

May 13th, 2016

Email: casinomine.review@yesab.ca

Yukon Environmental and Socio-Economic Assessment Board
Executive Committee
Suite 200-309 Strickland Street
Whitehorse, Yukon
Y1A 2J9

Attn: YESAB Executive Committee

Re: Casino Mine Review - Environmental and Socio-economic Effects Statement

To Whom It May Concern:

The Yukon Conservation Society (YCS) has the following comments regarding the Casino Mine Environmental and Socio-economic Effects (ESE) Statement.

YCS understands that the Executive Committee is not seeking views on the project proposal previously submitted by the Casino Mine Corporation (CMC) or whether YCS agrees with the project. At this stage, the objective is to specify the information that CMC should be required to include in its ESE Statement for the Casino Mine Project.

Overall, the draft Environmental and Socio-economic Effects (ESE) Statement is comprehensive and is mostly complete. There are some sections that, in the opinion of YCS, require additional information. These are detailed below.

Given the length of the ESE Statement, and the multitude of subjects covered, YCS recognizes that some of the issues raised below might be covered in sections other than the ones indicated.

Given that this is a new process for all parties concerned, YCS would appreciate if YESAB would provide rationales if any of YCS's requests for additions to the ESE are not incorporated.

Numbering Correction

On page number 30 of the Draft Environmental and Socio-economic Effects Statement Guidelines the numbering for the Noise section is incorrect. It starts at 5.3.16. NOISE, then goes to 5.4. INTRODUCTION followed by 5.5. ELEVATED NOISE LEVELS and then proceeds as 5.5.1. BASELINE CONDITIONS.

YCS suspects it is meant to be 5.4 NOISE, then 5.4.1 INTRODUCTION, and so on.

4.2.9. ACCESS ROAD

YCS respectfully suggests the following be added:

Details on the number, location, remediation and closure of borrow pits for upgrade and extension of the Freegold Road, as well as the Carmacks bypass and Nordenskiöld River bridge.

Note: since the publication of the ESE Statement, the Yukon Government has announced it will be doing the Carmacks Bypass (refer to government press release dated April 19, 2016, titled *Proposed Carmacks bypass road project to undergo environmental assessment*, available online at <http://www.gov.yk.ca/news/16-146.html#.Vx6wfl-cG1s>.) It is now unclear what portion of the Freegold Road, as well as the Carmacks bypass and Nordenskiöld River Bridge is the responsibility of the Casino Mine Corporation or the responsibility of the Yukon Government. YCS respectfully suggests that this be clarified for both the project proponent and other interested parties, including the general public.

4.2.15. POWER PLANTS

YCS respectfully suggests the following be added:

Project greenhouse gas emissions from operation of the power plants be included.

YCS notes that greenhouse gas emissions are also addressed in section 5.3.8. GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE.

5.3.8. GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Within this section, the following is stated:

5.3.11. PROJECT EFFECTS

In order to understand the context of predicted effects, project effects descriptions are to be supported by:

- Projections of emissions generation, by type, over the life of the project by source
- Provide a description of project effects stemming from GHG emissions by the project. Include:
 - A description of contributing effects to climate change

To provide clarity, YCS respectfully suggests the following revision:

Projections of emissions generation, by type, over the life of the project by source, both onsite and offsite. In addition to direct project emissions from fossil fuel combustion, this must also include upstream emissions resulting from fossil fuel extraction, processing, transmission, liquefaction and transportation.

The onsite emissions would include electricity generation plants, heavy equipment and truck operation, waste incineration, etc., while the offsite emissions would include highway trucking (ore, LNG and supply trucks), aircraft flying directly to and from the site, and upstream GHG emissions from LNG fuel production.

YCS asserts that consideration of the upstream emissions is consistent with YESAA Section 42, although YCS recognizes YESAB did not consider upstream emissions in its assessment of Yukon Energy's Whitehorse Diesel-Natural Gas Conversion project. The rationale for this was outlined in YESAB document 2013-0115-081-1: YESAB - YCS Response to Scope Request - 2013-12-09.

However, YCS wishes to bring to the attention of YESAB a recent precedent that has been set to consider upstream emissions in an environmental assessment. In January of this year, the Government of Canada issued a press release (*Government of Canada Moves to Restore Trust in Environmental Assessment, January 27, 2016*) that announced “Direct and upstream greenhouse gas emissions linked to the projects under review will be assessed.” – the release can be read at <http://news.gc.ca/web/article-en.do?nid=1029999>.

