

Date: Sept 3, 2021

Meeting purpose / Title

KPMA Annual General Meeting (presentation to the board & open house public and members)

In attendance

KPMA Board Members, DRPC Staff (Tim Sellars, Nicole Percival, Charlotte Luscombe) DRPC (Debbie Nagano, Alice McCulley)

Summary

The four main topics that were discussed at the KMPA AGM are summarized below.

Thresholds – The concept of thresholds in the plan is problematic for the [some of the] miners that were present at the meeting. The source of surface and linear disturbance is perceived to be outdated (based on updated data from 2014). There is a lack of clarity about the current on-the-ground disturbance and the relationship to the thresholds that are recommended in the Draft Plan. Questions were raised such as “Will restored land be ‘put back into the pot?’” and “what counts as disturbance (i.e. legacy mining shouldn’t count, regrowth, trails etc.)”. Thresholds and the ‘first come first served’ nature of them may encourage people to overestimate during the permitting process, or rush to work the land.

Wetlands – halting mining in wetlands will essentially push placer mining out of the region. It should be acceptable to still mine in wetlands and then be held accountable to restore wetlands into marsh, they are productive ecosystems abundant with wildlife.

Yukon River Corridor - there remains to be some confusion about what is and is not permitted to happen in the YRC in the plan. Access is a major concern, especially barging. The DRPC should look to the placer authorization for more guidance in this area.

Reclamation – there was a lot of positive comments about reclamation and the good work that is being done. There were general comments about the rich habitat that reclaimed placer areas can provide for the region. There was frustration at the inconsistency surrounding the standards and a general desire for standardization of this element of the operation.

Support for the Placer Community – Generally, it was commented that the draft plan be better at supporting the placer mining community. Both in terms of encouraging the industry to grow and continue to be a strong, responsible contributor to the Yukon economy and in terms of cultural and community relevance.

Notes

KPMA – Klondike Placer Mining Association

DP – Draft Plan

DRPC – Dawson regional planning commission

RP – Recommended Plan

YRC – Yukon River Corridor

IRW – Indian River Watershed

SMA – special management area

KPMA Board meeting presentation

Presented overview of Draft Plan to the board and focused on LMU #19 and #12

Took questions throughout the presentation and discussion went as follows:

- How will the Precautionary Principle be applied in the plan?
 - o The intention of the P Principle in the plan is not to halt all activity in the face of uncertainty, but to approach some things iteratively – the three threshold levels before the critical threshold in surface disturbance was give as an example.
 - o The Principle can be upheld and tested with adaptive management and the plan being able to be amended as necessary when new information arises
- When you talk about plan reviews and adaptive management, when would that occur?
- In SMA 2s there is concern about the water license renewal. – KPMA are worried that the miners' water licenses will not be renewed even though the plan indicates that development can still occur.
 - o This is a major concern from the Board
- Threshold questions
 - o Where is the data from that the thresholds were set at?
 - Explained that the best available data is from 2014 with some amendments more recently.
 - o How did the commission come up with these numbers (for the thresholds)
 - Explained that the pattern of acceptable disturbance was based upon the pattern for increased disturbance (%) in the previous two plans (NY and Peel).
 - o What is the current level of disturbance in the East LMU?

- DRPC did not have that information on hand but will look to working on making the disturbance available (noting that new data that will become available soon from YG).
- Yukon River Corridor discussion
 - River access may cause difficulties for industry
 - Barge landings
 - The withdrawal in the YRC will halt exploration in the area for a long time because the subregional planning will take for ever – look at Beaver River for example
 - Placer Regime (secretariat) look at this again when you are working on the YRC
 - Jessica Gangon (DFO) can provide more information on the Fish Habitat Management Program
- Northern Access Route – DRPC pointed to the recommendations in the Access section of the plan
- Interim Withdrawal was discussed
- Wetlands
 - No mining in wetlands is basically everything (mining) and the industry will be shut down
 - Water Management
 - People will be put out of business – Wounded moose for example. That is in SMA 2 and amongst many wetlands
 - DRPC staff noted that IRW is a great example of a place in the plan where we can come together to try to find solutions to these very difficult decisions
 - Placer reclamation is very good at making marshes – why can they not mine marshes (the plan says no due to rarity). There could easily be a no net loss for marshes.
 - Reclamation generally creates marshes so it would increase the rare feature in the region
- DRPC staff reviewed process for DP to RP

General Public Open House Discussion – Public Attendees and not necessarily representative of the KPMA

- TH is taking too much in terms of economic value in their settlement lands off the table.) The intention of some of the settlement lands was due to their mineral potential and economic value (TH citizen comments)
- The money (transfer payments?) is going to go away, the lands need to be used for the economy (TH citizen comments)

- There is confusion about the YRC – is mining not allowed? DRPC staff confirmed that mining is 'allowed' under the plan under stricter management and no further mineral claims can be staked until sub-regional planning is complete
- Hard rock reclamation – why isn't this industry being held accountable?
- The 'reclamation' standards need to be consistent for each operator
- YG needs to take inventory of what's been done and what needs to be reclaimed
- Historic disturbance (legacy mining) – the old dredge tailings
- The Plan should recognize reclamation in a more substantive way. The investment and effort put into reclamation are significant and can result in return to functional habitat in a short amount of time.
- LMU 15 & 16 (Fortymile)
 - o There are thousands of gold bearing mineral claims in these LMUs.
 - o The economic value of these needs to be recognized in the plan.
- ISA 2 uses the term minimize land use impacts. It needs to be clarified that minimize impacts does not mean "no development". Same concern with the word "limit" in the Plan.
- We need to know in which ISA's we already at the cumulative effects precautionary and cautionary levels so that we know what the rules are going to be in those areas.
- The ban on development in bogs and marshes is a big problem. "All" placer operations are in some form or wetlands, so this would effectively shut down any development.
- We need to be able to see the wetlands mapping, otherwise how are we going to know where we can operate and where we are not supposed to go?
- In Alaska, wetlands assessments before and after activity are undertaken by the US Army Corps of Engineers. They rate the values of wetlands (biodiversity, habitat value, water quality) and therefore have very good data and understanding of the impact of mining on the wetlands and the tools for management.
- You are going to end up in a situation where proponents are going to overestimate the permit application if they are faced with more restrictions
 - o This will be especially true when the thresholds are approaching the cautionary and critical levels
 - o It is based on a first come first served system
- What about disturbance that exists on the landscape that has no responsible party? perhaps this shouldn't be included in the disturbance indicator (legacy disturbance)
- Is the goal for modern mining 0 % disturbance?

- There was a lengthy and productive conversation on the effectiveness of disturbance thresholds.
 - o What data is it based on? Questions of quality
 - o What happens when a place is 'restored' does it 'go back in the pot?'
 - o There are different ways of measuring disturbance
 - o What about the old tailings? They shouldn't count
 - o Discussion about width of trails (as mentioned in the plan), height of vegetation etc.
 - o Placer miners could restore legacy mining (or a fee of course)
 - o Restoration is inconsistent.
 - o Bad operators exist
 - o The thresholds are a real problem for their industry
- How does the plan support the mining sector?
 - o It should recognize the socio-cultural and economic contributions that the industry makes to the community
 - o There is a distinct culture that matters (and is not acknowledged in the plan)
 - o Financial tools needed to support industry (in their restoration endeavors? To support and encourage targeted mining practices to reduce footprint?)
- Exploration for minerals
 - o Prospecting should be allowed everywhere – the impact is negligible
 - o In the OIC the wording 'entering the land for the purpose of prospecting' is too strict. How can a geologist walk on the land and not think about rocks.

Action Items / Follow Up
