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Parks and Protected Areas Branch
Department of Renewable Resources
Box 2703
Whitehorse, Yukon Y1A 2C6

Attn: Mr. Bob Kuiper, Sr. Planner

Via Fax: (867)393-6223

Sir:

Re: Yukon Draft Protected Areas Strategy

I am a geologist who lived and worked in the Yukon from 1969 to 1978. Although I now live in Vancouver, I have remained actively involved in mineral exploration in the Yukon since 1978, giving me the opportunity to have worked in most parts of the Yukon during my career of almost 30 years. This year, my company, La Teko Resources Ltd., completed a successful drill program on its Scheelite Dome property, near Mayo. In addition, I have had a significant amount of experience with regard to British Columbia's Protected Area Strategy through my volunteer work with the British Columbia and Yukon Chamber of Mines, of which I am a past president. I therefore feel qualified to comment on the Yukon's protected area proposal.

After my review of the draft protected area strategy plan and I am left with some basic questions. First, what are you trying to protect the Yukon from? Is there an immediate or even foreseeable threat to the Yukon's vast tracts of wilderness? There is no clear answer to this question in the draft report. Second, have you considered the cost? The Yukon will be faced not only with the cost of implementation of this ambitious program and the ongoing cost of maintaining these protected areas, but also with the cost of compensation for tenure holders who are expropriated from the new protected areas and, most importantly, of lost economic opportunity. If Yukoners are to make intelligent decisions as to the need for protected areas, where they will be placed and how much of the land they will occupy, they should first have the answers to these questions.

I would like to specifically address the issue of mineral exploration and development and how these activities will be impacted by your current proposals. On page 1 of the report you state "We can do all of this [create protected areas] while respecting economic interests and the many Yukon families whose livelihoods depend on resource industries." When it comes to mining, this statement is false, and I'll explain why.

If the process of protecting core areas is carried out with integrity, as I believe it will be, areas with known mineral potential will be excluded from protection. The problem is, this will not necessarily exclude the next major mineral discovery in the Yukon. For examples, we need go back only so far as the last two major mineral discoveries in Canada and a recent Alaskan discovery.

- I. The Ekati Mine at Lac de Gras in the Northwest Territories, the first diamond mine in Canada, will be in production this fall with diamonds valued at over \$6 billion. The staking rush inspired by the Lac de Gras discovery was the largest in Canadian history and resulted in at least one more very rich mine. At the time, Lac de Gras was believed to be an area with low mineral potential.
- II. Voisey's Bay, one of the largest and richest nickel deposits in the world, containing metals valued at \$8.2 billion, was discovered in a part of Labrador that had been virtually written off by all the experts as not containing the right types of rocks for a major nickel deposit.
- III. Pogo is a recent large, high grade gold discovery in eastern Alaska, not far from the Yukon border, that was discovered in an area believed to have low mineral potential prior to the discovery. Now, the hot exploration play surrounding the Pogo discovery is extending into the Yukon as well.

Using all the best experience and expertise available, mineral deposit geologists can extrapolate across geological maps of the territory to show areas with high mineral potential and low mineral potential. However, it is my contention that no one can predict where the next major mineral discovery in the Yukon will be made and that it could just as likely be in an area of low mineral potential, as the experts perceive it, as high.

If the Yukon persists with this plan which would see the isolation of large tracts of the territory, both as core protected areas and as surrounding "buffer zones", which exclude or highly restrict mining activity, mining companies and their high risk exploration budgets will go elsewhere. The chances for discovery of new mines in the Yukon will drop dramatically. It certainly has in British Columbia.

So what's to be done? Is there a solution that will satisfy the mining industry and, at the same time, not compromise the integrity of the protected areas plan?

I believe there is, and that is simply to allow mineral exploration in all but the most sensitive parts of protected areas. Early stage mineral exploration, up to the stage of

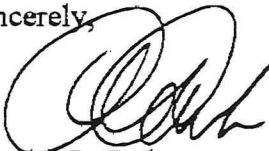
drilling, but excluding road access, has little more impact on the land than hunting or tourism. The draft proposal already suggests that these two activities will be allowed in core protected areas.

And what about mining? There are already two fine examples of well-planned mines successfully operating and co-existing within parks in British Columbia and Saskatchewan. I propose a keyhole approach to mine development within a protected area. The mine itself would typically have a very small footprint and access could be strictly regulated. If necessary, new land could be added to the protected area to compensate for that which is lost to the mining activity. An example of this kind of progressive thinking took place recently in Alaska, where the Green's Creek Mine, surrounded by a National Monument, was allowed to expand into the National Monument in exchange for additions elsewhere.

New regulations for exploration in the Yukon ensure that early exploration programs, wherever they take place, will be low impact and highly controlled. Today, new mines are not allowed to proceed if there is a threat of serious environmental damage.

In conclusion, I believe that Yukoners must first decide if they want a mining industry or not. If the answer to that question is yes, and if a protected area strategy is to be enacted, then there must be serious consideration to allowing exploration within the protected areas, with guarantees to allow reasonable development when discoveries occur. The evidence is all around us. Modern exploration, new mine development and ecosystem and biological conservation are not mutually exclusive. If more large tracts of the Yukon become off limits to mineral exploration, the territory will follow British Columbia's lead and mineral exploration will dry up. Without exploration, Yukon's mining industry will wither away.

Sincerely,



Gerald G. Carlson

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