



Canadian Parks and Wilderness Society, Yukon Chapter
101-301 Hawkins Street
Whitehorse, Yukon
Y1A 1X5

April 8th, 2022

Attn: YESAB Whitehorse Designated Office

Re: Quartz Exploration - Hartless Joe, Project 2022-0032

To Whom It May Concern:

Based in Whitehorse, the Canadian Parks and Wilderness Society, Yukon Chapter (CPAWS Yukon) advocates for the territory's most valuable and priceless resource: our abundant wild spaces. 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.

CPAWS Yukon has thoroughly reviewed the project proposal and has information to share and some concerns.

Local knowledge

CPAWS Yukon has local knowledge to share as the author of this comment visited the project vicinity over a seven day period in late August and early September of 2019. From Lake Laberge I hiked along Joe Creek and over a pass into the valleys immediately north of the proposed work area (see Figure 1 below). While located relatively close to Whitehorse, this area is difficult to access and acts as a remote refuge for wildlife and people alike. While I did not set foot in the proposed work area, many of the wildlife I witnessed likely utilize the proposed work area for habitat or as a travel corridor.

On the west side of Joe Mountain, on Ta'an Kwäch'än Council Settlement Land, I saw a group of three caribou on the slopes and a grizzly bear traveling up a narrow gully. On the east side I saw a caribou cow and a calf traveling together, two grizzly bears, a few Fannin lambs and ewes, and two groups of Fannin rams (~20 total). The Fannin rams can be difficult to spot, due to their tan colouring and the time they spend in the willows at low elevations. Given the presence of sheep in late August and early September and the relatively limited terrain, I suspect the current

'Thinhorn Sheep Winter Range' Wildlife Key Areas in the project vicinity would be better classified as a 'Thinhorn Sheep Year-Round, All Functions (small, isolated populations)' Wildlife Key Areas.

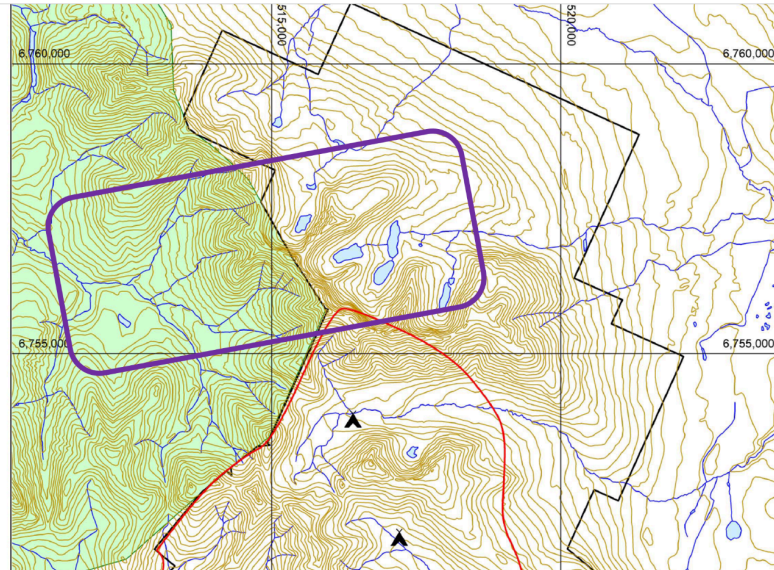


Figure 1. General area (in purple) visited by the author in late August and early September in 2019. Adapted from Map 3: Proposed Work Areas, YESAB Registry document #2022-0032-0010.

Carcross caribou herd

Caribou are highly sensitive to disturbance and alterations to their habitat. For example, researchers have determined a zone of influence ranging from 1.5 km to 9 km for northern mountain caribou, depending on the season and type of disturbance¹. According to the range assessment of the Carcross caribou herd², prepared for Yukon Government:

“...the Carcross herd has relatively low ecological resilience, which is a state that the herd will likely continue into the future. Low resilience means that the caribou herd and the range have limited capacity to absorb additional stressors that reduce habitat conditions (i.e., amount, effectiveness and availability, and/or connectivity) or risk factors that directly affect the population itself through increased rates of mortality and/or decreased productivity” (pg. 7 of 84).

