11 Response to Public Consultation Comments

11.1 Ross River Dena Council Comments (Review of Environmental Assessment Report for Wolverine Project)

11.1.1 Cover Letter

The report is divided into two sections, a description of our comments and concerns and a compilation of questions our people would like to be answered. A map is attached to illustrate some of the issues. We realize that some of the comments, concerns and questions may not be part of the assessment itself; however, we feel that all of our issues must be heard by YZC, YG and other stakeholder of the process to improve their understanding of our concerns and, hopefully, lead to project improvements right away.

11.1.2 General Concerns with EAR

1. We would like to clarify that Light Creek, as we know it, is located northwest of the creek referred to as Light Creek by the proponent (see map). To avoid confusion, this creek must be renamed. We further encourage the proponent to research the Kaska names for the creeks, lakes and mountains in the area to give them their proper names. Further, elders' knowledge should be used to identify creeks and water flows in the area.

YZC Response:

We will rename Light Creek, as shown on the map, plus other features to Kaska names that they are referred to or as selected by the Kaska.

2. One elder stated that the reason for the airport acting like a ramp is that it is build over a creek not acknowledged by the proponent. We are concerned about this creek being blocked for spawning fish.

YZC Response:

The airstrip was originally constructed in the mid 1990's on the northeast side of Go Creek and does not cross the creek. Go Creek runs parallel to the airstrip and, at the northwest end of the airstrip it has been culverted under the access road. The topography naturally slopes (or ramps) upstream. Based on fish and fish habitat assessments conducted in 1996-7 and 2005, no fish were found in the upper reaches of Go Creek.

3. We would like to know more about the impacts of the road development, especially during the construction phase. We are concerned about the concentrated noise on the local wildlife.

YZC Response:

The road will be constructed from both ends to minimize the period of potential disturbance. The main construction period will be during July and August 2006.

4. We still need to know why the route proposed by our elders has not been chosen by the proponent.

YZC Response:

Several routes have been suggested in the past year, and it is not clear which road route is being referred to. One of the routes proposed would go northwest from the mine site along the east side of Wolverine Lake and join the KZK road. This route is not preferred as it would travel along the lake and through caribou calving grounds. A second route proposed would travel east up the mountain behind the mine site. This road would be unfeasible from an engineering perspective due to the steep slope and low gradient requirement for haul trucks. It would also require numerous cut and fill slopes leading to an aesthetically unattractive site from other areas in the Wolverine watershed, as well as increased erosion potential. YZC met with the RRDC in early July 2005 and submitted a proposal for a joint study on the access road. It included plans for the comparison of road route options, opportunities for additional biophysical and archaeological field studies and the collection of traditional knowledge information. This proposal resulted in helicopter tour of a couple of potential road routes by YESAA coordinator Testloa Smith and LGL Consultants on behalf of the RRDC. It also resulted in the preparation of a proposal by the RRDC to YZC for funding for a Traditional Knowledge Study. See 11.1.6 below for the status of that study.

5. Finally, as this report demonstrates, our people are concerned about the quality of studies undertaken by the proponent, lacking data and environmental damaging practices at the mine site. We are requesting the proponent to employ a Kaska to act as environmental monitor at the mine site for this summer's activities. This monitor would participate in all studies undertaken at the mine site, communicate with the Council on important environmental issues and suggest necessary environmental monitoring studies, which are timed to the occurrence of wildlife and fish at specific locations.

YZC Response:

YESAA coordinator Testloa Smith participated in numerous meetings pertaining to the studies conducted in 2005. Concerns were brought forward and work plans were revised as necessary for components including surficial geology and soils (including terrain hazards), aquatic resources (periphyton, benthic invertebrates, fish resources), terrestrial resources (soils, vegetation, wildlife), water and sediment quality, hydrology, and archaeology. Several Kaska were employed at the site in 2005 and participated in these studies.

As stated in the Environmental Assessment Report (EAR) there will be an Environmental Manager and an Environmental Technician onsite fulltime. There is opportunity for a Kaska employee to fill the Environmental Technician role, not only in the summer, but also year round.

11.1.3 Environmental Effects of EAR

11.1.3.1 Wildlife in LSA

6. The proponent states that the LSA contains only moderate marten habitat. However, the LSA, especially in the vicinity of the road, is known for its prime marten (pine

marten). A local trapper who trapped in the early 1990s along the proposed road (close to Campbell Highway) has gotten high prices for his high-quality furs. According to this trapper, marten were abundant on his trap line in December and January. In February they move on.

YZC Response:

The EAR (p. 7-299 to 7-300) states that suitable marten habitat is found in the LSA. Although no marten or sign of marten were recorded during the field sessions associated with this project; several records of observed marten were noted at the exploration camp on Wolverine Lake. Marten were considered by YZC in the EAR to be an important species due to their economic value as a trapped species in the area.

7. Our people state that marten, within a close proximity to the mine site, are rare at the moment and, thus, must not be threatened to secure their population rebound in the area. They also confirmed that there are lots of moose, beaver, lynx, rabbits, fox, grouse (willow and blue grouse), otter, mink, weasel and some wolverines in the area of the proposed road. They state that baseline studies of the furbearers must be undertaken to better understand the effects of the road development on their populations.

YZC Response:

For studies conducted in 2005, a number of key issues were defined to focus the wildlife assessment on. The potential project effects on wildlife included the following key issues:

- ***Habitat availability**—impacted either directly by habitat loss or alteration, or indirectly by sensory disturbance (e.g., noise, human activity) and reduced patch size (e.g., increased habitat fragmentation). Potential project effects are related to clearing and removal of habitat in the minesite area, clearing and construction of a 25 km access road from the Robert Campbell Highway to the site, and human use activities associated with both facilities (underground blasting, ore crushing, air and road transport).*
- ***Disruption to movement patterns**—resulting from increased habitat/landscape fragmentation (e.g., increased density of access corridors) or higher road use levels limiting daily or seasonal wildlife travel. The mine access road and Robert Campbell Highway, south of the access turn-off will be used to haul concentrate on a regular basis.*
- ***Mortality risk**—increased mortality resulting directly from site development, vehicle collisions (i.e., mine traffic), increased hunting/poaching, or lethal control of problem wildlife.*

Of these key issues, the potential for increased wildlife mortality rates due to increased road access and human use is of particular concern. In the EAR, YZC has listed monitoring and follow-up programs and project effects for caribou, moose, grizzly bear, lynx and snowshoe hare, American marten, the songbird community, trumpeter swan, beaver, and thinhorn sheep. Refer to EAR Section 7.10 for additional details.

8. The proposed mining road as well as part of the Campbell Highway (between the mining road and Frances Lake) is situated in prime moose habitat. We are concerned about the number of road kills this development will cause. The speed limit of 60

km/h proposed for the mining road may reduce incidences. However, once a truck is moving, especially on downhill sections, it will be difficult, if not impossible, to give animals right away. Thus, road kills will be unavoidable. To limit the number of road kills we request that the speed limit of 60 km/h to be observed along the mining road will be extended to the Campbell Highway. Further, we request that all road kills and wildlife encounters on the mine site and the haul way will be reported to us immediately.

YZC Response:

As indicated in the EAR, the speed limit of the mine access road will be 60km/h. Monitoring programs, including documentation of wildlife sightings in or near the project area, road kills, and problem wildlife incidents will be conducted by YZC during life of project. YZC will report any wildlife encounters to the RRDC.

9. Linear developments are known to benefit wolves in their hunting activities as these corridors offer easy movement. Thus, this road will increase impacts on moose not only through reduction of habitat, but also through easing the movement of its main predator. Clearly, the development will increase the hunting pressure of wolves on caribou and moose in the area. Therefore, linear developments have to be minimized and reclaimed as soon as possible. Further, the road clearing must be minimized to leave cover for animals, and to protect soil and permafrost. The Ross River Dena Council (RRDC) requests the closure and reclamation of the mining road after mine closure to limit its long-term effects on the wildlife in the area.

