

From: [Fleming, Chelsea](#)
To: [Public Input](#)
Subject: FW: Proposed Bylaw 2024-23
Date: Monday, March 11, 2024 10:22:52 AM

From: Duke, Peter [REDACTED]
Sent: Friday, February 16, 2024 9:14 AM
To: Fleming, Chelsea [REDACTED]
Subject: Workflow Response

Mayor and Council,

I'm not a mining guy. I'm a somewhat-retired professional engineer and Whitehorse citizen worried about climate change. I spend a lot of time outdoors.

1. Sure, nobody wants to live next to a dusty, noisy mine. Nobody wants to live next to a dusty, noisy gravel pit either.

2. We have no mines in city limits. We have gravel pits.

3. We accept that gravel pits are OK in the City because we need gravel. Helping the transition to an electric world to combat climate change requires a lot of copper. So, why would we go for gravel but exclude copper?

4. Whitehorse city limits cover an unusually large area for such a small population. Our population density is about 10% that of cities with similar populations.

5. City limits expanded in the 1970s to include active copper mining areas, adding the Whitehorse Copper company to the municipal tax base. That mine was a big employer and very important to the local economy.

6. The Official Community Plan specifically designates areas for heavy industrial. These are away from populated areas, generally along the Copper Haul Road. This includes old mine areas that are not currently useful for anything.

7. If we could find some use for old unused mine areas that have heavy industrial zoning and are away from houses, why would we not want to do that? Or even other areas well away from houses? This could deliver new economic benefit from otherwise unused areas.

8. Mineral exploration in current city limits has been going on for the last 120+ years. The exploration process is pretty low impact. Only exploration will reveal if the prospect of mines is real.

9. Transition from mineral exploration to mine operation is a long process with much consultation even in areas outside municipal boundaries. More sticks in the spokes would be counterproductive.

10. Yes, this all needs to be done with due consideration for environment (including water), lifestyle, and recreation.

So:

- We have no idea now if mines in city limits are economically feasible. Deciding now to ban all mining and exploration in the future would be extremely short sighted.

- There is nothing to be lost and much to be gained by considering each project on its own merits with consultation if and when such a project comes up.

==Tim



Peter Duke, RPP, MCIP (he/him)

Manager of Planning Services

City of Whitehorse • [REDACTED] • whitehorse.ca

*Working and living within the traditional territories of the
Kwanlin Dün First Nation and the Ta'an Kwäch'än Council.*

From: [Bill Mann](#)
To: [Public Input](#)
Subject: ZONING AMENDMENT – BYLAW 2024-23
Date: Sunday, March 10, 2024 10:17:04 AM

I wish to object in the strongest possible terms to the proposed bylaw 2024-23. The mining industry is already the most highly regulated industry in the territory, and these existing regulations provide more than adequate environmental protections to the citizens of Whitehorse. Therefore any additional regulations only add to already onerous delays and costs associated with mineral exploration.

The Yukon requires real industry, not just multiple layers of government jobs and can't rely forever on the handouts from generous southern taxpayers. Mining is our best hope for some semblance of self sufficiency, and the Whitehorse copper belt is a great brownfields area to continue our proud mining legacy.

Sincerely,

--

Bill Mann

From: [Brienne Warner](#)
To: [Public Input](#)
Cc: [Fleming, Chelsea](#); [YCM Office Manager](#); [communications](#)
Subject: YCM written submission to the City of Whitehorse Public Hearing - Mining Activities March 11, 2024
Date: Monday, March 11, 2024 11:12:23 AM
Attachments: [image001.png](#)
[YCM submission_2024.03.05.City of Whitehorse NOTICE OF PUBLIC HEARING Final.pdf](#)

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

Please see attached Yukon Chamber of Mines submission to the City of Whitehorse regarding the PUBLIC HEARING – ZONING AMENDMENT – BYLAW 2024-23 amendments.

If there is any other action required, please let me know.

Kind regards,
Brienne Warner
Executive Director
Yukon Chamber of Mines

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



I respectfully acknowledge that we live and work within the traditional territories of the Kwanlin Dün First Nation and the Ta'an Kwäch'än Council.



