



YCS has engaged in the Yukon's efforts to improve the management, and to reduce the impact of placer mining since the early days of YCS. Notably, YCS was central to the development of the Fish Habitat Management System for Placer Mining. YCS sits on the writing group, charged with drafting a Wetlands Policy for the Yukon. YCS has intervened in and provided comments on, almost all the Water Licence applications by placer miners affecting the Indian River wetlands.

Consequently, YCS had been anticipating a chance to review the Wetlands Reclamation Plans that were to be submitted to the Yukon Water Board (YWB) prior to placer miners being issued a Water Licence in the Indian River valley. However, because a set of guidelines for the content and rigour of reclamation plans have not been agreed upon, the YWB was unable to properly assess any reclamation plans it received. For much the same reason,, YCS found itself unable to comment on conformity of the reclamation plans in a substantial manner.

Similarly, the YWB was unable to issue water licences that included Wetlands Reclamation Plans and, consequently, unable to issue water licences.

As a temporary work around, the YWB has decided to issue licenses to placer miners in the Indian River Wetlands with the condition that the licensees submit a wetlands reclamation plan to the Chief of Placer Mining Lands who will review the plan, and ensure it is of adequate quality that the overall function of wetlands will be retained.

It is the expectation of YCS that once a Wetlands Policy is in place, and once guidelines for the reclamation of wetlands are agreed upon, the authority for judging the adequacy of Wetlands Reclamation Plans will return to the YWB.

This letter was composed with the spirit of the Yukon Environment Act in mind:

Yukon Environment Act

Preamble

Recognizing that the Government of the Yukon is the trustee of the public trust and is therefore responsible for the protection of the collective interest of the people of the Yukon in the quality of the natural environment;



Recognizing that comprehensive, integrated, and open decision-making processes are essential to the efficient and fair discharge of the environmental responsibilities of the Government of the Yukon;

Public trust

38(1) The Government of the Yukon is the trustee of the public trust.

(2) The Government of the Yukon shall, subject to this Act or a schedule 1 enactment, conserve the natural environment in accordance with the public trust. S.Y. 2002, c.76, s.38

Unfortunately, under the current interim system, there is no opportunity for the public, other miners and stakeholders to review these proposed reclamation plans, so in the absence of reviewing the actual plan, YCS here offers the following considerations for Yukon to use when assessing any proposed wetlands reclamation plans.

These considerations are necessarily broader than they would be if YCS had an actual Wetlands Reclamation Plan to review.

Wetlands quantum

- Please include the exact number of hectares of each wetland type in the licence area.
- Please calculate how much of each type is undisturbed, and how much has already been disturbed.
- Please calculate the exact amount of each wetland type that will be disturbed.
- Please calculate the exact amount of each wetland type that will remain once mining and reclamation is complete.

Disturbance

- Please describe the nature of the disturbance of all unmined wetlands, and provide a rationale for why they should be considered previously disturbed.
- Please describe the nature of the disturbance for all wetlands proposed to be disturbed.

Hydrology

- Please describe the effects of disturbing wetlands on the hydrology of the area, including the impact on nearby wetlands that may not be inside the perimeter of the application area.
- Please describe how connectivity between wetlands will be maintained
- Please describe how any changes to water table level; ground water or hyporheic flow will be restored.



- Please describe anticipated changes to the ability of the undisturbed wetlands to:
 - Filter water
 - Regulate water flow
 - Sustain water flow
 - Sustain water quality

Climate impacts

- Please calculate the exact amount of carbon stored in each wetland type in the area.
- Please calculate the carbon sequestration rate of each wetland type in the area.
- Please calculate the amount of carbon that will be released upon disturbance
- Please include in this calculation carbon released from nearby wetlands that may be dewatered as a result of changes to the hydrology.
- Please calculate the carbon sequestration rate of any reclaimed wetlands
- Please calculate the date at which the carbon balance will be restored.
- Please include any actions planned to offset any climate impacts.

Reclamation

- Please describe in detail how each type of wetland will be reclaimed, including at a minimum:
 - To which class each disturbed wetland will be reclaimed.
 - What the water table will be, post reclamation compared to pre disturbance.
 - The changes in biodiversity, post reclamation compared to pre disturbance.
 - How these changes will be achieved.

Post Reclamation

- Please describe how reclaimed wetlands will remain reclaimed, in other words, we need to know that after all the work and expense to restore functioning wetlands, they will not be disturbed again.

Again, thank you for the opportunity to contribute this input.

If you have any questions or concerns, please contact the undersigned.

Sincerely.



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