

Beaver River Land Use Plan

What We Heard

August 21, 2019



Submissions Package

- 1.0 Comment Sheets
- 2.0 Stakeholder Submissions
- 3.0 Email Submissions



1.0 Comment Sheets

What do you see as the important values of the planning area?

- Wetlands, wetlands, wetlands! And the huge biodiversity (notably moose, furbearers, and fish) that rely on them.
- Maintaining the values of the land and that monitoring is done yearly for the impacts the road has on the environment and resources.
- Established baselines are important.
- This needs to be done right.

Is there any specific information about the planning area and the proposed route for the tote road that you think the planning committee should know about? Possible topics include land, water, fish and wildlife, heritage areas and areas of special interest. Please describe.

- The Gwich'in families of the Mayo area had their grandparents travel the area to and from Fort McPherson. Our families used the land for many generations and pristine water is very important to us, Yukon people and the world. We have migratory beings that come from Mexico and South America that depend on the land. Let's leave it pristine.
- The 'Tote Road" is a ridiculous premise; it's a road. A planning process should not start with a given, e.g. a road! Planning looks at the whole area and interests and how those interests and values can co-exist. THEN maybe a road is discussed. As was stated many times, the roads DON'T go away once established. The companies go bankrupt and don't clean up; plus, a permanent road is forever obvious.

Do you have any other comments to pass on?

- Please back up or this will be another planning process that is faulty. Thank you.
- Need to explore any potential alternatives to a road – notably airstrips. Yukon needs to think in a visionary fashion about exploring and

investigating this technology, and exploring the setting up of a pilot program for this technology.

- Serious limits on the human activities that have irremediable impacts— notably placer destruction of wetlands.
- Use the territorial Lands Act's provisions for setting up an area in which off-road vehicle use is prohibited (this option is already in place in regulation under that act).
- I would like to see very high [monetary] penalties to all who trespass onto the First Nation of Na-Cho Nyäk Dun lands and the road. Maybe as high as \$25,000 to NND and to Government of Yukon: to cover assessments needed to reclaim if any damages have been done.
- I would like to see this road remain private now, tomorrow, in a decade, and in 100 years.
- Who will grant additional access in the future? NND should be the custodians of the road as part of our agreement. It will be just too easy for access to be granted to 'other' mining/exploration companies when ATAC moves on and another company moves in.
- When a company explores isolated areas/and with no road access, then they should know the cost of doing business in remote areas. Yukon Government seems to be 'giving' ATAC free access to this pristine land. This road will lead to other roads off it and there is no real end until the Peel Watershed has been compromised.

2.0 Stakeholder Submissions

2.1 Alexco Resource Group

2.2 Archer, Cathro & Associates Limited

2.3 ATAC Resources Ltd.

2.4 Bonnet Plume Outfitters

2.5 Canadian Parks and Wilderness Society (Yukon)

2.6 Ducks Unlimited Canada

2.7 Mayo Renewable Resource Council

2.8 Metallic Minerals Corp.

2.9 Strategic Metals Ltd.

2.10 Widrig Outfitters Ltd.

2.11 Wilderness Tourism Association of the Yukon

2.12 Yukon Chamber of Mines

2.13 Yukon Conservation Society

2.14 Yukon Outfitters Association

May 17, 2019

Beaver River Land Use Planning Committee
Yukon Government
PO Box 2703
Whitehorse, YT Y1A 2C6

Beaver River Land Use Plan

Dear BRLUP Committee Members,

Alexco Resource Corp. is the owner and operator of the Keno Hill Silver Project. A small portion of the Quartz Mining claims that comprise the Keno Hill Silver Project are located within the Beaver River Land Use Planning area however Alexco and the predecessor companies that have operated the Keno Hill Silver Project have also conducted extensive exploration within the Beaver River area.

The previous exploration work is documented in public records such as Yukon MINFILE and reports submitted for Quartz Mining Assessment credit. Confidential reports and databases also exist in company files and databases maintained by Alexco and likely many other companies who have been active historically in the region. This work indicates the planning area covers a region with significant mineral potential. Mineral potential is difficult to quantify as areas with high mineral potential can often be directly correlated to the amount of data that exists for that area. The detailed data that is required to properly assess an areas mineral potential is gathered through the process of mineral exploration much of which has very little impact on the environment. This is the underlying reason that our business requires guaranteed access to large regions which is a critical component of exploration.

Mineral exploration is a science-based business that is constantly evolving and in recent years has advanced to the stage where it can be conducted in ways that leave a minimal environmental footprint through non-disturbing techniques. In cases where ground disturbance is required reclamation best practices have evolved to the point where areas can be restored to near original condition. Mineral exploration and mining in Yukon are subject to rigorous environmental and socio-economic assessment. The regulatory system in Yukon is rigorous and regulators use the assessment process to apply terms and conditions appropriate to the scope of the proposed activities. Regulators then conduct monitoring to ensure compliance with project requirements. The result of the modernization of both mineral exploration, mining and the

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ALEXCO

assessment and regulatory process in Yukon is a dramatic reduction in the negative effect and risk of negative effect of mineral exploration and mining on the environment.

Exploration and mining have long provided significant benefits to Yukon's economy and is a major contributor to the territory's GDP. If Yukon is to continue to enjoy the economic benefits from the industry, mineral exploration must be allowed to access large regions to conduct the work that determines where and where not mines may occur. Alexco supports a robust assessment and regulatory system to govern mining and mineral exploration. A robust assessment and regulatory system must also be applied to other users of the land where improved access due to mineral exploration and mining occur and brings benefit. The Beaver River Land Use Plan should not restrict access or withdraw areas from exploration and mining activity.

Sincerely,
Alexco Resource Corp.

A handwritten signature in black ink, appearing to read "Brad A. Thrall".

Brad A. Thrall
President



Lesley Cabott
Co-Chair First Nation of Na-cho Nyäk Dun
Lesley.cabott@stantec.com

George Stetkiewicz
Co-Chair Yukon Government
George.Stetkiewicz@gov.yk.ca

March 6, 2019

Re: Beaver River Land Use Plan

Dear Lesley and George,

Thank you for the opportunity to provide feedback for the Beaver River Land Use Plan on behalf of Archer, Cathro & Associates (1981) Limited (Archer Cathro). Archer Cathro participated in the Whitehorse Community Meeting on February 6, 2019, but did not provide a written response at that time.

While a majority of the quartz claims within the Beaver River Land Use Plan area are registered in the name of Archer Cathro, these claims are held in trust for various clients and Archer Cathro has no ownership of mineral tenure in this area. Our interest in this land use plan is to provide general feedback as a Yukon-based business with over 50 years of experience conducting mineral exploration programs on behalf of clients in the territory.

The Beaver River Land Use Plan area hosts a belt of highly prospective rocks with demonstrated and long term mineral potential. The area has been explored for nearly 100 years, with significant exploration activity over the last 40 years. Despite this exploration activity the area is still described as pristine wilderness, which supports the premise that mineral exploration has been, and is, conducted with little to no footprint on the environment.

The significant contribution that mineral exploration makes to the Yukon's economy cannot be overlooked. A conservative estimate of the economic stimulus of work within the Beaver River Land Use Plan area exceeds \$78,000,000 in un-inflated dollars.

Since the 1920s, six mineral deposits have been defined in the area. In recent years, new discoveries have been made of previously unrecognized styles of mineralization, and significant opportunity exists for additional discoveries. Recent discoveries of nickel-vanadium, copper-gold and lead-zinc mineralization have been made by various proponents exploring in good-faith and in accordance with existing Land Use regulations and reviews by the Yukon Environmental and Socio-economic Assessment Board. These discoveries have been made because of the evolution of scientific knowledge and the perseverance of prospectors and junior explorers.



It is critical that ground remains open to further exploration and that provisions are made for reasonable access routes, once projects reach a stage that justifies development.

We recognize that one of the main concerns regarding new access is the pressure this could cause on moose population through increased hunting. We respectfully suggest that this issue be addressed head-on with restrictions on hunting by Territorial and First Nation governments rather than blanket policies against access development. Furthermore, effective policy and planning that is supportive of long-term multi-user access can enhance the viability and responsible development of projects while minimizing environmental impacts that would result from duplication of infrastructure.

In summary, Archer Cathro's primary concerns during this land use planning process are:

- Ensuring proponents' good-will while exploring under Quartz Mining Act legislation is recognized;
- Acknowledging the economic contribution made by past and present proponents exploring in the area;
- Incorporating the geological potential of the area with all other factors;
- Ensuring that future development is not blocked through restrictions on new access; and,
- Recognizing that scientific knowledge is continually evolving and therefore it is critical to keep as much of the Beaver River Land Use Plan area as possible open for exploration and potential future development.

Sincerely,

A handwritten signature in blue ink that reads "Heather Burrell".

Heather Burrell, P.Geo
Senior Geologist and Partner
Archer, Cathro & Associates (1981) Limited



ATAC
RESOURCES LTD.



BEAVER RIVER LAND USE PLAN SUBMISSION

May 7, 2019

ATAC Resources Ltd.
1016-510 W Hastings St.
Vancouver, BC V6B 1L8

EXECUTIVE SUMMARY

ATAC has been active in the area covered by the Beaver River Land Use Plan (“planning area”) since 2007, and holds the largest land position in the area, with 5,008 quartz claims (1,007 km²) in good standing. Over \$36 million has been spent by ATAC on projects within this area, which has resulted in the discovery of over 22 promising mineral targets. Work at one of these targets, the Tiger Gold Deposit, has resulted in a Mineral Resource containing 485,700 ounces of gold in the Measured and Indicated categories and 188,500 ounces of gold in the Inferred category, and a Preliminary Economic Assessment demonstrating a pre-tax Net Present Value of \$106.6 million.

ATAC’s comments are categorized into seven (7) *Key Themes*:

1. Rich Mineral Potential
2. Importance and Impacts of Access
3. Land Withdrawal in Yukon
4. Environmental Impacts of Exploration
5. Existing Regulatory Mechanisms
6. Wildlife & Habitat Protection
7. Economic Benefits of Mineral Exploration

The planning area covers a region with significant mineral potential, which has seen more than \$100 million in exploration activity — conducted by ATAC and other operators — over the last 100 years. Despite the work conducted to date, much of the area remains under-explored and new mineral discoveries are being made regularly. Over 9,000 quartz claims are active in the area, with 34 documented MinFile occurrences for a variety of commodities, including: gold, silver, lead, and zinc.

Access is a critical driver for exploration, and investors require certainty that ground access can be constructed should a project advance to a stage where it is warranted. Any prohibitions on new access in areas without existing roads effectively bars exploration and development. It is reasonable to expect that multiple proponents may wish to use infrastructure, and shared multi-user access is the more responsible and environmentally friendly solution, rather than construction of multiple parallel access routes.

The area available for exploration in Yukon has been significantly limited, with approximately 58% of the land-mass permanently, or temporarily, withdrawn from staking. Mineral potential varies dramatically across the territory, and discovery of projects that can create strategic economic opportunities for Yukon take multiple exploration cycles to identify, fund, and develop.

Modern exploration techniques provide opportunities for work to be conducted using low-impact methods that leave minimal environmental impacts. Historical negative legacies, such as Faro and Mount Nansen, are not indicative of modern projects. Modern existing regulatory regimes provide effective and appropriate methods of reviewing and regulating projects.

While detailed wildlife information is lacking for much of the planning area, what is available suggests significant critical habitat is not located in this region. Exploration itself has minimal impacts on wildlife if conducted appropriately, and it is important not to conflate separate issues like hunting with proposed access for exploration projects. Other regulatory mechanisms such as restrictions or lotteries for hunting could be implemented to more effectively address the specific problem.

HISTORY OF ATAC AND THE BEAVER RIVER AREA

ATAC has been conducting mineral exploration in the area covered by the Beaver River Land Use Plan (“planning area”) since 2007. ATAC’s Rackla Gold Property (“the Property”) is the largest exploration project within the bounds of the planning area. The Property consists of the Rau Project (“Rau”), the Osiris Project (“Osiris”), and the Orion Project (“Orion”). Osiris lies at the eastern end and is fully outside the planning area. Rau comprises the western portion of the project and lies entirely within the planning area. Orion is the portion of the property between Rau and Osiris, and partially overlaps the planning area. The focus of discussion in this document will be on the Rau Project, given the relative location of each property.

RAU PROJECT HISTORY

Various operators have conducted exploration in the area for decades, with the earliest known activities occurring in 1922¹. This historical work primarily focused on lead, zinc and silver mineralization, and included numerous periods of notable activity. By August 2005 all but four claims in the area had expired. No operators had conducted exploration for gold.

In the summer of 2006, ATAC staked an initial 64 claims to cover a gold stream sediment anomaly identified by the Geological Survey of Canada. Prospecting and geochemical sampling identified gold and tungsten anomalies, and the claim block was expanded in 2007, 2008 and 2009 to cover a broad trend of favourable geology. The entire Rackla Gold Property now consists of 8,738 claims (1,700 km²), with the Rau Project comprising 3,314 claims (667 km²). Of the total Property, 5,008 claims (1,007 km²) wholly or partially overlap the planning area.

Prior to ATAC’s work on this project, only three exploration targets had been identified in the area: Now (lead-zinc); Blue Lite (tungsten); and Grey Copper Hill (copper-silver). As a result of ATAC’s significant investment and methodical exploration activities, the property now hosts 22 targets. These targets vary from early- stage geochemical anomalies to drilled prospects, and include the Ocelot silver-lead zinc discovery and the Tiger Gold Deposit, which hosts a Mineral Resource with a favourable Preliminary Economic Assessment. While ATAC has largely focused on gold mineralization, these targets also include copper, lead, zinc, silver, and tungsten prospects.

ATAC has incurred \$36M in exploration expenses on the Rau Project alone, but substantial portions remain under-explored. This area is host to significant mineral potential across a variety of commodities, and data indicates the opportunity for multiple new discoveries is high.

TIGER GOLD DEPOSIT

The Tiger Gold Deposit, located in the central portion of the Rau Property, is a grassroots gold discovery made by ATAC in 2009. Since its discovery, ATAC has undertaken significant work on Tiger, including completion of 28,000 m of drilling in 162 diamond drill holes. This exploration work has resulted in a Mineral Resource containing 485,700 ounces of gold in the Measured and Indicated categories (5.8 Mt @ 2.66 g/t Au) and 188,500 ounces of gold in the Inferred category (3.2 Mt @ 1.81 g/t Au). A Preliminary Economic Assessment completed in 2016 demonstrated positive project economics, with a Pre-Tax Net

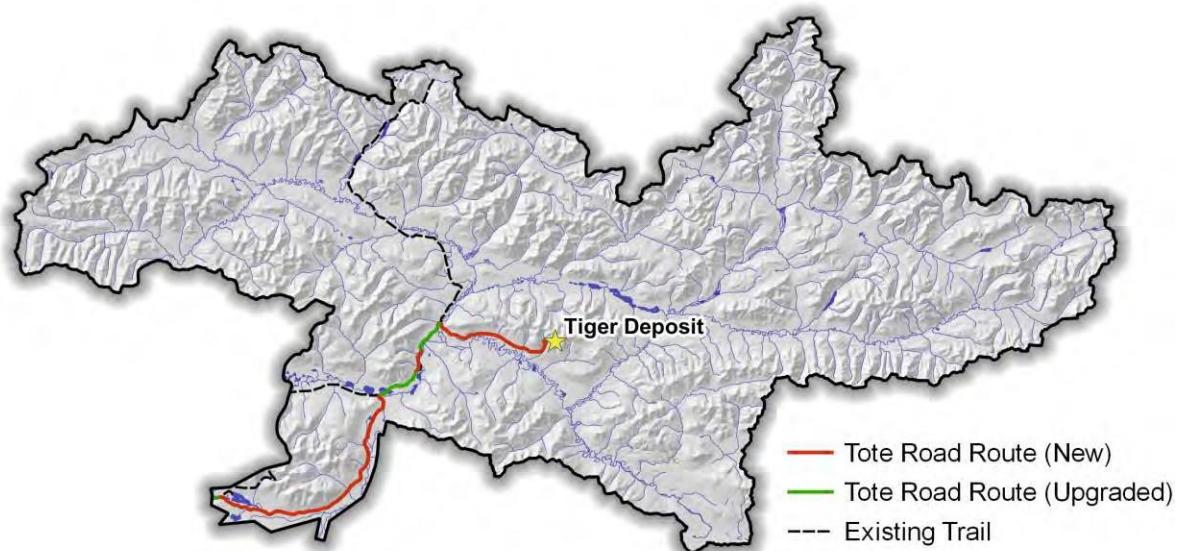
¹ For a detailed review of the Property’s exploration history, see ATAC’s 2016 Technical Report for the Tiger Deposit PEA: https://www.atacresources.com/assets/img/tiger_deposit_pea_july_2016-20160714111533-20190207134310.pdf

Present Value² (5% discount rate) of \$106.6 M. The deposit remains open to expansion, and presents a compelling low-cost development asset.

PROPOSED ALL-SEASON TOTE ROAD

In order to support advanced exploration, and feasibility level engineering work, ATAC determined that ground access to the Tiger Deposit was necessary. In July 2016, ATAC submitted a project proposal to the Yukon Economic and Socio-Economic Assessment Board (“YESAB”) for *All Season Access Development to [the] Rau Property*³. On March 2, 2018 the project received a conditional approval in the form of a joint Decision Document signed by Yukon Government and the First Nation of Na-Cho Nyak Dun (“NND”).

The proposed “tote road” is a 65 km all season access route from the existing Hanson Lakes Road to the Tiger Deposit, consisting of 53 km of new road, and 12 km of upgrades to existing trails, including portions of the Wind River Trail. The term “tote road” is used to differentiate it from a more traditional access road. The proposal is for a private, gated, radio-controlled, 5 metre wide, single lane with pullouts, unpaved road. The specific route was chosen to have the least construction impacts while providing an alignment that could be upgraded in future to a full mine haul road, if warranted. Further adjustments to the route were made in consultation with local communities.



Since 2010 ATAC has completed detailed engineering, heritage and environmental studies as part of the design and assessment process. These studies were made publicly available as part of the YESAB assessment for the project, and consist of:

- EBA Engineering Consultants (2010) – *Rau Property - Terrain Assessment and Access Route Evaluation*
- Laberge Environmental (2010) – *Biophysical Investigations for the Proposed Rau Road Route* (Hydrology, water quality, wildlife, benthic invertebrates, fisheries)

² For details, see ATAC’s 2016 Technical Report for the Tiger Deposit PEA.

³ YESAB file #2016-0129: <http://yesabregistry.ca:80/wfm/Project/nulliqec547isw0>

- Matrix Research (2010) – *Heritage Resources Overview Assessment of the Rau Property Proposed Pioneer Road Route*
- Matrix Research (2010) – *Heritage Resources Impact Assessment of the ATAC Resources Ltd. Rau Pioneer Road and Rau Airstrip*
- EBA Engineering Consultants (2013) – *Route Selection and Terrain Assessment* (Winter Trail; Hanson Lake Road to Beaver River)
- EBA Engineering Consultants (2013) – *Route Selection and Terrain Assessment* (All Season; Beaver River to Tiger Deposit)
- NND EBA Land Protection Corp. (2013) – *Assessment of Winter Road Conditions for Future Truck Traffic; Wind River Trail to Rau Property*
- Laberge Environmental (2013) – *Baseline Environmental Assessments for the Tiger Gold Project* (Wildlife surveys, vegetation, rare plant assessments, fish and benthic invertebrate studies, stream sediment characterization)
- Stantec (2013) – *Heritage Resources Inventory and Impact Assessment of the Proposed Rau Road Corridor*
- NND EBA Land Protection Corp. (2016) – *Conceptual Design of Tote Road; Hanson Lake Road to Tiger Deposit, YT* (Includes geotechnical, hydrological and ARD assessments)
- EBA Tetra Tech (2016) – *Preliminary ARD Characterization Study for Rock and Granular Soil Material Exposed Along the Proposed Tote Road to the Tiger Deposit from the Hanson Lake Road*
- Stantec (2017) – *Heritage Resource Overview Assessment for a Revised Tiger Tote Road Route*

The design and study process evaluated multiple alternatives, including: use of, or upgrading of, the existing Wind River Trail; seasonal winter access via the existing Wind River Trail, or an alternative route; and other potential all-season road alignments. A detailed assessment of the existing Wind River Trail determined that it would not be suitable for the planned levels of vehicular traffic without extensive ground improvement work. As this existing route passes through areas of sensitive wetlands it was determined that a less impactful route should be selected. The route was further modified to avoid prime moose habitat located in the McQuesten Valley. Winter access was ruled out following ice thickness studies at the Beaver River crossing point, which determined that it was unlikely to reliably freeze so as to permit safe crossing of the river. Rather than risk break-through with equipment, and potentially hazardous supplies, it was determined that a constructed bridge was the appropriate crossing type from a safety and environmental perspective.

ATAC began community consultations regarding proposed ground access in 2009, and has continued engagement on this project in subsequent years. In the lead-up to the YESAB submission, a series of consultation events were held in March, April and June 2016. These events included a series of open houses in Mayo, Keno City and Whitehorse, as well as presentations to NND at a General Meeting and an Annual General Assembly. In response to feedback obtained during the consultation process, additional alternatives were evaluated, and changes were made to the proposed project. In particular, ATAC investigated the feasibility of airships instead of ground access, and developed an alternate route that was relocated to cross NND Category A Lands. A detailed consultation summary report⁴ can be found as part of the YESAB registry for the project.

⁴ See YESAB registry documents 2016-0129-028, 2016-0129-029, 2016-0129-030.

The airship technology to transport loads of the scale required for advanced exploration does not currently exist, let alone that which would be required for mine construction and supply. While a number of companies are currently in the process of developing heavy-lift airships, none of these technologies are commercially ready, and remain at least five (5) years from rollout. Furthermore, ATAC contacted several experts and companies involved in development and determined that airships would not be applicable for this project in any circumstance given the terrain.

The main concerns that arose during consultations were regarding access – specifically, ensuring that new access was not made available to the general public. Participants recognized ATAC's commitment to ensuring a private access-controlled road; however, there were questions about what could happen if the project or company ownership changed. NND proposed that the route could cross segments of their Category A lands as a way of ensuring NND had an irrevocable say in any future changes to use of the road. To accommodate this request, the road design was revised to cross two limited segments of NND Category A Lands (2.4 km in total).

