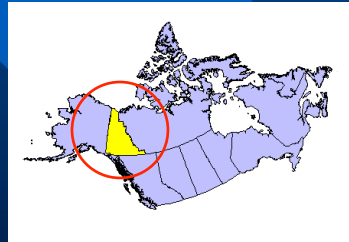


A Review of The Draft Dawson Land Use Plan

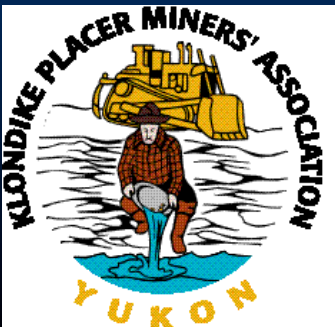


By:

Randy Clarkson, P.Eng.

Klondike Placer Miners' Association

March, 2014



Outline of Presentation

- Modern Placer Mining & Tourism
- Existing Regulatory Environment
- The Strategic Decision Making Process
- Recommendations for DLUP

<<Gold



About the Author

- Professional Mining Engineer
- Worked in the Yukon since 1974
- With the KPMA since 1987, presently ED

**Extensive
experience in
placer mine
restoration and
pollution control
in North and
South America**



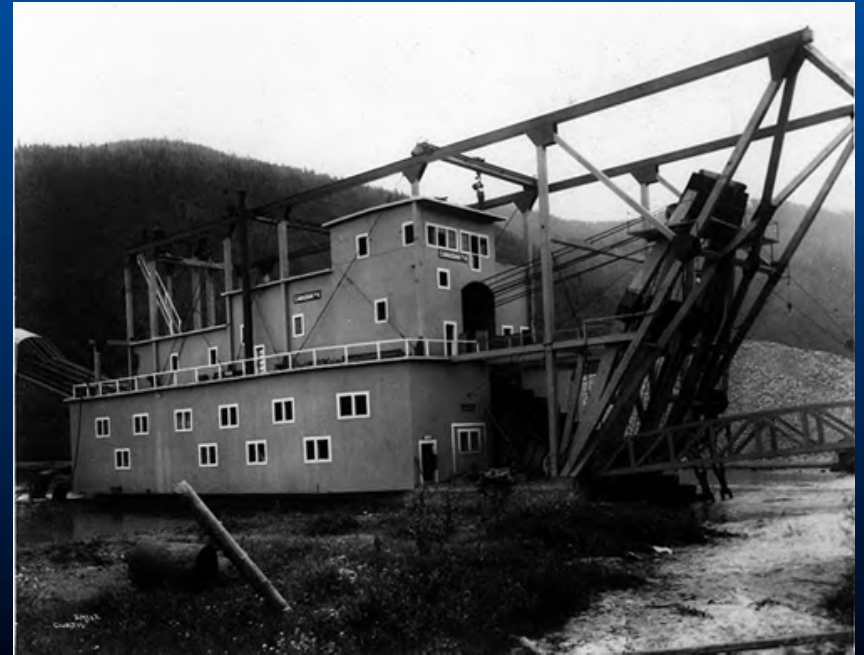
Klondike Placer Miners' Association

- Represents about 100 family based placer mines in the Yukon and
- Dozens of service industries and suppliers



