should be summarized as a best management practise; and, used by other government departments when undertaking similar planning initiatives involving the public and FN's	The Kusawa planning process is being considered in other Special Management Area- Park initiatives. No change to plan
4	The recommended management plan needs to include a five year implementation plan to identify annually priority initiatives, their timing/order and the general staff/contractor and financial requirements (capital and operating maintenance costs). Such a plan is required so that when YG approves the plan it understands what resources are required to put the plan into effect. The implementation plan should also include an organization chart identifying permanent and seasonal staff requirements including park rangers and administrative, interpretive and maintenance staff. Ultimately the success of establishing and operating the park will be determined by the resources made available to implement the approved management plan.	It is anticipated that the recommended plan will include an implementation budget as part of the internal YG plan approval process. No change to plan
5	The annual progress review identified in the PMC TOR should include a report that summarizes park activities, emerging issues and the next year activities. The annual review should include a meeting with the membership of the 3 FN's and public in Haines Junction and Whitehorse.	The PMC will determine the scope of its activities including: "3.1: Guide the implementation of the approved management plan by: overseeing yearly park work plan..."
6	Given that the Wild land zone "...will be managed to maintain its wilderness character and related opportunities.." an understanding of the intensity and extent of back country will be critical, especially when identifying emerging use trends and potential problems. Visitor use data is required to monitor such trends and is best collected through a simple, no cost, on line overnight backcountry registration system. Data collected would include: basic contact information, group size, travel schedule, means of travel and anticipated travel route and activities. Furthermore, while the expectation is "...self-reliant back country use..." the reality is that emergency search and rescue situations enviably will occur. In such cases, this basic information will assist responding agencies such as RCMP and EMO in conducting search and rescue activities. (also see commercial and private air access comment #9 below)	The SC does not feel such a system is warranted at this time. No change to plan
7	The Kusawa Bluff area is a culturally significant and highly valued area subject to extensive use and progressive bank erosion and site degradation. For these reasons, a site/area protection plan should be developed within the first 5 years in order to identify specific actions or restrictions required to manage the area.	The SC believes the management direction to close the motorized access route to Kusawa Bluff and messaging to interpret the area and discourage/prohibit use provides sufficient direction. No change to plan
8	The landscape and ecological values and the heritage and cultural values are the critical, underpinning values of the park. With this in mind, it underscores the importance of early development and implementation of the IMR plan for the park identified in section 11, page 37. The implementation plan identified above must include the resources required in the first 5 years of undertaking the IMR plan. In the absence of such baseline information meaningful management and program decision making will not be possible.	It is anticipated that the recommended plan will include an implementation budget as part of the internal YG plan approval process. No change to plan

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9	Commercial and private air access into the park by rotary or fix wing should be monitored for the same reasons and in a manner similar to the recommended back country registration system. An annual permit could be issued at no cost with the requirement to report at the end of the season the trips taken, the locations landed, when, and number of visitors. This would be the same type of information typically required when completing a flight plan so should not be an imposition. (also see back country registration comment #6 above)	The plan has been amended to require a park permit for all aircraft landings.
10	The management directions for ORV use underscore the need to improve Map 6 to show where the existing trails are; and, to have a back country registration system to monitor this type of use. An unclear reference is made in this section: “.. low level monitoring will be sufficient...” Does this mean ongoing, opportunistic, informal monitoring by staff when in the park or only by word of mouth when conflicts between users or serious landscape degradation occurs? In either case the approaches are insufficient to monitor trends and to identify management solutions before serious problems occurs. The fact that some Yukon residents will likely resist having to register does not mean it should not be done. It is typically better to implement such a system early on rather than introducing it in 5-10 years after implementing the management plan.	There are currently no regulations in place either generally or specific to a Yukon park that allow backcountry registration except for commercial use. Monitoring will be dependent on allocations in the implementation budget.