As part of the YESAB assessment process, ATAC contacted the Department of Fisheries and Oceans ("DFO") and requested they review the project to determine if there was potential for significant harm to fish. A detailed submission was prepared and provided to DFO as part of this process, outlining fisheries data and stream information for all crossings. DFO conducted their review and determined that "[s]erious harm to fish can be avoided or mitigated", and that a *Fisheries Act* authorization was not required⁵. ATAC's submission to DFO⁶ includes detailed information on fish habitat and hydrology, and can be found on the YESAB registry entry for the project.

In addition to the reports discussed above, ATAC prepared and submitted three management plans as part of the assessment process: an *Erosion and Sediment Control Plan*⁷; *Spill Contingency Plan*⁸; and *Access Management Plan*⁹. The Access Management Plan remains in draft form, and incorporates the results of detailed discussions with NND and local community members. The Access Management Plan is being reviewed in a separate process, as outlined in the YG-NND agreement¹⁰.

⁵ DFO's response can be found on the YESAB registry in document 2016-0129-133.

⁶ The DFO Request for Review can be found in YESAB document 2016-0129-051.

⁷ The Erosion and Sediment Control Plan can be found in YESAB document 2016-0129-050.

⁸ The Spill Contingency Plan can be found in YESAB document 2016-0129-011.

⁹ The draft Access Management Plan can be found in YESAB document 2016-0129-027.

¹⁰ Clause 2 of the "Agreement Between the Government of Yukon and First Nation of Na-Cho Nyak Dun" dated January 21, 2018 and available at <http://www.emr.gov.yk.ca/rup/pdf/yukon-na-cho-nyak-dun-atac-agreement-20180221.pdf>

LAND USE PLAN COMMENTS – KEY THEMES

ATAC has conducted extensive work in the planning area, and provides the following comments towards regional land use. Comments are organized into seven (7) themes.

Maps are used throughout the following sections to detail relative distribution of values within the planning area. Larger versions of these maps can be found in Appendix B.

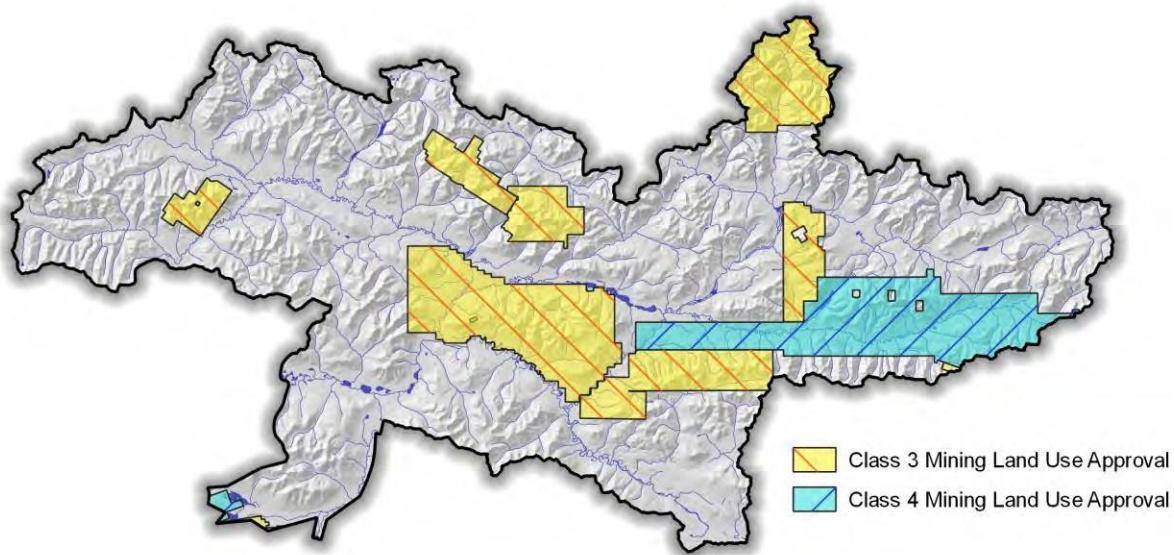
THEME 1: RICH MINERAL POTENTIAL

IN BRIEF

- \$100M in exploration has occurred in planning area.
- More than 9,000 active Quartz claims within the boundary.
- 34 MinFile occurrences recognized for a variety of commodities.
- Significant mineral potential exists throughout the area.

DISCUSSION

The planning area is host to significant mineral potential, with numerous advanced stage projects, as well as highly-prospective, underexplored ground. Exploration has been conducted in the area for over 100 years, with over \$100 M of exploration expenses (adjusted for inflation) recorded¹¹. Advanced exploration projects (defined as a *Class 3/4 Mining Land Use Approval*) are being conducted on eight (8) properties by five (5) operators. These projects are shown on the following figure¹².

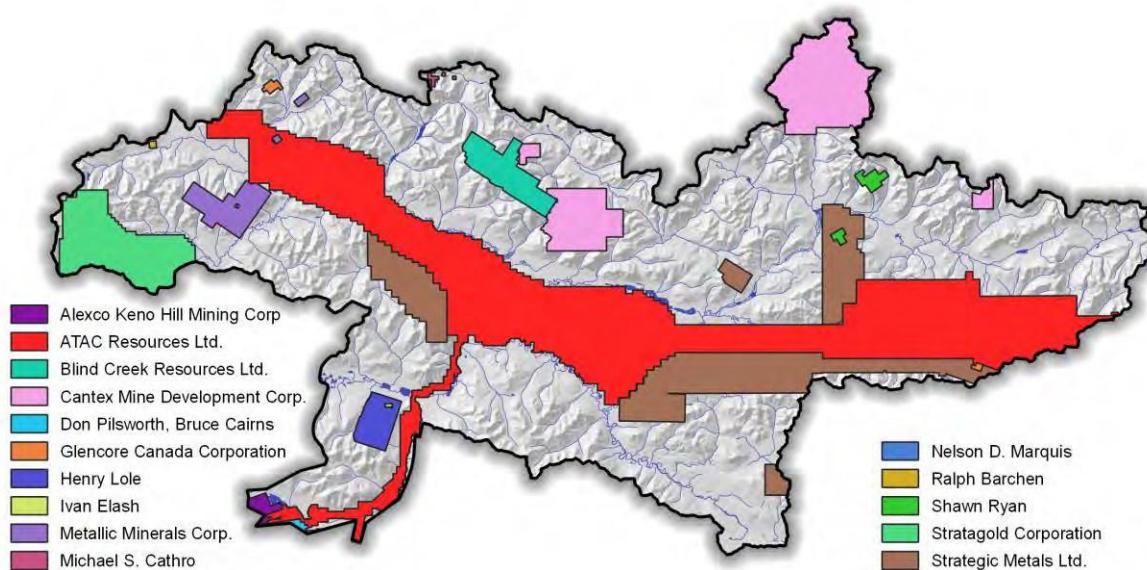


Historical exploration has been ongoing in the planning area since the early 1900s. For the majority of this period, work focused on identifying high-grade lead, zinc, and silver deposits. Gold and other metals were not evaluated in a systematic manner until ATAC's 2009 discovery of the Tiger Gold Deposit. Subsequent to this discovery, a staking rush occurred, with companies recognizing the immense geological potential

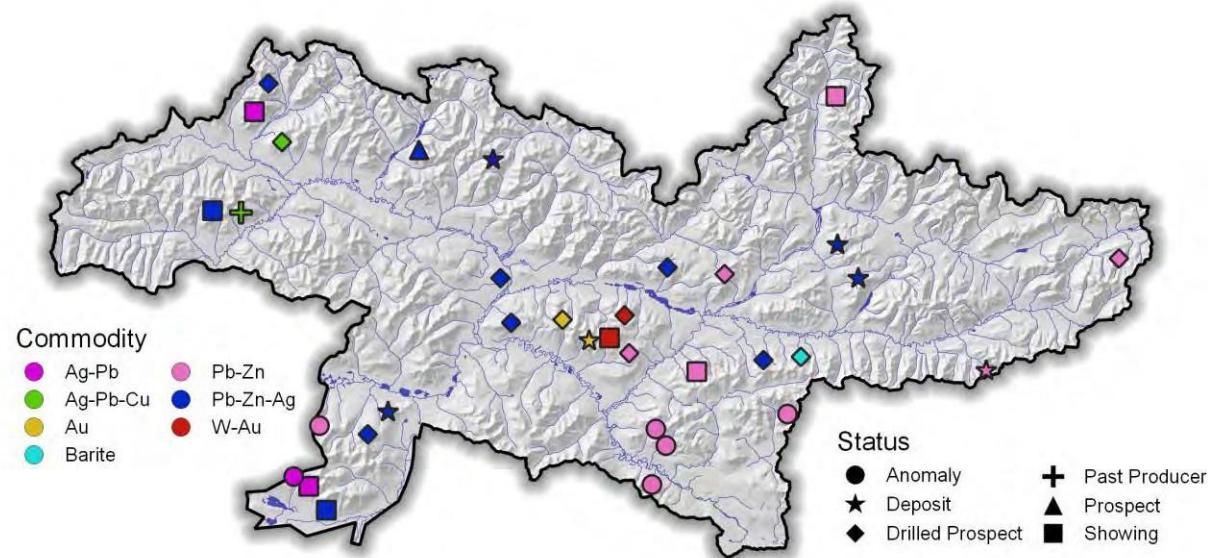
¹¹ According to data compiled by the Yukon Geological Survey.

¹² Data from Geomatics Yukon in a shapefile entitled "Quartz Land Use Permits 50K".

present in this region. The following figure shows current claim holdings in the planning area, coded by owner, which total more than 9,000 active quartz claims¹³.



The Yukon Government's MinFile system catalogues and characterizes known mineral occurrences throughout the Yukon. MinFile contains entries ranging from the early stage of target identification through to drilled prospects and former operators. It also encompasses a wide range of minerals, including both metals and non-metal commodities such as barite. There are 34 MinFile occurrences located within the planning area, shown on the following figure¹⁴.



¹³ Data from Geomatics Yukon in a shapefile entitled "Quartz Claims 50k".

¹⁴ Data from Geomatics Yukon in a shapefile entitled "Mineral Occurrences 250k".

The majority of the occurrences are lead±zinc±silver. Only four gold, two tungsten, and two copper targets have been documented to date. This metals distribution is more reflective, however, of the commodities of interest when the majority of exploration was conducted, rather than a lack of prospectivity for other minerals. Additionally, as this information was compiled by the Yukon Geological Survey based primarily on information filed by companies in assessment reports, it should not be taken as an exhaustive list of anomalies in the area. For example, of the 22 showings present on ATAC's Rau Project, only nine (9) are reflected in the MinFile occurrences.

Changing market prices, development of innovative exploration techniques, previous lack of resources, and the scale of the area all represent opportunities for new discoveries. Vanadium and cobalt have recently become sought after materials due to their demand for cutting-edge battery technology, while a resurgence in copper has been driven in part by the emerging electric car market. It is impossible to predict what minerals might have emergent economic value in the future, and may have been passed over in previous exploration due to their relatively low present value. Exploration techniques and methods — including new geophysical techniques and innovative geochemical analyses — are constantly being developed, tested and implemented. These modern methods provide ways of identifying buried deposits that are often difficult to detect using conventional techniques. Finally, the size of the planning area is large, and exploration resources are always limited. While work thus far in the area has identified a multitude of promising discoveries, the majority of the region has not seen systematic exploration.

THEME 2: IMPORTANCE AND IMPACTS OF ACCESS

IN BRIEF

- Ground access is important for exploration and critical for development.
- Prohibitions on new access materially impedes exploration and economic development.
- Shared, multi-user access provides economic and environmental benefits.

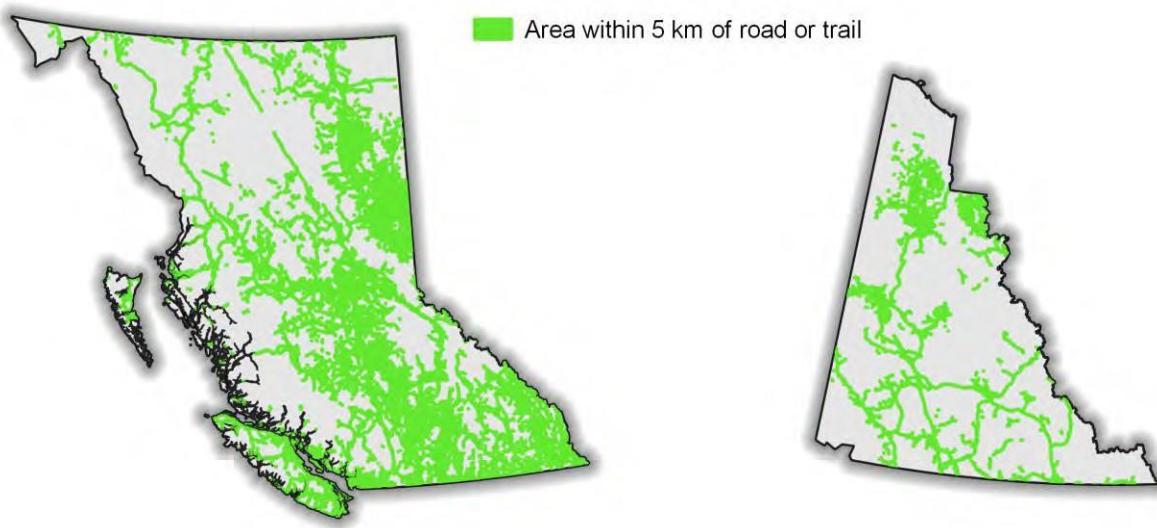
DISCUSSION

Access is a critical driver for exploration, both in terms of early-stage access for exploration activities, as well as certainty that access could be expanded as appropriate should a project proceed to development. Early stages of exploration generally rely on either existing ground access or air support. Once an initial target is confirmed, the access requirements begin to increase. In remote areas where there are no existing road networks, construction of an on-site airstrip is often one of the first steps. This provides a significant improvement over helicopter supported activities, while avoiding initial costs from construction of a road or trail network.

Once a project reaches the feasibility stage, it becomes progressively more prohibitive to conduct activities solely via air support. Larger drilling equipment is often needed, and bulk samples are typically extracted for advanced metallurgical testing. Both of these can be challenging, if not impossible, to transport by air. If a project proceeds to development, ground access will be necessary for mine construction and operation.

Any restriction on ground access would effectively prevent any development from occurring even if the land use designation allows for mining. In discussions with investors, certainty of access remains one of the primary concerns and acts to significantly limit funding available for exploration and development. Exploration companies operating in the area staked claims and spent significant amounts of money with the understanding that unreasonable restrictions would not be placed on future development.

Existing ground access is very limited for much of Yukon, particularly in comparison with other provinces. This is in part due to lack of regulations (Yukon does not currently have a regulatory regime in place for resource roads), but also due to the territory being in a nascent stage of exploration and development relative to its peers. Other jurisdictions, such as British Columbia, have seen extensive road and trail development for forestry purposes, which can be re-used by other industries. The following figures show the relative distribution of roads and trails in Yukon vs BC. For comparison purposes, 23% of Yukon's land-mass and 43% of B.C.'s land-mass are within 5 km of an existing road or trail¹⁵.



Multiple industries, including tourism and wilderness-driven activities, benefit from ground access in other jurisdictions. B.C. is undeniably more developed than Yukon, but it is still thought of largely as a wilderness destination despite the proliferation of ground access. New roads and trails can be constructed and operated in a responsible manner, with provisions for multi-user shared access, without compromising the wilderness and environmental values of Yukon.

Despite the overall lack of access in most regions of Yukon, the planning area is host to existing infrastructure, including winter trails and a number of public and private airstrips. These trails and airstrips have been built and used without unduly compromising the wilderness and environment within the planning area. Future access can be done in a similar manner, particularly given the assessment and regulatory regimes that are now in place for mineral projects. The following map outlines the known infrastructure within the planning area.

¹⁵ Calculated using "Canvec 50K" transportation network data from the Government of Canada Open Data website. BC data is almost certainly understated by this calculation. BC's Road Atlas dataset gives a calculation of 70% of BC within 5 km of a road or trail, but there is no comparable Yukon dataset.



Multiple companies, including ATAC, are currently conducting exploration work on numerous targets throughout the planning area. It is reasonable to expect that ATAC may eventually seek to extend the proposed road further east to its Osiris Project (located outside the planning area). It is equally likely that another operator in the area may look to construct ground access to their project sites. The most responsible and environmentally friendly way to handle this is through shared use of common infrastructure. This can be supported by the land use planning process identifying and supporting use of common transportation corridors throughout the area. It is important to recognize that access needs to exist, while ensuring that duplication of roads and unnecessary construction is minimized.

THEME 3: LAND WITHDRAWAL IN YUKON

IN BRIEF

- Over half of Yukon is currently withdrawn from staking of new mineral claims.
- Not all areas have equal mineral potential, and broad areas must be left open in the hopes of finding any economic deposits that may exist.

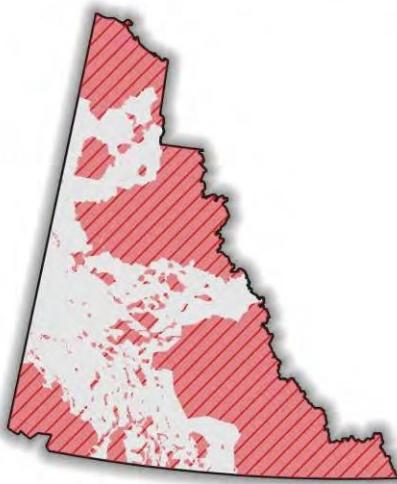
DISCUSSION

Land is being withdrawn from exploration in Yukon at an alarming rate. As of the writing of this submission, 58% of the land-mass of Yukon is permanently or temporarily withdrawn from staking¹⁶. The following figures show the current state of land withdrawal in Yukon, as well as a breakdown of permanent withdrawal by type¹⁷.

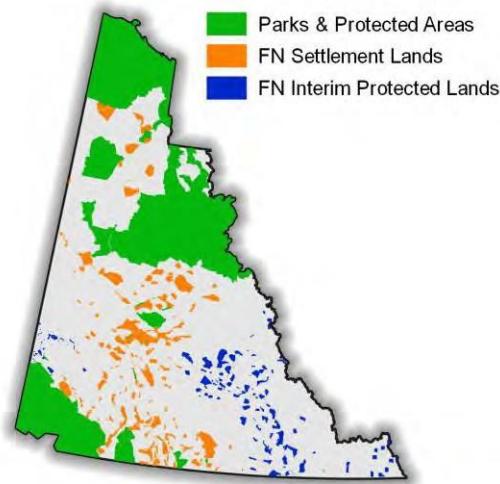
¹⁶ Calculated from the “Areas Withdrawn from Staking 50K”, “First Nation Settlement Lands Surveyed” and “OIC Lands Act” shapefiles available from Geomatics Yukon.

¹⁷ Permanent withdrawal figure assumes the recommended Peel Land Use Plan comes into force. Parks & Protected Areas includes Wildlife Areas and Special Management Areas. First Nation Interim Protected Lands are assumed to be made permanent in future.

Permanent & Temporary Withdrawals



Permanent Land Withdrawals by Type



It is important to protect areas of environmental and cultural significance, but any permanent withdrawal of large regions should be done with extreme caution due to unforeseen, long-term economic repercussions. Mineral potential varies dramatically across the territory, and not all areas can host strategic deposits. Of the deposits that are found, relatively few ever demonstrate the economic parameters necessary to warrant development. If mining is to remain a key industry in Yukon, as much land as possible must remain open for exploration, so that broad geological work can be undertaken in the hopes of finding the relatively few economic deposits likely to exist in the territory.

Furthermore, exploration techniques and commodities of interest are continually changing, leading to new deposits being found in locations that may previously have been thought to be barren. Even an area that has seen material exploration in the past without development of a mine should not be broadly withdrawn from future work. Projects that can provide important economic opportunities for Yukon will take multiple exploration cycles to identify, fund, and develop.

THEME 4: ENVIRONMENTAL IMPACTS OF EXPLORATION

In Brief

- Modern exploration can, and frequently is, conducted using low-impact methods.
- Reclamation and best practices can effectively minimize environmental impacts of exploration.
- Past negative legacies of mining (Faro, Mt. Nansen) are not indicative of modern projects.

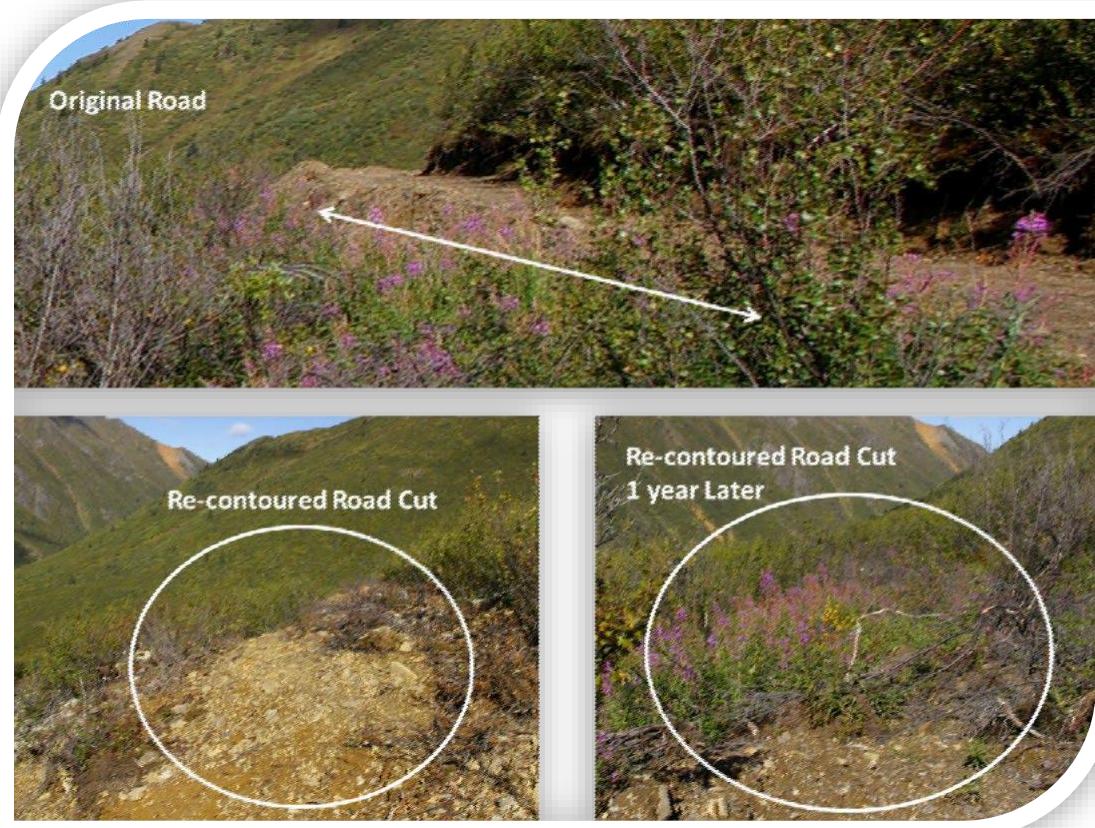
Discussion

Exploration is regularly characterized by opponents as an environmentally negative activity. The reality, however, is that modern exploration can be conducted in ways that leave a minimal environmental footprint, and reclamation best practices can restore areas relatively close to original condition. It is reasonable to believe that concerns around mining and exploration stem in part from historical failed projects such as Faro and Mt. Nansen, but these projects were constructed decades ago without the benefit of modern scientific methods and regulatory regimes.