YZC Response:

Once areas are no longer in use, including the road route, they will be reclaimed. A road decommission plan will be prepared upon completion of detailed road engineering in spring 2006. It will include details pertaining to slope stability and surface reclamation, water management and control of road access. Following the cessation of all activities onsite, the road will be fully decommissioned, reclaimed and impassible.

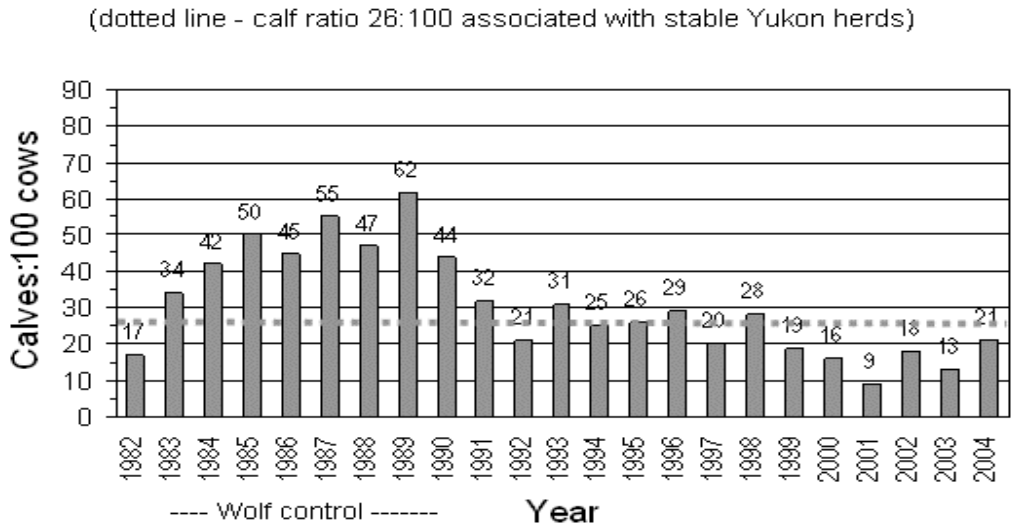
10. Local people state that there are not many caribou during wintertime in the LSA; however, the area is important to the Finlayson Caribou herd during calving, post calving and rutting season. While the proponent argues that the Wolverine project is located in the outskirts of the caribou herd, local knowledge insists that the mine is located in prime caribou country. One local person recounts to have seen about 60 caribou bulls in the mid 1980s around the end of July at today's mine site. Further, our people report a steady decline of the Finlayson Caribou herd.

YZC Response:

Finlayson caribou herd (FCH) locations as documented by Environment Yukon from 1982 to 2004, and local study areas boundaries, are provided in ***Error! Reference source not found.*** *(see Figures Section). The known range of the FCH is approximately 29,100 km^2; the local study area for the project overlaps approximately 3.5% of this known range.*

It was acknowledged in the EAR that management of the FCH in response to population declines had included wolf control efforts, reductions in sport hunting, and that First Nation hunters had been encouraged to harvest male over female caribou. Wolf

predation and human hunting were probably the main causes of caribou population declines in the area; since 1998 the licensed harvest of Finlayson herd caribou has ranged from 3-8 animals/year and the First Nation harvest was cut in half over this same time period by voluntary compliance with conservation concerns for the herd (Farnell, 2005b, pers. comm.). As supplemental information, the figure below was provided by Environment Yukon (Farnell, December 09, 2005 pers. comm.) and indicates declining calf recruitment for the FCH.



11. Part of the Kudz Ze Kayah project, located in the vicinity of the Wolverine project, was detailed caribou studies undertaken in the mid 1990s by caribou biologist Rick Farnell. These studies found that caribou are calving between May 20 and May 27. They required Cominco to cease any noise producing activities for 2-3 weeks surrounding these dates to ensure that caribou could calve in peace, avoiding the potential of them aborting or abandoning their calves.

YZC Response:

YZC will adhere to similar mitigation practices to ensure the protection of wildlife, especially during sensitive periods.

12. Sheep react similarly sensitive to noise during calving season. One local recalls having been told by biologists that sheep can develop stress-induced pneumonia. Thus, the proponent should cease any noise development (blasting and air traffic) during calving season of sheep and caribou. Hiking east of Wind Lake, locals have heard blasting noise from a 26 km distance from the mine site. Using a 26 km radius around the mine site, it becomes apparent that the impacts of the mine, especially on caribou and sheep, goes far beyond the limits of the LSA or the RSA (see map). To better understand the impacts of air traffic on the animals in the area, we would like to know the numbers of flights planed per month to and from the mine site.

YZC Response:

No surface blasting has occurred at the Wolverine mine site to date. Underground blasting occurred periodically over a five month period in 2005.

As outlined in the EAR, there will be regularly scheduled flights for employees on a two-week on, two-week off rotation. Two 30-passenger planes will be used that will originate from Whitehorse with stops in Ross River and Watson Lake. Beside the scheduled personnel flights, the aircraft will also be used periodically for emergency supplies and in the event of a medical emergency. The majority of supplies will be mobilized to the site via the Robert Campbell highway and the access road. YZC proposes to adopt and follow the Yukon Guidelines for helicopters and fixed-wing flight paths and altitudes in the vicinity of sheep and other wildlife species; and provide orientation programs and training to staff, pilots, guests and contractors with respect to wildlife harassment policies.

13. Further, sheep, as well as caribou and moose are moving throughout the season. The map showing sheep habitat shows that the mine is in the pathway of different sheep locations. The mine has and will further greatly influence the movement of these animals. Since exploration started at the mine site, people noticed some animals avoiding the mining area already at this point in time. While the movement of animals to other areas may be acceptable from a researcher's point of view, it increases the uncertainty of our people to carry out their traditional practices. Thus, a study must be undertaken to look at the impacts this development has on the local sheep, moose and caribou populations.

YZC Response:

In 2005, studies were undertaken to look at the impact of the project on local species. Based on the findings detailed in EAR Section 7.10, the project results in disturbance of a relatively small area within a region that is rich in wildlife habitat and very little existing disturbance(apart from the Robert Campbell Highway). Using conservative assumptions about the size of the project disturbance footprint, effects on habitat availability for all valued species assessed are expected to be low in magnitude and therefore not significant.

Barrier effects to wildlife movement are predicted to be low. The project is on the perimeter of the Finlayson Caribou Herd Range. Concentrate haul south to Watson Lake will avoid potential effects on intensely utilized caribou range to the north. The relatively narrow right-of-way for the access road and low level of traffic will allow wildlife to cross with little impediment. Accordingly effects on wildlife movement patterns are expected to be not significant.

Potential wildlife mortality due to wildlife collisions and hunting on the access road is a concern. Mitigation measures to manage hunting/collision mortality will be implemented as part of the Environmental Protection Plan:

- *Access to the private mine haul road will be restricted by a locked gated during the construction, operations, and decommissioning and closure phases of the project.*
- *Firearms will not be permitted.*
- *Hunting and fishing will be prohibited at all times on or in the vicinity of the project site. This restriction will apply to all mine employees, managers and contractors. It will be in effect throughout the life of the project from construction through to closure and reclamation. Infringement of this policy is to be reported.*

- *Fuel haul and concentrate haul volumes will be approximately 13 round trips per day on the proposed mine haul road. Incidental traffic will be kept minimal with air access being used for employee transfers.*
- *Maximum speed limit on all access roads will be set at 60 km/hr.*
- *Any observed wildlife corridors will be signed to alert drivers to potential wildlife crossings.*
- *Any mortality on the access road will be recorded and reported and any modifications to the mitigation measures will be considered in consultation with YTG and the RRDC, as required.*

14. All measures available should be taken to avoid bear activities on the mine site. There must be electric fencing around the areas that are of particular interest them. Problem bears should not be shot, but re-educate (scare them off the mine area) so they stay away from the development area.

