

Submission 1- Nov. 25, 2019 - Yukon Prospectors Association Submission to Dawson Regional Land Use Commission

(more submissions and discussions will follow over the next year)

Explorers and prospectors from the “outside” began arriving in what is now called the Yukon in 1840. The newcomers sought furs and gold and coal. The indigenous people in this land over time immemorial have harvested animals and food and minerals in responsible ways and with respect.

It was a challenge for the newcomers to live in this northern land. Many survived only with the help, support and friendships of the First Nations. During 1898 gold rush and in the years following indigenous people continued to help the newcomers, despite the disruption to their culture and way of life and the sickness and the deaths. As the newcomers took control, the indigenous peoples for many, many years were excluded and oppressed which only in the past decades is being rectified through conversation, understanding and reconciliation – and through the Umbrella Final Agreement and changes in regulations and laws.

The industry of exploration and mine development has matured and now any activities more than low-impact activities on the land are only allowed if done respectfully and carefully with the peoples input and Governments’ consent thru the YESA process and Decision Documents and monitoring.

The Umbrella Final Agreement calls for Land Use Plans to be developed throughout the Yukon, which is the task we are now undertaking.

It would be good if the partners/stakeholders/citizens strive to and then achieve a consensus on land use in the Dawson region which respects all of our values and rights.

Principles should be discussed and agreed upon as an initial step in land use planning.

The following principles of the Yukon Prospectors Association, could form a basis for discussion and for policy and procedure development. They focus on responsible land use and economic development in the Yukon.

The effects of policies and procedures developed by the Governments should be evaluated by considering whether they encourage or discourage responsible exploration, mine development and land use. The following principles should be considered:

1. As very little (less than 1 %) of all Yukon land covers potentially economic mineral resources that could eventually result in mining and infrastructure development, the amount of land available for prospecting and responsible exploration should be maximized, and sequestration of land from exploration activities should be minimized.
2. Access to all public lands for responsible activities should be maintained and not impaired, provided that effects on the land are of low impact.
3. Responsible mineral exploration and mine development should be strongly encouraged, as they provide a healthy economy, as well as revenue for socio-economic activities such as education and community development, and jobs for citizens and families in the Yukon.
4. Policies and procedures and laws and regulations should
 - encourage and enable efficient and responsible exploration, development and reclamation
 - discourage irresponsible practices
 - ensure long term protection of environmental and cultural values.
5. The right of the industry to pursue responsible development needs to be assured. Adherence to clear and sensible rules providing certainty and a realistic hope for a return on the risks taken by project proponents allows industry to confidently invest time and money in mineral exploration and mine development, providing good jobs and economic benefits for the Yukon.

More discussions among all should be undertaken to reach principles that we can agree on and then move towards a consensus on Land Use Planning before decisions are finalized.

Any Land Use Plans should be flexible and reviewed periodically – every five or ten years

The lands should all remain open for all responsible low-impact activities of all types from hiking, camping, hunting, gathering, harvesting, prospecting, exploration and mapping of all minerals, flora and fauna. Exploration and mapping will aid in land use planning.

Sensitive habitats and ecosystems and prospective ore bodies should be identified.

Biodiversity should be maintained and enhanced.

Mineral resources when discovered should be available for advanced exploration and mining subject to agreements with the appropriate First Nations, and YESAA assessment and Decision Documents providing conditions to mitigate adverse effect and responsible reclamation.

The Governments should make the mandate for Land Use Planning Commissions and Renewable Resource Councils to allow for and encourage responsible recreational use, prospecting and mineral exploration, fish, animal, plant and mushroom and other harvesting, road and trail development where appropriate and where responsibly possible on lands. Some areas are and will be restricted as parks, etc., but even those should not discourage exploration and mapping and prospecting and not forever disallow economic development of mines considering the maximum potential area for mining is less than 1% of the Yukon's area.

In Canada and the Yukon, we should agree that we can successfully mine minerals as efficiently and as safely as anyone, anywhere in the world - right in our own backyard.

