



January 15, 2021

Attn: YESAB Dawson Designated Office

Re: Project Number: 2020-0075 Project Title: Quartz Exploration – Antimony Creek

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:

CPAWS Yukon has some concerns relating to the proposed Antimony Creek Quartz Exploration Project. Given that the project is situated only 2.5 km from Tombstone Territorial Park and is within the Dawson Regional Land Use Planning area, we feel the proponent must make further considerations and provide additional information before the project advances. Many of our concerns echo the sentiments shared in Yukon Conservation Society's (YCS's) comment on this Project. As proposed, this 10-year exploration project may result in:

- Negative effects to the conservation values in the area, including the habitats and population health of a number of species, including thimblehorn sheep, moose, grizzly bear, woodland caribou, and alpine raptors;
- A decrease in the recreational value of the neighbouring Tombstone Territorial Park, and;
- Undermining the Dawson Regional Land Use Plan.

CPAWS Yukon recommends the project not proceed until each of these components are addressed in full. Our specific concerns are described in more detail below.

Tombstone Territorial Park

Tombstone Territorial Park is an extremely high value recreational, cultural, and harvesting area and serves as an important tourist destination during the summer. Visitors are attracted from around the world to enjoy world-class pristine mountain views and wildlife viewing opportunities. The park boundary is only 2.5 km from the Antimony claims, with several of the park's popular hiking trails and backcountry campsites clustered nearby¹. CPAWS Yukon is concerned that the high volume of helicopter flights proposed for the Antimony Creek project – up to 6 flights a day and up to 883 round trip flights a year – will negatively affect the recreational and tourism values of the nearby portion of Tombstone Territorial Park through visual and auditory disturbance to visitors and wildlife. CPAWS Yukon recommends the proponent develop an air traffic management plan which addresses this issue.

Dawson Regional Land Use Plan

In the mining land use permit application the proponent indicated that there is no land use plan to consider for the proposed project. It is important to note, however, that the project is located within the boundaries of the Dawson Regional Land Use Plan, development of which is underway. The Draft Dawson Regional Land Use Plan is to be released to the planning parties at the end of March 2021. The proposed project is in an area with high conservation value for several reasons, including being within caribou range and containing river corridors and unglaciated areas^{2,3,4}. At the time of the release of the draft Land Use Plan, this general area may be identified as part of a land withdrawal to protect conservation priority areas until finalization of the plan. CPAWS Yukon recommends the project assessment is put on hold until it is clear whether the area will be put under a land withdrawal. Continuing with the assessment at this point in time, and potentially approving the project before the end of March 2021, could undermine the spirit and intent of the Dawson Land Use Planning process. CPAWS Yukon recommends the project assessment is paused until the Dawson Regional Land Use Plan is complete.

Wildlife

CPAWS Yukon finds the proponent's assessment of wildlife and associated mitigations inadequate. The proponent identified several species that are likely to occur in the area, but hasn't undertaken any wildlife survey efforts that would allow for the development of appropriate mitigations. The proponent has proposed to undertake wildlife monitoring work while conducting exploration work, but this approach could result in negative effects to wildlife

¹ Government of Yukon. 2019. Tombstone Territorial Park Map. Available at: <https://yukon.ca/sites/yukon.ca/files/env/env-tombstone-territorial-park-map.pdf>

² Pages 265-268 of: Dawson Regional Planning Commission. 2020. Dawson Planning Region Resource Assessment Report. City of Dawson, Yukon, Canada. Available at: <https://dawson.planyukon.ca/index.php/publications/resource-assessment-report-final-2/1551-dr-rar2020/file>

³ Dawson Regional Planning Commission. 2020. Dawson Planning Region Resource Assessment Report - Map # 15: Caribou Ranges. City of Dawson, Yukon, Canada. Available at: <https://dawson.planyukon.ca/index.php/publications/resource-assessment-report-final-2/rarmaps2020/1331-map-15-caribou-ranges/file>

⁴ Dawson Regional Planning Commission. 2020. Dawson Planning Region Resource Assessment Report - Map # 8: Unique and Special Landscape Features. City of Dawson, Yukon, Canada. Available at: <https://dawson.planyukon.ca/index.php/publications/resource-assessment-report-final-2/rarmaps2020/1261-map-8-unique-and-special-landscape-features/file>

occurring during data collection and would influence survey results and the subsequent conclusions. Adequate information is needed prior to conducting exploration work to put appropriate mitigations in place. The information gathering and biological study the proponent proposes to do are positive steps; however, these studies should be completed before mineral exploration work commences.