YZC Response:

EAR Section 9.5.2.2, Wildlife Issues and Proposed Mitigation discusses the potential for and the management of wildlife attractants. In the event of wildlife situation, the Environmental Coordinator, Mine Manager or designate(s) will initiate the appropriate response actions problems. Any direct intervention with respect to problem wildlife will be conducted by authorized personnel in consultation with the Kaska onsite monitor or Kaska representative, and as approved and/or directed by Environmental Yukon officials. Authorized personnel will opt for non-lethal solutions (e.g., aversive conditioning, relocation) whenever it is considered appropriate and safe to do so. The following table provides proposed mitigation practices for bear issues.

Proposed Mitigation Practices for Bear Issues

Bear Safety	1. Bear safety pamphlets will be available from the Environmental Coordinator, Mine Manager or designate(s). 2. Bear safety videos will be available for viewing at any time. 3. Crews working in the field may carry commercially available personal deterrent devices (i.e., bear spray, bear 'bangers') but will require an orientation on the use of these devices. General restrictions on the use and transport of these devices must be followed. 4. Employees are not permitted to have firearms on or in the vicinity of the Project site. 5. Immediately notify the Environmental Coordinator, Mine Manager or designate(s) of any problem bear or bear safety issue (e.g., bear-human interaction). 6. The Environmental Coordinator, Mine Manager or designate(s) will initiate the appropriate actions in response to a problem bear or bear safety concern. 7. Only authorized personnel are permitted to use non-lethal (e.g., rubber bullets) and lethal problem bear or bear safety interventions. 8. Do not attempt to deal with a problem bear issue on your own. Problem bears can be dangerous.
Bear Aware	1. All new and returning staff and contractors are required to participate in a Bear Aware Program orientation. 2. Bear Aware pamphlets will be available from the Environmental Coordinator, Mine Manager or designate(s). 3. Conform to all requirements for preventing problem wildlife. 4. Report all bear observations from in and around the Project site and along access roads.

15. Tailing must be fenced right from the beginning of the mine life. Experiences in Faro demonstrate that animals, such as moose, are attracted by the minerals in the tailing ponds. We frequently see animal tracks going through the Faro tailings. As we depend on the health of our animals, we will not accept any mining development in our territory without fenced tailings facilities.

YZC Response:

Trapping of wildlife within the tailings impoundment is not anticipated to be a concern during or after operations. The facility will be an active area during operations with tailings and reclaim water being pumped and waste rock (DMS float rock) being trucked on a predominantly continuous basis. The amount of activity in and around the tailings facility will deter wildlife from the immediate area.

At the end of operations a coarse layer of gravel sized material (DMS float) will placed over the entire pond area (see Section 7.6 for additional details). This layer will not pose a concern for wildlife to exit from the pond should they enter it. Also, the adjacent topography will not prevent exit as the tailings facility is situated within a shallow bowl shaped area and the north and east edges of the facility at the end of operations will shape to the surrounding terrain. During closure, water treatment is anticipated to continue during the spring and summer months for approximately a three year period (see Section 9.3 for more information).

16. Further, people are concerned how contaminated water could influence the health of migratory birds. Thus, water has to be monitored on a constant basis to ensure high quality water for the birds. Of special importance is the water quality of the flooded tailings pond, which should be monitored well after the closing and reclamation of the mine. Plans and financial resources must be in place in case the water quality will not stay within acceptable guidelines.

YZC Response:

See response to #15 above. The tailings impoundment water will be treated during operations and closure to ensure compliance with site specific water quality criteria in Go Creek. Stream water quality stations will be monitored downstream to ensure that aquatic and avian species are being protected.

11.1.3.2 Fish in LSA

17. The proponent argues that the occurrence of fish in Go Creek is limited to a point south of the mine site (approximately 5 km). Kaska people say that this is incorrect. Further, people insist that there are fish in all the creeks surrounding this area. For example, there are grayling in one of the creeks the proponent describes as poor fish habitat. These graylings are small because they are land locked by beaver dams, but they are also very tasty. The Kaska people request that a study of fish populations be undertaken which is not based on assumed fish habitat, but on the actual fish in the water. Such a study must consider the differences in spawning times of the diverse fish populations in the area.

YZC Response:

Copies of reports of fish and fish habitat studies are summarized in the EAR Fish Resources Baseline Data Report (Appendix 7.8-1). Studies conducted in 1996-7, 2004

and 2005 confirm the presence of seven species in total including bull trout, lake trout Arctic grayling, slimy sculpin, northern pike and burbot. No fish were found in Hawkowl Creek or the upper reaches of Go Creek during 1996-1997 and 2005 studies. For Go Creek, the upstream limit to fish distribution was found to be 4.5 km upstream of the confluence with Money Creek (consistent with previous studies). Studies considered the life cycles of the various species.

18. There are concerns about the use of floatplanes on Wolverine and other surrounding lakes as it is assumed to be a reason for decrease of fish (experiences with Jackfish Lake near Ross River).

YZC Response:

All plane traffic to and from camp for Wolverine employees will be by 30-seater planes that will land at the airstrip. The new camp will be constructed near the airstrip.

11.1.3.3 Water Quality

19. The most important issue for Kaska people is the water quality surrounding the mine site and down stream. Both, surface and ground water must be well taken care of. Water should be recycled to minimize fresh water use. Past practices by the proponent, such as defrosting creeks by spilling diesel on surrounding brush and burn it are absolutely unacceptable. Any spill, whatever size, must immediately be reported to us.

YZC Response:

Based on the proposed water management system at the mine site, most of the water (94%) will be recycled between process plant and the tailings facility. Fresh water used as potable water and emergency firewater at the industrial complex and the camp will be obtained from the groundwater well at Go Creek.

YZC is unaware of an incident where diesel was used to defrost a creek by spilling diesel fuel on surrounding brush and burning it. Please provide additional details such as source of the information and location and time of occurrence, so that YZC can verify and provide additional information.

20. While maps 7.5-2 and 7.5-3 show an impressive amount of water testing sites, the attached list of actual water sampling occasions shows that water sampling is insufficient. We are especially concerned about the water near the present camp site. We are expecting grey water entering the lake at this place, yet no water has been tested at this point since June 2000. The number of people working this year at the mine site is expected to rise from approximately 35 people to 80 people. We request that proper sewage treatment facilities are build now, the grey water release into Wolverine Lake is being stopped and water testing around the camp site be undertaken as soon as possible. Further, Kaska members insist that all creeks near the mine site must be tested at an ongoing basis, especially where they enter lakes (including France Lake). Further, there must be testing sites where Kaska people get drinking water (Van Bibber Creek, Money Creek and the creek referred to by the proponent as Light Creek).

YZC Response:

The water sampling work plan was developed in conjunction with the Ross River YESAA coordinator and the EAR technical committee to ensure adequate characterization of the watercourses around the proposed mine site (Go Creek and tributaries, Wolverine Creek) and downstream (Money Creek upstream and downstream of Go confluence), areas along the proposed access road, and potential reference areas. Prior to the monthly sampling conducted in 2005 at 30+ sites, historic sampling programs included:

- *1995 – 22 stations in October*
- *1996 – 11-29 stations in March, May, June, July, August and November, with extensive sampling in late July and late August*
- *1997 – 12-29 stations in March, May, June, July, August and September, with extensive sampling in May, July and September*
- *2000 –14 stations during June*
- *2001 – 6-10 stations in January and July*

Water sampling will continue as outlined in the EAR and Section 9 of this document.. Regarding grey water and sewage treatment, the mining camp will be constructed near the airstrip along with a sewage treatment plant.

21. One elder raised concerns about a drill site near Little Wolverine Lake. He states, water is running through the drill site right into Little Wolverine Lake.