March 11, 2024

Whitehorse City Council
2121 Second Avenue
Whitehorse, YT Y1A 1C2

RE: City of Whitehorse NOTICE OF PUBLIC HEARING – ZONING AMENDMENT – BYLAW 2024-23 amendments

The Yukon Chamber of Mines (YCM) appreciates the opportunity to submit written comments to city council Chambers regarding the proposed Zoning Bylaw Amendments 2024-23;

“Text amendments to the Zoning Bylaw are proposed to allow for greater public involvement and Council oversight on mining activities within the city limits. The proposed amendments include adding new definitions of “mineral development” and “mineral exploration” that will be listed as conditional uses in the IQ – Quarries and IH – Heavy Industrial zones and adding a new section to the Temporary Development Permit regulations to require that temporary use permits for mineral exploration include a public input session and be issued by Council. It is proposed that temporary use permits for mineral exploration be issued according to Zoning Bylaw section 4.8 *Notice of Proposed Conditional Use* and section 4.9 *Conditional Use Decisions*.”

Our industry understands that there are multiple land use considerations for Whitehorse city council and YCM believes these to be interconnected and valuable to diversify and ensure economic prosperity into the future. Recreational pursuits, residential housing, industrial/commercial land use, all look to increase economic value for the city. The work to ensure future generations can live and make their livelihood here in the territory starts with decisions made based on science, transparency and in collaboration with all partners. Therefore, the YCM supports Council efforts to provide certainty around potential exploration and mining activities within city limits and believes amendments that further clarify the difference between mineral exploration and mining may assist in that.

Industry also understands they need the support from the community to build successful projects that minimize impacts and maximize benefits. Focusing on environmental stewardship and continuous improvement in processes while ensuring close partnerships with First Nations and communities are key to a sustainable future for exploration and mining and by extension, a sustainable Yukon.

A key requirement for any successful OCP or land use plan is having accurate information. If governments are going to make the wisest land use choices, then all of the potential uses of that land must be assessed. Mineral exploration accomplishes this not only through the identification of mineral potential, or confirmation of no potential, but also through all the other data that must be gathered and submitted by an industry proponent as part of the assessment and regulatory process including identification of environmental, heritage, cultural, and community values.

There are already significant restrictions on where mineral exploration activities can take place within municipalities. YCM does not support further restrictions that continue to remove prospective areas that may or may not have mineral potential from the land base available either through outright removal or sterilization by restricting activities in adjacent areas that preclude activity in the area of interest.

YCM also believes it is critical for decision makers and citizens to understand the difference between mineral exploration and mining. Mining can not happen with out exploration, but exploration can and does occur without any further mineral development the majority of the time. The exploration process is long and involved and goes through numerous stages before it ever becomes apparent that a potential for a mine development exists. Then if a resource is proven to exist, the proponent must do a detailed economic analysis to determine if it is feasible to develop a mine and must file a series of reports under the Canadian Securities Act 43-101 National Instrument, Standards of Disclosure for Mineral Projects, including a Preliminary Economic Assessment, Preliminary Feasibility Study, and Definitive Feasibility Study. Each step in the process provides a greater level of detail as plans are adjusted and more certainty about the project is obtained. Some of this work can continue in concert with the assessment process but no project can be developed with out it being done.

If it is determined that a project is feasible, then a detailed and comprehensive environmental assessment and regulatory process, taking several years and involving numerous opportunities for public input takes place. Then if a proponent is successful in this multi-year process and obtains all necessary approvals, they need to raise the money to actually develop the project. This is why it takes decades to advance a project from prospecting through to development.

In short, mineral exploration does not mean mining.

If the OCP allows for exploration activity, then in addition to any process or permits the City may require, that activity must also go through a comprehensive and thorough assessment and regulatory process. Below are a few examples of how our industry is overseen in the Yukon:

- Quartz mining land use regulation: class 2 notification / class 2 exploration program
- Territorial Lands (Yukon) Act
- Environment (Yukon) Act
- Yukon Wildlife Act (species at risk)
- Yukon Environmental and Socio-economic Assessment Act (YESAA)
- Waters (Yukon) Act
- Heritage Resources (Yukon) Act

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- Forest Resources (Yukon) Act

Much has been made in recent years about critical minerals and the role they will play in the transition to a green economy. The Yukon is known to have 26 of the 31 critical minerals identified by the federal government as part of their Critical Minerals Strategy. The Yukon can play a significant role in the transition to the green economy, but we can't do that without mineral exploration. The Yukon and the City of Whitehorse have a responsibility to their citizens to ensure any development is done in a sustainable and environmentally acceptable manner. However, they also have a responsibility to ensure potential economic returns aren't halted without adequate analysis and due consideration of all opportunities.