Exploration has been ongoing in the planning area for over 100 years, yet it is frequently referenced as pristine wilderness. This serves as validation that exploration can be conducted without significant

disruption. Grassroots exploration begins with prospecting, mapping and soil sampling. These techniques leave virtually no disturbance, and allow for initial assessment of large areas. Airborne geophysical surveys are often conducted as well, with no impacts to wilderness. Once initial targets are identified, exploration often progresses to relatively more disruptive methods, such as drilling and trenching. The impacts of these activities are still minor if properly remediated. Drilling generally includes clearing and/or leveling of sites ($20\text{-}50\text{ m}^2$) to support drill platforms. Once drilling is completed, best practices are that the collar is cemented in place and the site is re-contoured and allowed to revegetate. Trenching can be more involved, including excavation of large amounts of material, but modern progressive reclamation practices can be mitigate any lasting impacts.

ATAC in 2003 received the Robert E. Leckie Award for *Outstanding Reclamation Practices in Quartz Exploration and Mining* from the Yukon Government. Its primary contractor, Archer, Cathro & Associates (1981) Limited, has received four Leckie Awards since 2000. ATAC is firmly committed to modern exploration techniques, progressive reclamation, adaptive wildlife management, and minimizing the impacts of exploration on the environment. This commitment has been put into practice at its Rackla Gold Project where progressive reclamation is conducted on an ongoing basis. The following photos demonstrate an example of reclamation activities.



THEME 5: EXISTING REGULATORY MECHANISMS

IN BRIEF

- Exploration and mining projects are subject to rigorous assessment in Yukon.
- YESAB, the Water Board, and regulatory agencies provide appropriate checks on proposals.
- Project-specific evaluations allow for effective public engagement and collaborative approaches.

DISCUSSION

Exploration and mining projects are currently subject to substantial review and regulatory requirements. These mechanisms provide means for detailed evaluation of project-specific impacts, benefits and mitigations. Existing processes serve as appropriate means of management, versus blanket restrictions on development in any given area. ATAC has been through the public YESAB review process nine (9) times since 2007 for projects within the planning area, including a positive decision on the 65-km Rau tote road.

The first stage of review for all projects is a submission to YESAB, an independent agency tasked with conducting public reviews of proposed projects to evaluate potential impacts and make recommendations as to whether the project should proceed. This formalized process provides an opportunity for regulators, members of the public, and the proponent to work together in a transparent manner to evaluate a project.

Depending on the scope of a project, YESAB assessments can take the form of either a Designated Office, Executive Committee, or Panel review. This provides flexibility and ensures that projects are evaluated at an appropriate level based on the scope of proposed activities, and more fundamentally ensures the environmental and socio-economic impacts of projects are adequately considered. Depending on the proposed activities, projects may also require review by the Yukon Water Board – an additional independent public registry process and regulatory decision regarding issuance of a *Water License*.

Once a proposal completes the YESAB review process, it proceeds to regulators to make a final decision regarding allowance and any terms and conditions that might be appropriate. Depending on the scope of proposed activities, financial security may be required from a proponent before project activities can begin. Ongoing monitoring is then conducted by regulators to ensure compliance with project requirements.

Altogether, this public review and regulation process provides an effective means to ensure proposed projects will not have negative impacts that cannot be mitigated.

THEME 6: WILDLIFE & HABITAT PROTECTION

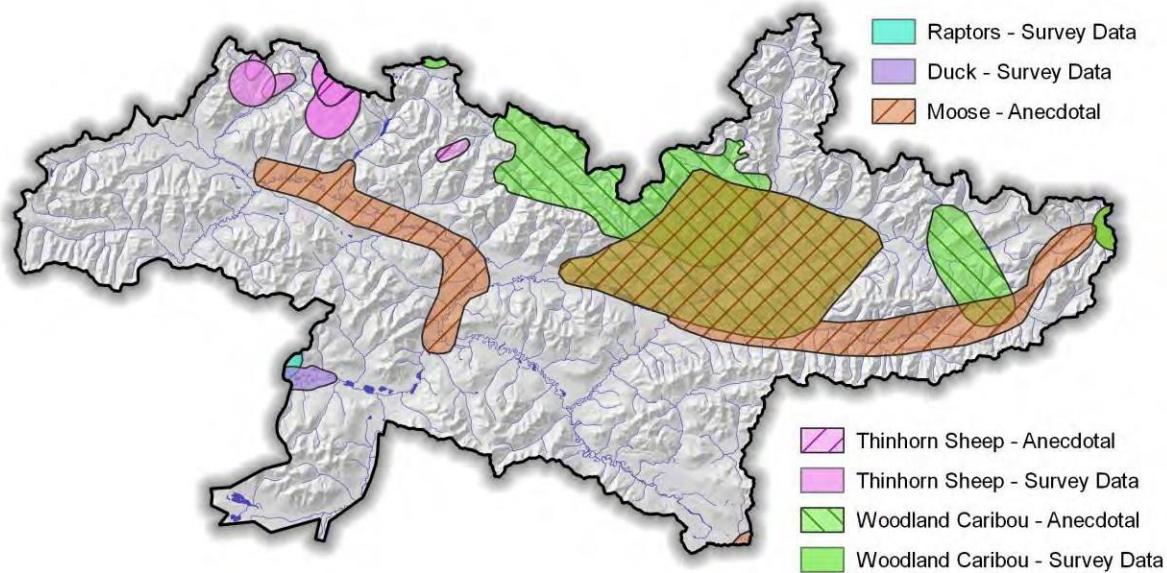
IN BRIEF

- Wildlife data is largely anecdotal outside of surveys conducted for the tote road proposal.
- Current information suggests the planning area is not host to significant critical wildlife habitat.
- Impacts of exploration on wildlife should not be conflated with concerns regarding hunting.

DISCUSSION

One of the primary priorities for conservation and designation of protected areas in a land use planning process is the preservation of key wildlife habitat. Based on the currently available information, it does not appear that the planning area is host to critical habitat. According to public data released by Yukon

Conservation Data Centre¹⁸ there are no species of concern areas within the planning area. The following map shows all Wildlife Key Areas (WKAs)¹⁹ that overlap with the planning area.



This map shows that there are a number of WKAs, which overlap wholly or partially with the planning area, primarily for moose, thinhorn sheep, and woodland caribou. Of the WKAs, only several thinhorn sheep polygons and the edges of one raptor and two woodland caribou polygons are categorized as based off of survey data. The remaining WKAs are classified as “anecdotal”. ATAC recognizes the value of anecdotal information, but important regional decisions should also rely on systematic wildlife surveys. ATAC has conducted numerous wildlife surveys in this area that have tracked the widespread moose population. No woodland caribou have been observed. All of ATAC’s data has been submitted to Yukon Environment, NND, and made publicly available on the YESAB Registry.

ATAC supports protections for all wildlife and wildlife habitat. Development can be conducted in ways that minimize impacts, but this must be (and is) addressed in a project-specific manner through regulatory mechanisms and adaptive management techniques. Over the course of consultation on the proposed Rau tote road, a common theme involved concerns about potential impacts to moose. More specifically, concerns that creation of new access would lead to increased hunting pressure on moose – not concerns that the construction or authorized use of the road itself would have any significant negative impacts. ATAC respectfully suggests that the issue at question is not one of exploration and development’s impacts on wildlife, but one of the impacts of hunting. These issues are commonly addressed in other jurisdictions through government regulation on hunting such as lotteries or restrictions.

¹⁸ Based on the “CDC Species of Conservation Concern” shapefile available from Yukon Geomatics. Last updated October 2015.

¹⁹ Wildlife Key Areas defined by Yukon Environment, and taken from the “Wildlife Key Areas 250K” shapefile available from Yukon Geomatics. Last updated April 2015.

THEME 7: ECONOMIC BENEFITS OF MINERAL EXPLORATION

In Brief

- Mineral exploration provides important benefits to Yukon's economy.
- Mines provide large royalty streams in addition to employment opportunities.
- Three major projects are proposed or under construction and offer significant benefits to Yukon.

DISCUSSION

Exploration and mining provide significant benefits to Yukon's economy, both through direct employment and expenditures with service providers, and indirectly through the downstream effects those expenditures have for other Yukon businesses. According to data from the Yukon Bureau of Statistics, between 2008 and 2017, Yukon's mineral exploration and development industry has directly contributed \$1.4 billion to the territory's economy, with support activities contributing a further \$650 million²⁰. This data further notes that mining, quarrying and oil and gas extraction was directly responsible for 9.6% of the territory's GDP in 2017. This makes natural resources the fourth highest economic contributor after Public Administration, Real Estate and Rental and Leasing, and Construction.

Since 2007, Capstone's Minto Mine and Alexco Resources' Bellekeno Mine paid a total of \$34 million in direct royalties to Yukon²¹. Three major mining projects are currently proposed (Newmont Goldcorp's Coffee Project; BMC Minerals' Kudz Ze Kayah Project), or under construction (Victoria

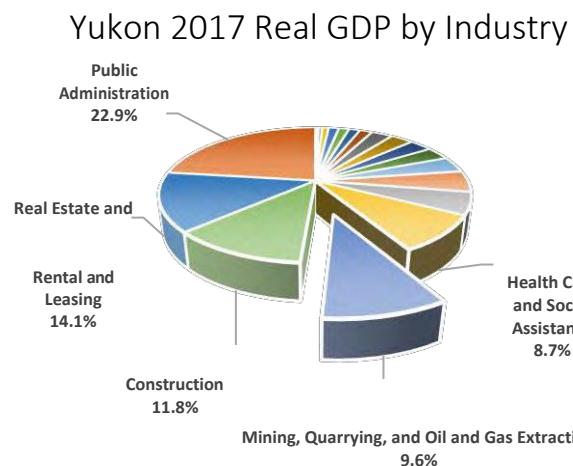
Gold's Eagle Project). These projects will provide significant royalties to Yukon should they go ahead, in addition to the employment opportunities and construction costs incurred within the territory.

It's clear that mineral exploration and development provide important benefits to Yukon's economy.

CLOSING

ATAC appreciates the opportunity to provide input as part of this Land Use Planning process and looks forward to ongoing engagement with the committee on topics identified in this submission, or any others that may arise as the process unfolds. While ATAC trusts that the public reports and data referenced in this submission are already available to the committee, it would be pleased to directly provide copies at request.

ATAC looks forward to further discussions about the Beaver River area and the important values that it contains for all users. Questions or comments regarding this submission can be directed to ATAC at brlup@atacresources.com.



²⁰ Sourced from the 2017 Real GDP by Industry data, published by the Yukon Bureau of Statistics:

http://www.eco.gov.yk.ca/stats/pdf/gdp_2017.pdf

²¹ From data published by Yukon Energy, Mines & Resources at

http://www.emr.gov.yk.ca/mining/royalty_narrative.html

APPENDIX A – FREQUENTLY RAISED CONCERNS

1. ACCESS RESTRICTIONS ON THE ROAD WON'T BE EFFECTIVE

ATAC is committed to ensuring all efforts are made to restrict unauthorized access. The draft Access Management Plan²² outlines multiple strategies for access control, including, but not limited to:

- Gates will be placed at multiple locations along the route to deter access, with locations chosen to be difficult to circumvent (i.e. on steep hills or midway along bridges).
- Regular patrols of the route to deter unauthorized traffic and hunting, as well as to inspect and repair any damaged gates.
- Automated cameras and traffic counters to log and review any unauthorized use.

2. CONSULTATION IS LACKING

ATAC conducted, and logged, comprehensive engagement and consultation in advance of submitting the proposed road to YESAB. The YESAB process subsequently provided additional opportunities for public engagement. In addition to ongoing discussion with local communities since 2009, ATAC's outreach activities specific to the proposed road include:

- Community Meetings
 - Mayo – March 22, 2016 & April 20, 2016
 - Keno – March 23, 2016
- NND Meetings
 - Mayo – April 21, 2016 & June 1, 2016 & June 24, 2016
 - Whitehorse – April 22, 2016
- Direct mailer with info sheet to all residential addresses in Mayo, Keno and Elsa (Feb 2017).
- Multiple meetings with the Mayo District Renewable Resources Council, Yukon Conservation Society, local outfitters (for details see ATAC's *Consultation Log*²³ submitted to YESAB).

3. MOOSE AND OTHER WILDLIFE WILL BE OVERHUNTED AS A RESULT OF THE ROAD

ATAC has a strict no hunting policy for all employees and contractors. Any hunting that would occur in the areas as a result of the new road would be unauthorized and subject to enforcement by Yukon Government and Conservation Officers. Regulatory mechanisms, such as restrictions on hunting or tag lotteries, provide a better means of protecting wildlife than restricting road construction.

4. BASELINE INFORMATION FOR THE PROPOSED ROAD IS INSUFFICIENT

In preparation for submission to YESAB, ATAC conducted comprehensive baseline environmental and engineering studies. These include fisheries assessments, wildlife surveys, stream hydrology, and geotechnical assessments. All studies were made public as part of the YESAB assessment, and the available information was deemed adequate. DFO was requested to conduct a review of the project and determined that “[s]erious harm to fish can be avoided or mitigated”, and that a *Fisheries Act* authorization was not required.

²²The draft Access Management Plan can be found on the YESAB registry as document 2016-0129-027.

²³The Consultation Log can be found on the YESAB registry as documents 2016-0129-025 and 2016-0129-026.

5. ALTERNATIVES TO THE ROAD SHOULD BE CONSIDERED (I.E. AIRSHIPS, WINTER ROAD, ETC.)

ATAC conducted a detailed assessment of alternatives, including examination of both winter roads and heavy-lift airships. Field data collected during winter seasons determined that the Beaver River crossing does not reliably freeze so as to permit safe crossing of the river. The existing Wind River Trail has experienced issues with freeze-thaw, ice build-up, breakthrough and rutting when used by previous operators, and passes through sensitive wetland habitats. Alternative routes were extensively examined, and the proposed road was determined to have the least environmental and socio-economic impacts.

ATAC investigated the feasibility of airships instead of ground access and found the necessary airship technology to transport loads of the scale required for advanced exploration do not currently exist, let alone that which would be required for mine construction and supply. Furthermore, ATAC contacted several experts and companies involved in development and determined that airships would not be applicable for this project under any circumstance.

6. THE ROAD LEADS TO THE PEEL WATERSHED (“THE PEEL”) OR WILL NEGATIVELY IMPACT THE PEEL

The proposed route terminates over 28 km from the closest edge of the Peel Watershed boundary, and does not change access that currently exists to the Peel as a result of the Wind River Trail. The planning area is located in a separated watershed from the Peel, and any downstream effects that may arise from the project will not impact the Peel.

APPENDIX B – MAPS

The following pages include tabloid (11" x 17") format copies of the maps present in the text of this report:

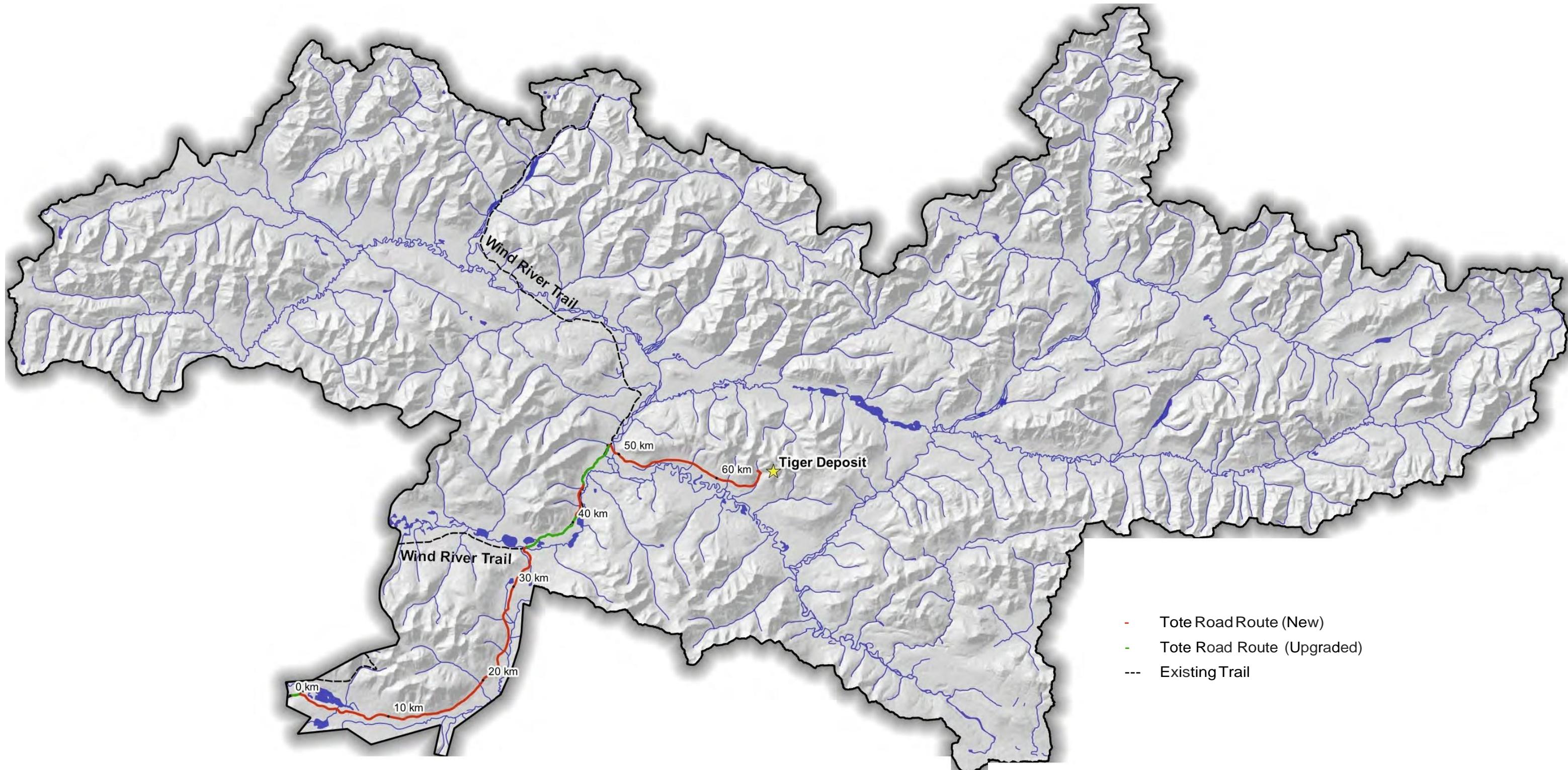
- 1. Tote Road Route**
- 2. Mining Land Use Permits**
- 3. Quartz Claims**
- 4. MinFile Occurrences**
- 5. BC-Yukon 5km Road Buffer Comparison**
- 6. Existing Infrastructure**
- 7. Land Withdrawal Status**
- 8. Wildlife Key Areas**

ATAC grants the Planning Committee permission to use, share and reproduce these maps without alteration.