YZC Response:

The drill site referred to is actually the pump/water intake site situated on Little Wolverine Lake during the spring of 2005. Water was pumped from the lake via a series of hoses to the drill sites located near the mine site. No drill water was released to the lake.

22. Elders are concerned about the tailing dams. They recommend that there should be several dams, so that in case of one dam's failure, others could retain the tailings and water.

YZC Response:

The tailings dam design has incorporated flood storage capacity as well as seismic and geotechnical components, and has been designed to the highest standard for potential risk. An assessment of a dam breach is provided in Section 7.9.1

11.1.4 Section 2.8.2 Tailings Storage Facility, pages 2-75 to 2-76

23. Further, community members are concerned about the quality of ground and surface water after mine closure and reclamation. Has climate change been incorporated into the calculation of the water necessary to sufficiently cover the tailings?

YZC Response:

Effluent discharged from the tailings facility water treatment plant to Go Creek 200 m downstream of W16 will be treated to reduce levels of metals and other constituents (TSS,

pH, ammonia, nitrate) so they meet water quality objectives in Go Creek in fish-bearing waters throughout the year for all parameters. As a result, the discharge of metals to Go Creek is not expected to have an adverse effect on water quality, benthic invertebrate or periphyton communities. The tailings facility will be lined with an impermeable liner; therefore groundwater impacts are considered to be negligible.

All aspects of inputs/output have been incorporated into the tailings water balance. Climate change has been considered for the project a whole (see EAR Section 7.2.3), but it will have an insignificant effect on the volume of water required to cover the tailings pond as there is a net inflow of water into the facility after closure.

24. What gives the proponent certainty that the water flooding the tailing, as well as the ground water passing the sealed drill wholes and entering Wolverine Creek will not become contaminated?

YZC Response:

The tailings facility is located in the Go Creek drainage, approximately 3 km from the headwaters of Wolverine Creek so the facility water will not affect Wolverine Creek. See response to #23 and further details are provided in Section 9.

25. What happens to the sealing of the drill holes in the event of an earthquake?

YZC Response:

The Tintina Trench is a localized seismogenic zone located near the Wolverine Project (further details are provided in Section 7.2.3). An earthquake poses no environmental risk to the drill hole seals.

26. Does government guarantee to test the water for another 100 years after mine closure to control the compliance of water with the guidelines? Should, after 50 years government become aware that the groundwater becomes contaminated; will they take the financial responsibility to clean it up?

YZC Response:

YZC cannot answer on behalf of the government but can provide information pertaining to water quality and compliance. YZC will be required to post a bond as part of its License requirements to ensure that short and long-term closure objectives are met.

27. Are methods and techniques available to deal with contaminated groundwater in the Wolverine Lake water shed?

YZC Response:

Yes. Potential impacts pertaining to flow, water quality, and aquatic resources in Wolverine Creek are detailed in Section 6.4.9. Since Wolverine Creek is a small watercourse (0.3 m channel width) that represents only 0.8% of the total watershed area of Little Wolverine Lake, any effect on Wolverine Creek would not affect Little Wolverine Lake, or Wolverine Lake.

11.1.5 Trapping Concerns

28. The Wolverine mine site is directly impacting the group trap line held by the RRDC and a private trap line, Registered Trapping Concession (RTC) 250. While depicting both on map 7.11-1, the proponent failed to consider the later one in his assessment report.

YZC Response:

EAR Section 7.11 recognized the following trapping concessions: RTC 249, 252, 255, 259 and 405. RTC 250, which was inadvertently omitted, as well as those concessions previously listed, are shown with actual RTC numbers in Figure 11-1.

29. Besides compensation for lost income, local trappers request the provision of easy access to trapping trails (no cutting off of existing trails for ATV and snowmobile traffic) and the granting of occasional uses of camp faculties.

YZC Response:

YZC will not limit current access routes to trapping trails. The haul road and camp facilities will be for mine use only, due to safety and environmental reasons.

11.1.6 Archeological

30. The area surrounding Wolverine Lake has been heavily used by our people during winter as well as summer time. There are many signs of our occupation in the area, such as old tree stumps and camps. Elders ask to be respectful of their cultural sites, especially the graves of our people, one of which is located right at the mine site.

YZC Response:

In fall 2005, YZC entered into a Traditional Knowledge Protocol Agreement with the RRDC to ensure that traditional knowledge is not compromised in any way by project activities. In August 2005, an archaeological impact assessment of proposed and existing project facilities sites was undertaken. No palaeontological, archaeological, historical or recent traditional use sites were identified. During this reconnaissance, two sites were previously reported at the south end of Wolverine Lake, in the vicinity of the exploration camp. Because they occur outside of the proposed disturbance footprint they were not revisited in the field. YZC has funded a traditional knowledge study and awaits the report from the RRDC.

The report will provide additional information on traditional use patterns and the possible occurrence of heritage resources in the project area to aid with proper management. If necessary, additional field studies will be undertaken to collect information for inclusion with the archaeological impact assessment and permit report.

In regards to respecting any cultural sites that occur within the LSA, or within an area potentially accessed by YZC personnel (for example, two sites at the south end of Wolverine Lake), the status and adequacy of protection will be reviewed in consultation with the Kaska Dena. Requirements for any site-specific protection to be implemented in the context of the current project will be developed upon receipt of the Traditional Knowledge Report from the RRDC.

11.1.7 Cumulative Impacts

31. We are dissatisfied with the cumulative assessment of the project. This area is heavily impacted by a variety of developments:

- Campbell Highway,
- tourism (Inconnu Lodge/Kluane Airways; Teslin Outfitters),
- several exploration camps (Thunderstruck - YZC, Fyre Lake - True North Gems, Kudz Ze Kayah - TeckCominco and R-15 – TeckCominco),
- staking efforts everywhere (with the potential of new mine discoveries),
- private land use (with ongoing applications for more land disposition), and
- local traditional land use.

Most of these developments cause noise (float planes, helicopters, blasting, air traffic etc.) and pollute the environment (fuel spills, garbage, sewage etc.). The habitat of the Finlayson Caribou herd, moose and sheep is already severely fragmented.

YZC Response:

In order to evaluate and characterize cumulative environmental effects, the effects of existing development and foreseeable future development were reviewed. A list of existing tenures and activities in the southeastern Yukon that could potentially contribute to cumulative effects were detailed in EAR Table 6.8-1 and are summarized by general category below:

- *industrial – mines, mineral exploration, major mineral deposits, oil and gas*
- *protected areas*
- *hunting, outfitting, trapping (including Teslin Outfitters Ltd. and Ross River Dena Council)*
- *recreation areas (including Frances Lake Wilderness Lodge)*
- *communities*

The scope and rationale for cumulative effects assessment for each valued ecosystem and cultural component along with the categories listed above (where appropriate) were described in EAR Section 7. In addition, EAR Figures 7.11-3 to 7.11-7, respectively, provided the following location information:

- *mines, mineral deposits and exploration areas*
- *Game Management Zones*
- *registered trapping concessions*
- *outfitter concessions*
- *protected areas and recreation sites*

32. Furthermore, climate change must be taken into consideration when assessing the cumulative effects of development. Cold spring times are assumed to be the reason for the poor calve survival of the Finlayson Caribou herd in recent years. This,

however, has not been scientifically studied by governments because of lacking funding. Thus, an in-depth study must be undertaken to better understand the different factors influencing the health of the caribou herd and their correlation, as well as a management plan must be developed to ensure the survival of this herd.

YZC Response:

The effects of climate change were presented in EAR Section 7.2.3. See responses to #10 for additional information on calf survival. It is beyond the scope of the EA for YZC to comment on the previous or required government studies.

33. The proponent assumes that because there will be little to no relocation of workers to the or within the Yukon, that "no undue demands on existing health, law enforcement or social services are expected in the communities of interest". However, experiences with the Faro Mine and other projects surrounding Ross River have demonstrated that there are impacts independent of in-migration of a mine workforce, which need to be considered.

