



July 22, 2025

**Attn:** YESAB Whitehorse Designated Office

**Re:** Project Number: 2025-0031 Project Title: Quartz Exploration - Whitehorse Copper Project

To Whom It May Concern:

Based in Whitehorse on the traditional territories of the Kwanlin Dün First Nation and the Ta'an Kwäch'än Council, CPAWS Yukon aims to conserve the Yukon's ecologically and culturally important lands and waters for all. We advocate for the protection of wild spaces in a manner grounded in respect for both traditional knowledge and western science and believe that this can only be achieved through collaboration and reconciliation. We represent the views of many Yukoners who want the Yukon to be an example of how people can live in reciprocity with the natural world that we depend upon.

CPAWS Yukon has thoroughly reviewed the project proposal and has several concerns regarding Gladiator Metals Corp's Class 3 MLU Proposal and 5 Year Operations Work Plan that must be addressed if the project is to progress. Our concerns include improper site characterization and insufficient consideration of environmental impacts due to inadequate environmental consideration and insufficient assessment and monitoring protocols.

### Site Characterization

Gladiator Metals Corp repeatedly refers to the project area as a "brownfield setting" (Proposal parts 4 and 5), however, the project proposal further states that the project area is "predominantly well forested, with extensive stands of coniferous and deciduous species typical of the boreal forest," in which "Past and present mining activities have created industrial zones and fuel breaks affecting an estimated 5% of the Project." (Proposal part 6). CPAWS Yukon understands that the company's use of previously disturbed sites for many of their drill pads could potentially reduce impacts to undisturbed

areas within the existing regional ecosystem but is concerned that the mischaracterization of the proposed project site does not account for the area's ecological, recreational, and current economic importance.

**Request for Information:** Could the proponent please clarify whether the proposed project area is entirely within a brownfield setting (a site which is vacant, idle, and underutilized), or whether the site is a largely natural landscape used for other purposes such as wildlife habitat, wetland drainage, or recreational uses?

## Environmental Impacts

### Aquatic Habitat

Gladiator Metals Corp's proposal includes an inadequate contingency plan reliant on the expectation that Wildland Fire Management will construct a permanent crossing at Cowley Creek, essential work that would be necessary to mitigate the potential negative impacts on fish habitat the proposed project would incur. In the meantime, the proponent plans to use a temporary ford across Cowley Creek up to four times per day. It is unclear within the present proposed plan as to whether Gladiator Metals Corp will obtain DFO authorizations for this temporary ford as it is not outlined in their proposal. At present, the company's fording plan does not adhere to the DFO Code of Practice for temporary fords, nor does it adhere to the best management practices which it proposes based on the *Yukon Mineral and Coal Exploration Best Management Practices and Regulatory Guide*. As such, we request that YESAB recommend Gladiator Metals Corp, in case of river crossing installation delays, develop a contingency plan which adheres to regulations and best management practices for avoiding habitat destruction due to stream fording.

**Request for Information:** Can the proponent please clarify whether the proponent plans to obtain a DFO authorization for the temporary ford used to cross Cowley Creek?

**Proposed Mitigation:** The proponent must develop a contingency plan for avoiding habitat destruction or loss due to fording that adheres to the DFO Code of Practice for temporary fords.

### Wetlands

In the Cub/Cowley work area, the proposal does not make it clear that the proponent has access to or will conduct wetland mapping to ensure that wetlands and riparian areas are appropriately buffered from drilling activity, which can impact wetland values, such as water quality and habitat services.

**Requests for Information:** (1) The proponent shall provide a detailed map of intended drill sites overlaid with wetland and land classifications. (2) The proponent shall provide work plan and methodology for determining wetland extents to verify the commitment to no disturbance activities within 30 metres of a wetland, watercourse or waterbody as outlined in response #4 to YESAB information request #1.

**Suggested Mitigations:** (1) Undertake comprehensive wetland extent determinations. (2) No drilling shall occur in mapped and otherwise identified wetlands.