11	Furthermore it is vitally important to consider how the ORV management directions will be enforced. Proper resources need to be allocated to ensure that ORV use is limited to designated trails and not deeper into the Wild Land Zone.	It is anticipated that the recommended plan will include an implementation budget as part of the internal YG plan approval process. No change to plan
12	The plan should recognize that new front or back country trails 1.5 metres wide or greater will trigger a YESEAA review including the requirement for public consultations.	The plan has been amended to list YESAA as a law of general application
13	It is also important to consider the implications of the Whitehorse and Southern Lakes Forest Resources Management Plan process which is currently on-going on the park’s territory	The Whitehorse and Southern Lakes Forest Resources Management Plan abuts the eastern boundary of Kusawa Park such that there is no overlap. No change to plan
Ducks Unlimited Canada		
1	Ducks Unlimited Canada (DUC) supports the Draft Kusawa Park Management Plan. We feel this plan – with only minor alterations to clarify allowed uses – will achieve the vision and guiding principles set forth by the steering committee. We believe that implementation of this plan will allow the natural processes and values of Kusawa Park to remain in their natural state for years to come. In particular, we would like to highlight sections of the plan that we feel are important and wish to lend our support to as the plan is modified based on feedback from the public and other stakeholders. These include the following:	“...minor alterations to clarify allowed uses” is addressed in comment #7 below. No change to plan
2	Guiding Principles: DUC agrees with the six principles for managing Kusawa Park. We are pleased to see that ecological integrity is one of the two most important principles and that all decisions will consider the well-being of ecosystems, biodiversity and fish and	No change to plan

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	wildlife populations.	
3	Park Governance: The confirmation of the existing withdrawals and prohibitions regarding mining, oil and gas, and coal rights is necessary. We also support the withdrawal of quarrying, hydro, and forestry interests within the park. Stating these clearly is transparent and communicates with certainty the permissible activities within the park.	The plan has been amended as follows: “Any future consideration of potential hydro development would require consensus of the parties, in consideration of Final Agreements and the <i>Parks and Land Certainty Act</i>.” “Further, permits for quarrying will be considered only for park purposes. Permits for commercial forestry within the park will not be considered.”
4	Park Zoning: We believe zoning is a suitable method of managing the park. The location of the zones and the management direction described for each is appropriate. The important wetland complexes within the park fall mainly in the wild land zone where maintaining the ecological integrity of this zone will ensure many of these wetlands function in a natural manner providing habitat for many species of waterfowl.	No change to plan
5	Landscape and Ecological Values: We agree that sensitive areas should receive management direction when examining park activities. In addition to Thandlat fen, we assume that wetlands, particularly the Mendenhall wetlands, those along Takhini, Rose and Primrose Lakes, and the mouth of the Hendon River, would be considered as sensitive, vulnerable or otherwise important habitat areas and be given consideration when planning park activities.	The management direction on sensitive areas addresses the comment – “All park activities will give consideration to sensitive, vulnerable or otherwise important habitat areas and ecosystems. Criteria will be developed to list, describe and map sensitive areas (such as dunes and Thandlat fen).” No change to plan
6	Inventory, Monitoring, and Research: Inventory, monitoring, and research are important to DUC. As a science-based organization we see this as a necessary step in successfully managing any piece of land. DUC has in the past conducted inventory work in Kusawa Park to inform this management plan including waterfowl surveys and land cover mapping. We are pleased to see the plan will continue using the best available science to aid in decision making.	No change to plan
7	While there is much that DUC agrees with in this plan we do see an opportunity to provide further clarity. As written, the plan does not explicitly state whether or not access roads are allowed to be constructed within the park, be it to access new sites for park activities, or to access values outside the park such as a mineral deposit. Our preference would be to not allow further road construction within the park boundaries. We suggest wording be included that clearly states the steering committee’s position and makes management recommendations regarding whether roads would be allowed to be constructed within the park boundaries. We believe it is best to resolve this issue now instead of having to make decisions under tight timelines once a development is proposed.	The park governance section has been emended with a management direction as follows: “Pursuant to Chapters 10, Schedule A, 2.1.3, of the CTFN and KDFN Final Agreements this plan envisions a park free from industrial development. “

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Yukon Heritage Resources Board		