Beaver River Land Use Plan

Rau Tote Road Route

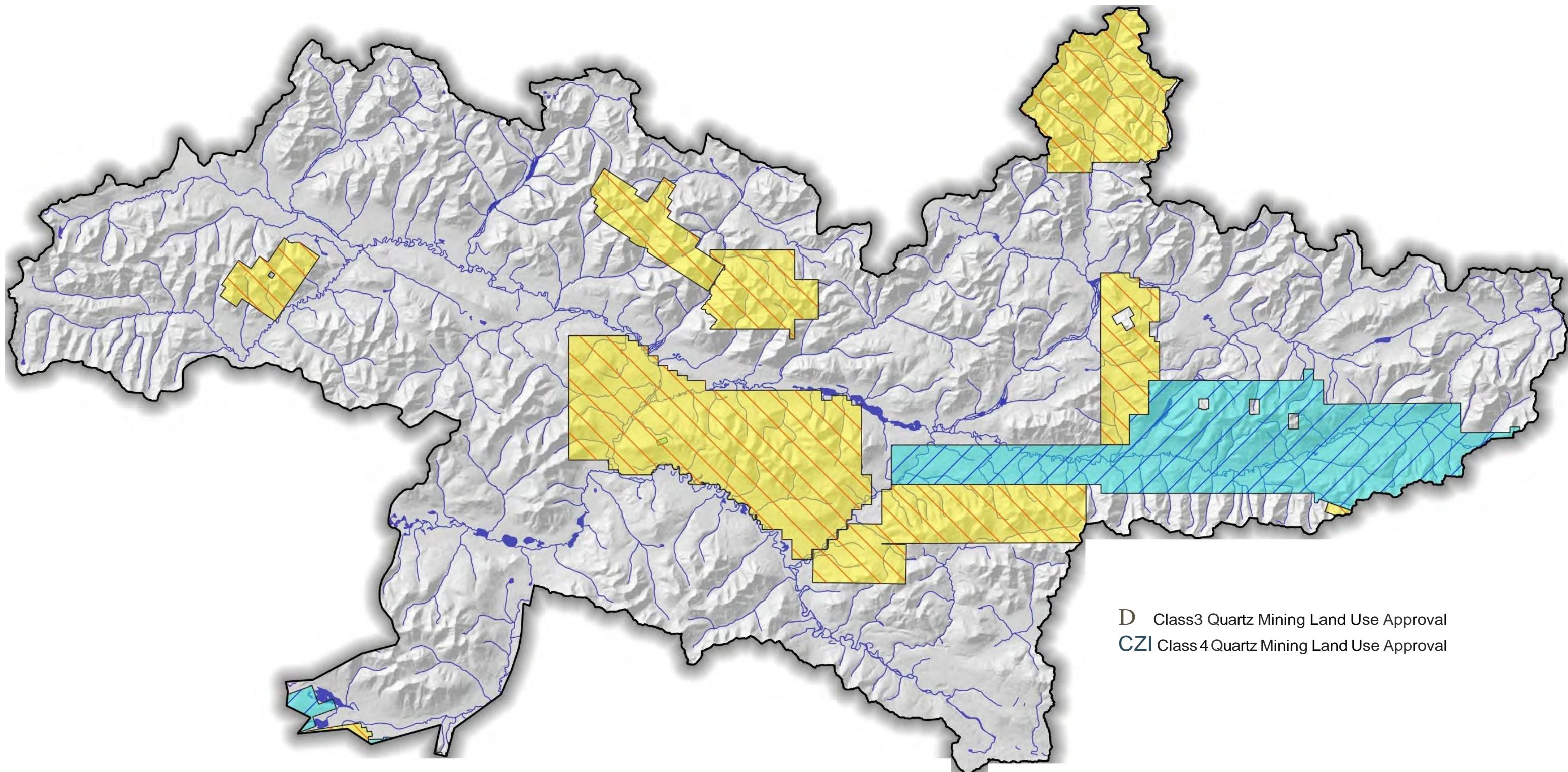
April 2019



Beaver River Land Use Plan

Active Class 3/4 Quartz Mining Land Use Approvals

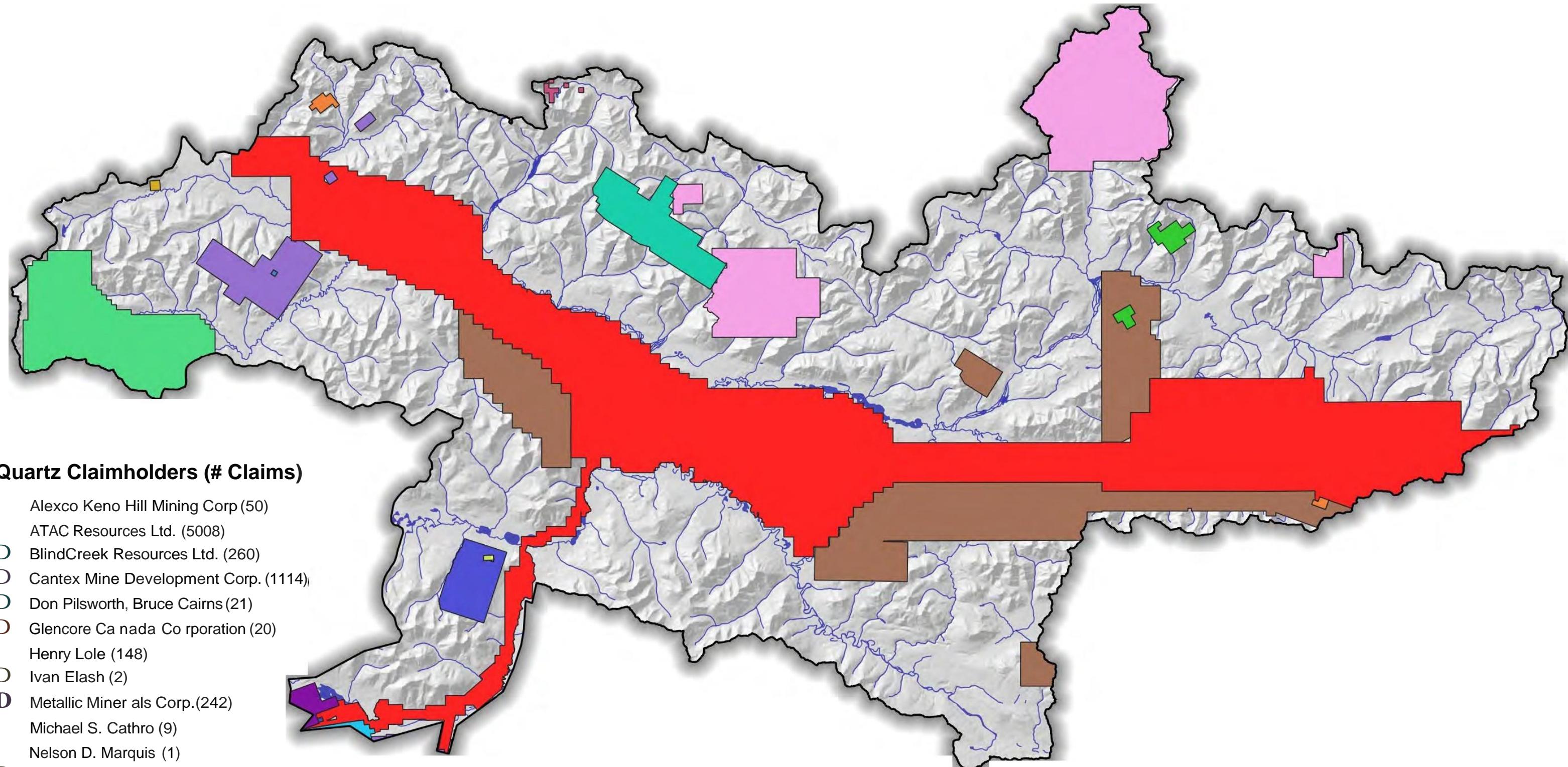
April 2019



Beaver River Land Use Plan

Active Quartz Claims

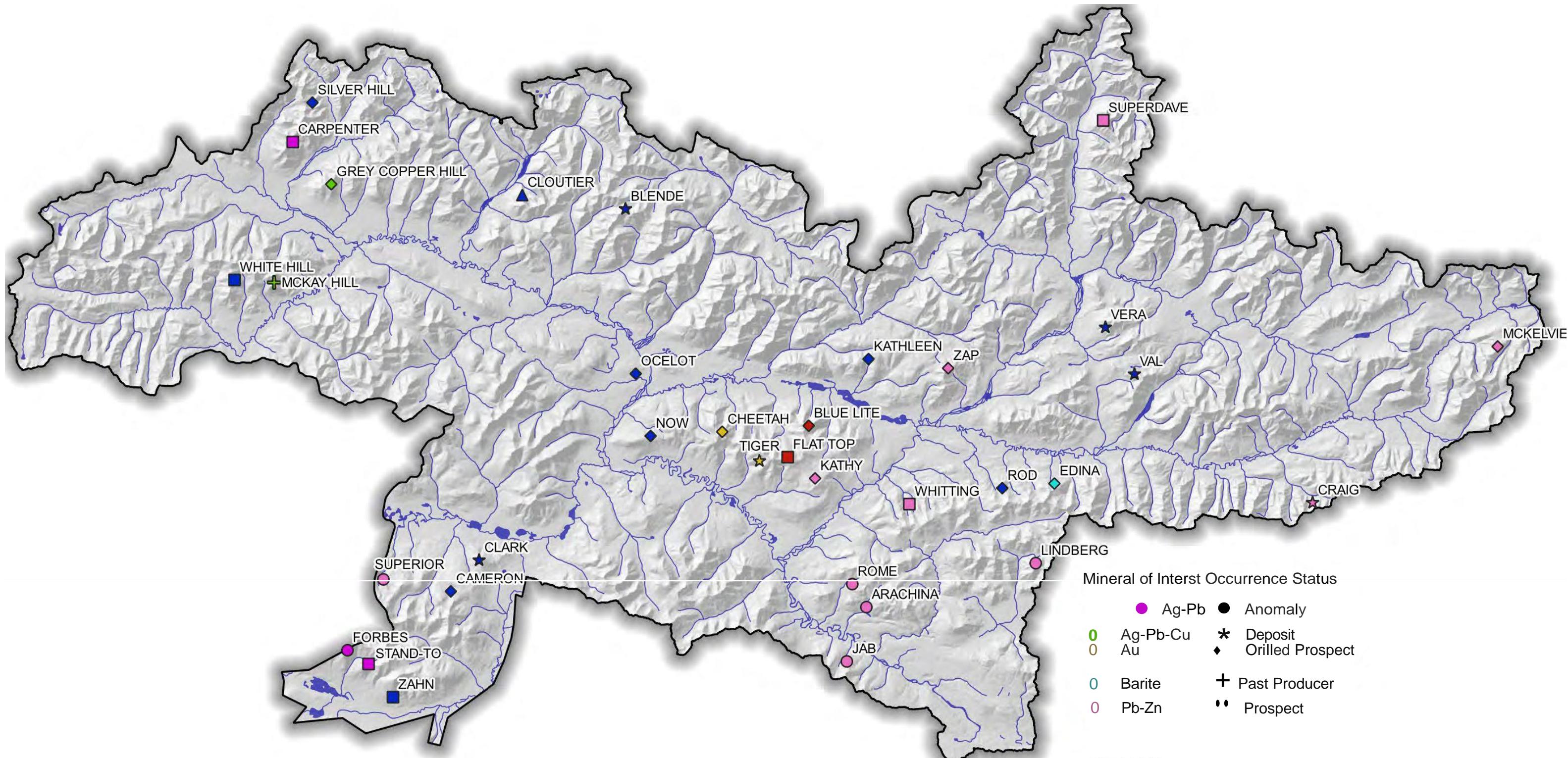
April 2019



Beaver River Land Use Plan

MinFile Occurrences

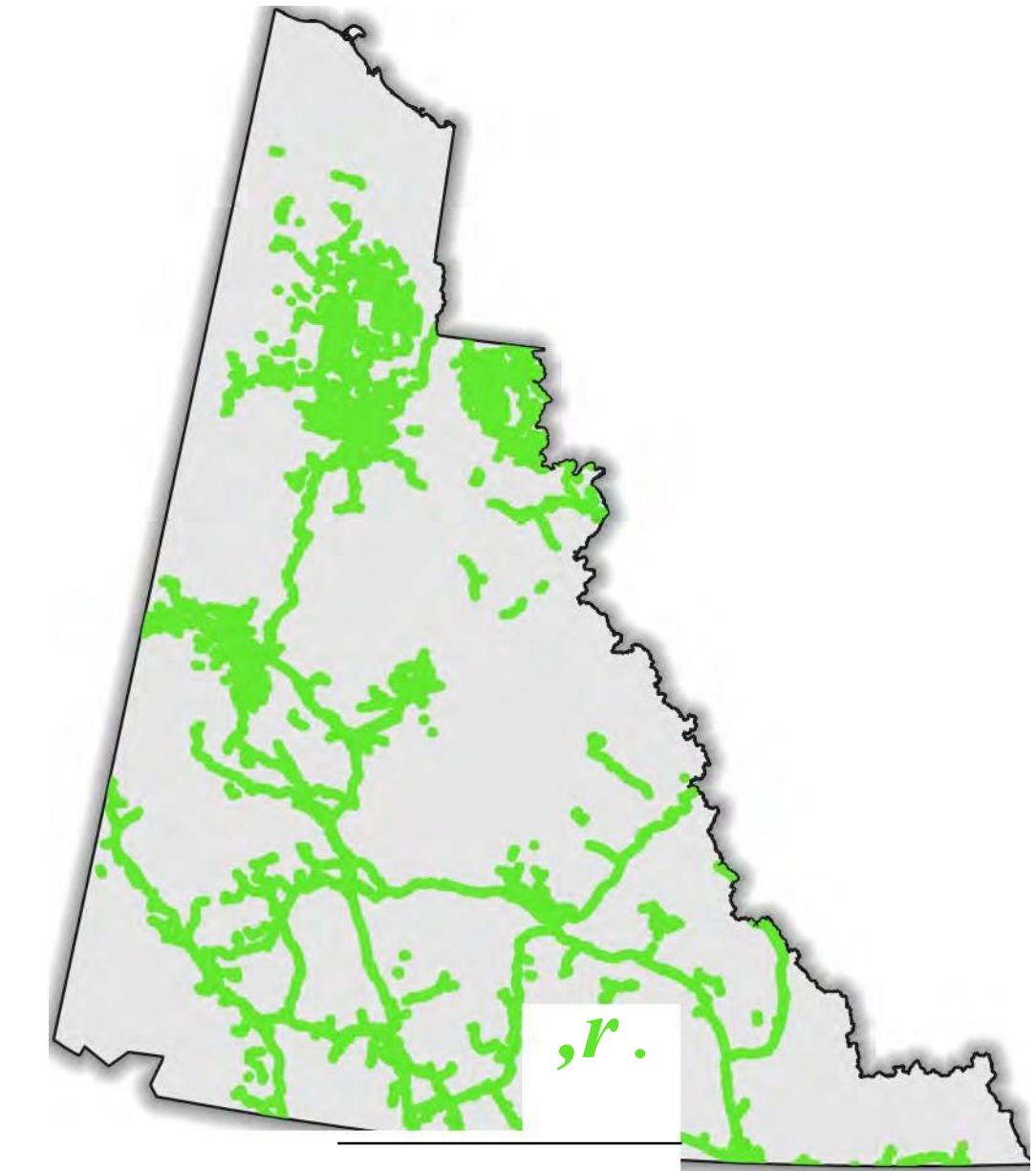
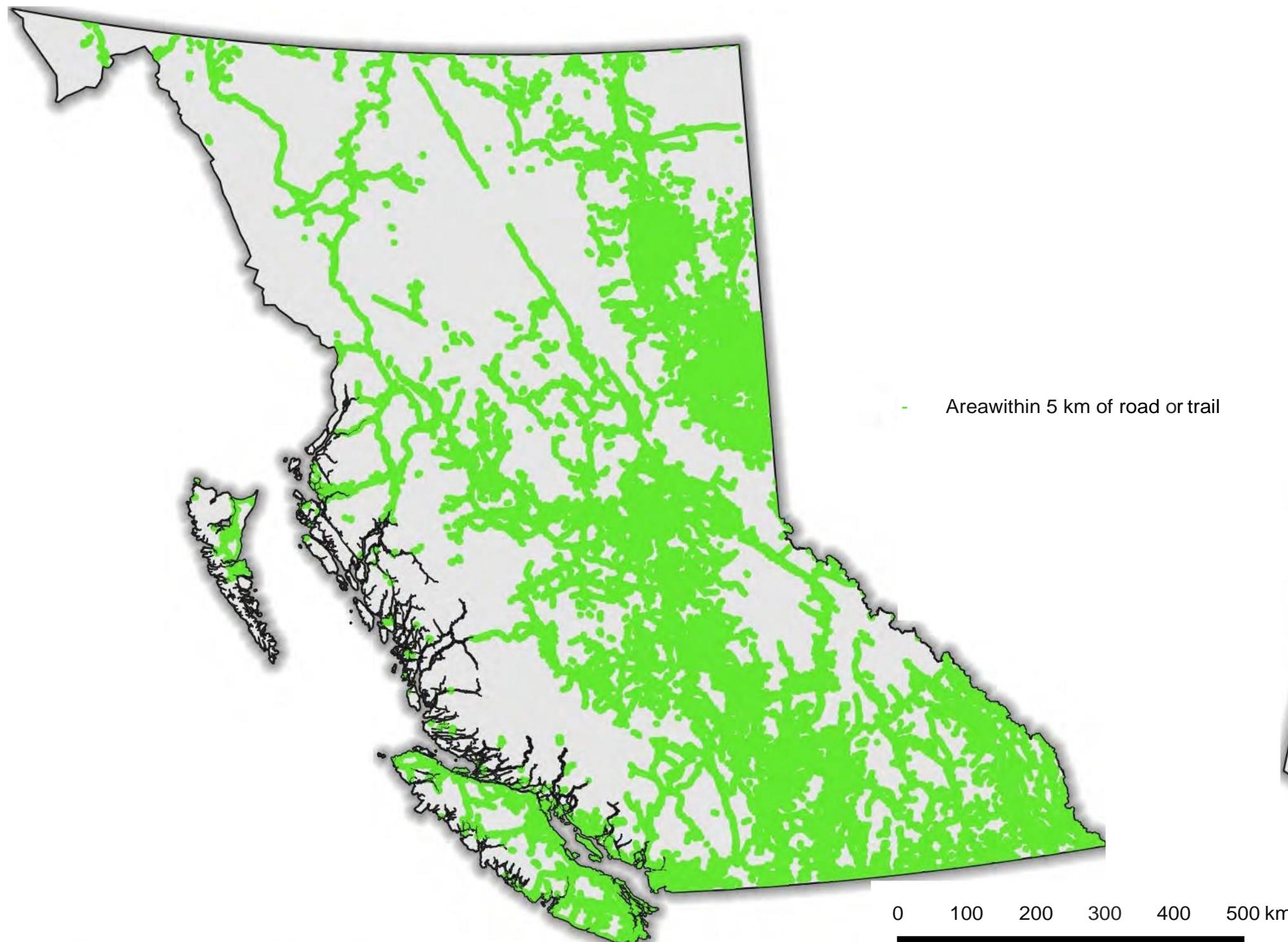
April 2019



Beaver River Land Use Plan

Land Within 5 km of Roads or Trails (BC & Yukon)

April 2019

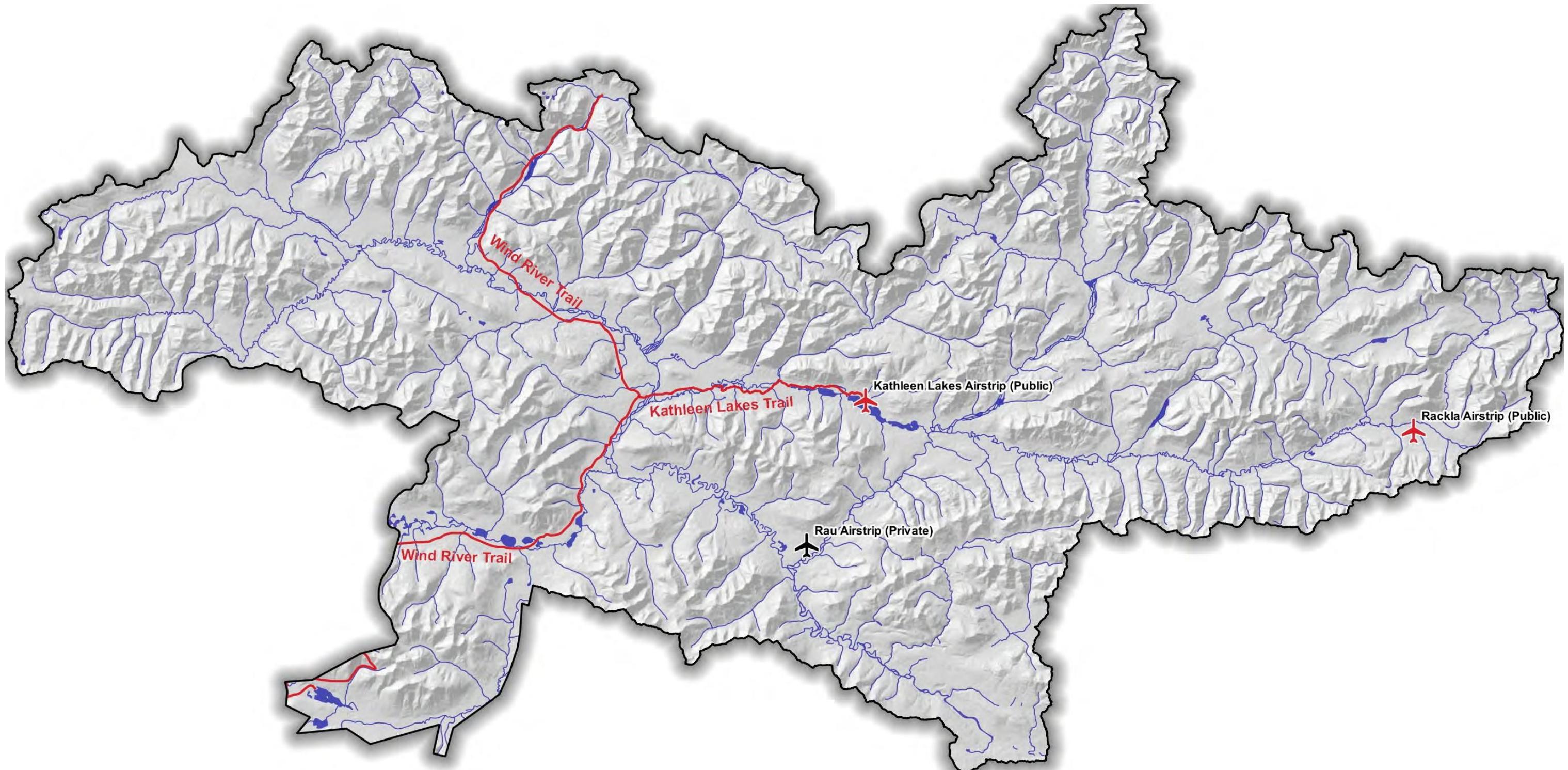


- Using Canvec 50k transportation layers for both Yukon and BC, as made available by the Government of Canada BC's Road Atlas data shows significantly more roads and trails in BC. As no comparable data set exists for Yukon, it is not used here.