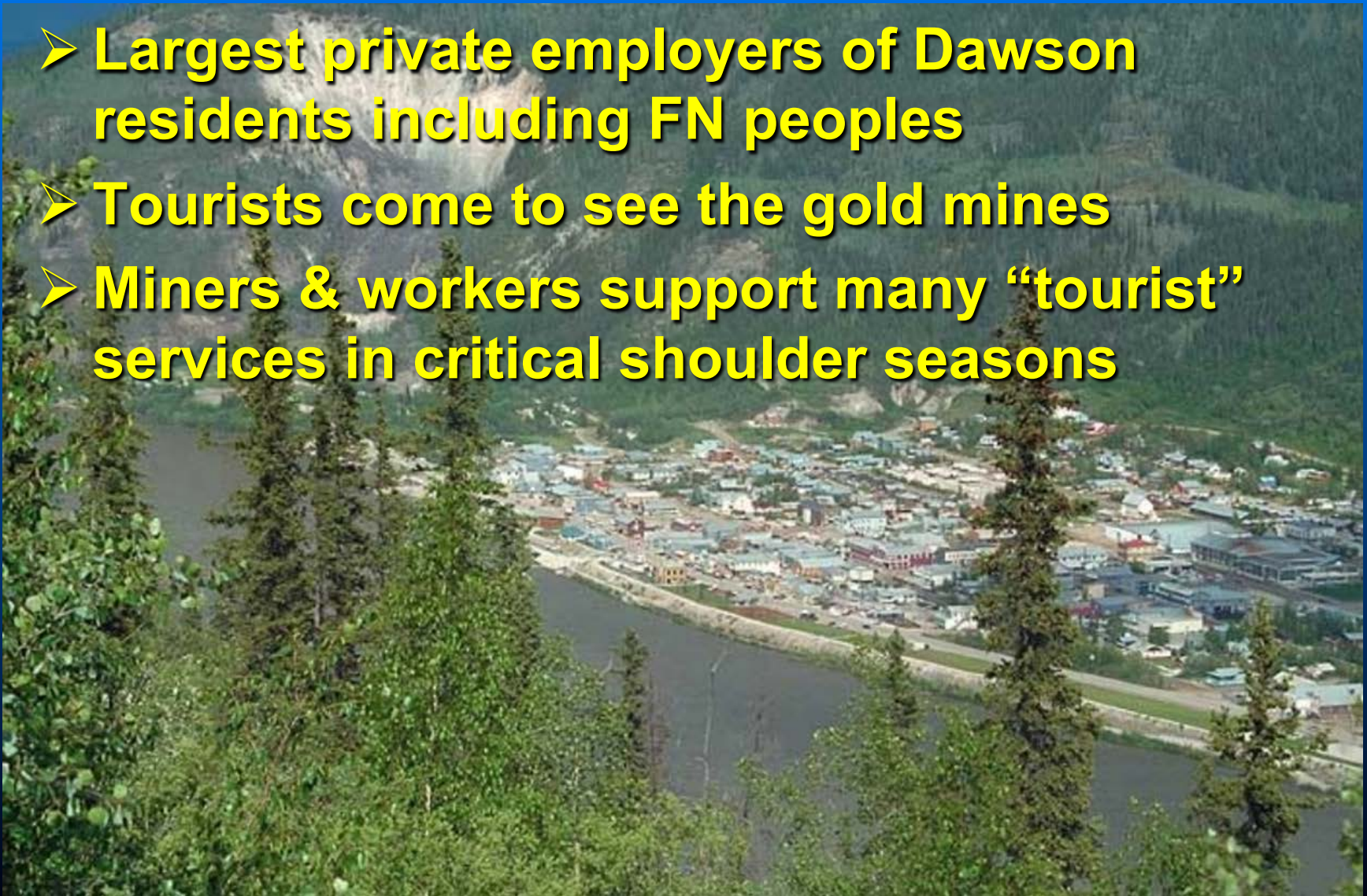
Klondike Placer Miners' Association

- Most reliable generator of wealth and employment for over 130 years
- Cumulative Gold Production of ~\$50 million annually ~2.5 x in Spinoff Benefits



Klondike Placer Miners' Association

- **Largest private employers of Dawson residents including FN peoples**
- **Tourists come to see the gold mines**
- **Miners & workers support many “tourist” services in critical shoulder seasons**



Klondike Placer Miners' Association

Intensive but short
summer work season
allows for attending post
secondary school in fall
Long days with plenty of
overtime for healthy pay
cheques

Skills learned on mine
sites are readily
transportable to other
jobs/areas

Placer mine workers are
among the highest paid



Modern Family Operations

- Generally have 2 to 10 persons
- Use large heavy mining equipment
- Employ efficient gold recovery
- Important part of Yukon identity



Modern Yukon Placer Mines (1970>>)



Klondike Placer Miners' Association

Have come a long way from the dredging era and from the 1970's & 1980's

90% reduction in sediment to streams

97% compliance with water licenses

>90% compliance with land use plans

Annual "Leckie" award for best reclamation



Regulated Industry

- Yukon Placer Act, Yukon Waters Act, Canada Fisheries Act, Mining Land Use, Migratory Birds, Yukon Environment, Yukon Heritage Acts and many others



Settling Ponds (1970' s)



- Sediment releases during the modern gold rush (1970' s to present) were limited by the change in mining methods and technology, and by the introduction of settling ponds.

Placer Mining Land Use (1999)

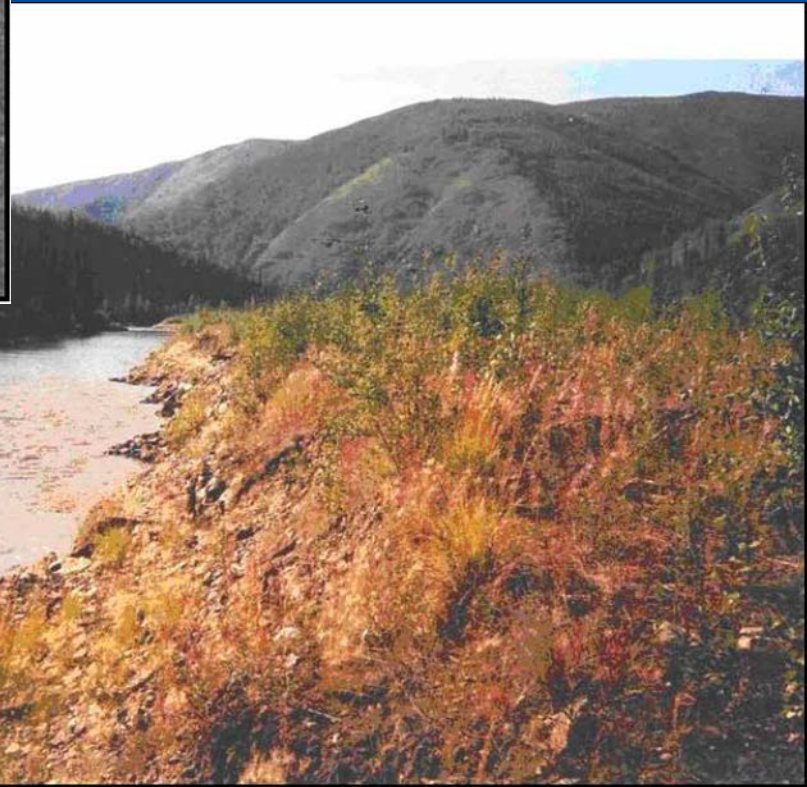
- In 1998, placer mining land use regulations required the reclamation of placer-mined areas.