These impacts are often associated with an increase in disposable income for community members. Alcohol and drug abuse are the most important impacts, which, in turn, can increase family violence and accidents (freezing, burning, traffic accidents, murder). The effects of the Faro Mine were tremendous and have not been forgotten by our people. Thus, it is crucial to put measures in place to, first, minimize negative impacts and, second, mitigate negative impacts that occurred.

In order to do that monitoring is necessary, which includes the collection of baseline data and the recurrent check-up of any changes. Also, the proponent, YG and RRDC must work together to secure sufficient funding to RRDC - Margaret Thompson Centre, local Yukon Government Social Services and the local nursing station to allow them to upgrade and broaden their services for the community.

YZC Response:

In July 2005, YZC signed a Socio-Economic Participation Agreement (SEPA) with the RRDC that provides a basis for participation by all Kaska in project exploration and development activities. In addition, the agreement sets out to advance the achievement of social and economic development of the Kaska Nation members, communities and governments, while minimizing cumulative adverse environmental and socio-economic effects of the Wolverine Project on the Kaska. As part of this Agreement, annual funding will be provided by YZC to support the development and maintaining of social, health, educational and recreational programs within the community of Ross River during the period of its mine operation.

34. The ban of alcohol and drugs at the mine site must be rigorously enforced.

YZC Response:

Agreed. In 2005, several employees were dismissed for this reason.

11.1.8 Local Employment

35. An assessment must be undertaken to find out how many people, in fact, can be hired locally. The skill assessment started by YZC needs to be expanded and subsequent

training initiated in order to prepare local people in time for qualified jobs at the mine.

YZC Response:

As stated in SEPA Section 11.5, upon a production decision, YZC will identify Kaska Nation members who are candidates for employment at the mine and will develop and implement an effective and appropriate training strategy. Advanced Education and YZC are currently working on a plan to conduct in-community training for all those interested in working in the mining industry. Job skills, what to do to maintain a job, how to do better in the community, how to improve job success, safety and environmental awareness will be the initial focus. Onsite training will consist of job specific skills and cross-cultural awareness. There are also plans to have more industry specific training, facilitated by the community colleges in Whitehorse. The RRDC has been updated on preliminary discussions.

11.1.9 Effects on Traffic and Safety (construction and operation)

36. Contrary to the assumptions of the proponent, highway traffic of heavy equipment such as ore trucks can have significant impacts on wildlife and other highway traffic (i.e. broken car glass). Therefore, the speed level of 60 km/h proposed for the mine access road should be extended to the highway traffic itself. Wildlife must have right away. Further, special care must be given when passing 2 Mile and 2.5 Mile, the First Nation communities on the outskirts of Watson Lake.

YZC Response:

YZC has not assumed that impacts are insignificant, but they have been assessed to not be significant if mitigation measures are implemented to reduce their potential for occurrence. See response to #13 for additional information.

37. In the past, we experienced that mining development drew more people into the development area, resulting in people using our camps and stealing gear. Advertisement for work at the mine site must clearly state that workers will only enter the mine site by plane from Ross River, Watson Lake and Whitehorse. We will report any incidences affecting our camps to the proponent.

YZC Response:

Private vehicles will not be permitted on the access road. All employees will be flown into site as described in response #12.

11.1.10 Effects on Traditional Lifestyles

38. We propose that an introductory course will be offered to our people reiterating the possible positive and negative effects of employment. Moreover, this course should teach ways available to our people to communicate challenges they face at the work site or with coworkers, and the need and requirements of mining business. Further, we require the proponent and its non-Kaska workers to learn about our culture and values to avoid conflicts and misunderstandings (cross-cultural training). Moreover, this training must reiterate the importance of keeping the mine site and surrounding environment as clean as possible. You are all visitors on our territory and must act accordingly.

YZC Response:

Agreed.

39. To minimize impacts on wildlife and fish, the proponent needs to implement a strict ban of any hunting and fishing activities (including catch and release) when working at the mine. Our elders tell us that fish, once touched, will die.

YZC Response:

Agreed.

11.2 Community Questions and Concerns Raised during Meetings and Interviews

Questions from First Nation Community Meetings held in Ross River and Watson Lake in January 2006

11.2.1 Ross River

G.P.

40. Why wasn't the road chosen by the elders used?

YZC Response:

Refer to #4

41. When were the studies done for the caribou?

YZC Response:

The Finlayson Caribou Herd FCH) population was last estimated at approximately 4000 in 1999. The FCH has had an annual monitoring program (population surveys, rut and post calving surveys, and aerial telemetry surveys of collared caribou) in place since 1982 to monitor population trends. Studies have continued from 1982 through 2004 (See response #10.

C.C.

42. What kind of industrial waste disposal is available at the site (for example for empty oil and lubricant container)? Does this go through the incinerator?

YZC Response:

Waste oil will be collected in designated waste oil tanks and will be periodically shipped off site to a licensed recycler, or it will be filtered or centrifuged to remove particulate matter and then used as fuel in the incinerator.

Burnable non-organic wastes will be incinerated. Non-burnable materials (such as cans, bottles etc., used rubber products, scrap metal, and plastic packaging will be collected in designated recycling bins and removed from site periodically. Non-hazardous solid wastes tat cannot be recycled will be buried in landfill, which will be established early I the construction phase and remain in use for the life of the mien. This material will be

periodically buried under a layer of soil to prevent the loss of garbage through wind action.

R.D.

43. Where are the diversions on the mine site for fresh water?

YZC Response:

Details pertaining to water supply are provided in Section 9. Approximately 94% of water used in the mill and for portal uses will be reclaimed from the tailings facility, with surface water (Go Creek) providing the input at the start of operations. The only groundwater well for potable water use is located in the upper Go Creek watershed.

44. What has been done for beaver habitat in the area?

YZC Response:

Existing beaver ponds, dams and lodges will not be disturbed. The tailings facility was originally planned to span the beaver pond area adjacent to Go Creek, but was re-designed and is now located to the northeast of Go Creek.

45. How do TeckCominco and YZC manage mine site and lands together?

YZC Response:

They are two completely separate mining companies, with different projects occurring on different mining claims.

F.C.

46. Waste rock - will it be neutralized – is it close to fresh water?

YZC Response:

The temporary waste rock pad will be decommissioned within the first couple of years of operations. Waste rock will be moved to the tailings facility and covered with both DMS float and water to prevent oxidation. Additional details are provided in Section 7 and 8.

47. What happened at last year's fuel spill? What was the reaction of YZC?

YZC Response:

A 1700L Fuel-Easy Bladder carrying of diesel ruptured over the portal area while being set down by a helicopter. The fuel was being hauled from the Robert Campbell Highway to the fuel storage area at the portal. The rupture, caused by a defective seam, occurred on top third of bladder, spilling and approximately 800 L of diesel onto the ground. The remaining 900L in the bottom of the bladder was offloaded into the fuel tank. The spill was immediately contained on the hard packed surface, by the construction of earth berms and collection ditches. Hundreds of absorbent filled from the pooled diesel in front of the berms. All contaminated soil was transported to a lined area for temporary storage. A land treatment facility will be constructed in the spring of 2006 to remediate

the contaminated soil. YZC had the supplier immediately inspect all other bladders in use. The manufacturer accepted all responsibility for the spill and replaced the defective bladder. Note: of approximately 4000 bladder in use for water and fuel transfers in remote locations, this is the first defect of this kind.

T.C.

48. Will waste rock be under water? I take that the oxygen is causing the ARD. I am wondering if the water will be treated at an ongoing basis as the water will evaporate.

YZC Response:

See #46

49. Is it possible to see the baseline studies?

YZC Response:

Yes, the baseline studies are contained in the Environmental Assessment Report which is available at the Ross River and Faro libraries, or through the YESAA coordinator.

K.S.