If it can be agreed that mining minerals is necessary and important to us and to the world should we not encourage responsible prospecting, mineral exploration and mining here in Canada – in the Yukon? This is better than driving mining to other parts of the world where there are less responsible regulations, and then they will receive the economic benefits.

Despite past problems - indeed because of our past experience - we should develop confidence that we can do it right.

If we do it right we get the added benefit of the economic growth, jobs for citizens, and the opportunity for young persons to learn a variety of skills to get good employment – right in our backyard.

Thanks for your consideration and I look forward to further discussions.

Grant Allan

President Yukon Prospectors Association

Submission 2. Nov 25, 2019 Yukon Prospectors Association Thoughts and hypotheses on wetlands ecosystems and the Dawson Land Use Planning

Over the past 2 years I had the opportunity to attend the Yukon Wetland Roundtables and drafting group meetings, and we all learned much and agreed on some important principles and respect for the land.

Studies should be, and are ongoing on all aspects of the wetlands, the wilderness and the environment including climate change.

The concerns regarding land use and in particular placer mining has been recently focused around disturbing/changing wetlands. Wetlands covers a broad range of lands and ecosystems.

They vary widely and include shallow water wetlands like ponds in flatlands and in streams and river and creek valleys, and surface marshes and swamps all of which can support a large diverse population of flora and fauna. These populations and types vary widely largely in part due the wide range in climates from the tropics to the north where wetlands (and drier lands) are frozen for a large part of the year with only the surface metre or so thawing in the summer.

Some lands classified as wetlands are normally dry on the surface and have moist to wet soils and sediments under the surface for a metre or so until frozen for more than 6 six months a year.

Some of the normally surface dry wetlands can have surface water in places at least part of the year – as the snow melts and the ground is still frozen, or after periods of heavy rains.

Much of these lands where there is permafrost are not very productive for wildlife and vegetation. For example in the central and northern Yukon often mostly frozen swamps, fens and peat bogs have small, dwarf spruce trees, and only some lichen and willow, etc..

Treating all classifications and types of wetlands and ecosystems, whether generally dry on the surface or not, as if they all need special protection compared to other drier wilderness types and ecosystem is not borne out by science. Drier lands on plains and forests and on hills and mountains are also important ecosystems to the plants and animals who live there, including for example burrowing animals and those that live in dens, and including the people that use and value all of these lands.

All these lands – all of the lands - are wildernesses that should be, and are protected from activities beyond low impact Class 1 by land use regulations and laws – specifically the YESA and Decision Document processes. Further protection, except for special circumstances and locations, is not required.

Some locations may deserve special attention. For example; types of wetlands that are relatively rare in an area that is supporting flora and fauna only found in limited locations in a region, may deserve that attention. For example, in a region where there are very few ponds or surface swamps, localized populations of birds and fish inhabiting those locations may deserve some protection. Ensuring biodiversity now and in the long term is important.

After placer miners alter these mostly frozen peat bogs and fens, the result is a more productive and diverse environment, including settling ponds which become swamps and shallow water wetlands. Much more and diverse vegetation grows in these thawed wetlands and that supports much larger populations of moose caribou and other species/populations of mammals. As well the ponds can support much larger populations of birds and aquatic life (fish).

There is much anecdotal information and studies supporting this, and the wetlands, both disturbed and undisturbed, and the flora and fauna can be seen each summer.

In the longer term, if the climate continues to warm, and as peat bogs thaw, the growth of microbe populations and activity will produce much more methane gas.

If peat bogs are thawed and removed there will be an initial release of carbon, and then there will be much less microbe activity in shallow water wetlands in the thawed ground will result in much vegetative growth which soaks up carbon.

Studies should be, and are ongoing on all aspects of the wetlands, the wilderness and the environment including climate change.

I appreciate your consideration,

Thanks,

Grant Allan
President Yukon Prospectors Association