



Executive Council Office
Environmental Assessment Unit (A-310)
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File # 5110-20-33

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Herb Klassen,
Major Projects Unit
Fisheries and Oceans
Pacific Region
Suite 200-401 Burrard Street
Vancouver, B.C. V6C 3S4

Dear Mr. Klassen,

The Yukon Government is providing advice to Canada on the *Canadian Environmental Assessment Act* screening of the proposed Tulsequah Chief mine project and associated transportation impacts.

The key areas our comments address are;

- The effects of construction activities during the upgrade of the Atlin Road
- The effects of transporting ore concentrate and mine supplies on Yukon highways, and
- The cumulative effects and effects of project components and activities in BC which affect the Southern Lakes transboundary caribou.

Effects of Construction

Yukon recognizes that the existing segment of the Atlin Road from the Yukon border to the Alaska Highway is not safe for combined passenger vehicle and ore concentrate truck use. This road segment requires re-alignment and water crossing improvements that will require an environmental assessment under the *Yukon Environmental Assessment Act* (or successor legislation). At this time there is no clear project description. There are a range of options to upgrade the Atlin Road but the selection of the final option will be dependant on the final trucking profile for the mine (frequency, size, seasonal distribution, speed) and other possible industrial users. The assessment of the effects of construction will be deferred until an upgrade option is selected.

The upgrade is of a Yukon Government highway and the Yukon Department of Highways and Public Works will be the proponent for the road upgrade work and the

Yukon Government will be responsible for mitigating environmental effects of construction.

A cumulative effects analysis conducted by DIAND prior to devolution is attached for your use. The cumulative effects analysis includes an intermediate option for the highway upgrade. The analysis indicates that there is concern about effects on caribou from increased access in BC and direct mortality from increased traffic in BC and Yukon. Construction activities in Yukon may also contribute to habitat loss because granular resources in the area tend to correlate with high quality caribou habitat. The highway upgrade itself will not affect much habitat because it is mostly within the existing right of way. Yukon Government will carefully consider the use of any new granular resources in the area of the Atlin Road and will seek sources that minimize the cumulative loss of high quality caribou habitat.

The selection of an option to upgrade the road segment will depend on the outcome of negotiations between Redfern Resources or British Columbia and Yukon Government. The proponent should contact Wally Hiding of H& PW, Yukon Government.

Effects of Transportation through Yukon

Yukon Government identified several areas of concern based on previous consultation and environmental assessment work conducted by the Department of Indian and Northern Affairs (DIAND). They include;

- Highway safety
- Spills and Spill Contingencies
- Impacts to wildlife, especially caribou
- Impacts to culture
- Impacts to Hunters and Trappers

The Yukon Government will implement a suite of mitigations to reduce the likelihood and significance of environmental effects from mine related trucking on Yukon highways by agreement with Redfern before committing to upgrade the highway. The specific mitigation will be determined during the future environmental assessment of the road upgrade. Best practice mitigations that may be applied are appended to our comments because I believe you will find these mitigations are also pertinent to the public highway use in BC and to some extent the mine road segment in BC.

Cumulative Effects

The environmental effects of the mine development, road construction, ore haul and already existing impacts are likely to affect the long term sustainability of the Southern Lakes caribou.

Small population sizes and low recruitment make woodland caribou populations in this region very vulnerable to any additional mortality and to the possibility of cumulative

effects. Currently, all hunters in the Yukon have stopped all harvesting of woodland caribou in the Southern Lakes region to support recovery of these herds. Additional mortalities resulting from accidental vehicle collisions could negatively affect the long-term viability of woodland caribou herds in the Southern Lakes region and hence road mortality of caribou must be reduced to an absolute minimum.

To reduce the likelihood of long term adverse effects on First Nations it is important to assist the Southern Lakes caribou population to increase to a size that can again support a traditional harvest. All efforts should be taken to reduce the mortality of caribou from this project to zero.

The Yukon Government wants to ensure the long term viability of Southern Lakes caribou populations. To this end the Yukon will apply mitigations to activities occurring within it's jurisdiction to reduce effects on and to promote the recovery of the Southern Lakes caribou populations. The trans-boundary nature of the caribou and the division of mandate between BC, Yukon, Canada, First Nations and land claim bodies means that the long term viability of these caribou populations will depend on compatible and complementary efforts by all jurisdictions. Yukon believes there is a need for a coordinating forum to develop a broadly accepted and consistent management plan for the Tulsequah chief mine and the Southern Lakes caribou to ensure there will not be significant adverse environmental effects on the Southern Lakes caribou.

Yours truly,



Rob Walker
Manager, Project Assessment

- cc. Terry Chandler, Redfern Resources
Chief Mark Wedge, Carcross Tagish First Nation
Mike Svoboda, Taku River Tlingit
Chief Eric Morris, Teslin Tlingit First Nation
Chief Mike Smith, Kwanlin Dun First Nation
Joanne Koser, Chair, Yukon Fish and Wildlife Mangement Board
Wally Hiding, Highways and Public Works, Yukon Government