50. Does all waste rock go into the tailings pond?

YZC Response:

Yes – see response to #46

51. What is planed for the wildlife monitoring for the next years?

YZC Response:

Onsite wildlife monitoring programs to be conducted by YZC during the life of the project include:

- *systematic documentation wildlife sightings in or near the project area, road kills, and problem wildlife incidents*
- *systematic documentation of wildlife use of reclaimed habitats*

These programs are specifically intended to check mortality predictions and mitigation effectiveness (Section 9.5: Wildlife Protection Plan) and guide adaptive management as required.

The onsite environmental monitor will maintain systematic records of wildlife observations, and incidents (e.g., wildlife-vehicle collision, aggressive bear observation) in or near the project area will be kept in a 'wildlife log'. Reports will include the date, time, description of location, species, number of individuals, and the activity (e.g. feeding, nesting).

The following monitoring programs and, where applicable, adaptive management strategies, are proposed:

Wildlife-vehicle mortalities – Large mammal mortalities or accidents along the haul routes will be recorded and reviewed. If road kills occur, corrective actions or additional mitigation measures (e.g., lower speed limits, warning signs, improvement of visibility, worker advisories) may be implemented.

Problem wildlife – Problem wildlife incidents will be monitored and recurrent incidents will precipitate a re-evaluation of the effectiveness and enforcement of existing prevention measures.

Grizzly bears– Observations of grizzly bears or their sign (e.g., tracks, scat) in and around the project area will be recorded. These observations will informally track grizzly bear use patterns within the project area through all development phases.

T.C.

52. Lots of the stuff must be dealt with through permitting process. Please bring better map -whole water drainage area for Wolverine, Finlayson and Frances Lake.

YZC Response:

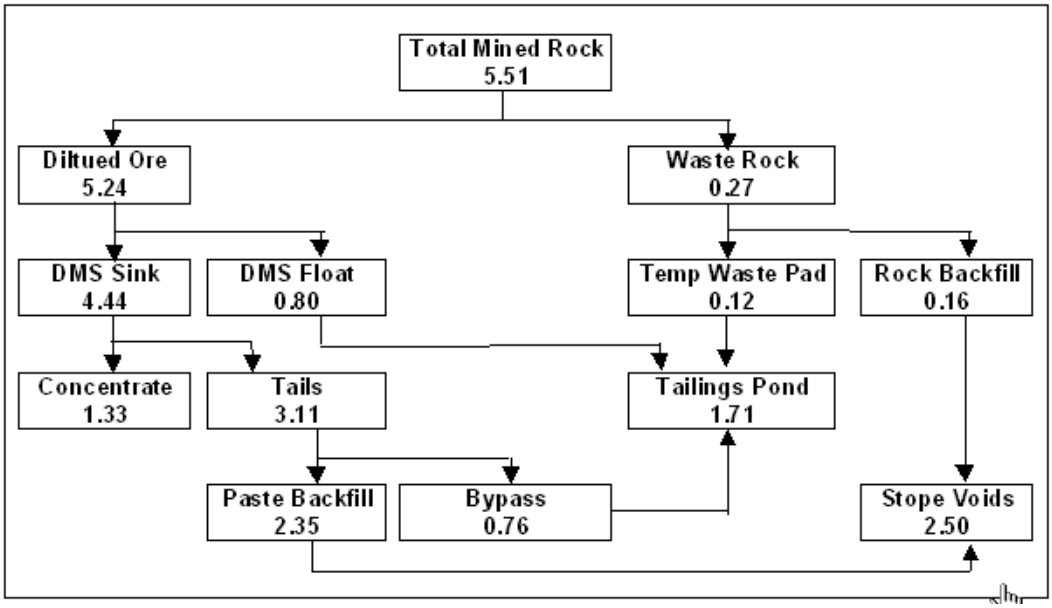
Two open houses were conducted in 2005 and appropriate visual aids were available for reference. The focus of the meetings, such as this one, needs to be adequately relayed to those invited in order for adequate preparation to be done.

C.C.

53. How many tailings will be in the tailings pond?

YZC Response:

As per the mine material balance presented below, there will be 0.76 million tonnes of tailings in the tailings pond, along with 0.12 million tonnes of waste rock and 0.80 million tonnes of DMS float rock. See section 7 for additional information.



R.D.

54. I am a bit concerned about the road. How will be the condition of road be after a few years? YZC should hire locally. There must be bridges over creeks.

YZC Response:

The road will be engineered, constructed and maintained following the best management practices possible. There are five stream crossings that will require culverts. All culverts will be designed and installed to be fish-passable and sized to appropriately hand flood events. All other surface drainages and overland runoff will be controlled with ditches along the upslope side of the road that will connect culverts installed at regular intervals.

H.N.

55. Worked on Mine site – encountered strange fish being caught – big heads and small bodies. YZC has been informed, but did not respond. Fish presence has to be checked not only in spring.

YZC Response:

YZC has no record of such correspondence. Please provide the name of the individual and location and date of occurrence. Are there any photos? Surveys have also been conducted in the summer and fall – See EAR Section 7.8 for additional information.

Y.M.

56. Harlan, Jason, Pam should sit with the community and answer questions. There are lots of people coming to my office, voicing concerns and asking questions about spills and employment. RRDC must be informed right away. Leadership should be directly informed. Employment should be arranged that people don't have to collect EI at the end of the year.

YZC Response:

YZC is accepting both written and verbal questions through the Aboriginal Liaison Officer at all times, for furtherance to the YZC main office. The issue of having a RRDC point person has been raised in the past, but no one was appointed by the RRDC to date. The mine will operate on a year-round basis so EI should not be a concern for those wishing to remain employed.

D.S.

57. Will there be flood planes landing on Wolverine Lake because there were always lots of water plans on Jackfish Lake, and now there are no fish there anymore?

YZC Response:

The mining camp will be located near the airstrip and personnel and supplies will be brought to and from the site via the airstrip. See # 12 for more details.

T.C.

58. How do you mitigate the erosion of the road?

YZC Response:

The road has been engineered by an engineering company (McElhanney) and the slopes, road bed, and drainage features have been designed and will be constructed to minimize erosion. The key to controlling erosion and sedimentation caused by work-related activities is to manage off and onsite runoff. In general, to minimize erosion and sedimentation, work-related activities will be conducted to:

- *minimize disturbance to vegetation and limit area of clearing*
- *install sediment control measures (silt fences, sediment traps, etc.) before starting work*
- *inspect sediment control measures regularly and make necessary repairs immediately*
- *minimize length of time that unstable erodible soils are exposed*
- *direct sediment-laden or turbid runoff into vegetated areas*
- *stabilize erodible soils as soon as practical by seeding or installing erosion control blankets*
- *cover temporary fills or stockpiles with impermeable covers (e.g. plastic) during heavy rainfall*

Effective ways to control erosion and trap sediment are summarized in the following table. All sediment traps and barriers (i.e., silt fences, straw bales, etc.) must be cleaned regularly while they are in place if they are to remain effective. Installation procedures will be provided on individual fact sheets to be contained within the final EPP document.

Description of Sediment and Erosion Techniques

Technique	Description	Application
Vegetation: preservation and replanting	Maintain vegetation, minimize grubbing and maintain root mat, reseed/ replant	On slopes, stream banks, floodplains to permit infiltration and minimize surface disturbance
Silt fences	Geotextile vertical barrier that causes sediment deposition	On slopes with erodible soils – surface applications only (not to be used instream (i.e., flowing water))
Straw bales	Barrier that causes sediment deposition	On slopes with erodible soils and in low surface or low flows only
Sediment traps or basins	Excavate minor depressions to allow sediment to settle	In areas where high volumes of sediment-laden water occurs; may be used with silt fencing or bales
Flumes/ spillways	A chute or pipe of non-erodible material to convey runoff down a slope	In areas with concentrated high velocity surface runoff
Check dams	Small dams to reduce the velocity of storm water flows in swales/ditches	In small open channels
Erosion control blankets	Natural fibre matting used to minimize surface erosion	In areas with surface runoff or channels
Plastic covers	tarp to cover erosive soils	In non-vegetated areas where a temporary measure is required to control runoff until the site is stabilized

R.D.