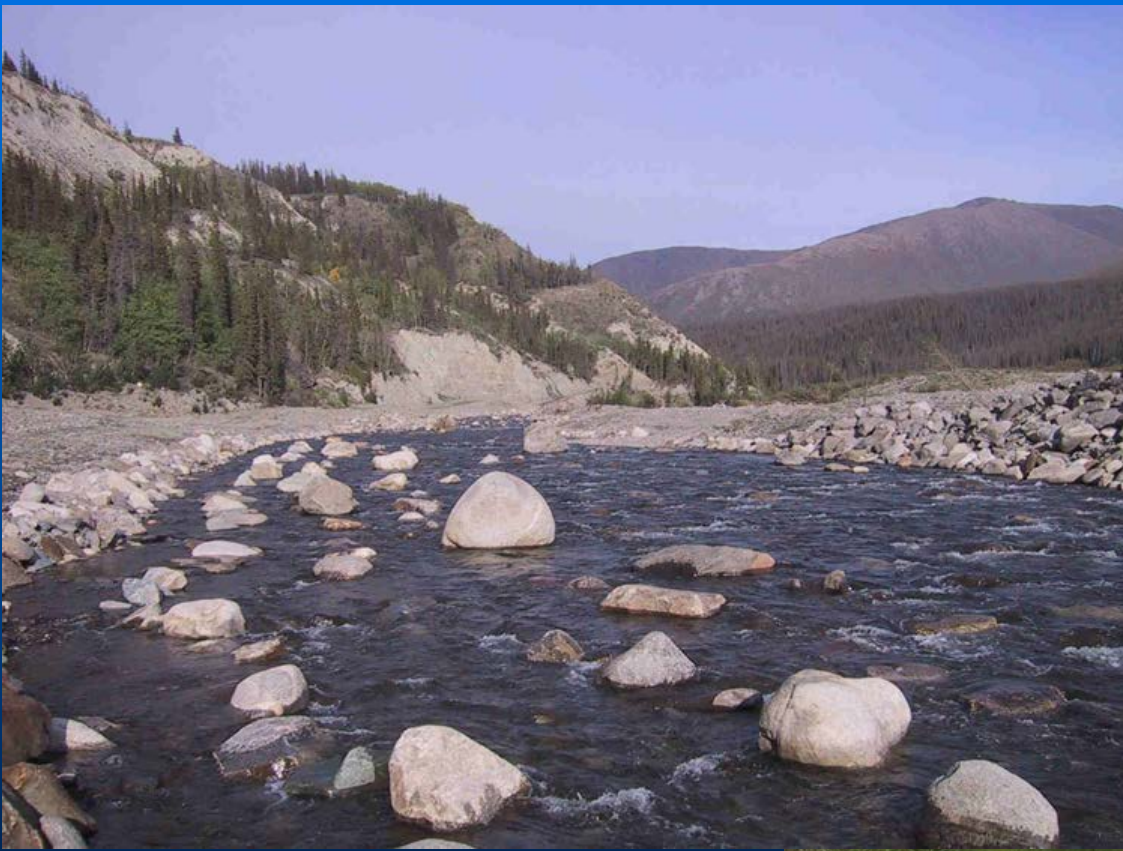
Reclamation of Placer Mines



Stream Diversions & Restoration



Stream Diversions & Restoration



Stream Diversions and Restoration



Enhanced Wetlands



Dawson Land Use Plan

- **Plan will have a dramatic impact on the economy and existence of the placer industry**



Dawson Land Use Plan

- **Difficult to know where the future placer deposits will be located – yet to be found**
- **Need to expand exploration frontiers**
- **Need to allow mining in new areas**
- **Recognize the reclamation of previous areas**
- **Don't unnecessarily isolate areas from mining**
- **Will need non-government sources of employment in the future**

Yukon River Corridor

- **View impacts don't extend more than 50 m from the Yukon River**
- **Many of today's "pristine" areas were logged off to supply fuel to the sternwheelers & have reclaimed naturally**
- **River transportation and developments including placer mining have been on-going since before the Gold Rush**

Yukon River Corridor

- **Miners report tourists using barge landings and old cabin sites along the river for campgrounds**
- **Signs of human habitation such as Fort Selkirk, the old telegraph lines, old and new cabin sites, barge landings, fish wheels exist on the river**
- **Is an essential highway - like having a railroad and saying we no longer want trains to pass**

Traditional Economy Areas

- **Would allow forestry, farming and hydro development which have a much larger impact on land and water than mining (<1% of land base)**
- **Propose a “temporary ban on placer and quartz staking” lead to further reduction in investor confidence in the Yukon mining industry**
- **Land management unit with a strong anti-mining bias**

Strategic Decision Making Process

- **Analytical process help choose the best option**
- **Potential to provide fairer, more realistic and balanced approach to land use planning**
- **Many resource and values maps – often lack data – incomplete – work with best available**
- **Particularly difficult to estimate placer and other mineral resources hidden underground**

Unrealistic Ranking Factors

- **Unrealistic ranking factors in SDM model led to plans extremely biased against mining and other resource development**
- **Lack of understanding of existing regs and reclamation practices**
- **Goal of balanced land use plan has not been met with the 5 alternatives**
- **SDM needs to be redone with more realistic ranking/performance factors**

Unrealistic Ranking Factors

- **Non of the five map plan alternatives can be supported by the mining industry due to their extreme bias**
- **Not clear what additional regulations or other limitations would be imposed on IMA' s**
- **Placer miners have a short season and often cannot operate with timing limits**

