



To: Mayor and Council, City of Whitehorse

Re: Proposed Bylaw 2026-25 and amendment to the Whitehorse 2040 Official Community Plan to permit mineral exploration in Future Planning areas

From: CPAWS Yukon

Date: August 19, 2026

The Canadian Parks and Wilderness Society - Yukon Chapter (CPAWS Yukon) advocates for Yukon's wild spaces, wildlife and their habitats while actively supporting Indigenous-led stewardship. As a conservation organization, we carry a responsibility to ground our actions within a commitment to reconciliation and recognize that the lands and waters we advocate for are also the Traditional Territories of Yukon First Nations, the Inuvialuit, and transboundary First Nations in British Columbia, the Northwest Territories, and Alaska.

We fully acknowledge that the City of Whitehorse and surrounding area has been stewarded by Ta'an Kwäch'än Council and Kwanlin Dün First Nation, long before the arrival of settlers to the area, and that it continues to be of deep importance.

CPAWS Yukon appreciates the opportunity to provide comments on the proposed amendment to the Whitehorse 2040 Official Community Plan (OCP). Whitehorse is nationally recognized as a "wilderness city," where residents' quality of life, community identity, biodiversity, and climate resilience are closely tied to intact greenspaces, wetlands, forests, trails, and wildlife corridors within and around city limits.

For many residents, access to nature is the reason we live here. Just three years ago, we celebrated the release of the city's adoption of the Official Community Plan 2024 (OCP 2040), which is structured and intended to ensure that the priorities of residents and local First Nations are consistently reflected in city planning, for the short- and long-term future.

Careful planning is key to balance the needs of people, the health of the land, and the health of the economy. It has been encouraging to see how the city has faced balancing this with all of the work and engagement with residents on the Mineral Exploration and Development Framework, with the intent of ensuring "*exploration and development progress in a manner consistent with local planning objectives and community values.*" from page 1 of the 2025 City of Whitehorse Engage Whitehorse What We Heard Report. The expressed intent of the OCP 2040 and Mineral Exploration and Development Framework should be at the forefront of all proposed changes to the OCP 2040.

CPAWS Yukon has no issue with amendments being made to the OCP and recognizes that the OCP should be able to adapt as the needs of Whitehorse residents change. It is

important to note very specifically though, **that amendments should be serving the public interest, residents, local businesses, and long-term community needs.** In this instance, the amendment being proposed is not only falling short on all of the aforementioned, but it is in direct conflict with the well-being of local residents.

Even more concerning to us was hearing at the July 7, 2026, City Council meeting that this proposed amendment postponed progress on the draft Mineral Exploration and Development Framework. The city had set the summer or fall of 2026 to release the draft, however, city staff told Council in the July 7 meeting that that work on completing the draft was set aside to work closely with the proponent on addressing their proposal. We commend city staff on their diligent work, but we are curious about the reason it would be prioritized over the draft Mineral Exploration and Development Framework. This draft Framework will would be a positive step to address the numerous concerns expressed by residents on current and future exploration activities and their impacts on wellness, the environment, and provide clear direction on mineral exploration in Whitehorse. *“The draft framework is intended to provide clear guidance to claims holders and the public while reflecting community values and goals.”* <https://www.whitehorse.ca/mineral-exploration-and-development-engagement/>

CPAWS Yukon urges City Council to:

- Reject proposed Bylaw 2026-25.
- Complete the Mineral Exploration and Development Framework before any amendments to the OCP or other policies are made in relation to mineral exploration and development activities or permitting.
- Retain Future Planning areas for community needs and long-term public priorities such as residences, schools, community facilities, transportation, parks, and civic infrastructure, not for mineral exploration and development which would comprise the city's ability to meet these high-priority public needs.
- Take special care to collaborate and engage with Kwanlin Dün First Nation and Ta'an Kwäch'än Council and Whitehorse residents if, and when, the city is defining a “disturbed area”.

Human activity has been prevalent on these lands since time immemorial, and silviculture practices such as fire smarting, or other human activities, have not denigrated that land to being automatically open for higher-impact longer-lasting transformation such as mining and exploration. CPAWS Yukon opposes the notion that all areas that have ever been disturbed should automatically be treated as suitable for mineral tenure.

We encourage the City to continue to work proactively with First Nations and residents and ground all decisions in meaningful collaboration with Kwanlin Dün First Nation and Ta'an

Kwäch'än Council, as well as the experiences, concerns, and priorities of Whitehorse residents.

CPAWS Yukon urges Mayor and Council to put people, planning, and the protection of Whitehorse's natural spaces first. **The City should reject proposed Bylaw 2026-25 and should not amend the OCP in a way that enables mineral exploration before completing the broader policy framework and public engagement needed to guide these decisions responsibly.** Whitehorse residents will live with the long-term outcomes of these choices; their needs, voices, and future must come first.

Joti Røsholt

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