



Klondike Placer Miners' Association

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Reg Whiten, Senior Planner
Peel Watershed Planning Commission
307 Jarvis Street, Suite 201
Whitehorse, Yukon Y1A 2H3

Re: Peel Watershed Draft Land Use Plan

Dear Mr Whiten,

The Klondike Placer Miners Association (KPMA) is the industry association for placer mining in the Yukon. The placer mining industry employs approximately 600 people annually on over 100 placer mines throughout the territory.

Regulation of the placer industry requires two primary permits: a Water License and a Mining Land Use Permit. Reclamation is mandatory and a plan must be approved before licenses are issued.

Stringent standards oblige placer miners to settle the silt out of their discharge water. Silt collected in settling ponds re-vegetates rapidly, usually with willow growth that provides browse for moose. Where ponds remain as wetlands, migrating waterfowl find useful habitat.

Placer claims and leases cover less than 0.2% of the Yukon land base and affect less than 2.5% of the water courses. Of that, actual mining impacts an even smaller fraction - and this impact is mitigated by stringent environmental controls. (In contrast cities, towns and rural development in the Yukon cover 2% of the land base.)

While there is very little placer activity in the Peel Watershed the KPMA is very concerned with the precedents for land alienation that your plan is setting. The Plan that you have written does not fully respect the value and significance of the mining and mineral exploration industry to that region.

The draft Land Use Plan, if adopted as is, could set a standard for percentages of protection in the remaining six planning regions covering the entire Yukon. With eventual protection of over 60% in the Peel Watershed and 50% in the North Yukon we are quite concerned. These numbers in placer rich regions of the Yukon would cripple our industry and destroy a vital component of Yukon's private sector economy. The land use planning process has turned into a *Protected Areas Strategy*. This process needs to respect all land users and not assign such a low priority to responsible resource development.

The regulatory and permitting regimes, and environmental screening performed through YESAA, are already in place to ensure responsible development. In essence, the environmental impacts are managed through this process with appropriate mitigative measures.

The economic benefits of a strong mining industry in Yukon are self-evident. It extends into the supply and service sectors, and contributes to Canada and Yukon's tax base. In 2009, it is estimated that mineral exploration and development will reach expenditures of 220 million dollars. This will make mining the #1 private sector industry in the Yukon.

Yours truly,

Stuart Schmidt, President
KPMA