Seasonal Limitations

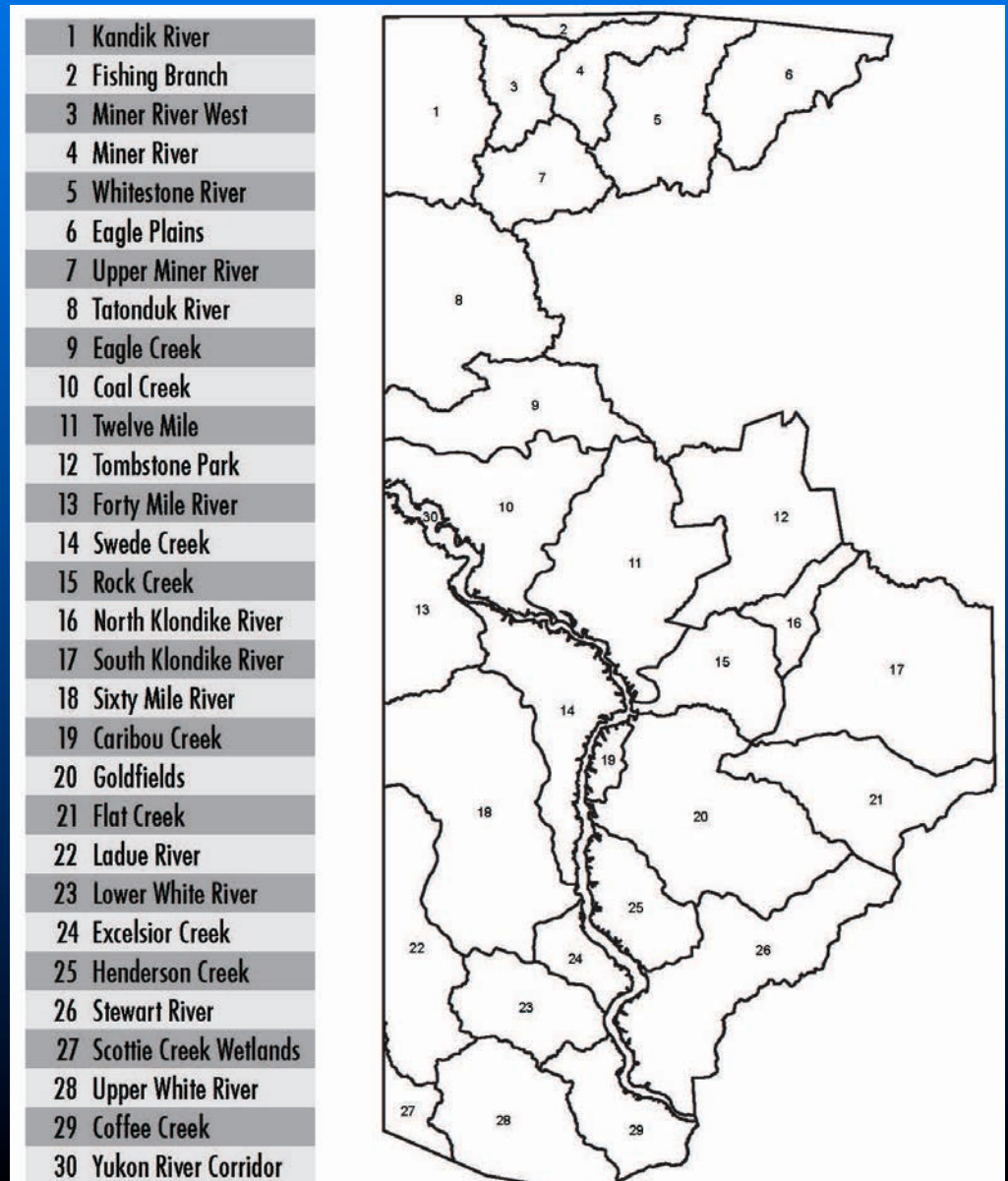
- **Placer miners have a short season and often cannot operate with timing limits**

<i>Wildlife</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sept</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>
Caribou	Grey	Grey	Grey	Grey	Grey	Grey	Blue	Blue	Blue	Blue	Blue	Blue
Moose	Grey	Grey	Grey	Light Blue	Light Blue	Light Blue	White	Blue	Blue	Blue	Blue	Blue
Thinhorn Sheep	Grey	Grey	Grey	Grey	Grey	Grey	Blue	Blue	Blue	Grey	Grey	Grey
Mountain Goat	Grey	Grey	Grey	Grey	Grey	Grey	Blue	Blue	Blue	Grey	Grey	Grey
Bears	Grey	Grey	Grey	Light Blue	Light Blue	Blue	Blue	Light Blue	Light Blue	Light Blue	Grey	Grey
Songbirds	Blue	Blue	Blue	Blue	Grey	Grey	Grey	Blue	Blue	Blue	Blue	Blue
Raptors & Owls	Blue	Blue	Light Blue	Grey	Grey	Grey	Grey	Light Blue	Light Blue	Blue	Blue	Blue

- **Wildlife Timing Windows for Selected Species – Skeena Region BC**

Strategic Decision Making Process

- **Land Management Units**
- **Dawson Region divided into 30 land management units – LMU's - drainage basins**



Strategic Decision Making Process

- **Resource & Values maps of various accuracies**
- **Some Land Management Units have more of a particular resource / value than others**
- **This is for sheep**



Strategic Decision Making Process

- **First Arbitrary Factor**
- **Areas of High Resource/ Value ranking =3**
- **Areas of Med Resource/Value ranking =2**
- **Areas of Low Resource/Value ranking =1**

- **Need to ensure that High has three times as much resources = 3 times as much gold = 3 times as many moose etc.**

SDM Ranking

- **Resource /values * ranking *square area that they cover in each land management unit = total value of resource in that land unit**
- **That is expressed as a % of the total resource / value for the Dawson Region**
- **Then that number is adjusted again for each Land Use Designation**

