

January 8th, 2021

Yukon Environmental and Socio-Economic Assessment Board
Dawson City, YT
Dawson.do@yesab.ca

Attn: YESAB Dawson City Designated Office

Re: Project Number: 2020-0075
Project Name: Quartz Exploration-Antimony Creek
Proponent: Ryanwood Exploration Inc.

To Whom It May Concern:

The Yukon Conservation Society (YCS) is a grassroots environmental non-profit organization, established in 1968. Through a broad program of conservation education, input into public policy, and participating in project review processes, we strive to ensure that the Yukon's natural resources are managed wisely, and that development is informed by environmental considerations.

YCS is not opposed to mining, as long as it is done in appropriate areas, uses best environmental practices, and has comprehensive and adequately funded closure plans. In light of these views, YCS has the following comments on the above referenced project.

Introduction/Context

This is a large (84km²) exploration project that is proposed for an area adjacent to the Yukon's flagship territorial park. This area is almost entirely undisturbed; it supports a full suite of predator prey related fauna, it includes a major tributary to one of the Yukon's premier salmon spawning rivers that is very likely to support rearing salmon. Therefore, it is the opinion of YCS that the utmost rigour be applied to this assessment.

VSECs.

Wildlife: As the supplied Wildlife Management Plan indicates, wildlife in the project area is thriving, most likely related to how difficult it is to access this area. YCS is concerned that the supplied 'Mitigation Measures' are not in fact mitigation measures, rather they are promises to do investigations that will potentially lead to mitigation measures. YCS is of the opinion that this is simply not adequate and therefore **YCS recommends that YSAB pause the assessment of this project until such time as the proponent produces a complete suite of wildlife impact mitigations.**

Salmon: To the knowledge of YCS, Antimony Creek and the associated watershed have not been surveyed for salmon habitat suitability, salmon spawning presence or salmon rearing. **Therefore, YCS recommends that a thorough salmon habitat suitability, salmon spawning and salmon rearing survey be completed before this proposal is re-submitted.**



Protected areas disturbance: Tombstone Territorial Park is close to the project's western boundary. Helicopter flights will be numerous and regular. Helicopters will be readily heard from within the Park. Road construction is proposed up to the edge of the project area. Road construction will be audible and visible from the Park. The proposed exploration road dead ends adjacent to the riparian zone of the N. Klondike and within 2km of the Klondike Highway. This leads to the reasonable conclusion that the corporation has foreseen the possibility of a road from the Dempster Highway to the project. YCS acknowledges that access from the Dempster is not currently part of the proposal and that therefore YESAB cannot assess this road outside of a cumulative effects study. **Therefore, YCS recommends that a full Cumulative Effects study be commissioned for the proposal and works that would reasonably redound from it.**

Land Use Planning: A Regional Land Use Plan (RLUP) is under development which would include the footprint of this project. While YCS cannot know the final form of the RLUP, we do know that several voices have called for the lands north of the Tintina Trench (which is to the south of the project) to be set aside for conservation. In addition, the Dawson RLUP Commission has indicated that it will take a threshold approach to disturbance in Land Management Units (LMUs) that are designated as Integrated Management Areas (IMAs) and that contemplate a certain amount of industrial development as an acceptable activity. These thresholds have not been finalized, neither do we know the designation, or even the boundary, of the land upon which the project is proposed. **Therefore, YCS recommends that YESAB pause this exploration project until the DRLUP is approved.**

Cumulative Effects: The ultimate purpose of this, and all quartz exploration projects, is the building and operation of a hard rock mine along with associated infrastructure such as all-season roads. Therefore, consideration of the effects of this proposal must include the purpose of the project in addition to the proposed impacts of the project. Assessment of cumulative effects is complex and, typically, problematic for Designated Offices of YESAB. This is rendered even more difficult in the absence of a Land Use Plan that has clear disturbance thresholds for Land Management Units. **Therefore, YCS recommends that a full Cumulative Effects study be commissioned for the proposal and works that would reasonably redound from it.**

Aircraft Movement

From the project description (available online at <https://yesabregistry.ca/projects/c1ce7a0c-2cfe-4256-9a24-efc3249b3012/>) the following information has been provided in regards to aircraft movement related to this project:

Helicopter: up to 883 round trip flights per year (up to 6 flights per day)
Aerial photogrammetry (100 km²)
Airborne Geophysics (500 line-km)
fixed wing aircraft (up to 4 per year)
Up to 4 hours prior to landing
Take place during an 8 hr time frame from 9h-17h
GT Probe samples (1000)
Helicopter support weekly
Up to 12 round trip flights from March 15 to May 11, 2020
Aerial photos with UAV drone

*Up to 60 minute flights
Up to 8hrs/day from 9h-17h
Up to 4 times per year*

This is a lot of aircraft activity. The Dempster Highway corridor and neighbouring areas can be a popular corridor for sightseeing aircraft. The proponent should develop an aircraft movement plan to avoid any potential conflicts with other aircraft.