59. A water plant should be built. All garbage should be removed from the mine site every 5 years. Climate change – I am concerned about its impacts.

YZC Response:

See responses #23 and #42. A water treatment plant will treat the tailings impoundment water prior to discharge. See Section 9 for additional details.

A.D.

60. Make sure that you fix the mine site really good. This is Indian land allover the place. People hunted there, moose, caribou, fish - it is ours. When mom and dad went hunting, they made lots of dry meat. Nowadays nobody goes trapping, nobody makes dry meat. Make sure that when the mine is opening that you take care of poisoned water. There is lots of fish up there. At Frances Lake, there are lots of people there during summer time. They come there for fishing. Having the mine is good, but make sure that you fix it good – not like the one in Faro.

No YZC Response required

M.M.

61. Will the tailings pond be fenced? What about waterfowl? What about animals falling in to it?

YZC Response:

See response #15

62. I'd like to see each employee of the mine to participate in a cross-cultural workshop. It should be mandatory.

YZC Response:

Agreed.

63. How would you prevent other people from using the road?

YZC Response:

A fenced staging yard will be constructed at the north end of the access road near the RCH. The staging yard will provide a double-gated system to control access onto the mine road. The first gate will control access from the RCH into the staging yard. The second gate will control access on to the mine access road from the staging yard. The road will be classified as a private mine road with no public access. Vehicles will be equipped with radios to permit access, and to arrange for safe passing with oncoming vehicles at desired passing points. Priority will be given to loaded concentrate haul trucks.

T.C.

64. What is the expected water quality?

YZC Response:

This question requires a detailed response - see sections 6.4.9 for Wolverine Creek and 9.4 for Go Creek.

65. What is happening next? When is construction starting? Must YZC wait for approval?

YZC Response:

In order to proceed with construction, Quartz Mining Land Use Permit is required. In order to proceed with water use and production a Type A Water License is required. Road construction is proposed to start in early summer once the necessary approvals are received.

M.M.

66. What is water quality after closure?

YZC Response:

This question requires a detailed response - see sections 6.4.9 for Wolverine Creek and 9.4 for Go Creek.

M.M.

67. There will be no hunters on the road – is this right?

YZC Response:

Correct. Access to the private mine haul road will be restricted by a locked gated during the construction, operations, and decommissioning and closure phases of the project. Firearms will not be permitted. See response #63.

D.D.

68. How much air traffic will there be?

YZC Response:

See response #12.

M.M.

69. I think it would be better if people would drive in, not fly in, especially during calving season. We worry about the low flying effects on caribou and moose.

YZC Response:

See response #12.

70. Can trappers use the camp? Are there ramps that make it easier for trappers to access their trap lines?

YZC Response:

Refer to #29

Y.M.

71. To maximize local resources (human and others) you have to start training now. You have to consider the socio-economic impacts of the mine on the community.

YZC Response:

Refer to #35

72. What will you do with alcohol and drug problems that this development will cause? There should be input from the community into policy making for the camp.

YZC Response:

Refer to #33

T.C.

73. Is there information about how much supply is needed for the mine?

YZC Response:

A full report will be available in April 2006 that outlines the types and amounts of supplies required for construction and operation of the mine.

T.C.

74. Is there any negotiation of benefits once the operations are starting?

YZC Response:

Refer to #33

M.M

75. Are you going to do any studies right now, such as caribou studies?

YZC Response:

Refer to #51

T.S.

76. There are lots of moose, lynx, marten, beaver, wolves in the area of the proposed road. I am not sure how the road will be there as it is a wet area.

YZC Response:

The majority of the road route is upslope of the valley bottom to avoid sensitive habitat areas, such as wetland and streams.

77. I want to know about what happens if there are accidents (oil spill, ore truck rolling over, loss of toxic waste or chemicals) along the road?

YZC Response:

Details pertaining to spill response actions and responsibilities are detailed in EAR Section 9.3.

K.S.

78. How is it that there is no significant impacts been noted for the wildlife impacts of the mine?

YZC Response:

Refer to #13

T.C.

79. If studies are important, I want to know if this means that they are import to us. For whom is an impact not significant?

YZC Response:

Refer to #13

D.D.

80. I have done wildlife studies with Rick Farnell and Jan Adamczewski. Before, we did 3 studies a year on caribou movement. Since 1997 or 98 the number of caribous has been dropping – some people say it is the impacts of the mining companies, but I think it is the weather. The first 30 hours after the calves are born are the most important ones. I think RRDC people should go along on these studies.

YZC Response:

Agreed.

M.M.

81. Any environmental monitoring has to be done independent of the mining company. Right now animals are healthy. If they get sick, the monitor should let people in RR know about the hazards.

YZC Response:

Refer to #5.

D.D.

82. There has been no counting of caribou for 6 years – needs to be done, as well as count of moose in the area. There should be a presentation from consultants working on the EAR to the community.

YZC Response:

An open house for the EAR was held in Ross River in November 2005; there was poor attendance from the community. A brief summary of caribou information is provided in response #10.

83. Are there wetlands down stream of the tailings?

YZC Response:

No. The tailings facility is upstream of Go Creek and the wetlands are to the west over a small ridge.

11.2.2 Watson Lake

WLE.

84. What are the requirements for septic waste?

YZC Response:

Two sewage treatment plants will be located at the industrial complex and at the camp to treat sewage.

L.J.

85. Please make sure the water is safe. The plants you find, the animals, have to be kept safe. We live by the natural laws that surround us. If not, something is going to happen to us. We are really connected to our land. It is about time that somebody comes and listens to our elders. Our leaders may think they know what we are thinking, but we are glad that you are listening to us.

WLE.

86. I think this mine will be affecting us more than Ross River. We will not be able to eat beaver and fish.

L.J.

87. Is Money Creek monitored?

YZC Response:

Yes. There are five sites: 1. Above Go confluence; 2. Below Go and Pup confluence; 3. Above Robert Campbell Highway; 4. Below Robert Campbell Highway; and 5. Above Dollar confluence.

L.J.

88. Highways have to be kept up better. Highways will be a big concern.

YZC Response:

The Robert Campbell Highway is currently being upgraded and based on discussions between YZC and the Yukon Highways and Public Works, improvements to the road will continue.

WLE.

89. Were overflows considered in the design of the tailings pond?

YZC Response:

Yes – see Section 7.5.

WLE.

90. Overflow on tailings – push up permafrost below and push up water on top.

YZC Response:

During geotechnical investigation in the tailings facility area, no permafrost was encountered. See Section 7.2 for additional details.

WLE.

91. Is the sludge pipe underground or above ground?

YZC Response:

The tailings and reclaim pipelines will be insulated above ground, and buried under an earthen berms. They will be removed at closure.

WLE.

92. Show elders the mine site before the mine opens. This is what they do with elders for the pipeline construction. I like to see training for our people here.

YZC Response:

Agreed.

WLE.

93. What kind of exploration is done in the area and how is it undertaken?

YZC Response:

Exploration of mineral resources using diamond drill rigs have been used at the Wolverine site in the past.

WLE.

94. What about bears?

YZC Response:

Refer to #14

L.J.

95. I have a question about the road. I am really concerned about it. We need to review the road alignment.

YZC Response:

Refer to #4

WLE.

96. What is the work rotation schedule? Will there be drug check-ups in camp? General health checks – Hepatitis B, AIDS?

YZC Response:

Work rotations will be on a two-week in, two-week out schedule. There will be a strictly enforced no drugs or alcohol policy. Workers must be healthy to be capable of fulfilling their job duties, and their health must not affect the health of others.

L.J.