Beaver River Land Use Plan

Existing Infrastructure

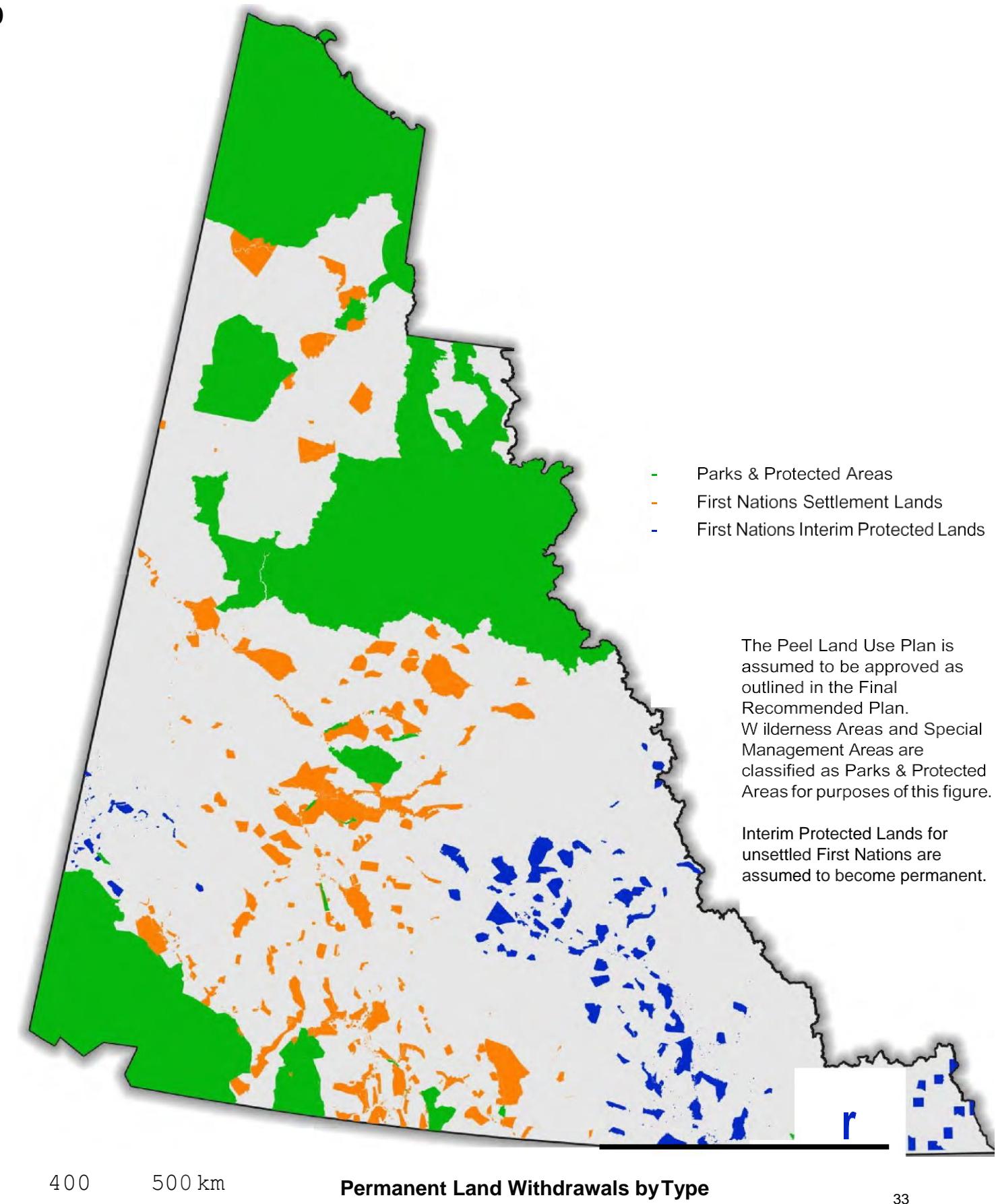
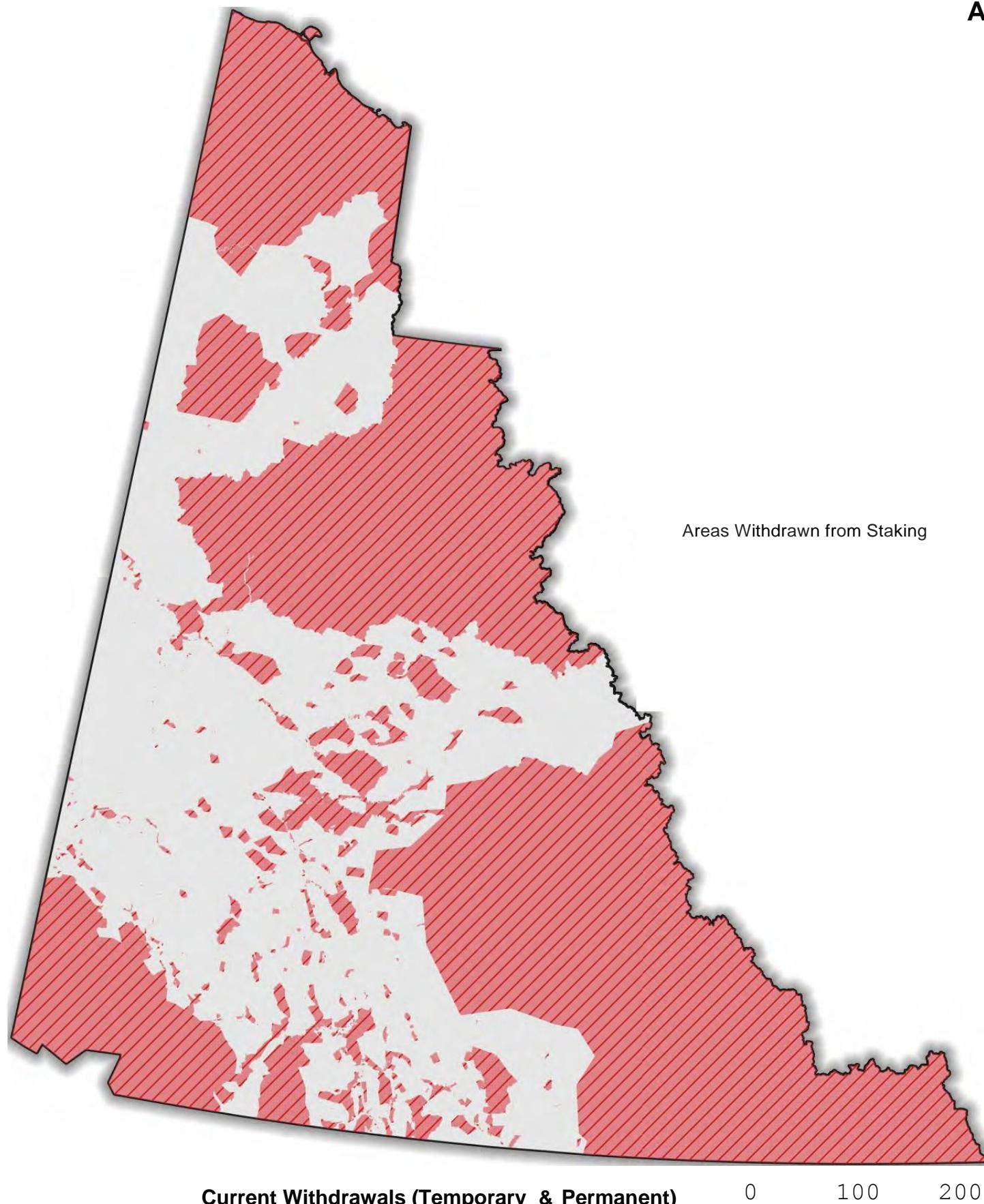
April 2019



Beaver River Land Use Plan

Land Withdrawn from Staking

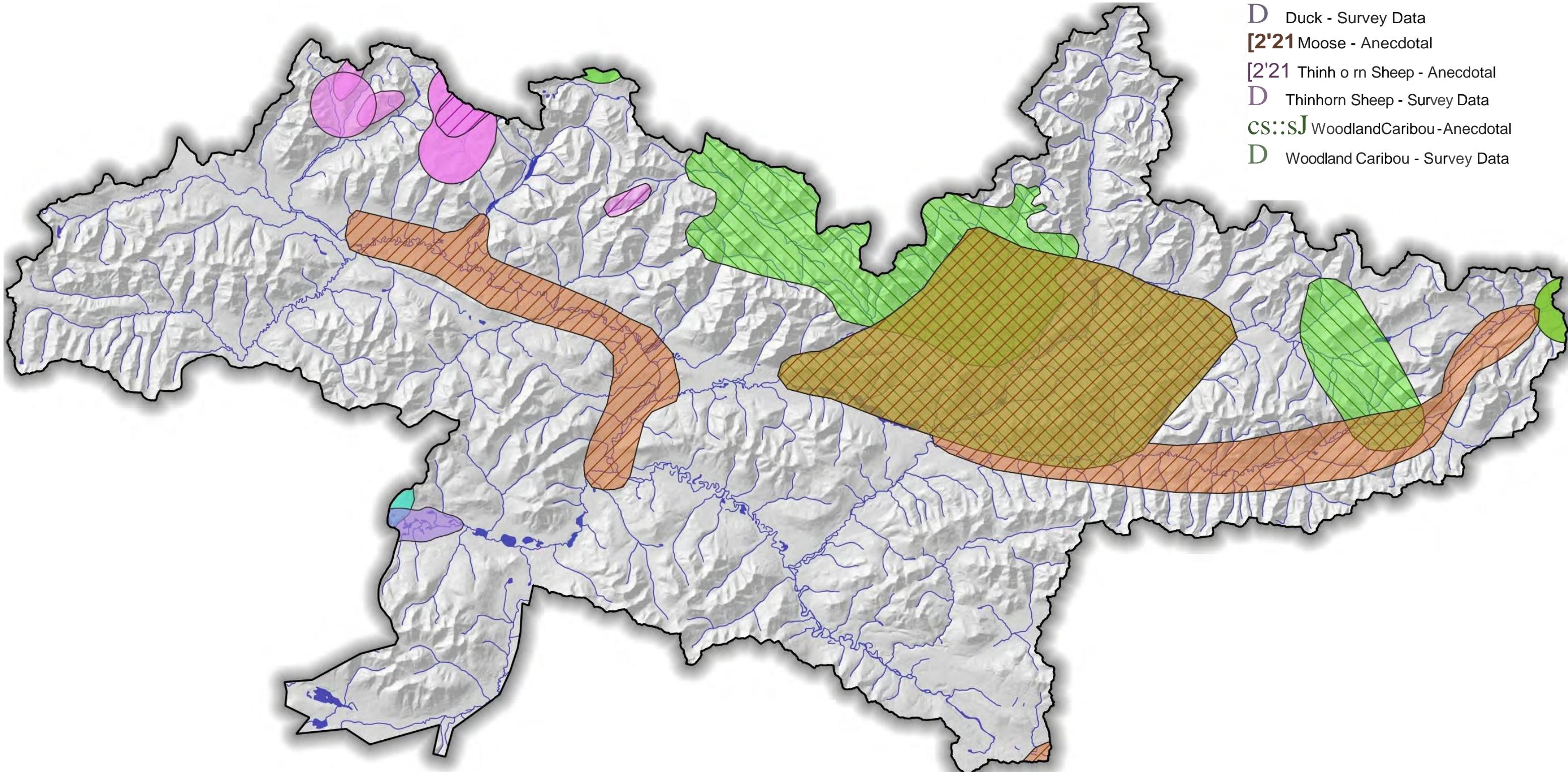
April 2019



Beaver River Land Use Plan

Wildlife Key Areas

April 2019



- D Raptors - Survey Data
- D Duck - Survey Data
- [2'21] Moose - Anecdotal
- [2'21] Thinhorn Sheep - Anecdotal
- D Thinhorn Sheep - Survey Data
- CS::SJ Woodland Caribou - Anecdotal
- D Woodland Caribou - Survey Data

To: George.Stetkiewicz

Subject: Re: Beaver River Land Use Plan - info gathering stage.

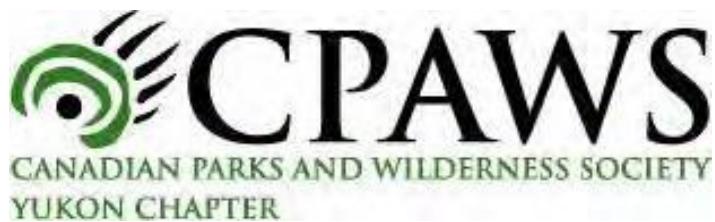
Hi George,

Thanks for taking the time to meet with us on April 3, 2019. As a follow up to the discussion at that meeting and in response to your email of May 7, 2019, I would like to reiterate the concerns we brought forward to the Beaver River Land Use Planning Committee in our email from Oct. 19, 2018 (copied below for reference), and restate the points we made at the meeting, namely the stated objectives of the Beaver River Land Use Plan are unattainable without the following (prior to road construction):

- 1) Road Access Management Plan. Clear regulatory mechanisms are required to restrict any and all unauthorized users from traveling on the proposed road. These regulatory mechanisms must be in place prior to any access development and remain effective during all stages of mineral development including, insolvency, sale, and transfer of mineral claims by the proponent, ATAC Resources.
- 2) Wildlife Harvest Management. The Wildlife Management Plan must effectively implement regulatory mechanisms to address and mitigate risks of overharvest of regional fish and wildlife populations by all users prior to any access being developed. In the Yukon, where declines in fisheries and moose populations have been observed (often associated with road access), management actions to recover these populations have not been effective.

In summary the Beaver River Land Use Plan must ensure innovative and effective regulatory mechanisms are in place (and enforceable) prior to any new access being contemplated.

Sincerely,
Chris and Sharron McKinnon
Bonnet Plume Outfitters Ltd



2.5

May 23, 2019

Beaver River Land Use Planning Committee
Government of Yukon
First Nation of Na-Cho Nyäk Dun

Attn: George Stetkiewicz
Lesley Cabott

Re: Beaver River Land Use Plan

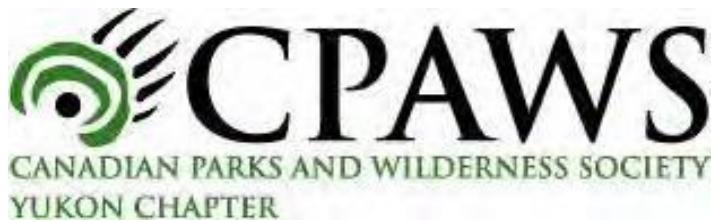
The Canadian Parks and Wilderness Society, Yukon Chapter (CPAWS Yukon) is pleased that the Government of Yukon and First Nation of Na-Cho Nyäk Dun have agreed to prepare a land use plan for the Beaver River watershed before construction of the ATAC tote road can be authorized.

The Beaver River planning process will set an important precedent for subregional planning in the territory and we are excited about the potential of this planning process. If done well, the plan could achieve a number of important objectives, including protecting areas that are ecologically and culturally important, and addressing the cumulative impacts of current and future development.

We are concerned, however, that the current Beaver River planning process is not appropriately designed or adequately resourced to achieve these objectives. To gain clarity, we have attached a list of questions and concerns about the current process and the associated Road Access Management Plan, compiled in collaboration with the Yukon Conservation Society. Please accept the following as our submission to the information gathering stage of the plan.

Sincerely,

Randi Newton
Conservation Coordinator, CPAWS Yukon



Beaver River Subregional Land Use Plan: Questions and Concerns

1. Why is the planning process being conducted outside of the Umbrella Final Agreement (UFA) when the UFA provides for subregional planning? Under what legislative authority is this subregional plan being prepared?
2. Why does the January 21st, 2018 agreement signed by the Government of Yukon and the First Nation of Na-Cho Nyäk Dun state that “the provisions of this Plan will prevail over any other local area district or regional land use plan to the extent of any inconsistency”? This clause does not appear to align with Chapter 11 of the UFA, which states that subregional plans are intended to conform to regional plans.
3. Why does the January 21st, 2018 agreement state that, where inconsistencies exist, the provisions of the Road Access Management Plan (RAMP) will prevail over the subregional plan?
4. How will public consultation inform the development of the RAMP and future amendments to it?
5. Under what legislative authority will the RAMP be enforced? Until resource road regulations are in place, it is our understanding that there will be no legislative authority to regulate compliance with the RAMP.
6. It appears that there are large information gaps on wildlife such as moose, grizzlies, Chinook salmon and their habitat. What is the current extent of environmental information for the watershed, and what is the timeline for assessing, gathering, and incorporating the information that is still lacking?
7. There is currently little information on the Beaver River land use planning page (<http://www.emr.gov.yk.ca/r lup/beaver-river-land-use-plan.html>) about the region or next planning steps. This lack of information and clarity makes it difficult for our organizations and members of the public to understand and engage in the subregional land use planning process. Will the Planning Committee be providing more information, such as a Resource Assessment Report? And is there a plan to clarify the process for members of the public, industry, and environmental organizations to participate in the subregional planning process?

Date: May 15, 2019

Introduction

As part of the information gathering stage of the Beaver River Planning exercise undertaken by First Nation of Na-Cho Nyäk Dun and Government of Yukon, Ducks Unlimited Canada (DUC) provided an assessment of conservation value throughout the Beaver River Planning Area in the Yukon with respect to waterfowl. As such, we completed an analysis including waterfowl abundance, wetland area, and water area throughout the region. This analysis can be used as a standalone product but its strength lies in being a starting point for larger land use planning (LUP) discussions and can be used in various ways to understand the waterfowl, wetland, and water values within the region.

Data / Methodology

(1) 1km² Hexagon Planning Units

- Generated by DUC as a base for the analysis.
- Hexagons are consistent with many land use planning applications as they can be easily linked together to create conservation areas.

(2) Elevation

- 30m Yukon Digital Elevation Model (DEM) acquired from Yukon Government, Department of the Environment GIS (ENVY GIS).
- Created a binary layer showcasing areas that are above and below 5,000 feet.
- Calculated the percent (%) area above 5,000ft in each planning unit.
- Removed all planning units with more than 50% of their area above 5,000ft from the analysis.

(3) Waterfowl Abundance

- Nicole Barker's Waterfowl Abundance Data, 2013, for cavity, ground, and overwater nesting guilds (data available from DUC by request, data sharing agreement required).
- Cavity, Ground, and Overwater Nesting Guild abundance was area weighted for each planning unit.
- Planning units were ranked based on quartiles and assigned a score from 1 (low: 0-25% of total guild abundance) to 4 (high: 75-100% of total guild abundance) depending on which quartile they fall within.
- Total waterfowl abundance ranking was assigned based on the highest score from each of the individual guilds (e.g. a planning unit with a cavity nester score of 1 and a ground nester score of 3, will have a final value of 3).

(4) Wetland Area

- DUC's Hybrid Wetland Layer (HWL) was sourced for wetland data. It is a compilation of national sources of data: Land Cover, circa 2000 and CanVec (note: the Canadian Centre of Remote Sensing produced the Northern Territories land cover).
- HWL data is available upon request, data sharing agreement will be required.
- Wetland area was calculated for each planning unit.

- Planning units were ranked based on quartiles and assigned a score from 1 (low: 0-25% of total wetland area) to 4 (high: 75-100% of total wetland area) depending on which quartile they fall within.
- A zero value was maintained for all planning units with no wetlands.

(5) Water Area

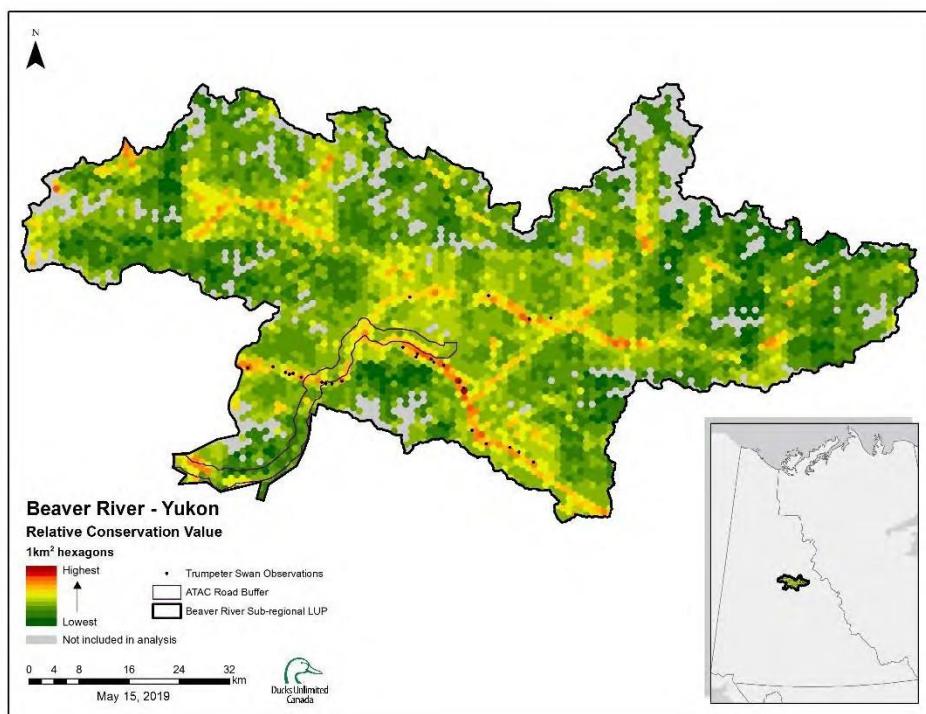
- DUC's Hybrid Wetland Layer (see description in #4 – Wetland Area), was also sourced for open water data.
- HWL data is available upon request, data sharing agreement will be required.
- Water area was calculated for each planning unit.
- Planning units were ranked based on quartiles and assigned a score from 1 (low: 0-25% of total water area) to 4 (high: 75-100% of total water area) depending on which quartile they fall within.
- A zero value was maintained for all planning units with no water.

(6) Final Scoring

- To generate a final conservation value, the scores from the total waterfowl abundance, the wetland density, and the water density were added together resulting in a final score between 1 (low) and 12 (high).
- The map shown below, showcases the range of values assigned by planning unit throughout the region.

(7) Supplemental Data

- Some supplemental data was used to see how the analysis performed.
- Trumpeter Swan observations were provided by Canadian Wildlife Service (CWS) and need a data sharing agreement for access. These points show observations from 1995 through 2015 and range in total number of observations of 1 to 12. As a result of their low values and limited variance, we decided to use these as supplemental data.



Using the Model

DUC has provided the scores for waterfowl, wetlands, and water as well as the final score. It will be important to work with our Yukon Conservation Programs Specialist, Jamie Kenyon, 867-668-3824, regarding potential cut off points in assessing conservation values. Additionally, any technical questions regarding the data and methodology can be directed toward our GIS Specialist, Lindsay McBlane, 604-592-5002.



