



April 26, 2006

Peel Watershed Planning Commission
307 Jarvis Street, Suite 201
Whitehorse, YT Y1A 2H3

Attention: Brian Johnston, M.E.S., Senior Planner

Dear Brian,

In the Peel Watershed Planning Commission's "Issues and Interests" report dated December 22, 2005, it is important to note that the plan does not restrict mineral staking for prospectors. The authors of the Peel report state that, "mineral exploration / development sector has provided very few comments." They should be commended for extending the deadline to April 28, 2006 in order to allow for additional comments from this and other sectors that may have slipped through the cracks. Although certain potentially mineable properties (iron, coal) are mentioned in the report, it is future mineral exploration that must be accommodated. The Peel area has high mineral potential. It is under-explored.

Until prospecting, mapping, sampling and in some cases, drilling is conducted, no one knows where the next mine will be found! This type of grass roots mineral exploration usually only lasts a month or two and has negligible environmental and positive socio-economic consequences. It should be noted that any medium to advanced exploration programs are subject to Yukon Environmental and Socio-Economic Assessment Act (YESAA) recommendations, which take into account among other things, First Nation concerns. The degree of activity which triggers a YESAA review was worked out in a Tri-party agreement among the government of Canada, Yukon Government and Yukon First Nations'. This agreement became law (*as outlined in the Canada Gazette Part II Volume 139 No 25 Schedule 1 Part 1 – Mining*) registered December 14, 2005. YESAA recommendations are further subjected to operating conditions and guidelines contained in a permit issued under the Mine Land Use Regulations (MLUR). For example, with the exception of grass roots prospecting, almost all drill programs trigger YESAA and MLUR which mitigate any environmental and socio economic concerns.

The Yukon needs to find new mineral deposits, in order to reduce the high dependence on federal subsidies. For instance, the discovery and subsequent mining of diamonds in the NWT has raised their gross domestic product to 42% of their total economy. This creates jobs for the smaller outlying communities, which is exactly what the Yukon needs. Twenty years ago almost no one believed that diamonds would be found in the barren lands. In other words, it was believed this area had low mineral potential. Basic grass roots exploration in the form of hand sampling followed by drilling changed all this!



Yukon



Chamber of Mines



The Peel report discusses “zoning” under the sub-heading of “Potential Management Direction” on page 15. For example, “zoning . . .such as seasonal closures” is suggested. Does this apply to mineral exploration? It also states that “zoning will incorporate various degrees of protection, or restriction of human activities, including core areas and buffer zones *radiating out from the core.*” This should be avoided, since it is very ambiguous and subject to change on a whim. If implemented, this clause would only create confusion and uncertainty! Consequently, investors would once again consider the Yukon a bad place to invest. Business needs certainty!

The Peel report suggests a map showing designated rights-of-way and potential access routes be created. This is a good plan and should be implemented. This map should show both permanent and temporary winter access routes.

The Peel report also mentions that yet another Park be created here. Keep in mind, the Yukon already has over 12% of its land withdrawn for protected areas and along with other land withdrawals over one quarter (¼) of the Yukon is now withdrawn from staking for Yukon prospectors. It is interesting to note, the Inuvialuit First Nation in the Arctic was talked into agreeing to a large national park. Later, high mineral potential was discovered just crossing the park boundary. They later applied for a small adjustment to be made in the boundary location in order to allow for this mineral exploration. Both, the Canadian House of Commons and the Senate rejected this. Needless to say, the Inuvialuit are not happy with this decision.

Nothing in the future Peel Watershed Land Use Plan should conflict with “grassroots” mineral exploration for prospectors. This activity has negligible environmental consequences. It has a positive socio economic advantage of creating temporary jobs. When and if a mine is discovered, the mandated participation of the Yukon Environmental and Socio-economic Assessment Board (YESAB), Yukon Water Board, Dept of Fisheries and Oceans (DFO), Quartz Production Regulations, Canada Mine Effluent and Discharge Regulations, Dept. of Environment, Yukon Fish and Game Regulations etc. etc. are more than enough to mitigate all concerns. These measures will make sure that the goals of sustainable development will be achieved allowing for multi-use of the land by other stakeholders.

Yours truly,

YUKON CHAMBER OF MINES

John Witham
President

cc Yukon Chamber of Commerce

‘Mining Works For the Yukon’