Land Use Designation

Land Use Designation System Table

	Integrated Management Area**			Yukon River Corridor	Traditional Economy Area	Conservation Area	Protected Area
	IMA Zone IV	IMA Zone III	IMA Zone II				
Management Intent	Enable Non-Renewable and Renewable Resource Development	Enable Non-Renewable and Renewable Resource Development	Enable Non-Renewable and Renewable Resource Development	Maintain cultural and ecological values within a multi-use river corridor.	Enable renewable resource development and enhance the traditional economy.	Conserve important wildlife habitat and ecological values.	Protect significant ecological and cultural values.
Explanation	Enables all activities within acceptable limits that are meant to maintain ecological and cultural values. These limits may encourage innovation and cooperation among land users. This management regime is most restrictive for Zone II and least for Zone IV. Management tools may include adaptive management, a range of cumulative effects indicators and threshold levels, access and seasonal restrictions/allowances, research and monitoring recommendations, and/or the newly created measures for Class 1 mining activities.			Enables transportation, tourism, recreation, renewable resource development and cultural pursuits, viewpoints, heritage sites, and cultural and ecological values are major considerations.	Promotes renewable resource development and enhances the traditional economy, including forestry, non-timber forest products, agriculture, and tourism as well as subsistence harvesting activities.	Allowable activities may include recreation, tourism, traditional subsistence activity, hunting, trapping, guiding. Access corridor to LMIUs designated as IMA can be provided.	Allowable activities may include recreation, tourism, traditional subsistence activity, hunting, trapping, guiding. Access corridor to LMIUs designated as IMA can be provided.
Legal Designation	No	No	No	No	No	Yes (e.g., Habitat Protection Area in Wildlife Act)	Yes (e.g., Natural Environment Park in Parks and Land Certainty Act)
Withdrawal of Sub-Surface Rights (all current rights grandfathered*)	No	No	No	Subject to sub-regional planning	Interim***	No	Yes
Subsequent Planning	No	No	No	Sub-regional plan	To be determined	Management Plan	Management Plan
Examples	North Yukon and Peel Watershed Land Use Plans IMA's			New Land Use Designation - no examples available		Fishing Branch Habitat Protection Area	Tombstone Territorial Park

COMMUNITY AREA: Area identified to enable potential future expansion of Dawson City municipal boundary and/or additional land for residential development, infrastructure, and recreational purposes.

* In legal terms, "grandfathered" means to grant a special exception. It allows certain situations to continue to exist based on an older rule (the "grandfather clause"), even though a new rule is in place. Those with sub-surface mineral or oil and gas rights now would still be able to access and use those areas, even if they are in an LMIU that is eventually zoned PA (or another zone where withdrawal of rights is seen as necessary to achieve the management intent). No NEW rights would be granted, and if the old claims lapsed they would no longer be valid.

** There is no IMA Zone 1 because the Yukon River Corridor is a unique regional "substitute", and to ensure consistency with the definitions of IMA-II, III and IV in adjacent planning regions.

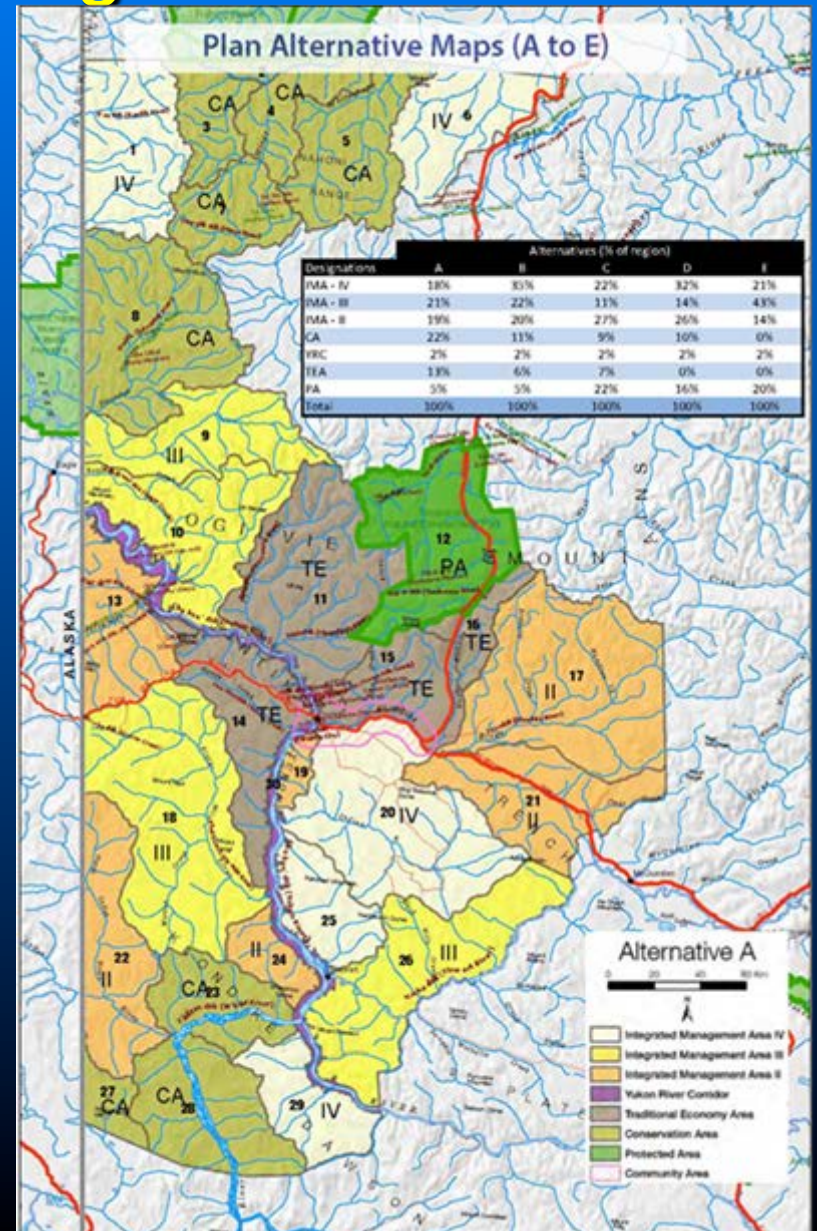
*** Interim rights withdrawal would be reviewed at 10 year Plan review, during sub-regional planning or as described in Implementation Plan.