MAYO DISTRICT RENEWABLE RESOURCES COUNCIL
BOX 249, MAYO, YT
YOB IMO 2.7
867-996-2942
info@mayorrc.ca

May 10, 2019

TO: Chief Mervyn and Council, First Nation Nacho Nyak Dun
Honourable Pauline Frost, Minister Environment, Government of Yukon
Honourable Ranj Pillai, Minister of Energy, Mines and Resources, Government of Yukon

RE: Beaver River Watershed Land Use Plan

The Mayo District Renewable Resources Council (MDRRC) would like to express our concerns of the Beaver River Watershed Sub-Regional Land Use Plan (The Plan), and the proposed ATAC Resource Access Road (The Road). MDRRC was established under the Umbrella Final Agreement (UFA) and the Yukon First Nations Final Agreement (YFNFA) as "a primary instrument for the local renewable resources management in that Traditional Territory as set out in a Settlement Agreement, Chapter 16.6.1".

The MDRRC have 3 main areas of concern: Wildlife/Habitat, the Road and the Plan.

Wildlife and Habitat are the primary source of concern for MDRRC and this area with previously limited access is of great importance. Yukon Government is also only in the research and drafting stage of the Wetlands Policy's in Yukon. The Beaver River Watershed is a prime example of wetlands with diverse wildlife habitat. Moose are one species which benefit greatly from wetlands habitat.

Council has for many years been actively engaging with YG regarding the moose populations in the Mayo area; which have continually been in decline. Specific surveys in the Plan area have shown it to be an area of high concentration of moose activity, with preferred moose habitat directly along the proposed road corridor.

The destruction of the moose habitat along this corridor route will no doubt have a detrimental, negative effect on the moose populations and should not proceed at this time. Extensive future surveys and studies should be conducted for further analysis to create a baseline data inventory. This is standard relevant information in any plan.

This area is also habitat for a great many other species; some such as salmon, raptors and grizzly bears are considered "Species at Risk" or "Special Concern".

Page 2 - BEAVER RIVER LAND USE PLAN

MDRRC is extremely concerned with the proposed road. The Road , will create opportunity for increased human activity and harvesting in this area, which is, for the most part, undeveloped. It is uncertain at this time if the new Resource Roads regulations will govern the road. If not, this could ultimately define the road as "public " removing the authority of ATAC to regulate access.

The proponent has stated at public meetings that the road is preferred to off-set the cost of helicopters. MDRRC does not agree this is justifiable for exploration.

MDRRC did not and continues to disagree with the staking of claims for the purpose of access and/or road building; therefore, we do not support this type of development activity.

A "Resource Road" should not be approved until that regulation process is in place and certainly not until proven mine development is imminent.

The Plan, simply put, does not adhere to the UFA and the NNDFA and the process of the Yukon Land Use Planning Council and Commissions (Sec-11.8.4) has been disregarded.

MDRRC feels that the Plan is being pushed through, under pressure, despite the overwhelming majority of consultation results that indicate an opposition to the proposed road.

Thank you for considering these concerns for MDRRC.

Respectfully,



Franklin Patterson, Chair
Mayo District Renewable Resources Council

Cc- Beaver River Land Use Planning Committee
 Nacho Nyak Dun lands and Resources Department
 Yukon land Use Plan Council

To: Beaver River Land Use Planning Commission
From: Metallic Minerals Corp.

RE: Information letter regarding Metallic Minerals properties in the Beaver River Land Use Planning Area

Date: May 17th, 2017

Metallic Minerals Corp. (the Company or Metallic Minerals), is pleased to provide comments on the Beaver River Land Use Planning process for which a request for information has been received from the Planning Commission.

Introduction

Metallic Minerals Corp. has been active in the central Yukon since August of 2016 and maintains strong interest in the region, with over 211 square kilometers (km²) of mineral claims under its management. These claims include the Keno Silver Project, McKay Hill Project, Grey Copper Hill Property and Nazgul Property all of which are within the traditional territory of the First Nation of Nacho Nyäk Dun (NND). The McKay Hill, Grey Copper Hill and Nazgul Projects cover 47 km² in claims within the Beaver River Land Use Planning Area, while the Keno Silver Project borders the southern edge of the Land Use Planning Area.

Metallic Minerals activities in the region range from early stage exploration (prospecting, mapping and sampling) to more advanced stages of exploration (trenching and drilling). Exploration activities conducted to date are primarily seasonal, and in the case of its Beaver River area projects, helicopters have been used for access. The Company believes that, by applying modern exploration processes, the properties in the planning area have the potential to successfully advance through various stages of exploration and future development.

The Company recognizes and respects the importance of the land and wildlife resources to the NND and has consistently provided updates to the First Nation on its exploration work as well as participated in local job fairs and community meetings in the region. The Company has utilized NND-affiliated contractors, locally based contractors and local employees as much as possible to service its projects. These include: New Age Drilling Co., Underhill Geomatics Ltd., Chieftain Energy LP, Alkan Air, Boart Longyear Ltd., ALX Exploration Services, Smalls Expediting, AFD Petroleum, Total North, Heli Dynamics Helicopters, Fireweed Helicopters, Kent's Carpentry, Mammoth Exploration, Stewart Basin Exploration, Keno Hill Exploration Corp., BV Laboratories, J & B Contractors and Mayo Bigway Stores.

Metallic Minerals supports the process of a land use planning process and the associated constructive dialog regarding the potential for mineral development in the region with consideration for management of wildlife resources in the area. While each of our Beaver River area projects are in the early stages of exploration, it is this early base of prospects and exploration that is needed to support the eventual development of future mines.

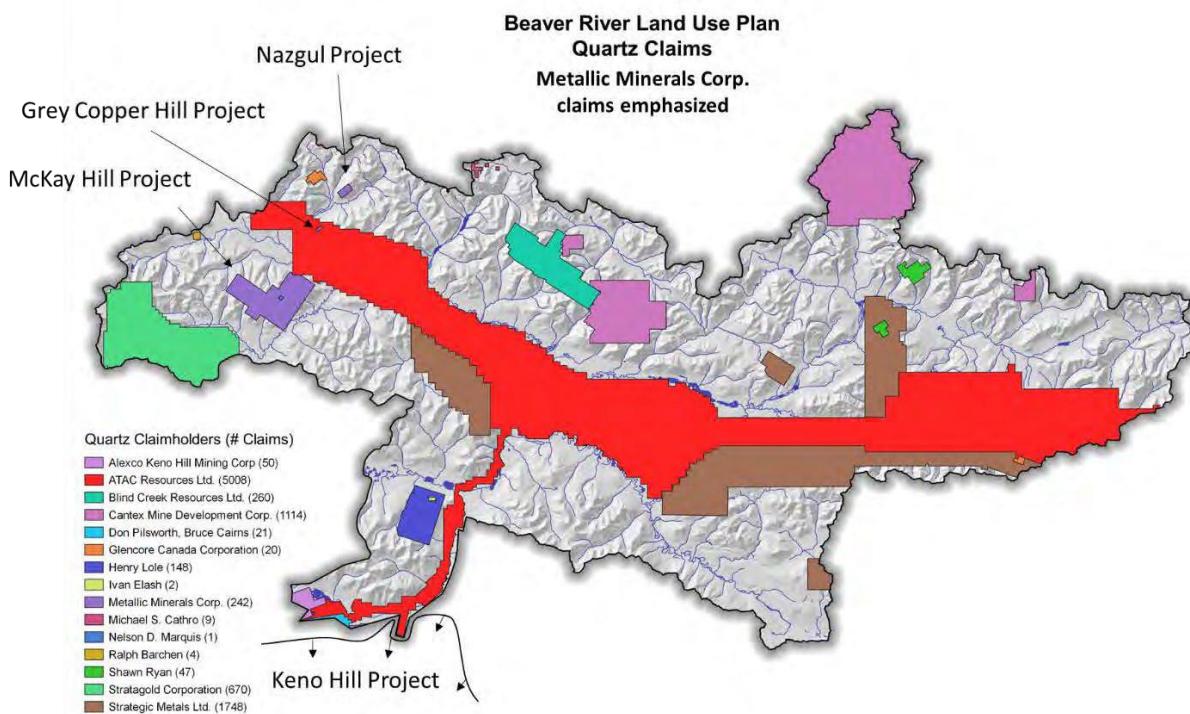
Since 2016 the company has expended over \$6.5 million dollars conducting early stage exploration in the Central Yukon on its properties in and adjacent to the Beaver River Land Use Planning Area (including the Keno Silver Property). The Company spent over \$630,000 CAD on exploration expenditures on projects within the Beaver River Land Use Planning Area over the last two field seasons, 2016 and 2017. These expenditures are expected to increase in the coming years as these prospective projects advance through the next stages of exploration, similar to that seen in the development of the Keno Hill Silver District.

Metallic Minerals' primary concern in this planning process is to preserve the option to permit future road access to exploration projects in the Beaver River area, where these projects are able to show the necessary economic

criteria for mine development. Road accessibility is a fundamental requirement for mineral projects that produce bulk concentrate materials as their final product. Without the possibility of future road access, it is almost certain that exploration on these properties will cease permanently, resulting in the loss of value from past exploration and future mineral potential as well as any future investment which is typically much higher.

The Keno Hill silver-lead-zinc mines are a good example of the scale of economic activity that future projects in the Beaver River Land Use Planning Area might contribute to the local economy, should they advance to the mine development stage. In the Keno Hill Silver District, bulk lead and zinc concentrates containing over 200 million ounces of silver have been produced historically with future production potentially targeted to restart in 2019 by Alexco Resource Corp. Alexco has invested over \$80 million in construction costs to build the Keno Hill mill and facilities. They are investing an additional \$24 million in 2019 to develop two new mines and have invested approximately \$4-5 million per year in exploration over the past 10 years in order to define new resources to allow for the restart of mining. The two new mines are anticipated to spend approximately \$50 million per year in operating costs, 40% (\$20 million per year) going to labour costs such as wages and another \$5 million per year in fuel, supplies and power with much of these fees going to local and Yukon based employees and businesses.

The following section provides information on Metallic Minerals' properties in the region. A location map showing the Beaver River Land Use Planning area and Metallic Minerals claim holding is shown below.



Revised from ATAC Resources 2019

Keno Hill Silver-Lead-Zinc Properties

Metallic Minerals' Keno Silver Property is a significant part of the Keno Hill Silver District and is an example of the types of mineral systems that we see the potential for at our projects in the Beaver River Land Use Planning area.

Metallic Minerals has conducted exploration activities on the Keno Silver Project between June and October each year since 2016, by way of prospecting, mapping, geophysics, soil sampling, trenching and core drilling. These activities are expected to continue through 2019 and beyond. Recent work by Alexco Resource Corp. demonstrates that systematic exploration in these high potential mineral areas can lead to significant economic silver-lead-zinc discoveries through the application of modern exploration techniques.

Claims controlled by ATAC Resources along the Ladue River - the proposed tote road corridor - and a southern spur of those claims up the Faith Creek drainage, are generally adjacent the Keno Silver Project. Restricted use of the proposed tote road by companies other than ATAC may limit Metallic Minerals' ability to efficiently develop access to future resources in the eastern half of the Keno Hill Silver District. A completed access road though Ladue Creek may represent the easiest and least impactful way to access resource areas in that area of the district. Alternative access to Ladue Creek may force development of longer roads that may be more impactful with increased disturbance.

McKay Hill Property

The McKay Hill Property is fully within the Beaver River Land Use Study Area and has a rich exploration history dating back to the 1920s during the early days of the Keno Hill District staking rush. Significant work has been conducted on the property since its discovery including the production of high-grade silver and lead mineralization in the 1940s. Today the McKay Hill Project represents a promising silver-lead-zinc-copper exploration target that may have potential to become a Keno Hill sized mineral system. Recent exploration results have demonstrated the potential for the development of large-scale targets that have not yet been drill tested.

The 44 km² McKay Hill property, comprised of 212 quartz mineral claims, located 50 km north of the existing infrastructure at Keno City, is currently only accessible by helicopter. The closest road access to the property is via Hanson Lake Road to McQuesten Lake from the Silver Trail Highway at km 102.1. From this point, a 1959 era winter road forms the Wind River Trail which follows McQuesten Lake, Scrougale Creek and the Beaver River to its junction with Braine Creek which is approximately 20 km downstream along the Beaver River from the McKay Hill Property. If the property proves that it has development potential the original access route that followed the South McQuesten River from Elsa across a low divide to the East McQuesten River to the Beaver River could be evaluated.

Exploration on the property by Metallic Minerals over the last two years has been very successful. Work on the property has identified 37 mineralized veins including 18 new veins discovered during the 2018 field season. Exploration expenditures in 2018 totalled approximately \$500,000 CAD. Activities in 2018 included the construction of a remote camp for a helicopter-supported exploration program. The new camp at McKay is designed to also be a temporary base of operations for work at the Grey Copper Hill and Nazgul properties and allows for decreased local air traffic.

Limiting the potential to access the northwestern part of the Beaver River drainage by a future road would effectively halt near-term exploration on the McKay Hill Property, as well as the Grey Copper Hill and Nazgul Properties resulting in the area no longer being attractive for mineral exploration. The clear potential to permit

road access to these properties is necessary to ensure that the current and future economic benefits from exploration and mining continue.

Grey Copper Hill Property

The Grey Copper Hill Property has seen historic small-scale mining work including drilling, soil sampling, geophysical surveys and hand trenching programs that were conducted sporadically between the 1950s and late 1980s. After acquiring the claims in 2017, Metallic Minerals explored the property in 2018 with positive results and plans to return to the property for follow-up work in 2019.

Nazgul Property Metallic Minerals has also been conducting field work at the Nazgul Property and has successfully identified significant new areas of silver, lead and zinc mineralization. We are encouraged by this discovery and intend to spend more time and resources on additional exploration activities in this area in 2019.

Summary

Metallic Minerals has strong interest in the mineral potential of the Beaver River drainage. We have significant mineral holdings that we are actively exploring and we wish to continue exploration thus increasing our expenditures in the area. Mineral exploration is a long-term, high-risk, high-cost endeavor. The process of determining whether an exploration project can become a mine requires years of exploration work, millions of dollars of investment and the certainty that regulatory environment will allow for environmentally responsible development including necessary ground infrastructure such as the ability to permit road access. Having certainty for road access is critical to the future development of mineral resources, not just in the Beaver River area, but in the Territory in general. Without this certainty, exploration in the region will likely cease and the current and potential economic benefits of exploration and mining to the region and territory would be missed.

Metallic Minerals provides a few comments in review of the concerns as stated in previous Beaver River Land Use Planning meetings held in the local communities.

Mineral Potential

- The Beaver River drainage has a high degree of mineral potential including over 40 listed MINFILE occurrences. The MINFILE occurrences do not completely represent the amount of potential as has been demonstrated through Metallic's work at McKay Hill where 18 new veins were discovered in 2018, and at the Nazgul Property where new mineralization was found resulting in the staking of mineral claims. Much of the region has not seen modern exploration techniques, with the exception of ATAC Resources, as demonstrated by their discoveries at Tiger and Ocelot and 22 other targets. Limiting access to the region would limit the economic opportunity that follows mineral exploration.

Land Withdrawals

- A total of 58% of the land in the Yukon has been withdrawn from staking including the region directly north of the planning area. Mineral deposits are not evenly distributed across the Territory. The Beaver River Land Use Planning area shows that it is an area with excellent potential for significant mineral systems and has many active exploration projects and potential for additional unrecognized economic opportunities. It will be important to keep these areas available for staking and development while still ensuring areas of environmental and cultural significance are protected through an appropriate permitting process. If these mineralized areas within the Beaver River Drainage are withdrawn from

mineral entry or restricted from having permitting road access the potential economic development opportunities from exploration and mining in the region will be lost.

Tote Road Access

- Access into the area can be controlled through permit-only access that limit the vehicles and people utilizing the road to ensure minimal impacts on wildlife resources.
- Winter only roads are insufficient for continual production of a mineral resource at the mining stage where project economics generally require year-round activity.
- Airstrips are not an economically viable alternative to a road or a reliable method of transportation of materials to and from a potential mine site for projects that produce bulk concentrate materials such as base metals and silver due to the quantity of materials that must be transported.

Economic Benefits

- Exploration and mining provide significant direct economic benefits to the local, regional and Territorial economy though direct employment, services and necessary supplies (many of which are associated with First Nation corporations). Examples such as Keno Hill demonstrate how significant these capital investments and on-going operating economic contributions can be including labour and materials for these operations as well as taxes and royalties.

Regulatory Environment

- Exploration and mining are highly regulated in the Territory. These regulations ensure that a projects potential benefit, impact and associated risk are fully understood and documented before approvals and exploration activities or mining can begin. It is through these regulatory controls that the public continues to be a part of review and future discussions regarding ongoing or new mineral exploration and mining in the Beaver River Land Use Area. As such, individual projects can be evaluated on a case-by-case basis as opposed to being limited by blanket restrictions and closures.
- Metallic Minerals recognizes the environmental significance of the region and the relationship First Nations have with the land. As a result, the company has strived to ensure that its planned activities have reflected this through the permitting and planning, execution and ongoing reclamation of its projects.

Metallic Minerals appreciates the opportunity to contribute to the discussion on the Beaver River Land Use Plan and believes that the Beaver River drainage represents a major potential area for enhanced economic opportunity that can benefit the local communities, the Nacho Nyäk Dun First Nation, and the Territory for years to come with balanced and appropriate regulation of lands and wildlife resources.



Strategic
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April 29, 2019

Lesley Cabott and George Stetkiewicz
Co-Chairs of the Beaver River Land Use Planning Committee

Dear Ms. Cabott and Mr. Stetkiewicz:

Re: Beaver River Land Use Plan Submission

Thank you for the opportunity to provide feedback and information regarding the ongoing planning related to the Beaver River watershed (the "Planning Area"). Strategic Metals Ltd. ("Strategic") has been involved in mineral exploration in the Planning Area for over 12 years. Strategic currently controls 1,748 quartz mining claims that are wholly or partly within the Planning Area and are held in trust by Archer, Cathro & Associates (1981) Limited. These claims date back as far as 2006 and encompass a wide range of exploration targets containing a variety of metals in multiple deposit types.

The Planning Area has significant mineral potential as is evidenced by the number of quartz mining claims, the abundance of Minfile occurrences and the amount of past exploration expenditures incurred in the region by a large number of companies. In particular, Strategic and its exploration partners have spent \$3 million on exploration within the Planning Area on the following properties:

- (a) the Staff property is an early-stage gold exploration target with a strong gold-in-soil anomaly;
- (b) the Rusty property is a high-grade silver-lead-zinc target that has received extensive work by previous operators and hosts the Val deposit and showings related to the Veradeposit;
- (c) the Zap property is a zinc-lead-silver prospect with mineralization confirmed in drilling by both Strategic and previous operators; and
- (d) the Rod property hosts multiple silver, lead, zinc, vanadium, nickel and gold targets, and covers large multi-element soil geochemical anomalies which have seen drilling conducted by Strategic and prior operators.

The Planning Area has very prospective geology that is relatively unique in Yukon. The various rock units contain a wide variety of metals in differing deposit types that span nearly 1.5 billion years of evolving continental margin. Exploration in the area has been conducted since the

1920's by many different operators. Historical work in the area focused largely on lead, zinc and silver mineralization. Exploration for gold and other metals has occurred since 2009 when ATAC Resources Ltd. discovered its Tiger Deposit. Discoveries continue to be made in the area, as demonstrated by a major new zinc-lead-silver discovery that was announced by Cantex Mine Development on its North Rackla Property in the fall of 2018.

Exploration techniques and relative values of commodities are always changing and as recent discoveries have shown, unsuccessful exploration in the past does not definitively indicate that an area is "barren" or that economic deposits will not be found in the future.

Significant portions of the Yukon are currently subject to temporary or permanent withdrawals from mineral exploration and development. While other areas in Yukon remain open, not all ground is equally endowed with mineral potential. The Planning Area is one of the most prospective areas that remains open and access should be maintained and improved. In particular, it is important that ground based access be permissible for advanced exploration activities.

It is critical that any permanent land use restrictions not prohibit mine development. Given the costs and environmental impact of constructing new access in areas with no pre-existing roads, exploration work is routinely conducted using fixed wing aircraft and helicopters. This air supported activity is reasonable for early stages of exploration, but ground access is essential if a deposit is to be advanced and moved towards development.

While the mineral industry continues to innovate and develop new and lower-impact methods of advanced exploration and mining, ground access remains necessary for economic development of virtually all mineral deposits. Mining equipment, supplies and products cannot be transported to and from remote sites by air on a timely or cost effective basis.

Exploration is already subject to regulations that limit the frequency and type of activities that can be carried out in Yukon. It can be and usually is conducted in a manner that leaves a minimal environmental footprint. Extensive prospecting, mapping, sampling and diamond drilling have been conducted throughout the Planning Area for decades, yet the region is still frequently described as "pristine wilderness". This is a testament to the work conducted by operators in the area and demonstrates how it is possible for mineral exploration to co-exist with other activities, while also respecting environmental values.

Any future mine development in the Planning Area will be subject to intense independent evaluation through existing regulatory and assessment processes. These will include the Yukon Socio-Economic and Environmental Assessment Board, the Yukon Water Board and Mining Land Use requirements. These processes are intended to evaluate the specific impacts and benefits of a proposed mining project and include recommendations on whether or not negative impacts from a project can be satisfactorily mitigated should a project be allowed to proceed.

The evaluations noted above are project specific and provide both the project proponent and concerned parties with an opportunity to work together to find a path forward. Blanket restrictions on development in an area before specific mining projects are proposed would

preclude future mineral deposit discoveries and deprive the local area and the Yukon generally of the significant economic benefits generated by early stage, low impact mineral exploration activities.

In summary, Strategic's primary concerns relate to the withdrawal of land from exploration and development and prohibitions on new access. Mineral exploration and mining are and have been key contributors to Yukon and continue to be a cornerstone of its economy. While some historical mining operations that pre-dated environmental and socio-economic reviews have left poor legacies, modern exploration and development are conducted in ways that minimize environmental impacts and can provide comprehensive benefits to the local communities and Territory as a whole.

Yours truly,

STRATEGIC METALS LTD.

A handwritten signature in blue ink, appearing to read "Ian J. Talbot".

