



February 24st, 2017

Yukon Environment and Socio-Economic Assessment Board
Mayo Designated Office
PO Box 297
Mayo, Yukon
Y0B 1M0

Attn: YESAB Mayo Designated Office

Re: All Season Access Development to the Rau Property
ATAC Resources
YESAB Project Number 2016-0129

To Whom It May Concern,

The Canadian Parks and Wilderness Society (CPAWS) is Canada's only nationwide environmental charity dedicated solely to the protection of our public land and water and to ensuring our parks are managed to protect the nature within them. Based in Whitehorse, CPAWS Yukon advocates for the territory's most valuable and priceless resource: our abundant wilderness. We work with First Nations and all levels of government, local organizations, businesses and citizens to ensure the natural wealth we enjoy today is available for our children tomorrow. We represent the views of many Yukoners who want the Yukon to be an example for the world of how people can live in balance with the natural resources we depend upon.

CPAWS Yukon has the following comments to make on the referenced project.

Given that the proponent of this project is only at the exploration stage of the Rau deposit, and that gold ore (if deemed worthy of extraction) does not require ground transport, we are concerned about the extent and duration of impact such an all-season road would have on other future land uses in this unplanned region.

Long Term and Cumulative Impacts

A new road has impacts that are important to consider at both a spatial and a temporal scale. These impacts would reach beyond the road's physical location, into both terrestrial and the aquatic ecosystems. Additionally, road developments facilitate the development of additional

roads and trails, thereby catalyzing cumulative impacts on a region that are difficult to quantify, yet nonetheless important to consider.

New roads have significant impacts on an area, both direct and indirect. This includes sedimentation of streams, changes to hydrology and water quality, introduction of chemical pollutants, and noise. They're also known to be a barrier to animal movement and even a source of mortality, depending on their level of traffic. Perhaps more worryingly, roads are a conduit for more than just vehicles. They facilitate the movement of invasive species and predators, including humans and wolves, which can result in the displacement of other plants and animals from the area¹. Avoidance, as has been demonstrated by Grizzly Bears, can be independent of traffic, creating a reduction in usable habitat that far exceeds the projected footprint of a new road². With some animals moving more easily than others, roads introduce pressures on ecological communities³, with potential impacts on activities that depend on them, such as trapping and traditional harvest, outfitting and wilderness tourism.

Given the impacts a four season road can have, if allowed to proceed, it would preclude other potentially desirable options in the area. Even a small, valley land use plan could allow for a community-informed assessment of what land uses are appropriate for the region and whether this kind of proposal is well suited for that.

In the absence of land use planning along the project route, CPAWS Yukon respectfully requests that YESAB recommend against such an all-season road.

Uncertainty for Salmon

Of the 46 stream crossing sites, many have not been assessed on the ground yet have been assumed not to be fish bearing⁴, despite young Chinook salmon being inventoried on two tributaries of the Beaver River⁵. This is disconcerting, given the cultural importance of this species and ongoing concerns about its population's health.

CPAWS respectfully requests that YESAB require further on-the ground inventory to assess the potential impacts that this road may have on salmon, prior to considering an approval of the project.

¹ Coffin, A.W. (2007) From roadkill to road ecology: A review of the effects of roads. *Journal of Transport Geography* 15, 396-406

² McLellan, B.N. and D.M. Shackleton (1988) Grizzly Bears and Resource-Extraction Industries: Effects of roads on behavior, habitat use and demography. *Journal of Applied Ecology*, 451-460.

³ Trombulak, S.C. and C. A. Frissell (2000) Review of Ecological Effects of Roads on Terrestrial and Aquatic Communities. *Conservation Biology*. Pages 18-30.

⁴ YESAB 2016-0129-060-1, *Memo From Technical Expert Regarding Wildlife and Proposed Project* – Page 27

⁵ YESAB Document 2016-0129-060-1, *Memo From Technical Expert Regarding Wildlife and Proposed Project* – Page 24

Permanence

Some impacts of building a new road into an area end up becoming effectively permanent since, to our knowledge, no road has ever been completely remediated in the Yukon to the extent that no further motorized access has continued.

CPAWS respectfully requests that, should this project proceed (which CPAWS is not in favour of at this point), YESAB recommend that the proponent pay, in advance of the road's creation, a reclamation bond to the Yukon Government, administered through the territorial lands branch to ensure that adequate funding would be available at the end of exploration for restoration.

Alternatives/Mitigation

Having reviewed this proposal, we curious to know whether other options for transportation have been completely explored. Given that this project is proposed for work that is still exploratory in nature, can equipment and supplies not be delivered on a winter road, or flown in, with advance planning? These are options that appear far more desirable than an all-season road, given the duration of impact relative to the potential duration of exploration work.

CPAWS respectfully requests that YESAB recommend against this proposal, given that there are alternative options.

When it comes to the exclusion of public traffic, it has been noted that gates may not be adequate, and a requirement for supervision may be necessary to avoid gate removal.⁶

If this proposal is to be approved, and supervision of these gates is required to mitigate some of the impacts, CPAWS respectfully requests that YESAB recommend the road be decommissioned via the reclamation bond prior any termination of supervision contracts at gates along the road.

In conclusion,

CPAWS respectfully suggests that YESAB recommend against this project proceeding for the following reasons:

- Long-term cumulative impacts on fish and wildlife are greater than first meets the eye
- A thorough on-the-ground assessment of salmon habitat has not yet been completed
- Land use planning has not occurred
- There are alternative options to an all season road

Should the project proceed (and CPAWS is not in support of it proceeding), the following actions should be implemented:

- An advance reclamation bond should be required to ensure reclamation occurs regardless of the outcome of exploration
- A supervised gate should be added to the road

⁶ YESAB document 2016-0129-060-1, *Memo From Technical Expert Regarding Wildlife and Proposed Project* – Page 44