The range assessment also states that, “While direct comparison studies are not currently available, the Yukon portion of the Carcross herd range likely contains the highest level of direct

¹ Polfus, J.L., Hebblewhite, M., & Heinemeyer, K. (2011). Identifying indirect habitat loss and avoidance of human infrastructure by northern mountain woodland caribou. *Biological Conservation*. 144(2011) 2637-2646. Available at: <https://www.sciencedirect.com/science/article/abs/pii/S0006320711002862#>

² Francis, S. & Nishi, J. (2015). *Range assessment as a cumulative effects management tool: Assessment of the Carcross Caribou Herd Range in Yukon*. Prepared for Environment Yukon Fish and Wildlife Branch Regional Programs. https://open.yukon.ca/sites/default/files/carcross_caribou_assessment_march2015_1.pdf

and indirect human-caused habitat impacts of any woodland caribou herd range in Yukon” (pg. 19).

While we recognize that early stage exploration activities are not as impactful as advanced exploration, mine construction or mining activities, the above paragraphs indicate that the long-term health of the Carcross caribou herd requires a high standard of care and precaution. The proposed project area falls within a portion of the herd’s range that is currently less disturbed than the southern reaches of the range, and it will be important to maintain refuge areas for the herd.

The range assessment document also notes that the Joe-Cap-Teslin Mountain block is a known summer range for the herd, supporting calving, post-calving and the rut (pg. 12 - 13). This project specifically overlaps a Wildlife Key Area rutting range and at a minimum project activities should cease on September 15 of each year, although this would still result in the disturbance of caribou utilizing the area for post-calving habitat.

Thinhorn sheep (Fannin population)

As shared above, the author has seen rams, ewes and lambs directly north of the proposed project area in late August and early September. In addition, during the 2016 assessment of the *Hartless Joe Property - Quartz Exploration #2016-0017*, the outfitter noted that the project falls in “the heart of sheep country” (YOR 2016-0017-016-1). This suggests that project activities, particularly helicopter flights to and from the camp and for moving drilling equipment, are likely to disrupt the small, local Fannin sheep population throughout the year. This can cause sheep to be more alert, costing them energetically, and can also cause them to avoid or abandon parts of their range. For these reasons, CPAWS Yukon supports the sheep-specific recommendations YESAB put forward for project #2016-0017, and we hope they will be applied to this project. These recommendations were as follows:

1. If a mineral lick is identified within the project area, the Proponent shall contact the Regional Biologist in Whitehorse for an appropriate set-back distance.
2. The proponent shall conclude activities within 1 km of sheep winter range by September 15th of each year, to reduce the potential for significant adverse effects to the small and geographically isolated Fannin sheep population.

Grizzly bears

This project falls in grizzly bear habitat and camps can provide bear attractants in the form of fuels, food and garbage. If these attractants are not properly managed, conflicts between humans and bears can result, often leading to the preventable destruction of bears. CPAWS Yukon recommends the installation and use of bear proof containers for domestic garbage and the installation of an electric bear fence during the operating season around the camp and any stored fuel or other attractants.

Potential future activities and impacts

CPAWS Yukon recognizes that YESAB must assess the project in front of it, and not potential future activities. Yet, we feel compelled to state that we do not believe this area could support future mine construction or mining activities, as these activities would overlap rutting areas and important winter ranges. We cannot imagine how the impacts of these activities on sheep and caribou could be mitigated.

While it may be possible to mitigate the impacts of this proposed exploration project, given that the logical outcome of mineral exploration is mine development, and that mine development would not be appropriate in this area, it is difficult to comment on this project in a way that feels logically coherent.

In the absence of a better place to state this on record, CPAWS Yukon would like to point out that mine construction, mining and potentially advanced exploration activities would contradict Habitat Strategy 2.3 in the range assessment document for the Carcross caribou herd, which states that “Outside of the existing human ZOI, locate new temporary land uses in habitats with lower winter effectiveness” (pg. 36). The document further explains that, “New temporary land use activities, such as forest harvesting or mineral exploration, that occur outside of the existing human zone of influence, should avoid areas with high winter habitat effectiveness (winter habitats with high effectiveness are shown in red on Figure 4)”.

Comparing this project to Figure 4 of the range assessment document shows that the proposed work area and broader claim area overlaps winter habitats with high effectiveness for the Carcross caribou herd (pg. 16, and in greater detail on pg. A20, pg. 81 of 84 in the pdf).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Randi Newton', is positioned above the typed name.

Randi Newton
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