



April 14, 2016

Stephanie Routley  
Yukon Environmental & Socio-Economic Assessment Board  
Teslin Designated Office  
Box 137,  
Teslin, YT YOA 1B0

Dear Ms. Routley – Lead Assessor,

**Re: Project Number 2016-0018, Harry Property – Quartz Exploration**

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The Carcross Renewable Resources Council (CTRRC) would like to thank your office for conducting a public meeting with the proponent on this project in Tagish on April 6, 2016. The meeting was very well attended with approximately 40-50 people in attendance. Most in attendance had concerns about the project's effects on Southern Lakes caribou; however, there was a wide range of issues including:

- Effects (cumulative and immediate) on the Southern Lakes Caribou Herd and its prime habitat
- impacts to First Nation subsistence harvesting rights and culture,
- impacts of increased access to the area,
- noise impact to wildlife and Tagish residents,
- impacts to furbearers and other wildlife populations,
- key habitat disturbance,
- impacts to water quality and fish including salmon rearing habitat,
- impacts to trapping trails and disturbance to the landscape.

The ephemeral nature of exploration companies with a lack of responsibility and accountability for environmental damage and restoration based on past experience was also raised. It was also noted that Southern Lakes communities and residents would incur most of the project risks and dis-benefits without any demonstrated employment and economic benefits. There was very little support for the project expressed at the meeting.

The sensitivity of Woodland caribou to development and land use and disturbance is well documented; this project is located in the most sensitive and critical winter, rutting and migration habitat of the Carcross caribou herd (see attached map). The importance of the Carcross caribou herd to the Carcross Tagish First Nation (CTFN) citizens and other residents of the Southern Lakes was highly emphasized at this meeting.

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The sacrifices and the ongoing voluntary suspension of aboriginal harvesting rights by CTFN and five other First Nations over the 23-year period are well documented and were discussed at length at the meeting. Several individuals at the meeting related personal experiences and observations of how land use practices and disturbance in the past had affected habitat utilization by caribou over the long term.

The CTRRC is very concerned about the potential impacts and risks of this project. This proposed project is located in critical Carcross caribou herd winter range, rutting, and migration habitat. The cumulative effects of this and other existing and proposed projects in critical caribou habitat could have drastic negative effects on the on-going recovery of the Southern Lakes Caribou Herd. Any negative impacts to the herd will translate directly to continued impacts to First Nation harvesting rights and cultural practices.

The CTRRC is also concerned about impacts to other users in the area that would be directly affected like trappers and other impacts to communities and residents of the area based on the many concerns raised at the meeting.

The project proponent indicated that exploration activities in 2016 would be limited (expenditures of around \$40K) and were intended mainly as a seed effort to attract other investors and exploration partners interests. The proponent also indicated that if the project was not supported, the company would likely move these resources to other areas and projects. The CTRRC is particularly concerned that exploration companies come and go, often on a year-to-year basis. It is very difficult, or impossible, to communicate and establish a relationship and hold companies responsible and accountable for activities and commitments.

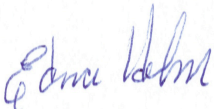
Based on the issues and factors outlined above and in particular the risk to the Carcross caribou herd, the **CTRRC recommends that licencing should not proceed at this time**. Given the high risks, and the uncertainties of the project, it would be highly premature to proceed with a long-term land use disposition at this time.

If further licencing efforts are planned or undertaken, critical mitigation requirements and conditions would include the following:

1. Site access should be by helicopter only. No new access trails or roads developed and no upgrading of existing trails
2. All activity on the site should cease by August 30
3. The proponent or exploration company should meet at least annually with the CTFN and CTRRC to discuss and review plans and activities undertaken

Should you have any questions or require further supporting information or documentation please do not hesitate to contact the Council.

Sincerely



Edna Helm, Co-Chair



Ken Reeder, Co-Chair

Enclosure: Map

cc. Lawrence Ignace, Director CTFN, Heritage, Lands & Natural Resources