Based on the above statement about the Federal Government’s interim approach to environmental assessments, an analysis and calculation of upstream GHGs was conducted by Environment and Climate Change Canada for the Pacific NorthWest LNG project. It can be found in Canadian Environmental Assessment Agency’s draft report for the proposed project at <http://www.ceaa-acee.gc.ca/050/document-eng.cfm?document=104785>.

Environment and Climate Change Canada has set the precedent for consideration of upstream emissions, and has said it will work with northern boards to implement the principles outlined in the interim approach to environmental assessments. As such, and pertinent to YESAA Section 42, YCS respectfully requests that direct and upstream greenhouse gas emissions associated with the project, regardless of whether they occur in or outside Yukon, be considered in this assessment.

7.3.3. PROJECT EFFECTS

In 7.4.3. PROJECT EFFECTS the following is stated:

- In addition to information provided in original proposal documents, provide:
- Effects of the project to Burbot

YCS requests clarification that the original documents also include an analysis of the effects of the project on Salmon.

7.5.3. PROJECT EFFECTS

In 7.5.3. PROJECT EFFECTS the following is stated:

- Project effects descriptions are to include consideration of:
- Changes to Water Quality and Contaminants of Concern
- Aluminum, Cadmium, Copper, Fluoride, Molybdenum, Selenium, Sulphate, and Uranium

YCS respectfully requests that Arsenic be added to the above list.

9.2. GENERAL INTERACTIONS & EFFECTS TO WILDLIFE

In 9.2. GENERAL INTERACTIONS & EFFECTS TO WILDLIFE the following is stated:

- Species to be considered in this section include:
- Wood bison, mule deer, black bear, snowshoe hare, Canada lynx, grey wolf, coyote, red fox, porcupine, little brown myotis, small mustelids, aquatic mammals, small mammals, hoary marmot, amphibians, and terrestrial insects.

YCS respectfully requests that White Tail Deer, Cougar, and Grizzly bear, be added to the above list.

11. COMMUNITY SERVICES, WELLBEING AND VITALITY

In 11. COMMUNITY SERVICES, WELLBEING AND VITALITY the following is stated:

Affected communities for this value for individual consideration will include:

- Carcross, Village of
- Carmacks, Village of
- Dawson City, Municipality of
- Pelly Crossing
- Whitehorse

YCS respectfully requests that all communities along the Alaska Highway heading south towards British Columbia (this would include Marsh Lake, Johnson's Crossing, Teslin, Watson Lake etc.) be included. The reason for this is that given the high volume of supplies the project will need, trucking along this section of the highway will greatly increase. In addition, Tagish should also be on this list of affected communities. In the event of the Alaska Highway washing out along the stretch where it parallels Marsh Lake, traffic is diverted through Tagish.

YCS recognizes that 11.4. TRAFFIC is concerned with traffic issues, so this section should also include the above mentioned communities. Certain aspects, but not all, of the concerns related with traffic are also addressed in 16.3.4. TRANSPORTATION ACCIDENTS.

15.6. CLIMATE CHANGE

In 15.6. CLIMATE CHANGE the following is stated:

Provide information on the potential for climate change to impact the operations of the project.

Include:

- Examination of historical trends of temperature, precipitation, and discharge for the Project
- Predictions and models used in determining scenarios used for climate change predictions
 - Worst-case scenario modelling should apply a 25% increase in flow to all baseline information
- Details on monitoring and precautionary measures
- Potential effects to the project

YCS respectfully requests that worst-case scenario modelling should apply an ultimate worst-case, and that a 100% increase in flow to all baseline information should be applied.

16.3.11. UNPLANNED CLOSURE

In 16.3.11. UNPLANNED CLOSURE the following is stated:

Provide additional information on the risks of and associated with unplanned closure of the Project. Include:

- Details on potential closure costs depending on project phase and age
- Details including costing, labour requirements, material requirements, and scheduling for:
 - treatment of water
 - completion of TMF (including construction of spillways)

- disposal or submersion of wastes including stockpiles
- decommissioning of access roads and site infrastructure
- decommissioning of the HLF
- closure of other components of the project
- A focus on socio-economic effects to employees, contractors, and businesses
- Rationale for selection and design of closure scenarios used for evaluating effects of unplanned closure.

YCS respectfully requests that details on how the proponent will be able to finance the potential closure costs also be included within this section.

If you have any questions, please contact the undersigned.

Yours truly



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