Land Use Designation

- **Protected Areas (PA) – no activity? Or no resource development?**
- **Conservation Areas (CA or NPA)**
- **Traditional Economy Areas (TEA – everything except mining)**
- **Yukon River Corridor (YRC)**
- **Integrated Management Units (IMA) II – IV – (what new regulations & restrictions?)**
- **Community Area – Dawson City & Burbs**





Land Use Designation

- Land Use Designations are applied to each of the Land Management Units
- The table shows the % of each type of land use designation in the Dawson Region



Performance Measures

Performance Measures	Units	A	B	C	D	E
Placer Potential	%	73.87%	88.10%	80.42%	94.16%	83.50%
Mineral Potential	%	31.21%	50.79%	32.19%	46.49%	47.07%
Gold Potential	%	38.41%	61.15%	40.86%	56.11%	56.22%
Oil & Gas basins	%	69.09%	53.49%	64.95%	64.95%	31.22%
Current # Placer Claims	%	35.72%	52.31%	35.76%	46.81%	46.24%
Forest Resource Management Zone with older trees	%	48.60%	78.83%	46.18%	60.85%	59.05%
High value recreation features	%	49.31%	48.42%	63.78%	61.62%	61.40%
Aboriginal trapping concessions	%	50.52%	37.82%	50.37%	44.51%	46.90%
Non-timber forest products (amt. forest <5km from access)	%	40.35%	20.76%	31.79%	21.39%	21.49%
Heritage Routes	%	54.89%	42.70%	55.05%	42.47%	44.02%
Cultural Sites	%	50.77%	36.01%	45.59%	38.88%	34.36%
Tr'ondëk Hwëch'in merged heritage value	%	83.91%	79.13%	82.11%	78.75%	75.53%
Viewscapes from cultural routes	%	53.31%	34.01%	51.71%	35.68%	32.31%
Rare Landscape Features: # (of 6 types) with >50% conservation	#	1	1	5	3	3
Ecological Land Classification Representation (0-1, 0 is best)	#	0.51	0.51	0.21	0.47	0.27
Salmon Spawning Habitat	%	45.62%	37.71%	52.30%	43.73%	39.27%
Non-sheep Wildlife Key Areas	%	42.54%	32.85%	50.77%	42.96%	41.27%
Sheep Wildlife Key Areas	%	51.66%	44.70%	67.60%	64.08%	59.07%
Forty Mile Caribou Herd Good Habitat	%	38.38%	23.01%	34.79%	25.48%	28.98%
Ecological Benchmark Index (0-1, 0 is best)	#	0.19	0.19	0.03	0.04	0.05

Key	
	Selected alternative
	Performance is significantly worse than the selected alternative
	Performance is significantly better than the selected alternative
	Performance is about the same as the selected alternative

➤ Value is further adjusted for each Land Use Designation

SDM Arbitrary Performance Factor

	Highlighted Questionable Performance Factors							
	Designations							
	HPA	II	III	IV	PA	TEA	YRC	
1 Placer Pot	0.1	0.25	0.5	1	0	0	0.15	
2 Mineral Pot	0.1	0.25	0.5	1	0	0	0.15	
3 Gold Poten	0.1	0.25	0.5	1	0	0	0.15	
6 Oil & Gas Basins	0	0	0.5	1	0	0	0.15	
11 Cur Plcr Claims	0.1	0.25	0.5	1	0	0	0.15	
14 For Res Mng	0.1	0.25	0.5	1	0	0.5	0.15	
16 Hig Val Rec Feature	0.5	0.5	0.25	0	1	0.5	0.5	
18 Aborig Trap	0.5	0.5	0.25	0	1	1	0.5	
19 NonTimbFP	0.5	0.5	0.25	0	1	1	0.5	
20 Heritage Rt	0.5	0.5	0.25	0	1	1	0.5	
22 Cultur Sites	0.5	0.5	0.25	0	1	1	0.5	
24 THMerge HV	0.5	0.5	0.25	0	1	1	0.5	
25 Viewscapes	0.5	0.5	0.25	0	1	1	0.5	
43 SalmSpn	0.5	0.5	0.25	0	1	0.5	0.5	
44 Non Sheep WL	0.5	0.5	0.25	0	1	0.5	0.5	
45 Sheep	0.5	0.5	0.25	0	1	0.5	0.5	
49 40mile Carb	0.5	0.5	0.25	0	1	0.5	0.5	

➤ Value is further adjusted for each Land Use Designation

Performance Calculation

- The performance factor is multiplied to the previous ranking
- $\text{Ranking} * \text{Area} * \text{Performance Factor} =$
Performance used to Evaluate the Various Alternatives
- If performance factor is arbitrary then the you cannot compare options fairly
- For example if the $\text{PF} = 0$ there are no resources/values whatsoever in that LMU





Moose Example

- **Boreal Moose habitat area x ranking factor x land use performance factor = % of resource / value available**
- **For IMA IV the performance factor = 0**
- **Therefore there must be no moose in resource development areas?**
- **Local hunters would disagree!**



