

YCS closing remarks, YWB public hearings on Placer mining in Wetlands

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by: Sebastian Jones, Wildlife Analyst

Good morning, and thank you. In this closing statement, I want to quickly address wetland conservation and reclamation objectives, and address some of the issues raised during the hearings.

These themes, and the ones raised in the YCS presentation will be further developed in our written submission.

I think the best way to understand the **watershed objective** for wetlands reclamation is by examining the Fish Habitat Management System for Placer Mining. The aquatic health objectives are measured using the Canadian Aquatic Biomonitoring Network (CABN) protocol, which not only looks at species abundance and richness, but how it compares to a reference condition, what it is supposed to be in a natural state. Dr. Foote spoke to this when he discussed the meaning of a transformation of a bog fen complex to a pond/upland landscape. I suggest that a modification of this process would be the best way to assess the ecological health of a watershed. For example, simply increasing the number of ducks in a landscape is no more relevant to ecosystem health than is increasing the number of black fly larva to aquatic health in the Fish Habitat Management System. It is my understanding that the Wildlife Conservation Society has a project underway to do exactly this.

As the presentation by the Yukon Chamber of Mines observed, wetlands are complex and it took natural processes thousands of years for these complexes to be created. The hubris all too often demonstrated by humanity that we can improve on nature is writ large in some of the reclamation concepts presented to us. The **wetlands reclamation objectives** should be that the wetlands function as they did before disturbance. If, as the Chamber of Mines asserts, it is impossible to reclaim peatlands, then they should probably not be disturbed. At the very least, the land should be left in a state conducive to natural reclamation to its original state, not into a very different mix of ponds and uplands.

Rebuttals:

YCS is of the opinion that the YWB does have jurisdiction over wetlands; wetlands are defined by water, and the YWB deals with it. Water flows through a fen, water flows through a river, water resides in a pond- all of these landforms fall under the jurisdiction of the YWB. As is noted on the YWB website “Under the Yukon Waters Act, the Yukon Water Board issues water licences for various activities for the use of water and/or the deposit of waste to water. Our process promotes the balance of conservation, development and utilization of Yukon water for all Yukoners and Canadians.” This description most definitely includes placer mining and wetlands.

For what it’s worth, YCS would like the board to note that YESAB has been considering the impact of placer mining on a wetland. Since 2013, YESAB has been recommending that placer miners avoid Indian River wetlands.

And finally, the 87% of wetlands that have been lost globally were lost incrementally, using the justification that wetlands are extensive and not rare and that the footprint of any particular disturbance is miniscule, none the less, in this way, through a thousand small cuts, as was observed on Tuesday by the TH Director of Natural Resources, most wetlands have been lost.

That we are considering the impacts to wetlands, and how we can reduce them and how to steward wetlands is a very good sign. I agree with Brooke Rudolf that we can work collectively to come up with a way forward that protects wetlands.

We very much appreciate having had this opportunity, thank you.