In Conclusion

YCM would like to ensure that any proposed bylaws are clear that exploration does not mean mining. Exploration is discovering and locating where minerals are and aren't. This is pertinent information for any jurisdiction or municipality to have when making long term land use or zoning decisions. Further, if a development is ever proposed we need to recognize that the mines of 50 years ago are not the mines of today and they won't be the mines of the future as technology evolves. Our industry is continually innovating to improve practices and minimize impacts. Environmental assessment and permitting processes are transparent, lengthy, detailed and thorough. Responsible exploration, following the rules established by regulators, can be done with minimal impacts. Closing the door on something that may never happen without all the necessary information to make a sound decision will not be beneficial to any Yukoner or citizen of the City of Whitehorse.

From: [REDACTED]
To: [Public Input](#)
Subject: Proposed Bylaw to prohibit mineral exploration
Date: Monday, March 11, 2024 12:12:32 PM

I am opposed to this proposed amendment.

Mineral exploration and mining is well regulated in the Yukon contrary to recent submissions to the Council that claim it is a “wild west show”.

The process of mineral exploration and its outcomes will allow governments to make sound decisions on land use. One cannot make reasonable decisions when you don't know what it is you are deciding on. Is there an economic deposit or not. Is it and underground or open pit scenario, where exactly is it located etc etc.

The future economic opportunities cannot be ignored. There are many residents whose future ability to live and work from home in a well paid mining job could be extinguished by banning mining and exploration within city limits.

For a council that has declared a climate emergency I would find it hypocritical to deny mining of a high grade copper deposit with an extremely low environmental footprint and carbon output.

I also find it hypocritical of nearby residents who squatted on lands within city limits but we later granted title opposing the legitimate rights of previously acquired mineral rights. Maybe they should have looked at the publicly available information on the Whitehorse Copper Belt before squatting in the middle of it. Other residents in nearby subdivisions have legitimate concerns but the process of exploration and subsequent proposed mine will be addressed during the public process of approving any mine developments.

Regards,

Mike Burke, B.Sc, P.Geo
Whitehorse, Yukon

[REDACTED]

From: [tyrell.sutherland](#)
To: [Public Input](#)
Subject: Letter of Support for Copper Mining in Whitehorse - A Catalyst for the Energy Transition Amid Regulatory Certainty
Date: Monday, March 11, 2024 12:54:40 PM
Attachments: [Zoning ammendment- Bylaw 2024-23 Copper Exploration.pdf](#)

Hello,

Please see attached my letter discussing my thoughts on copper exploration and development in proximity to Whitehorse and my concern regarding the continued regulatory uncertainty brought by proposed changes. This is in regards to the *City of Whitehorse NOTICE OF PUBLIC HEARING – ZONING AMENDMENT – BYLAW 2024-23*.

I have spent the last 14 years in mineral exploration in Yukon and I struggle to see how the proposed changes will allow Whitehorse and Yukon to remain relevant in the green energy transition beyond being simple consumers of goods. There is an opportunity for Yukon and Whitehorse to be leaders in the green transition however if Yukon's plan does not include mining that role will go to jurisdictions less able to protect their environment with potentially variable human rights records.

Regards,

Tyrell Sutherland, M.Sc., P.Geo.

C: 

Tyrell Sutherland

March 11, 2024

Subject: Letter of Support for Copper Mining in Whitehorse - A Catalyst for the Energy Transition Amid Regulatory Certainty *City of Whitehorse NOTICE OF PUBLIC HEARING – ZONING AMENDMENT – BYLAW 2024-23*

I am writing to express my enthusiastic support for the copper exploration and mining in Whitehorse and the Yukon, with emphasis on copper's pivotal role as a catalyst for the ongoing energy transition. In an era where sustainable and clean energy solutions are paramount, copper stands out as a critical component in advancing these crucial initiatives.

Copper is an essential element in renewable energy technologies, such as solar panels, wind turbines, and electric vehicles. The demand for these technologies is rapidly increasing as we collectively strive to reduce our carbon footprint and transition towards a more sustainable energy landscape. By supporting copper exploration and development in Whitehorse, we are directly contributing to the production of copper, which is indispensable for the manufacturing and implementation of these green technologies.

However, it is essential to address the regulatory uncertainty that often hampers mining operations. Such uncertainty not only poses challenges to the industry but also slows down the positive changes that mining can bring to our community and the broader energy landscape. Clear and consistent regulations provide a stable environment for responsible mining practices, fostering investor confidence and encouraging sustainable resource development.

The proposed mining project, committed to utilizing cutting-edge technologies and adhering to stringent environmental standards, not only promises economic growth for our community but also positions Whitehorse as a key player in the renewable energy supply chain. Regulatory clarity will play a vital role in ensuring that the project can proceed smoothly, contributing to the local economy and the larger goal of fostering clean and sustainable practices.