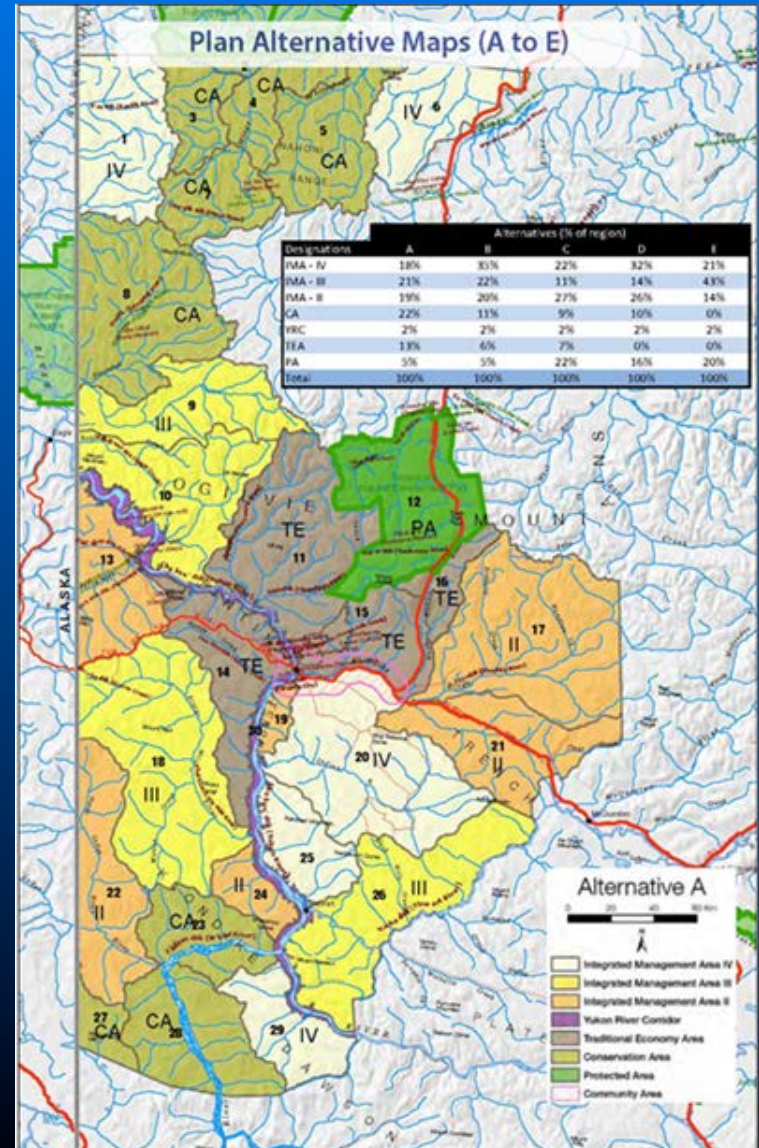
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Key	
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	Performance is significantly worse than the selected alternative
	Performance is significantly better than the selected alternative
	Performance is about the same as the selected alternative

Example Alternative “A” Map

- Note that IMA IV areas would not receive any credit for moose
- Moose favor disturbed / reclaimed areas
- Goal of balanced land use plan has not been met with the 5 alternatives
- SDM needs to be redone with more realistic ranking/performance factors



Highly Questionable Performance Factors

	Highlighted Questionable Performance Factors							Alternatives				
	Designations							A	B	C	D	E
	HPA	II	III	IV	PA	TEA	YRC					
1 Placer Pot	0.1	0.25	0.5	1	0	0	0.15	74%	86%	80%	94%	83%
2 Mineral Pot	0.1	0.25	0.5	1	0	0	0.15	31%	51%	32%	46%	47%
3 Gold Poten	0.1	0.25	0.5	1	0	0	0.15	38%	61%	41%	56%	56%
6 Oil & Gas Basins	0	0	0.5	1	0	0	0.15	69%	53%	65%	65%	31%
11 Cur Plcr Claims	0.1	0.25	0.5	1	0	0	0.15	36%	52%	36%	47%	46%
14 For Res Mng	0.1	0.25	0.5	1	0	0.5	0.15	49%	79%	46%	61%	59%
16 Hig Val Rec Feature	0.5	0.5	0.25	0	1	0.5	0.5	49%	48%	64%	62%	61%
18 Aborig Trap	0.5	0.5	0.25	0	1	1	0.5	51%	38%	50%	45%	47%
19 NonTimbFP	0.5	0.5	0.25	0	1	1	0.5	40%	21%	32%	21%	21%
20 Heritage Rt	0.5	0.5	0.25	0	1	1	0.5	55%	43%	55%	42%	44%
22 Cultur Sites	0.5	0.5	0.25	0	1	1	0.5	51%	36%	46%	39%	34%
24 THMerge HV	0.5	0.5	0.25	0	1	1	0.5	84%	79%	82%	79%	76%
25 Viewscapes	0.5	0.5	0.25	0	1	1	0.5	53%	34%	52%	36%	32%
43 SalmSpn	0.5	0.5	0.25	0	1	0.5	0.5	46%	38%	52%	44%	39%
44 Non Sheep WL	0.5	0.5	0.25	0	1	0.5	0.5	43%	33%	51%	43%	41%
45 Sheep	0.5	0.5	0.25	0	1	0.5	0.5	52%	45%	68%	64%	59%
49 40mile Carb	0.5	0.5	0.25	0	1	0.5	0.5	38%	23%	35%	25%	29%

This is the same table as in the alternatives report with questionable performance factors shaded.