1	The YHRB has mandates under the YFNFA's and the Yukon <i>Historic Resources Act</i> to operate in the public interest with regard to heritage issues. The legislated mandate of the Board is to make recommendations to Governments regarding management of heritage resources, heritage sites, and Special Management Areas in the Yukon, and to make determinations regarding ownership of heritage resources referred to the Board under Chapter 13 of the FA's	No change to plan
2	The Board appreciates the opportunity to review the Draft Kusawa Park Management Plan forwarded in May 2015. This is a very comprehensive, high-level management plan and one the Board feels is an appropriate and functional document with respect to providing direction the management of heritage resources and cultural uses in the future park.	No change to plan
3	The plan and planning process have incorporated a wide scope of input and reflect the guidance of the FA's with respect to the objectives for this management area. The Board appreciates that recognition of, support for management and monitoring of, and research related to heritage and cultural uses are emphasized throughout the management plan document, in keeping with the heritage significance of the area and the plan's guiding principles. Heritage resource management direction found in Section 6 of the draft plan provides for specific zoning and direction appropriate to the nature, use patterns, and vulnerability of several key areas of significance. The draft plan appropriately notes the existing and future legislation that will apply within the Park with respect to heritage management.	The SC believes the park management plan provides the appropriate level of direction to the PMC. The PMC ToR also provides a sufficient level of direction to implement the approved park management plan. No change to plan
4	The Board understands that the Management Plan is intended to be a high-level document to guide operational planning and implementation carried out through the Parks Branch, with the advice and assistance of the Management Committee (PMC). The YHRRB feels that this management plan, in combination with the establishment of an empowered and representative PMC, can provide suitable direction for the development of specific management steps to ensure ongoing conservation, promotion, and interpretation of heritage in the park. The Board looks forward to the development of an operational plan to better clarify practices and procedures necessary to the protection of heritage throughout Kusawa Park, and particularly in identified Special Feature – Heritage Zone areas.	The SC believes the plan provides sufficient direction to the PMC to “clarify practices and procedures necessary to the protection of heritage throughout Kusawa Park”. No change to plan
Yukon Energy Corporation (Andrew Hall, President and CEO)		
1	This letter confirms that YEC remains interested in exploring the future potential development of a hydroelectric facility on the Primrose River.	The plan has been amended as follows: “Any future consideration of potential hydro development would require consensus of the parties, in consideration of Final Agreements and the <i>Parks and Land Certainty Act</i>.”

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Individuals		
1	Management Plan: The “park (management) plan will be reviewed within five years and every ten years thereafter . . .” The Park Management Committee should be required to hold a public meeting once each year in order to report what progress has been made on implementing the Park Management Plan. This will allow interested members of the public to become more informed about park management concerns, offer suggestions, and present questions to the committee.	The PMC ToR addresses this comment: “3.1 Guide the implementation of the approved management plan, by: Coordinating an annual progress review and ongoing public input and ensuring there is First Nation involvement in park management planning”. No change to plan
2	Recreational Uses: Campgrounds can become problem areas particularly on weekends in Yukon. We need to better control the undesirable activities that can occur. Yukon campgrounds need volunteer hosts who have the means to contact park staff or police services if required. Volunteer park hosts have a great calming effect on visitors. There is less likely to be a problem if such a person is present. Volunteers could serve a two-week term, but if someone wanted to serve a longer period then that option should be offered. An interpretive centre at the larger of the two Kusawa Park campgrounds would be ideal as this would require a park staff member on site at all times. However, this is not likely to occur due to the costs involved. ORVs are a problem in the campgrounds and surrounding areas and this issue needs to be addressed in order to ensure the safety of other users and the protection of the park environment	Volunteer campground hosts have been periodically employed Yukon campgrounds in the past and will be considered in the future. A central park service facility is recommended in the plan. ORVs are addressed in section 8 – Park access. No change to plan