97. We pass on knowledge orally. We have been given all this knowledge orally. When we went to boarding school – we lost our language, our knowledge… Some people like me still speak the language. I know were my parents are buried, but I don't know where my grandparents were born. Who is buried at Wolverine Lake? As a child I knew lots of old people. Where are they buried?

YZC Response:

We are still awaiting the Traditional Knowledge review to be able to identify where these burial grounds, as well as other features, may be. YZC has entered into a Traditional Knowledge Protocol Agreement with the RRDC to ensure that traditional knowledge is not compromised in any way by project activities.

M.B.

98. We are concerned about the environment, the land, the culture. If you would sit down and talk to our elders. Our elders will tell you about the wildlife – how to protect it. I am concerned about the wildlife for the sake of our children. I think we have to work together. You have to listen to us. We are living here for a long time. We have lots of cancer patients. Is it the fish we are eating or the environment itself – I want to know.

YZC Response:

As outlined in the SEPA, YZC is also concerned about the environment, the land and your culture. See response #33.

L.J.

99. There is so much cancer in our area, and we don't know from what. Is it from the moose and caribou we are eating? There is a uranium mine 10 miles up the Liard River. We are not supporting it. Is it from there?

YZC Response:

Unfortunately cancer has become commonplace and hopefully the cause is discovered shortly.

11.2.3 Further Questions and Concerns raised during Interviews with Ross River Dena Land Users of the Wolverine Lake Area in January 2006

100. Where does the info on fish population come from? Who collected when the data?

YZC Response:

Three independent environmental consultants did fisheries assessments at the site in 1996-7, 2004 and 2005. Details are provided in EAR Section 7.8.

101. Pros and cons of allowing people to accumulate enough credits during a year to draw EI. (needs discussion)

YZC Response:

The mine will operate on a year-round basis so EI should not be a concern for those wishing to remain employed. People prefer a 3-weeks-on-1-week-off rotation.

102. People prefer a 3-weeks-on-1-week-off rotation

YZC Response:

During 2005, YZC observed that a 2-week on, 2-week off rotation better suited the Kaska employees. It allowed for more time in the community and to engage in traditional activities such as the fall harvest. A two-week cross shift allows two employees to share the same job position, and work equal time to their counterpart.

103. There is a need for a remote treatment camp to keep people off alcohol. (Comment from Dorothy Smith)

104. Will the Council be compensated for the animals killed through this development? If yes, how?

YZC Response:

As outlined in the SEPA, YZC will develop and enforce appropriate measures respecting wildlife management and protection.

105. Will trappers be compensated if they have to move their camps because of the mining development?

YZC Response:

Mining development is limited to the areas near the previous test mining program; there are currently no camps within this area or along the road route.

106. Will cut trees be salvaged for use of trappers or other residents?

YZC Response:

Yes (in consultation with the RRDC).

107. Can trappers go along side road into trapping area?

YZC Response:

For safety and environmental reasons, the road will be used by mining vehicles only (haul trucks and service vehicles). YZC will not restrict access to trappers (must access the area as they have done in the past before the mine road).

108. Will trappers have access to the camp facilities?

YZC Response:

Except for in the event of an emergency, the camp is for mining-related activities only.

109. Will there be ways provided in which trappers can cross the mine site and surrounding area (no cutting off of trapping trails)?

YZC Response:

YZC will not restrict access to trap lines in the mine site area.

110. What happens with flights in to camp in times of bad weather?

YZC Response:

Planes will not fly until it is safe to do so.

111. How will you ensure that local people can and will be hired?

YZC Response:

Refer to #33. It is the company's desire to hire and train locally as much as possible, both for the positive impact on the local community, and to reduce turnover and transportation costs. Preference will be given to qualified job applicants in the following priority:

- *members of the Ross River Kaska Dena*
- *members of the Kaska Nation*
- *non-aboriginal Ross River residents*

- *Yukon residents*
- *any other applicants*

112. How and when does the company intend to train local people for the mining jobs? (including welding, cleaning, management, heavy equipment operator, environmental monitoring, security services, catering, administrators)

YZC Response:

Refer to #35

113. Are there funds set aside for educational purposes? Trust funds, bursaries etc?

YZC Response:

Refer to #33 and the SEPA. YZC is working closely with the Advanced Education branch of YTG. The Yukon Mine Training Trust and Yukon Government Education Funding are two examples of funding set aside for educational purposes.

114. Is cross-cultural training going to be mandatory?

YZC Response:

Yes

115. Diesel used to defrost creek (Hawkowl Creek) – there was lots of fuel – 5-gallon container used and more standing around. Who was overseeing these actions? What has been done to check the impacts of these actions on the creek?

YZC Response:

Refer to #19

116. Campbell Creek – fire at a water pump. Did fuel spill into the lake?

YZC Response:

No diesel was spilled into the lake. The fire that occurred at the pump shack was located near the mine at the headwaters of Wolverine Creek (May 9, 2005). Approximately 8 L of diesel that was spilled during the pump shack fire.

117. Grey water from camp – through spill way released directly into Wolverine Lake. Why was there no recent water sampling?

YZC Response:

The grey water from the exploration camp does not go into a spillway, but is released into an underground pit, much like a septic pit. The mining camp will be located near the airstrip and a sewage treatment plant will treated domestic wastes.

118. Spill kit not sufficient for removing last years fuel spill – only 5-gallon kit. What determines the necessary size for a spill kit?

YZC Response:

Hundreds of absorbents were available for the 800 L diesel spill. A bulldozer was readily available to construct ditches and berms to contain the spill. The spill was quickly and effectively cleaned up to YZC and government standards. Sufficient supplies were and are onsite.

119. What is the distance from Magazine B (storage for explosives) to the next creek? Is it sufficient?

YZC Response:

Wolverine Creek is approximately 0.5 km away.

120. Where is the caribou fence?

YZC Response:

Refer to #97.

121. How is the decision been made about which water sampling stations are observed and when? Get water samples of all important creeks and lake sites right away.

YZC Response:

Monthly sampling is conducted for stations in the immediate area of the mine site as required by the Water License, and most stations are monthly during the open water season.

122. The winter haul road is been damaged and it was supposed to be repaired. How far along are you with the repair work?

YZC Response:

As of the end of February, the winter road is currently being used to bring in supplies for the 2006 season. Reclamation activities will commence in spring 2006 after the road is closed for the season.

123. Will waters in Wolverine Lake and Wolverine Creek be lowered when dewatering the drill portals for doing drilling work?

YZC Response:

Wolverine Lake water levels will not be affected. Wolverine Creek volumes will decrease by approximately 4% during the summer months, but this is within the natural range of variability. Low winter flows may decrease up to 25% - additional details are provided in section 6.4.9.

124.Is there a lick beside the proposed road?

YZC Response:

None have been found. See #97.

125.What are the Yukon and Federal Governments initiative in the environmental assessment?

YZC Response:

Before Devolution in April 2003 (the transfer of responsibility for public lands, water, forestry, mineral resources from the Federal government to the Yukon Territorial Government (YTG)), the federal Canadian Environmental Assessment Act (CEAA) applied to projects proposed in the Yukon. Upon Devolution, YTG created "mirror" CEAA legislation called the (Yukon) Environmental Assessment Act (EAA).

The YTG's Executive Council Office through the Development Assessment Process Branch will administer the assessment. Based on the Coordination of Environmental Assessment Procedures and Requirements Regulation under EAA, the Yukon departments of Energy, Mines and Resources and the Executive Council Office identified themselves as Responsible Authorities.

The Executive Council Office coordinated the development of EAR Guidelines (Executive Council Office 2005), based on generic information guidelines (Department of Energy, Mines and Resources 2004) and incorporating, where appropriate, the comments received during the review of the Project Description Report. Stakeholders were also invited to comment on the draft Guidelines and their comments were considered and incorporated in the final Guidelines, as appropriate.