Changed Performance Factors

	Changed Performance Factors and Lowered Categories							IV=IV				
	Designations							Alternatives				
	HPA	II	III	IV	PA	TEA	YRC	A	B	C	D	E
1 Placer Pot	0	0.25	0.5	1	0	0	0.25	74%	86%	80%	94%	84%
2 Mineral Pot	0	0.25	0.5	1	0	0	0.25	30%	50%	32%	46%	47%
3 Gold Poten	0	0.25	0.5	1	0	0	0.25	38%	61%	41%	55%	57%
6 Oil & Gas Basins	0	0.25	0.5	1	0	0	0.25	69%	55%	67%	70%	42%
11 Cur Plcr Claims	0	0.25	0.5	1	0	0	0.15	33%	51%	35%	46%	46%
14 For Res Mng	0.1	0.25	0.5	1	0	0.5	0.15	49%	79%	46%	61%	59%
16 Hig Val Rec Feature	1	0.75	0.5	0.25	1	0.75	0.75	78%	73%	81%	79%	76%
18 Aborig Trap	1	0.95	0.9	0.8	1	1	1	94%	92%	93%	91%	92%
19 NonTimbFP	1	0.95	0.9	0.8	1	1	1	92%	87%	90%	87%	87%
20 Heritage Rt	1	0.95	0.9	0.8	1	1	1	97%	93%	95%	93%	93%
22 Cultur Sites	1	0.95	0.9	0.8	1	1	1	96%	93%	95%	94%	92%
24 THMerge HV	1	0.7	0.6	0.5	1	1	0.5	85%	83%	84%	82%	80%
25 Viewscapes	1	0.7	0.6	0.5	1	1	0.5	77%	64%	73%	67%	63%
43 SalmSpn	1	1	1	0.9	1	0.9	0.5	76%	76%	76%	76%	76%
44 Non Sheep WL	1	0.9	0.9	0.9	1	0.9	0.5	91%	90%	91%	91%	90%
45 Sheep	1	0.7	0.6	0.5	1	0.5	0.5	77%	71%	80%	81%	78%
49 40mile Carb	1	0.7	0.6	0.5	1	0.5	0.5	60%	57%	64%	61%	62%

Note the dramatic increase in the performance of all resources /values when more reasonable performance factors are applied.

Changed Factors & Lowered LMU's

	Changed Performance Factors							HPA = II	TEA=II	PA=HPA = CA					
	Designations							Alternatives							
	HPA	II	III	IV	PA	TEA	YRC	A	B	C	D	E			
1 Placer Pot	0	0.25	0.5	1	0	0	0.25	92%	95%	92%	98%	98%			
2 Mineral Pot	0	0.25	0.5	1	0	0	0.25	59%	68%	50%	62%	74%			
3 Gold Poten	0	0.25	0.5	1	0	0	0.25	63%	78%	60%	73%	84%			
6 Oil & Gas Basins	0	0.25	0.5	1	0	0	0.25	85%	82%	73%	76%	54%			
11 Cur Plcr Claims	0	0.25	0.5	1	0	0	0.15	62%	71%	51%	62%	71%			
14 For Res Mng	0.1	0.25	0.5	1	0	0.5	0.15	59%	84%	71%	83%	98%			
16 Hig Val Rec Feature	1	0.75	0.5	0.25	1	0.75	0.75	58%	59%	74%	70%	67%			
18 Aborig Trap	1	0.95	0.9	0.8	1	1	1	89%	88%	90%	89%	88%			
19 NonTimbFP	1	0.95	0.9	0.8	1	1	1	87%	83%	86%	84%	82%			
20 Heritage Rt	1	0.95	0.9	0.8	1	1	1	91%	90%	92%	91%	89%			
22 Cultur Sites	1	0.95	0.9	0.8	1	1	1	93%	92%	93%	92%	90%			
24 THMerge HV	1	0.7	0.6	0.5	1	1	0.5	81%	81%	81%	80%	80%			
25 Viewscapes	1	0.7	0.6	0.5	1	1	0.5	61%	57%	65%	60%	57%			
43 SalmSpn	1	1	1	0.9	1	0.9	0.5	76%	74%	76%	75%	74%			
44 Non Sheep WL	1	0.9	0.9	0.9	1	0.9	0.5	88%	88%	90%	90%	90%			
45 Sheep	1	0.7	0.6	0.5	1	0.5	0.5	66%	66%	77%	74%	72%			
49 40mile Carb	1	0.7	0.6	0.5	1	0.5	0.5	58%	55%	56%	55%	53%			

Even with across the board more lenient land use designations, the performance for environmental and FN values is higher for all options

Yukon Placer Miner



**Yukon Placer
Miner**

**Land Use
Planners**

Mining usually takes a beating with Land Use Plans

Conclusions

- 
- A photograph of a man and a young child sitting in a field of tall green grass and yellow wildflowers. The man is on the left, wearing a blue shirt and glasses, looking towards the child. The child is on the right, wearing a blue shirt, looking up at the man. In the background, there are rolling hills and mountains under a clear sky.
- **Placer mines are the family farm of the north**
 - **Most reliable generator of wealth and employment for over 130 years**
 - **Largest private employer including FN peoples**
 - **Supports tourism facilities in shoulder periods**
 - **Provides valuable training and job skills**
 - **Is one of the resource industries that can provide a career for your children and keep them and your grandchildren in the Yukon**

Conclusions

- 
- **Placer mines have come a long way from the dredging era and from the 1970's & 1980's**
 - **Are a heavily regulated and inspected industry with an excellent record of compliance with many different acts and comprehensive regulations**
 - **Demonstrated natural reclamation and wildlife enhancement in a variety of terrains including wet lands created by mining**
 - **We should be credited for this and not be "written off" when assessing land use options**

Conclusions

- **The SDM model could be an excellent analytical tool to assess various land use planning options**
- **However the present use of the SDM model is biased against resource development due to the use of inappropriate ranking and performance factors**
- **None of the five plan alternatives have been accurately assessed and are unacceptable in their present form to the placer industry**
- **Reclaimed mines should be credited and not be “written off” when assessing land use options**

Recommendations

- **The ranking and performance factors for the SDM model should be examined in more detail, replaced with more realistic numbers**
- **The SDM model should be reapplied to map plans with more IMA IV designations and fewer PA and CA areas.**
- **The TEA areas should be dropped in favour of IMA designations.**
- **The Yukon River Corridor should be allowed to continue to be developed with minor (50) m buffers and revegetation measures.**
- **A new set of alternatives should be presented with these changes**

Acknowledgements

Hard Work of the Commission and their staff

Difficult Choices To Be Made

More Time for the Planning Process

Klondike Placer Miner's Association