YCS respectfully requests that if YESAB recommends this project proceed YESAB recommend the proponent develop an aircraft movement plan to avoid potential conflicts with other aircraft.

Acid Rock Drainage

YESAB document 2020-0075-0001 *Form 1* states in part on page 8/25 of the PDF:

The exposure time to weathering of the mineralized rock will be considered, in the case of trenching and sump building, the rock will be immediately reintroduced into its initial environment and topsoil replaced, once the exploration activity is complete. This step will eliminate the time sulphide bearing mineralized rock is exposed to oxygen and weathering processes. An additional measure will be to cover the exposed sulphide bearing mineralized stockpiles with a tarp to limit exposure to environmental conditions and prevent runoff from contaminating surrounding soil, vegetation and waterways.

YCS is of the opinion that this is not detailed enough. There is no indication how long a period will be required in regards to “once exploration activity is complete”. If the rock is to be “immediately reintroduced into its initial environment and the topsoil replaced”, how much time is required for exploration activity?

The use of tarps to cover exposed sulphide bearing material will prevent rain and snow melt from coming into contact and creating Acid Rock Drainage and Metal Leaching conditions. However, it is dependent upon tarp maintenance and the size of the tarp. More details are required.

YCS respectfully requests that if YESAB recommends this project proceed YESAB require from the proponent a detailed Acid Rock Drainage plan.

Fuel Spill Plan

YESAB document 2020-0075-0015 *Fuel Spill Plan* states in part on page 2/4 of the PDF:

- For any Class 3 Flammable Liquid spill greater than 200L, notify the GroundTruth office so that they can contact the Spill Report Centre

According to the Yukon Environment Act Part 11 - Spills, Section 132 states:



132 In this Part,

“spill” means a release of a substance

(a) into the natural environment;

(b) from or out of a structure, vehicle, or other container; and

(c) that is abnormal in quantity or quality in light of all the circumstances of the release;
or

(d) in excess of an amount specified in the regulations.

YCS wishes to draw to the attention of the proponent that sections c) and d) of the Yukon Environment Act emphasize that a spill is something that is ‘abnormal in quantity or quality in light of all the circumstances of the release’ or (and this must be emphasized that the Act does state ‘or’) is ‘in excess of an amount specified in the regulations’. It would appear that the Yukon Environment Act, specifically point c) of section 132 is emphasizing the reporting of all spills, regardless of quantity spilled. The proponent must be made aware of their reporting obligations under the Yukon Environment Act.

YCS recommends that YESAB pause this assessment until such time that the proponent updates the Fuel Response Plan to align with the requirements of the Yukon Environment Act.

COVID Response Plan

YCS recommends that the proponent consider the implications of the current Health Emergency related to COVID-19. The proponent should submit a detailed plan in how their operations will meet the requirements of the Chief Medical Officer Health of the Yukon in regards to issues such as the maximum size of gatherings, social distancing while at work, and quarantine or isolation periods for workers arriving from outside of the Yukon.

The situation related to the Health Emergency is changing from day to day, and the proponent should have a robust plan that can be easily adapted to ongoing changes. The plan is important from an environmental perspective in ensuring enough staff are on site to perform correct waste disposal, project activities are in accordance with environmental protection initiatives, and that appropriate revegetation and reclamation occur.

YCS is of the opinion that the issue has not been addressed by the proponent in YESAB documents 2020-0075-0007 *Health Safety and Environmental Policy*, and 2020-0075-0008 *Personal Protective Equipment Policy*.

YCS recommends that YESAB pause this assessment until such time that the proponent develops a COVID-19 Health Emergency Plan.

Conclusion.



YCS concludes that the above listed adverse environmental or socio-economic effects combine in such a way that the cumulative effects of this project *and other projects likely to take place in the vicinity or likely to arise from this project* cannot be adequately mitigated. Therefore, **YCS respectfully suggests that YESAB recommend this project NOT proceed.**

Alternatively, the unknown impacts detailed above combined with information gaps indicate that the Dawson Designated Office of YESAB cannot make a definitive assessment of current and cumulative effects and therefore **YCS recommends that this project be referred to an Executive Committee of YESAB for full consideration.**

If you have any questions, please contact the undersigned.

Regards,

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