### Birds

Gladiator Metals Corp's commitment to "Adjust work plans and schedules to minimize conflicts with observed and nesting species using the Project area" as detailed in the proposal needs to include a more comprehensive account of the birds in the area. Several Yukon bird species at risk have been identified across the project area, evidenced through reporting by local iNaturalist users. It is only through comprehensive monitoring programs that Gladiator will be able to meet their commitments and ensure the protections granted to bird species through the Migratory Birds Convention Act.

**Requests for Information:** (1) Could the proponent please specify how work plans and schedules will be adjusted to minimize conflicts with observed and nesting species? (2) Could the proponent provide methodology for how they plan to identify bird species at risk and their critical habitat?

**Recommended Mitigations:** (1) The proponent provides training to relevant personnel to ensure identification of species at risk during planned activities so that negative interactions with the species are avoided. (2) The proponent shall conduct assessment and monitoring of Yukon bird species at risk, including but not limited to the Bank Swallow, Barn Swallow, Horned Grebe, Olive-sided Flycatcher, and Rusty Blackbird. Assessment and monitoring shall include breeding bird surveys and critical habitat surveys with continued monitoring where necessary to ensure that work operations are not harming critical habitat to avian species at risk.

### Bats

Based on work undertaken by CPAWS to understand bat presence in the Chasàn Chùà and Wolf Creek areas, it is likely there are at least two species of bat present that forage and possibly roost in those areas. Excessive noise leads to bats avoiding areas they would otherwise make use of as foraging habitat. The noise that reasonably would be assumed to occur within the proposed work area could deter bats from the area, applying further pressures to these endangered species negatively impacting them, and the essential ecosystem services they provide.

**Recommended Mitigation:** We recommend Gladiator Metals Corp undertake assessments to more thoroughly understand the presence and behavior of bat species in the area to adequately anticipate the potential impacts of work operations on foraging behavior, roosting areas, and critical habitat for identified bat species.

### Caribou

CPAWS Yukon is concerned about the long-term impacts of developing Caribou Habitat. The Southern Lakes Caribou Herd uses the Cowley Creek area as winter habitat, where the proponent is planning their most comprehensive definition of drilling. There are unknown impacts to lichen on caribou wintering grounds from vegetative mat removal and replacement, and the proponent has not included any cumulative effects assessment of the destruction of winter range habitat on the Southern Lakes Caribou Herd. Furthermore, mapped extents of radio collar and anecdotal data do not reflect the current paradigm of understanding caribou use in the Cowley Creek area, according to locals.

**Recommended Mitigation:** All proposed work overlapping with suitable winter habitat for the Southern Lakes Caribou Herd be suspended until there is adequate data on potential and necessary mitigations for exploration to protect the vulnerable and culturally essential Southern Lakes caribou herd.

### Surface and Groundwater Hydrology

At present, Gladiator Metal Corp's baseline assessment protocol for water quality and flow monitoring is inadequate to identify and measure impacts from continued project operations. Expansion of assessment and monitoring protocols including upgradient and downgradient water quality and quantity testing would provide invaluable baseline data for the area which is an important environmental and community hub where recreation and environmental initiatives take place, such as the Wolf Creek Fry Release. Determining point sources of contamination and sources of potential surface and groundwater depletion through cumulative effects impacts caused by definition drilling and water withdrawal would be difficult without this baseline assessment expansion.

**Recommended Mitigation:** Gladiator Metals Corp expand their baseline studies for water quality and flow monitoring to include but not be limited to benthic macroinvertebrate sampling, fish population and bioaccumulation markers survey, and site-specific indicator species determination and monitoring. Seasonal streamflow monitoring and groundwater availability assessment for each watershed should occur to further determine potential water impacts from project activities.

### Noise

Health Canada's Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise, outlines that passive recreation areas should be included as sensitive receptors.

**Request for Information:** To better understand noise impacts, areas for passive recreation (hiking, xc skiing, and birdwatching, etc.), CPAWS Yukon requests that another noise assessment be completed including passive recreation in the baseline characteristics.

Sincerely,

Dakota Tomah, CPAWS Yukon Conservation Coordinator

A handwritten signature in black ink, appearing to read 'D. Tomah', with a stylized flourish at the end.