Ian J. Talbot
Chief Operating Officer

February 7th, 2019

**Beaver River Land Use Planning Committee
Lesley Cabott and George Stetkiewicz**

Dear Lesley and George,

Thank you for the well organized public meeting last night in Whitehorse. I did attend and was impressed with the number of tough questions regarding the Land Use Plan and proposed Road.

I wanted to send you a written submission on the concerns I have for the road and the overall Beaver River Watershed Plan.

There was really no mention of registered Outfitting Concessions in the meeting last night or in the literature you handed out at the meeting. To minimize actual or potential land use conflicts you must engage with the outfitters within the planning area. A portion of my Outfitting Concession # 6 is within the eastern watershed planning area. I have enclosed a small map with the outline of my concession within the planning area. I have spent 33 seasons operating in this area. Although I am not a resident, I certainly have extensive knowledge of the watershed.

There is a traditional horse trail that we use every July & October starting at McQueston Lake and progressing through the heart of the watershed to our base camps in the Peel watershed. We have used this trail since 1987 and according to Jimmy Johnny the trail has been in use since the 1960's. The horse trail is absolutely essential to our outfitting business. We have four established overnight camp areas along the route (I have enclosed a map outlining the trail and the camping spots.) The camping spots have adequate grass & water for the 30 horses we trail through the area. There is no alternative route for us. The stretch of proposed road from Clark Lakes to the Beaver River falls right along the horse trail. This is a land use conflict.

I am very concerned with cumulative exploration activity the proposed road will bring to the watershed; increased staking activity, multiple large camps, cut lines, bulldozed trenches, side access roads, new airstrips, helicopter activity, placer mining, four wheelers etc. Although the road is for Atac Resources, other junior exploration companies will now view this area as wide open for extensive exploration. What is now pristine wilderness will become a spider web of development. Wildlife, including moose & caribou will be suffer and be pushed out. Moose and caribou are the primary species that we hunt and represent a major portion of our outfitting income. Although we do not actually hunt in the Beaver watershed, it is a very important "seed" habitat area for the moose & caribou that we do hunt in the Peel and Stewart watersheds. Increased stress on ungulate populations within the Beaver watershed as a result of increased mining activity should be considered a land use conflict between outfitting and mining.

So these are my two main concerns as an Outfitting business within the watershed. As a resident of the Yukon I also have multiple concerns, especially about the intrinsic destruction

of “wilderness value” that the proposed road will bring. I would urge the Committee to take its time formulating the watershed plan and also to take into account all parties that have an interest in this beautiful area. Thank you.

Yours Truly,

Chrios Widrig

**Widrig Outfitters (97) Ltd.
139 Falaise Rd.
Whitehorse, Yukon
Y1A 3C8**

867-3903-3802 or 867-333-9660



2.11

Lesley Cabott
Co-Chair First Nation of Na-cho Nyak Dun
Beaver River Land Use Planning Committee

July 17, 2019

Dear Ms. Cabott,

RE: WTAY INPUT – LAND USE PLAN BEAVER RIVER WATERSHED

On behalf of the membership of the Wilderness Tourism Association of the Yukon (WTAY), thank you for meeting with us to outline the planning process for the region and the opportunities to be involved. Following our meeting in late April, we've now had the opportunity to share the information you previously provided with our membership and asked them for their input with respect to the development of the land use plan and to understand their interests in the area.

WTAY's role is to represent the collective voice of the wilderness and adventure tourism industry in the Yukon through marketing, advocacy, research, consultation, referrals and education.

All WTAY members must adhere to our strict code of conduct, demonstrating the highest standard of outdoor and business ethics. Members are encouraged to ensure the code of conduct is reviewed and put in to practice by each of their employees and is used to educate their clients and Yukon visitors about low impact wilderness recreation. Responsibility is central to the efficacy of WTAY's code of conduct, which means ensuring that all aspects of the member's operation are sustainable – environmentally, socio-culturally and economically. Our code of conduct is outlined in eight principles:

- Providing quality guest experiences;
- Creating an environment in which staff can excel;
- Supporting wilderness conservation initiatives;
- Ensuring operating practices are environmentally sustainable;
- Benefiting the local community;
- Respecting cultural values;
- Respecting historic and archaeological sites; and,
- Representing Yukon's wilderness tourism industry responsibly.

While the Beaver River Watershed region is on the "road less travelled" our membership does operate here and extensively in all other regions across the territory; and, by virtue of that, has a very keen knowledge and understanding of the effects that increased access to and development of land can bring. Our members have direct knowledge of the land, where and how accessible it is; they observe how the land is used and bear witness to the changes, effects and damages over time, perhaps even more so than other industries operating in the territory. Even though we are stewards of the land, we are not lost on the notion of wilderness tourism potential in this region. As an example, our operators have stated they are noticing an impact in the Wind River area over the last number of years due to increased usage. However, it is in our industry's best interest to keep

the Yukon - its land, culture, history, environment – as pristine as possible so that we can continue to deliver quality guest experiences in a sustainable manner.

Focusing on our mandate and staying true to our code of conduct, WTAY puts forward the following statements for consideration with respect to the Beaver River Land Use Plan:

- The Beaver River region is a rich ecosystem that has strong conservation values. It is home to important wetlands and thereby good habitat for wetland species, moose, etc. It is our belief that more research needs to be conducted to properly understand the potential impacts on species that inhabit the area, ultimately identifying key areas of ecological and cultural significance for permanent protection in the plan.
- With respect to the proposed 65km road to ATAC's Tiger site, our members have voiced considerable concern around the new road being extended to lead 65 kms into previously undeveloped terrain and potentially extending to the southern border of the Peel watershed, which is an area that is of particular value to our membership for a number of reasons.
 - One objective outlined for the development of the Beaver River Land Use Plan is to "Promote development that does not undermine the ecological and social systems upon which Na-Cho Nyäk Dun citizens and their culture are dependent." We support the completion of the land use plan prior to a road being considered. Furthermore, we suggest the plan would determine if a road should be developed and if so, where it would go, setting firm limits on access to the road. Without the plan in place to dictate the parameters of such development, the region is at risk of turning into a network of roads to access existing mineral claims, extending eastwards to the NWT border and all along the southern border of the Peel watershed region. This spiderweb of roads could have a large and potentially negative impact on our member's guest experience and ultimately, our industry.
 - ATAC is pushing for the road to their Tiger site however, we don't believe there has been enough planning consideration given to this culturally and ecologically important region. It is difficult to believe that the proposed ATAC road would not become a means for increased access to this country, which could result in increased harm to these sensitive ecosystems. We offer that the Yukon's resource Road Regulations should be finalized before completing the plan as without these regulations in place, there is no legal tool to enforce compliance.

WTAY values the land use planning process and supports a process that is both collaborative and in alignment with our mandate and code of conduct. It is our hope that the Beaver River Land Use Planning Committee allows itself a long enough planning timeline to thoroughly research, consult and develop a land use plan that considers the environmental, socio-cultural and economic factors in the region and respects the objectives outlined for the development of their plan.

On behalf of the WTAY's board of directors, thank you for recognizing our member's interest in the region, inviting us to participate in the process and for receiving our collective response. We look forward to continued participation and engagement of our members during this process. Should you have any questions or wish to discuss anything further, please contact the WTAY office at 867-668-3369.

Sincerely,



Kalin Pallett
President

May 17, 2019

Beaver River Land Use Planning Committee
Yukon Government
PO Box 2703
Whitehorse, YT Y1A 2C6

RE: Concern with the Beaver River Land Use Plan Process

Dear BRLUP Committee Members,

I am writing to you today on behalf of the Yukon Chamber of Mines, our board and membership, to urge you to take an evidence-based approach to land-use planning in the Beaver River area that considers the full potential of the area, including its economic and geological potential.

The sub-regional land use planning model is the first in the Yukon and will set a precedent in all future land use planning exercises in the territory, which could have dire effects on our mineral exploration and mining industry and Yukon's economy as a whole, if not conducted in an accountable, transparent manner.

Any process related misstep will ultimately threaten the credibility of any findings made by the committee, and further delay the length of time land remains withdrawn from staking. We strongly believe the process needs to be open, efficient, and based on quantitative data.

With over half of Yukon's land withdrawn from mineral staking, the most in any Canadian jurisdiction, our industry is already facing an uphill battle in the territory. The Yukon has mineral-rich land, however, not all regions have equal mineral potential, and viable deposits can take years of detailed exploration to find – often in areas that have seen previous work. It's critical for our industry that as much land as possible remain open to exploration in hopes of developing future economic deposits.

Over the past 100 years our industry has invested \$100M in exploration across the area being reviewed by the Beaver River Sub-Regional Land Use Planning Committee. There are currently more than 9,000 active Quartz claims in the area, with more significant mineral potential present elsewhere in the region as well.



Along with withdrawn land, restrictions on ground access to land is a large barrier for industry working in northern and remote areas. Without the ability to construction ground access to claims, at an appropriate stage, exploration becomes challenging and development is impossible.

The Yukon Chamber of Mines encourages and promotes responsible exploration and development that supports and protects Yukon's environment. Mineral exploration and mines provide both direct and indirect benefits to the territory's economy. In 2017, our industry was directly responsible for 9.6 percent of the Yukon's GDP. We believe shared, multi-user access provides far-reaching economic benefits to the territory while minimizing environmental impacts.

Recommendations from the Beaver River Sub-Regional Land Use Planning Committee, and subsequent plans produced from its findings, will directly affect Yukon's competitiveness for mining and exploration, with any restrictions leaving lasting negative impacts on the economy to be felt by future generations.

Precedent-setting exercises need to be undertaken thoughtfully and transparently. Please don't add unnecessary uncertainty to our industry by setting a precedent that can't be undone.

I urge the committee to take into account the significant mineral potential in the region and mitigate any further withdrawals of land that would further exacerbate the flight of capital from the Yukon as a jurisdiction.

Respectfully,

A handwritten signature in blue ink that appears to read "Mike Burke".

Mike Burke
President, Yukon Chamber of Mines

Yukon Conservation Society



302 Hawkins St. • Whitehorse, Yukon • Y1A 1X6 • (867)668-5678 • info@yukonconservation.org

May 23, 2019

2.13

Beaver River Land Use Planning Committee
Government of Yukon
First Nation of Na-Cho Nyäk Dun

Attn: George Stetkiewicz (george.stetkiewicz@gov.yk.ca)
Lesley Cabott (lesley.cabott@stantec.com)

Re: Beaver River Land Use Plan

The Yukon Conservation Society (YCS) is a grassroots environmental non-profit organization, established in 1968. Through a broad program of conservation education, input into public policy, and participating in project review processes, we strive to ensure that the Yukon's natural resources are managed wisely, and that development is informed by environmental considerations.

YCS is pleased that the Government of Yukon and First Nation of Na-Cho Nyäk Dun have agreed to prepare a land use plan for the Beaver River watershed before construction of the ATAC tote road can be authorized.

The Beaver River planning process will set an important precedent for subregional planning in the territory and we are excited about the potential of this planning process. If done well, the plan could achieve a number of important objectives, including protecting areas that are ecologically and culturally important, and addressing the cumulative impacts of current and future development.

We are concerned, however, that the current Beaver River planning process is not appropriately designed or adequately resourced to achieve these objectives. To gain clarity, we have attached a list of questions and concerns about the current process and the associated Road Access Management Plan, compiled in collaboration with CPAWS Yukon. Please accept the following as our submission to the information gathering stage of the plan.

Sincerely,

Mike Walton, PhD
Executive Director
Yukon Conservation Society

Beaver River Subregional Land Use Plan: Questions and Concerns

1. Why is the planning process being conducted outside of the Umbrella Final Agreement (UFA) when the UFA provides for subregional planning? Under what legislative authority is this subregional plan being prepared?
2. Why does the January 21st, 2018 agreement signed by the Government of Yukon and the First Nation of Na-Cho Nyäk Dun state that “the provisions of this Plan will prevail over any other local area district or regional land use plan to the extent of any inconsistency”? This clause does not appear to align with Chapter 11 of the UFA, which states that subregional plans are intended to conform to regional plans.
3. Why does the January 21st, 2018 agreement state that, where inconsistencies exist, the provisions of the Road Access Management Plan (RAMP) will prevail over the subregional plan?
4. How will public consultation inform the development of the RAMP and future amendments to it?
5. Under what legislative authority will the RAMP be enforced? Until resource road regulations are in place, it is our understanding that there will be no legislative authority to regulate compliance with the RAMP.
6. It appears that there are large information gaps on wildlife such as moose, grizzlies, Chinook salmon and their habitat. What is the current extent of environmental information for the watershed, and what is the timeline for assessing, gathering, and incorporating the information that is still lacking?
7. There is currently little information on the Beaver River land use planning page (<http://www.emr.gov.yk.ca/r lup/beaver-river-land-use-plan.html>) about the region or next planning steps. This lack of information and clarity makes it difficult for our organizations and members of the public to understand and engage in the subregional land use planning process. Will the Planning Committee be providing more information, such as a Resource Assessment Report? And is there a plan to clarify the process for members of the public, industry, and environmental organizations to participate in the subregional planning process?

to Karen.Clyde
Karen,

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As discussed, below please find Yukon Outfitters Association comments and concerns addressed to the Beaver River Land Use Plan Committee. We would be prepared to discuss further with the planning committee when appropriate. Please let me know if additional information is required.

Kind regards,
Shawn

Dear Beaver River Land Use Planning Committee,

Upon comprehensive review of the NND-YG Agreement for the Beaver River Land Use Plan (BRLUP), the YOA has a number of concerns related specifically to the creation of roads and the anticipated long-term impact access will have on wildlife harvest and wildlife displacement. It is clear, based on over-harvest lessons learned elsewhere in the Yukon (i.e. the present-day absence or extremely low abundance of moose in the high trail-density areas around Keno City and Elsa), that no road should be considered until effective conservation measures are in place to protect wildlife populations, especially species harvested by people i.e. moose, lake trout.

Hunting restrictions, as identified in the BRLUP Agreement, must apply to all people that may travel the road not simply contractors or employees of ATAC Resources. Vehicle traffic along the road must cease during critical times of the year (rut and winter), and be kept to minimal levels during other periods. This would help reduce displacement effects and risk of overharvesting. (What regulation currently exists that could enable implementation and enforcement of use and user restrictions of a private road?)

The area adjacent to the proposed ATAC road would provide relatively easy entry into a previously un-roaded and inaccessible area. To date, there is little historic harvest from resident and first nation harvesters along the proposed ATAC road given the present remoteness of this area. Harvest permits applicable to all harvesters may be the best enforceable mechanism to ensure that total allowable harvest of moose can be managed in a way to protect moose populations. In addition, any imposition of permits for harvest must be at an appropriate scale for specific species i.e. Moose Management Units Vs. Game Management Subzones, to manage total allowable harvest of moose.

The objective of the wildlife harvest plan must be to protect the wildlife populations and age-class over the long term (decades). This can only happen with a clear understanding of the total allowable harvest and ensuring that harvest complies with science-based guidelines. An effective and robust monitoring program must be put in place to measure both wildlife displacement and human-induced mortality. Furthermore, the results from the monitoring program must be used to continually improve management practices to ensure wildlife objectives are being met over the long term (decades).

Thanks for the opportunity for input. We look forward to working with you to develop an innovative plan to effectively address wildlife conservation and human access management.

Sincerely,
Shawn Wasel
Yukon Outfitters Association

3.0 Email Submissions

Please note that some emails may have been incorrectly identified by a spam filter and may not have reached the Planning Committee. If you believe that may have happened to your email please contact the Planning Committee at George.Stetkiewicz@gov.yk.ca and Lesley.Cabott@stantec.com.

***Names and identifying features have been removed to protect the confidentiality of the individuals.**

The Beaver River Watershed has incredible ecological qualities, and development in the area requires careful consideration of the impacts of proposed development.

The plan needs to address the cumulative impacts facing this area of ecological and cultural significance. These impacts include the rapid decline of biodiversity across the globe and the increase in global temperatures - which are more pronounced in the north. The plan also needs to create a framework for development and must include enforceable regulations. Currently, the Yukon has no regulation on off-road vehicles (ORVs), and no species at risk legislation to promote the protection of species that are deemed at risk of extinction or extirpation. A road (proposed by ATAC Resources) would open access to relatively remote part of this unspoiled landscape and, without the proper precautions would promote destruction of key habitat. It is my suggestion that the land use plan be put on hold until those regulations are in place.

Finally, it is well documented that roads play a key role in bear mortality. Fragmentation of the land creates barriers for animals with large home ranges, and increases human-bear conflict. The land use plan needs to address mitigation for human-bear conflict, bear mortality, and habitat degradation.

This submission was received by four separate individuals.

1. The March 2020 planning deadline is too short to properly consult with the community and public, fill information gaps on wildlife, and create a draft plan.
2. There are large information gaps on fish and wildlife species like moose, grizzly bears, and Chinook salmon. Putting in the time and resources to fill these gaps will help create a plan that sustains and adaptively manages these species and their habitat.
3. Yukon's Resource Road Regulations should be finalized before the plan is complete. These regulations will ensure that if the road is built and managed as promised.

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4. The plan should protect areas that are ecologically and culturally important, and set common-sense limits on development.
5. The committee should create a plan that is right for the region, and then decide if and how the exploration road should be built.

You have a great opportunity here to show the world that economy is not the only thing that needs to be considered when making decisions, that now more than ever decision makers need to think long term because the implications of not doing so could be catastrophic for future generations.

I do not have actual data regarding mining but for what I've been reading, mining and gas and oil exploration can bring economical benefits to the community in the short term but usually the cost of cleaning up the mess these companies use to leave behind exceed by much the benefits.

I urge you to consider and keep in mind the UN Global Assessment Report produced by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) because like IPBES Chair, Sir Robert Watson said the health of ecosystems on which we and all other species depend is deteriorating more rapidly than ever. We are eroding the very foundations of our economies, livelihoods, food security, health and quality of life worldwide.

If this area is open to development not only the current habitat of the wildlife will be impacted but in the long term you will be impacting your children and your children's habitat and for me, a planet without wild regions will become a very boring place to live.

Please protect this area from development, protect it so that future generations can enjoy them and to show the world that Yukon cares about the current state of Nature is stepping up to protect it.

The Yukon is seeing many newcomers and there will be increasing pressure on our fish and wildlife. I feel that there is already a slew of new road developments planned to access new resources and rework existing areas. Before any new roads are built I would like to see the resources fully exploited from the existing road network. I am specifically referring to the Victoria gold road, the Nahanni road, coffee creek region, Nansen, and

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others. If a new road is to be built another toad should be decommissioned.

Let's try to look at the long game and plan for the future. This maximize growth model is flawed. The resource will still be there in 50-100 years.

Please make a regional land use plan with the FN.

I think we show our human wisdom by rehabilitation of the land before taking more.

If we can maximize extraction in small areas, we will keep the moose and caribou. Continued expansion of roads will destroy the caribou and further reduce moose. It has always been that way across Canada. Let's show how to be sustainable and respectful.

This area is pristine & full of life, beaver, moose, grizzly bears & chinook salmon, please keep it this way. Let's keep a beautiful area clean.

With climate change you need to ask, why do you want another mine? How much damage would it cause? How much poisonous runoff would go into this river & is it worth the risk?

Dear Planning Committee members,
Please develop a plan!

I am concerned that this process is being done a bit backwards. How can you do planning in a meaningful way, when a key part of it has been determined from the outset. I ask you to take the time needed to get the needed baseline data and to complete a meaningful planning process. This will likely take longer than a year. I also ask you to make the decision on whether the planned mining road is appropriate a part of planning, rather than something that is determined in advance.

The committee should be nominated as per the UFA Chapter 11 - there must be consultation and consensus with ALL Citizens, not just Chief and Council - Because NND signed a letter of agreement does not mean they have to support the plan - does the Chief and Council have a letter from an

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Assembly giving them permission to sign away our lands? Category A Settlement Land cannot be accessed/developed without full consent of the Assembly.

More than a year is needed to plan for a lifetime and the generations beyond. March 2020 is too soon for such an important decision. More data about the habitat and land use is needed before a fully informed decision can be made. Extensive Indigenous consultation and knowledge is needed to do this in a good way. I hope the planning committee will make the right choices for our land for generations to come. If the project is as valuable and necessary as it claims to be, then dedicating the extra time and research will be good for everyone involved.

I am a young adult citizen of the First Nation of Nacho Nyak Dun.

I am gravely concerned and completely caught by surprise that I just found out that today is the deadline to submit comments from the public for this critical stage to develop the draft plan for this significant area. I strongly do not agree with it and believe that there needs to be an extension in order for more public input to be considered as I will assure you that there are MANY others who as well did not know about today's deadline. I am pleading that you extend this stage's comment period in order for your committee to be getting further feedback.

I also agree with the points made such as;

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3. Yukon's Resource Road Regulations should be finalized before the plan is complete. These regulations will ensure that if the road is built, it's managed as promised.
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5. The committee should create a plan that's right for the region, and then decide if and how the exploration road should be built.

Your consideration to these concerns would be greatly appreciated and I hope that you will make the right choice for all those that these decisions will impact.

Promote development that does not undermine the ecological and social systems upon which Na-Cho Nyak Dun citizens and their culture are dependent.

The most robust, resilient, and cost-effective development, is the kind which is sensitive and collaborative.

Please finalise Resource Road Regulations, and adequately assess cultural sites, stories, and wildlife populations and their needs, educate concerned populations with this info, and then consult concerned populations for the land use plan for the Beaver River watershed. This requires time, which is well-invested. Minerals won't disappear.

I write to protest the planned mining access road in the thus-far-unspoiled wilderness area of the Beaver River watershed north of Mayo, Yukon.

It feels these days like it's more "cool" to slap a sticker on your bumper saying "if it can't be grown, it must be mined" than to want to stop roads, but I feel that now is the very time that we must speak up loudly and proudly for lands and wild places that may seem unimportant to urban people--all the more so because the lands are out of sight, out of mind.

These remote places (which are only now being prodded by foreign companies BECAUSE they are so remote) hold great importance to the declining moose, to the grizzly, to the beleaguered wolf, and to the many smaller animals that are no less important such as the beaver, muskrat, marten, lynx ... Over the millennia animals get to know where foods grow at what time of the year. Bears, caribou, moose ... all pass the knowledge down to the next generation.