Negative effects to wildlife from disturbance by the high number of proposed helicopter flights are of primary concern to CPAWS Yukon. Any wildlife species can be disturbed by helicopters, but of greatest concern are alpine ungulates – thimhorn sheep and caribou – and alpine nesting raptors⁵. It is important to note that several different species have Wildlife Key Areas⁶ (WKAs) in the vicinity of the proposed project, including moose, thimhorn sheep, woodland caribou (the Hart River Herd), and Gyrfalcon and Golden Eagle. Some of these WKAs are specific to important life stages or seasons when wildlife are more sensitive to disturbance, and that temporally overlap with project activities. Further, the proponent has not addressed effects to thimhorn sheep. Asking pilots to follow the *Flying in Sheep Country* and *Flying in Caribou Country* guidelines is good practice, and highly recommended, but this alone is not sufficient in ensuring negative effects to sheep and other wildlife do not occur. A set of project-specific mitigations must be put forward. Spatial buffers and timing windows⁵ are key mitigations the proponent should describe in detail, informed by project-specific wildlife survey data. CPAWS Yukon recommends that:

- the proponent undertakes a baseline wildlife monitoring program prior to beginning the proposed exploration work so that appropriate mitigation measures can be developed;
- The proponent use data from the baseline wildlife monitoring program to identify areas where disturbance sensitive wildlife species, such as thimhorn sheep and raptors, are likely to occur and subsequently identify flight paths that will avoid such habitat. This should include flights from Dawson City to the project area and flights within the claim blocks/project area, and should consider habitat within a 3 km radius⁵ of all activities.
- Develop spatial buffers and timing window mitigations for applicable activities
- Reclaim all roads and trails immediately after they are no longer needed for exploration work
- Minimize surface disturbance to avoid unnecessarily damaging wildlife habitat

⁵ [Correspondence] Reid, D., and Hayes, R. 2014. Avoiding Disturbance to Yukon's Alpine Ungulates and Raptors: A Summary of Scientific Knowledge on Spatial Buffers and Timing Windows. Wildlife Conservation Society Canada – Whitehorse. Available at: <https://library.wcs.org/doi/ctl/view/mid/33065/pubid/DMX3271000000.aspx>

⁶ Government of Yukon. 2021. Find Wildlife Key Area GIS Datasets. Available at: <https://yukon.ca/en/science-and-natural-resources/fish-and-wildlife-species/find-wildlife-key-area-gis-datasets>

Fish

Some project activities have the potential to affect fish populations. Of paramount concern are effects to salmon, as Yukon salmon populations are in decline. As YCS noted in their comment⁷, we are not aware of any professional salmon habitat suitability surveys in the project area. It is important this survey is done prior to the project commencing so that appropriate mitigations can be developed to protect the wellbeing of fish and fish habitat.

Cumulative Effects

The project poses cumulative effects threats when considered in concert with other activities in the area and future development scenarios the project could lead to. Under YESAA, YESAB is required to consider:

*the significance of any adverse cumulative environmental or socio-economic effects that have occurred or might occur in connection with the project or existing project in combination with the effects of other projects for which proposals have been submitted under subsection 50(1) or any activities that have been carried out, are being carried out or are likely to be carried out in or outside Yukon;*⁸

In terms of the Antimony Creek project, YESAB has the responsibility to assess the cumulative effects of past, present, and likely future activities in the area. Since the proposed project is for quartz exploration work, it has the potential to lead to a hard rock mining application depending on the results of the exploration program. This falls under the following criteria for determining an activity likely to be carried out:

*“The completion of the project could facilitate or enable future development”*⁸

Therefore, a cumulative effects analysis should also consider the future possibility of a hard rock mine, with associated infrastructure, being developed. CPAWS Yukon asks that YESAB complete a cumulative effects analysis for the Antimony Creek project, which includes the context of the Dawson Regional Land Use Plan and the ongoing work of the Dawson Regional Land Use Planning Commission.

Sincerely,

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⁷ Yukon Conservation Society. 2021. Comment on Project Number 2020-0075: Quartz Exploration – Antimony Creek. Available at: <https://yesabregistry.ca/projects/c1ce7a0c-2cfe-4256-9a24-efc3249b3012/comments>

⁸ Yukon Environmental and Socio-economic Assessment Board. 2019. Considering Cumulative Effects in YESAB Assessments: Proposed Criteria for Determining Activities Likely to be Carried Out. <https://yesab.ca/wp/wp-content/uploads/2019/09/Proposed-Criteria-for-Determining-Activities-Likely-to-be-Carried-Out-09-16-2019.pdf>