3	Park Access: ORV use of the park should not be encouraged by adding trails to accommodate such use. All hikers who are doing overnight trips within the park should be required to register with park staff. This would allow park managers to monitor more effectively where backcountry hikers go within the park, the length of time they stay, and how they get there (helicopter, boat, float plane). There are safety concerns with backcountry hiking/climbing, and registration would help all concerned should an accident occur. (There are lots of examples of information packages that hikers should leave behind in case a problem should occur. Park managers could require such packages from overnight hikers.) There does not seem to be any reference in the Draft Plan to the possibility of controlling aircraft access to the park. Are there places where aircraft should not land, or should not land at certain times of the year? The draft plan seems to indicate that there is not much use of the backcountry, but this will only increase in the future, and along with that increase will come more aircraft.	The plan has been amended to address ORVs which will be “...limited to certain areas, as follows: <ul style="list-style-type: none"> • ORVs may only be used on designated ORV trails, in areas designated for ORV use, on park roads, on the frozen surface of Kusawa Lake, or as authorized by a park permit. • Designated ORV trails and areas may exist only in the Multiple Recreation Use zone and on the frozen surface of Kusawa Lake” <p>Currently there are no regulations in place either generally or specific to a Yukon park that allow backcountry registration except for commercial use. Safety concerns will be addressed in the interpretation and communications plan.</p>

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		<p>The Park Management Committee (PMC) to be struck upon approval of the park plan is also referenced in this column</p> <p>The plan has been amended to require a park permit for all aircraft landings.</p>
4	<p>Thank you for the opportunity to attend the public meeting on the Draft Management Plan and for allowing citizens to submit written comments. The establishment of a management plan for Kusawa Park has been a long time coming and it is certainly welcomed. I would like to thank those involved for their efforts in seeing the management plan come to fruition.</p>	<p>No change to plan</p>
<p>Other Comments received</p>		
<p>Verbal comments from trapper within Kusawa Park</p>		
	<p>Monday June 8 and Thursday June 11, 2015</p> <p>The trapper heard from a Yukon Trappers Association representative (who attended the Haines Junction public meeting) that trapline cabins were to be re-located under the park plan. Parks Branch called and reassured him the recommended direction management direction says: "New or relocated trapline cabins may be considered, and if deemed necessary, may be authorized through a park permit". The concession holder was satisfied with this response.</p> <p>On Thursday the trapper called back to ask that provision be made for his (disabled) access to his trapline cabins by quad in two locations, if he is ever to make it out to these locations in the snow free period:</p> <ul style="list-style-type: none"> • from a floatplane landing on a remote lake to his tenured trapline cabin i.e. via an existing 500m trail up from the lakeshore along a bank to his cabin • for a short loop trail from Kusawa Lake shoreline through the forest to his tenured cabin <p>The trapper wants to make sure he will be able to use a quad around his tenured cabin locations and for his son to be able to inherit the concession area if he chooses. Parks Branch said this situation will be handled through the trapline concession process by Conservation Officer Services Branch. A draft park management plan was hand delivered to the trapper the same day.</p> <p>On Friday June 12 the trapper called to convey the following:</p> <ul style="list-style-type: none"> • Fur reported is only for those species – wolf, wolverine and lynx – that are required to be recorded. It does not reflect trapper effort i.e. for the following species that he has trapped: beaver, coyote, marten, red fox and cross fox. <p>The trapper asked whether the park will promote canoeing down Kusawa Lake. He said the lake is dangerous for travel and winds and waves can come up very suddenly from different directions. The trapper asked about the kinds of campsite facilities envisaged for the southern end of Kusawa Lake. He doesn't want to see government style outhouses along the shoreline; he already has such an outhouse in the bush near his Takhini River cabin, available for public use.</p>	<p>The plan has been amended to clarify the provision for trapline cabins as follows: Section 9 – Commercial activities - management direction "Trapline concession rights will continue in the park. If a trapline concession holder wishes to apply for or re-locate a cabin it will be considered through a park permitting process"</p> <p>The plan provides for ORV access as follows: "ORV use in the park will be limited to certain areas, as follows:</p> <ul style="list-style-type: none"> • ORVs may only be used on designated ORV trails, in areas designated for ORV use, on park roads, on the frozen surface of Kusawa Lake, or as authorized by a park permit." <p>No change to plan</p> <p>Trapped harvest numbers have been confirmed with Fish & Wildlife Branch.</p> <p>An interpretation plan will address safety issues</p> <p>Kusawa Lake shoreline campsite facilities will be limited to an outhouse and fire ring.</p> <p>No changes to plan</p>

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Individual citizen		
	A written submission was received from an individual which match those from CPAWS above	Changes noted under CPAWS above
Social media: there were no substantive comments received through social media		