I believe there is merit in protecting wilderness for its own sake--independent of the financial benefit that despoiling it might accrue to a small number of

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entitled people. It's not all for humans. Once accessed, once a road is built, an area will never again be free of human activity, and this includes litter, trampling, and poaching. Animals that needed the area will leave it for their own safety and security.

As an aside, I am cabin-sitting for the moment in an area of Whitehorse I hadn't known had been developed--Whitehorse Copper subdivision. I am rather appalled by the vast tracts of previously unvisited boreal forest that has been plundered by, in my opinion, greedy people. Each property has its requisite "toys" and there is new damage daily from ATVs and dirt bikes. My point is that if even an environmentally low-importance area such as this subdivision is of concern--it has still displaced caribou, black bear, grizzly, and moose for a very small number of well-off humans--then vital lifeblood environmental areas such as the one discussed have a HUGE collective impact.

I would like to see this stopped entirely. I am sick of us humans treating the rest of the living world as unimportant, just because we can.

At the very least I think we need to add 5 years to the consultation period--aim for 2025. To aim for 2020 is to treat consultation with only lip service. By 2025 let's figure out, as non-invasively but thoroughly as possible, what lives in this area and in what numbers. Plants and animals. We don't want a situation like Site C in BC, where known COSEWIC and other rare or endangered species are put in further peril--although in that case, they ARE known and still the developments continue.

The Yukon's Resource Road Regulations are not yet complete, finalised. Surely any road-building cannot go ahead if the rules that would clarify how it would be taken apart after its damage had been inflicted is not complete? Of course not.

But it is my feeling that investing all this work in enumerating plant and animal life and establishing and finishing up road rules will create a strong inclination to make this mine and road happen, and I think that must not be the presumption. I believe the best plan, now that we know that humans are causing the very fast destruction of the planet, is to plan to NOT make roads, to not invade remote places that help sequester carbon and prevent methane release.

I attended the February public meeting in Whitehorse because I'm concerned about the impacts of the ATAC road and how it could transform the Beaver River watershed. I feel that the March 2020 deadline is unrealistic. This timeframe is too short to properly consult with the public on the region, develop a draft plan in response to consultation, and to properly consult again on the draft plan.

Many people at the meeting expressed their concerns about the road's impacts on wetlands and wildlife like moose and salmon. However, at this time it seems like there is not enough information on fish and wildlife to protect important habitat and set limits on development.

I am also not reassured by promises that the road will be private and gated. The meeting did not reassure me that these measures would keep people out, or that they're even legally enforceable.

Finally, we shouldn't be assuming that the ATAC Road will be built. This is doing planning backwards. Once this road is built there is no going back - despite ATAC's claims that the road could be reclaimed. It's much more likely that this road is just the beginning and will be extended to their other claims and used by other companies to access other mineral claims. The Peel Watershed is right above the Beaver River Watershed and I'm concerned about the cumulative impacts of the mining claims that extend beyond the borders of the Beaver River Planning area. The planning boundary is too small and doesn't include these mining claims.

I'm not intimately involved with the area but am concerned about land use planning being done right and protecting the Yukon's wilderness. I went to the public meeting to learn more. Since then, I've been disappointed that this plan and consultation period was not well advertised. I read the papers and listen to the radio and have heard nothing about this since that meeting. Average citizens have had no way of hearing or learning about this plan. I hope that the next phase of consultation will involve more public outreach.

You gotta leave this place in peace until Regional Land use Planning is completed!

This issue is once again an example of deep-flawed Canadian mining issues: The free entry system should have been axed decades ago. The mining industry always gets their way; this is intolerable!

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And the main issue now is: once again the Yukon Government is waaaay too slow with Regional Land use planning!!! Take a few years to get accurate baseline data!! Do this draft plan much later than by March of 2020. Don't forget; this is MY land and water, not that of vested nation-less corporate interest moneys. I insist that you take care of my interests - and that of my at least seven generations of descendants.

Axe the proposed road! Complete Regional Land Use Planning first. Then we can deal with the proposal of yet more destruction of pristine wilderness - of which there is precious little left.

I guess my submission for the what we heard document would be a request for information. In order to determine important values of the planning area (and maybe prior to further engagement), could the committee please provide some of the following:

- a comprehensive summary of all current and proposed Land Uses, their effects and anticipated cumulative effects.
- active Land Use Permits and the associated permitted activities
- current developments (from past and present) related to, or pre-dating these LUP's (i.e. roads, airstrips, camps, drill sites, trenches etc.)
- proposed and pending Land Use Permits and the proposed activities
- future proposed developments
- NND Traditional Territory Land Uses and activities
- NND heritage sites and areas of special interests
- Hunting and trapping concessions in the planning area
- related developments (i.e. cabins, camps, airstrips etc.), Land Uses and activities
- Wilderness Tourism, current and anticipated Land Uses
- additional information to help understand important values such as
- YG wildlife and habitat surveys for moose, caribou, sheep, bear, raptors and fish etc.
- Mineral Lick surveys and ecologically sensitive areas
- Water quality data, Water sample results and baseline data if available
- Heritage sites and structures

I realize this is a lot of information and impossible for one person to understand so it may be helpful to have some of it presented by experts in the various fields. Other data could be provided as documents to further the understanding of the important values of the Beaver River Land Use Planning area.

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Why is only a portion of the Ladue River, and not the entire Ladue River watershed to the Stewart River, was included in the planning area?

The term prohibition to entry near Ladue Lake needs to be clarified on our mapping – people believe it applies to them accessing the lake not understanding it refers to claim staking.

Mapping should include all previous developments such as winter trails to existing operations including Blend and Rusty properties and trails up the Rackla River, airstrips, the Lodge at Kathleen lake and 5 other camps in the area.

Airships should be considered for future access

As there was next to no information available during the community meetings and presentations held with respect to important values such as land, water, fish and wildlife and heritage areas, I think it is imperative that the data collected thus far and any additional information such as government surveys and cumulative industrial use and proposed use in the watershed be made available to be able to incorporate this information in a comprehensive and meaningful submission. It would seem unfortunate to create a "what we heard" document without having provided all information that is available first as obviously most people will not have access to a lot of this data and therefore would not be able to consider all the necessary aspects and implications.

I did discuss this and other concerns over the phone with George Stetkiewicz back in March and indicated that there is a lot of additional and important detailed information available about the watershed that should be presented prior to the deadline for submissions to give stakeholders the opportunity to make the most informed and educated comments. I understand that this is "only" the information gathering stage of the process, however, I request that there should be the possibility for additional submissions once this information has been compiled and made available to the public.

As a stakeholder that will be directly affected by any development in the watershed, I feel that more in depth consultation is required at this stage of the process to allow the committee to consider all information. I am looking forward to hearing back from you and to discussing these issues on a more meaningful level.

I have been a resident of the Mayo area for more than 35 years. I attended the Mayo meeting where we were asked for comments on the proposed land use plan for this area. I listened to the many comments at this well-attended meeting and I shared the concern of the voices I heard. With one voice, we said "No to the road until the land use plan is completed".

This process is backwards. Why is a road driving the process, and not the other way around? We need to step back, say "No" to the road at this moment, and firstly, this is essential, firstly, do the land use plan for this area.

It is hard to comment when you see the whole process as flawed. Why the great hurry? The land use plan for the Peel River Watershed took seven years and yet I heard that this plan is to be pushed through in half that time. Why? How can the necessary research and studies be completed in such a short timeline?

My other objection is also about the process. I believe you can not do this plan independently of the bigger picture. What about the area adjacent to this one? This whole area, which is touching the Peel River Watershed area, is just as pristine, just as vulnerable, as that area.

In summary, we should not be doing piecemeal land use planning, after a road is approved, but before it is approved. We should do land use plans for the whole region before any roads are proposed. We, as the residents of the Yukon, and custodians of the land, need to drive the process and not be in the back seat reacting after the fact.

Although I understand that the scope of this committee does not extend beyond mitigation of effects of this project, my feeling is that the project should not go ahead before completion of the full regional land use plan for the Northern Tuchone Region.

I also feel that the YESAB assessment for this particular project was inadequate for something of this magnitude. The suggested mitigations are laughable in their simple-minded ineffectuality.

Let us not decide to build a road and later develop a land use plan to fit that prescription. Rather, let us decide what are the important values in the region and the decide if a road fits. Let us not be pushed into a "hurry up and approve this" situation.

I'm writing to protest against the proposed development of the ATAC road in the Beaver River area.

I am a property owner in Mayo and while I was not able to be at the well-attended meeting I am adding my voice to those who said "No to the road until the land use plan is completed".

Why is it stated in the MOU that the development of a road trumps a land use plan? Why does a road drive the process? My "NO" to the road is because there has not been adequate or thorough investigation into the environmental impacts of such a proposed development in this watershed area. A long term land use plan and all the impacts must be considered first before a decision is made. Is this not just another short sighted hypothetical and hopeful grasp at financial gain for a few? The rush to approve this seems to be verification of this!

It is essential that the land use plan for this area been done first. Should not the protection of wilderness when we have the luxury of still having some, be a top priority. We can't keep grabbing for economic development at the expense of destroying our environment, essentially our home.

How can the necessary research and studies be completed in a short time frame? And what is the big picture for the whole northern area? This area can not be "planned" independently of the bigger picture for all the area adjacent to this one.

Piecemeal land use planning, after a road is approved, is a backwards and seriously flawed process. Planning needs to be done for the whole region before any roads are proposed.

Yukoners as custodians of the land, need to be informed up front and drive the vision and process, and not be drug along and informed after decisions have been made. Is this really land use planning or just a token effort and just a knee jerk reaction to the wants of a developer? Where's the long term vision and where's the thoughtful, well informed discussion, research and engaged process?

In my opinion, the undisturbed character of the area, the cultural significance, and its intact ecosystems carry the highest value in the region. Yukon is known around the world as having true wilderness: large swaths of land that are free of human impact and disturbance. People are drawn to the Territory because of its natural beauty and colorful history. So I ask, why has a 65 km road been approved through an undisturbed landscape for

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exploration purposes? There is virtually no information on this area, and the impacts from the road are not known. The greatest concern for Na-cho Nyak Dun citizens is the over-harvest of moose along the road. ATAC has stated that gates will be used to prevent public access, but can you provide an example in the Yukon where a gate has been used effectively? You will be searching for a long time. And I know they have suggested manning the gates and having regular patrols but is that a long term plan? Will they be monitored in 5 years? 10 years?

Looking at the planning region as a whole, this tote road will have a minimal impact. However, there are many quartz and gold claims in this region and if there is suddenly road access, what is stopping additional development from other companies? Claims extend literally to the NWT border over 100 km's to the east. There are over 40 stream and creek crossings, some of which are salmon bearing. Considering the state of the salmon fisheries, shouldn't there be an emphasis on creating crossings that do not further hinder salmon? Culverts hinder fish movement when the water is low, and sedimentation associated with development destroys salmon eggs.

Now I am not against mining. People have to work to make money to feed their families. But I am against the rushed process of approving this project to meet a 2020 deadline, especially when all the impacts have not been assessed. Deadlines should not drive a land use plan. Perhaps a larger question is, must we search for minerals in every wild place left in the Territory? I ask that the deadline be extended until enough information can be gathered about the area in order to proceed with minimal negative impact. The land use committee should exercise the precaution principle when creating development plans in a wilderness area with almost no human presence.

The impacts from the decisions you make regarding this land use plan will be felt for generations, and set a standard for future land use planning in the Yukon.

I submitted comments to the YESAB consultation on the ATAC road which impacts the Beaver River watershed. In those comments, I opposed the proposed road for a number of reasons, perhaps the most important of which were the negative impacts that would accrue on wildlife, habitat and the intact ecologies in the region, which are also the known source of important subsistence values for local indigenous people.

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Although YESAB opted to propose mitigation rather than disallowing the road development, I do not think that the Planning Commission should base their plan on this flawed decision. The Planning Commission should not plan around development through mitigation, they should plan for the ecological values first, including substance harvest values of local people, and both of these should be prioritized above development that represents short-term gain of an economic nature.

It is incumbent upon the Planning Commission to 1) collect baseline information about the watershed and its values, 2) to allow adequate time to complete this data collection and create a draft plan, and 3) to consult with affected First Nation people and the public on a draft and final plan which ensures the ecological and cultural values of the Beaver River watershed.

The current timeline for the plan is too short to complete a meaningful plan and should be extended. The Planning Commission and the Parties should implement an OIC to halt further work on access and other developments that would compromise the current values in the watershed until the plan is complete.

In my original letter to YESAB opposing the ATAC road, I mentioned some of the impacts which I consider to be the most insidious and damaging to the bigger picture of intact ecologies of which the Beaver watershed is a part. These include, but are not limited to, incremental fragmentation and disturbance of habitat for wildlife, degradation of water quality and quantity, increased hunting pressure, species and biodiversity loss, and the vastly increased pressure on every living being, including humans, as a result of climate change.

I am glad that a land use plan for the Beaver River watershed is underway and I hope that it will be a meaningful exercise. Planning in the context of large intact ecologies like the Beaver River watershed requires a very different approach than traditional planning which emerged in urban environments, and it is important that both Traditional Knowledge and western ecological science are combined in an appropriate and meaningful way. I encourage the Planning Commission to use the handbook of ecosystem-based conservation planning (Hammond, H. 2009. Maintaining Whole Systems on Earth's Crown: Ecosystem-Based Conservation Planning for the Boreal Forest), which achieves all the above and much more, as a basis for developing their plan.

I do hold mineral claims in the area. I have been working the area for the last 12 years mostly looking for high grade zinc deposits. As with any potential mineral deposit access is most important thing once a economic discovery is made. I see a lot of comments have concerns with road access.

In the USA they have large remote areas that are only accessible if you have a commercial permit. You need a commercial permit to get access, as such they can monitor all who travel the back roads. If such a system can co-exist in the USA I would think such a system can exist here in the Yukon. Traffic can be monitored or controlled and only those who have a real reason to be on the road can gain access, and restriction can be placed on hunting and fishing. As a prospector my real intentions are to find a mine and help the locals gain access to jobs.

While living in Mayo I rode horseback from McQuesten Lake to McClusky Lake along the old Wind River trail and canoeed from McQuesten lake over to the Beaver River, down the Beaver river, past the mouth of the Rackla River joining the Stewart River and back to Mayo. After moving to Whitehorse I took grade ten students from the ACES program on this canoe expedition from McQuesten Lake to the Beaver River, joining with the Stewart River and then continuing to Mayo. I would use local curriculum material like Gold and Galena local history material, stay over at Lansing, Visit trappers and First Nations hunters along the way and visit at No Gold. We would also stop at the old Germaine home site above the Rackla River mouth and use topographic maps to get a better sense of the area. Have also flown into the Wind River several times, the Bonnet Plume and the Snake, out of Mayo.

And yes, this is still pretty much wild country and fish, including Chinook salmon, Caribou, Moose, Sheep, Grizzly bears and Wolves still inhabit the area largely unmolested. The entry waters for canoeists to the Beaver River from Scougale Lakes and Creek are one way to get into the area without flying to a headwater lake. On several occasions I have seen Chinook salmon carcasses in these upper reaches of the Beaver River watershed and know they have been netted at Lansing and also visit Pleasant Creek on the Hess River.

So my first thought is about water quality in the Beaver river particularly as this proposed road will cross numerous entry streams including the Ladue, traverse the very steep slopes on the East side of the Beaver River course

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after it crosses close to the old Wind River crossing and connect to the air strip which is likely on top of wet lands just behind the old Germaine homesite above the mouth of the Rackla River. Chinook salmon populations are already in trouble in the Yukon watershed but still provide an important fishery for Yukon First Nations and need long term conservation management planning. The pollution possibility legacy of this proposed road may well be catastrophic to these iconic fish because of this very long term leaching of road sediments and vehicle effluent, summer and winter.

Further to this Wolves and humans will use this road access for many, many years to predate on big game and gain easy access to otherwise hard to get to recluses of fish and wildlife. There could be significant, short term, economic gain to road builders and mining exploration and operations but the long term effects of such a proposed road, in this location, bodes poorly for local fish and wildlife.

Keep access to the area the way it is now with helicopters and possibly a fixed wing access road to Kathleen Lake, re-think putting a back country airstrip on a wet land as there are significant numbers of migratory waterfowl that use the area for nesting and rearing young.

In teaching students, myself included, and helping to better understand our common, ecological footprint fish, wildlife, including bird life, require long term thinking and appropriate infrastructure. This tote road long term impact appears to me to be fraught with problems.

I am writing to you today to express my concern over possible outcomes of the Beaver River Sub-Regional Land Use Planning process. As a 45-year participant in Yukon's mining exploration industry, I am familiar with, and agree with, the broad concerns put forward by the Yukon Chamber of Mines regarding precedent setting nature of this ad hoc planning process, legitimacy, terms of reference and further loss of land available for exploration.

As a now retired executive of [REDACTED] and a long-time exploration geologist I am more versed than most of the mineral potential of the [REDACTED] project, central to the Beaver River Land Use Planning area. Prior to ATAC's initial investigations of mineral potential in the region in 2007, any planning exercise would have rightfully consigned the mineral potential to be relatively low, despite its immediate proximity to the

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Keno Hill silver mining district and Victoria Gold's soon to be opened Eagle gold mine. ATAC made a very significant new discovery of high-grade copper-gold mineralization on the property in 2018, in addition to previously established potentially economic reserves of gold at the Tiger Deposit. The upcoming exploration season will be focussed on exploring that copper-gold discovery along with newly found areas of promising silver and zinc mineralization on the property. Economic potential of the area is quantifiably higher than most regions in the Yukon and more so given proximity to highway access and the electrical grid.

Opportunities like this for adding to the economic sustainability of the Yukon are rare, especially in these times of cyclically low metal prices. ATAC has made a very concerted effort at consultation and implementation of exploration best practices and I have every reason to believe that those practices will continue. Odds of advancing an exploration prospect to a long-lasting mining operation from are, of course, long - but if exploration rights are denied especially in an area of such well endowed mineral potential, then that potential is forever lost.

I am asking the committee to take into account the significant mineral potential in the region when making recommendations for land use.

I would like to take this opportunity to express my concerns with the Beaver River Land Use Plan as it currently stands. The questions the Planning Committee has posed to the community in public meetings and through other avenues are, very generally, asking what valued components should the committee be aware of and to identify any specific information about the area that would be helpful. My concerns fall considerably outside the scope of these questions because I have issue with a number of aspects of the planning process itself which I have tried to outline below. I sincerely hope that you will take these comments into consideration, as well as those made by other groups and members of the community, which concern these topics and don't necessarily fit within the frame of your stated questions.

Planning Process:

The current Beaver River Land Use Plan was not initiated in the manner stipulated in Chapter 11 of the Final Agreement and in a way which was meant to assess a region of interest with sensible connectivity. This process was initiated by an industrial proposal submitted to YESAB for the construction of a

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road into very remote and sensitive habitat. Despite the controversial nature of the project and the scale of its potential impact, the

project was only evaluated at the Designated Office level. The resulting MOU between YG and NND led to the development of your committee as well as sub-regional boundaries for the plan which ludicrously involve a smaller watershed within the Stewart River Watershed with an additional geographic "appendix" the right size to accommodate a fictional road which is assumed to eventually develop into fruition.

Ultimately, I am frightened by the fact that something as extremely important and time-consuming as a land use plan can be prompted by, and catered to, a proposed industrial activity. The entire process, if it continues in this manner, will set a precedent that negates vital aspects of the Final Agreement, sends the message to the public that their input is secondary, and frames the land use planning process as a method for proponents to have their projects move forward with the appearance of being "sustainably" planned and developed. A true land use plan should involve first putting a moratorium on ALL activity in the planning area until a plan is created, then gather every amount of input and information available, move towards amending, accepting and then implementing the plan based on consultation, and then assess any developments or changes in a region according to the plan. To start with a proposed development and try to build a plan around it is to completely turn the process on its head and render it disingenuous, unsustainable, and ultimately ineffective. I am honestly frightened that the process your committee is currently mandated to undertake will set a precedent for future "land use plans" that truly don't allow for proper participation and consultation from the very beginning and adhere to the Final Agreements.

The following is a summary of specific points I have concerns with:

Prohibition Orders: It is imperative that all activity in an area halt while planning is taking place until a plan is complete and activity can be assessed in reference to the plan. This was stipulated in section 1 g) of the MOU yet never occurred with the exception of the "road corridor."

Timing: the timeline set-out in the MOU for the planning committee (section 1. d) i) to undertake its work is extremely short and cannot possibly allow for the work necessary. In particular, a number of data gaps including habitat mapping, wildlife population counts and geological data among many other aspects need to be addressed before a plan can be developed.

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Access Management Plan: The MOU states in section 3 that any conflict between the Land Use Plan and the Road Access Management Plan will result in the Road Access Management taking precedence. This clearly reveals not only the priority of the parties to cater to a currently non-existent road, but also makes the Plan ineffectual.

Scope and Reason for the Road: The original YESAB application and the MOU consider the tote road as a means to “support [ATAC Resources Ltd’s] advanced exploration and feasibility level development work at the Tiger deposit.” (section “A” of the MOU). Despite this being framed as a means of advanced exploration, mention of an upcoming mine and the assumption that a mine will develop is in common parlance even among planning committee members at public meetings. Any development should be assessed for its true impact within the entire scope. I find it worrying that a line is continually drawn on maps so the notion of a road is engrained in the public psyche as a certainty while a development stated on paper as “advanced exploration” is talked about in reference to an upcoming mine. Scope and clarity of intent must be evident from the very beginning and the public must also have input from the very beginning. This has, so far, not been the case.

In Summary:

The Yukon Territory is one of the few places on this planet that still has large swaths of in-tact wild habitat and interconnected ecosystems on a large and functional scale. Their worth in-and-of-themselves is immeasurable. The Beaver River watershed is one such area. As soon as these areas become fragmented by any type of development, very quickly and cumulatively, this value is depleted irreparably. It is therefore vital that development within this territory be done with foresight that spans into the centuries and considers all past, current and potential future aspects, values and stresses. In effect, true and thorough land use planning. The current Beaver River Land Use Planning process is not an example of this type of necessary diligence and I strongly urge the parties to reconvene and reconsider their approach for the health and future of this territory.