

Dear Mr. Scott Cassleman and Dawson Land Use Commissioners,

My family has been involved in placer mining and hard rock exploration in the Dawson area of Yukon from the early 1980's. Our income supports the [REDACTED] people in our family and the families of our [REDACTED] long term employees.

In short, there are not maps that I can support as they are all too far weighted to the conservation side and alienating mineral potential and future economic development. While D and B, do have the greatest areas of mineral potential (placer and hard rock) available, neither one of them is ideal for the Dawson region. There should be more areas designated at IMA IV and fewer areas that have excluded placer mining and mineral exploration/development. I think the commission should give greater weight to the current regulations and opportunities for site specific conditions on development through the YESAB/Regulatory process and re-think the maps in the Dawson area to ensure we maintain healthy placer and mineral exploration industries.

There should be a broader discussion about how much "protected area" is appropriate, the lowest level seems to be 11%, when a smaller number, like 5% might be more appropriate with good management practices on all industries (including outfitting, tourism, mining etc.). There is not enough information on the mineral potential of many areas to exclude all mineral exploration (placer and hard rock) at this time.

I do concur with what the Yukon Prospectors association as prepared in their briefing and appreciate all the hard work they put into their rationale for the mineral industry, concerns about land designations and hope you give their thoughts consideration. Of particular note, it seems that the commission has given little faith that the regulatory system for non-renewable resources protect land, and the assumptions seems to be that this results in non-mitigatable impacts. I

think this assumption needs to be challenged and the commission should re-examine what is required under the existing stringent regulatory regimes that have provisions for site specific protection of values.

The land use system proposed is very complex with multiple land use designations with yet unknown restrictions and timing. The existing regulatory regime should be used in areas where mineral /oil and gas rights are allowed and there should not be multiple different systems developed which will undoubtedly scare investment dollars away. The public should not have to choose between land designations without really understanding what the differences are and the potential thresholds and restrictions.

There should only be mineral claim withdrawals in protected areas, and if claims are expropriated, then holders should be fairly compensated. This includes the companies that invested and the underlying prospectors whose livelihood is based on eventually receiving royalties or payments from the work they put into locating the claims. If society chooses to take these rights away, either by complete expropriation, by not allowing reasonable access to the claims or reasonable operating conditions on the claims they have a moral obligation to bear the cost to compensate the people that made good faith investments of time and money.

If there are land designations that do “grandfather claims” or if there is a YRC designation, reasonable access to those claims must be provided. An additional idea might be a provision that existing claim holders can expand their position if there are demonstrated deposits that go from their claims into a “Non-mining” land designation.

If there is a YRC corridor designation, I do not think that mineral rights should be withdrawn and that access routes should be available to be constructed to access other areas. The Yukon River has always been an important transportation corridor and it will continue to be the best

way to access some areas with the least disturbance. 6 km for the YRC is way too wide, particularly if mineral rights are not permitted. A size of 1 km (0.5 km on each side) would be large enough to protect viewscapes and landings and also allow for reasonable access under current regulatory conditions.

I hope that the commission will take these comments into consideration in the final plan.

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