As we navigate the complex challenges of the energy transition, it is crucial to recognize that regulatory certainty is a cornerstone for the success of initiatives like the copper mining project in Whitehorse. A stable regulatory framework enables the mining industry to operate efficiently, attracting investments and partnerships that will further boost our region's reputation as a hub for sustainable resource development.

I am confident that with a shared commitment to environmental sustainability and clear regulatory guidelines, copper exploration and development in Whitehorse and Yukon will not only meet our community's economic needs but will also contribute significantly to the global effort to combat climate change through the promotion of clean energy technologies.

Thank you for your attention to this matter, and I sincerely hope that you will consider the long-term benefits that this project can bring to Whitehorse, emphasizing the importance of regulatory certainty in fostering responsible mining practices.

Sincerely,

Tyrell Sutherland M. Sc., P.Geo.

From: [Bill Harris](#)
To: [Public Input](#)
Subject: FW: Letter of Support for Copper Mining in Whitehorse - A Catalyst for the Energy Transition Amid Regulatory Certainty
Date: Monday, March 11, 2024 2:34:23 PM

From: Bill Harris [REDACTED]
Sent: Monday, March 11, 2024 1:02 PM
To: Public Input [REDACTED]
Subject: FW: Letter of Support for Copper Mining in Whitehorse - A Catalyst for the Energy Transition Amid Regulatory Certainty

From: Bill Harris
[REDACTED]
[REDACTED]
[REDACTED]
Sent: Monday, March 11, 2024
To: [REDACTED]
Subject: Letter of Support for Copper Mining in Whitehorse - A Catalyst for the Energy Transition Amid Regulatory Certainty

Hello,

Please see attached my letter discussing my thoughts on copper exploration and development in proximity to Whitehorse and my concern regarding the continued regulatory uncertainty brought by proposed changes. This is in regards to the *City of Whitehorse NOTICE OF PUBLIC HEARING – ZONING AMENDMENT – BYLAW 2024-23*.

I have spent the last 50 years in mineral exploration in Yukon and the Whitehorse area specifically, and I struggle to see how the proposed changes will allow Whitehorse and Yukon to remain relevant in the green energy transition beyond being simple consumers of goods. I am a 2nd generation Yukon Prospector, born and raised in Whitehorse. My fathers' name (Glen Harris) , and my name are on the prospectors statue, on 3rd Ave and Main St. There is an opportunity for Yukon and Whitehorse to be leaders in the green transition however if Yukon's plan does not include mining that role will go to jurisdictions less able to protect their environment with potentially variable human rights records.

Regards,

Bill Harris

Cell
[REDACTED]

From: [Grant Allan](#)
To: [Public Input](#)
Cc: [REDACTED]
Subject: From Yukon Prospectors Association (YPA) re City mining amendments.
Date: Monday, March 11, 2024 5:35:07 PM
Attachments: [FWhitehorse Copper March 11 submission.docx](#)

To: City of Whitehorse:

Please see attached submission from the Yukon Prospectors Association (YPA) regarding proposed amendments affecting mineral exploration and mining in the City of Whitehorse.

I appreciate the consideration of the Mayor and Council and City staff.

thank you.

Grant Allan
President
Yukon Prospectors Association (YPA)

From Yukon Prospectors Association (YPA)

[REDACTED]
[REDACTED]
[REDACTED]

To the City of Whitehorse Mayor and Council and Staff:

Regarding proposed amendments concerning mineral exploration and mining in the City of Whitehorse:

The YPA was invited about 10 years ago to consult with City of Whitehorse staff as the City was considering disallowing staking claims within the City of Whitehorse. We made a good case for keeping the land open for prospecting. Only a very small part (less than 1%) of the land is potentially economic to mine. Thus most all of the land should be available for low impact prospecting to identify drill targets.

We had a lengthy discussion and the City decided to ban staking mostly in the eastern part of Whitehorse, leaving the copper belt available, as the advantage of enabling copper mines to be developed was acknowledged and accepted. The advantages need to be explained and disadvantages understood and be mitigated.

After the exploration mapping, drilling and calculations are done, feasibility studies would be done. The City, stakeholders and First Nations and citizens would have options to consider to decide if and how mines could possibly be developed to minimize adverse effects and maximize community benefits.

Exploration companies and prospectors need to have some certainty, to encourage investment of time and money into projects that would benefit the community, First Nations and the Yukon. If exploration work is done properly and responsibly then additional permits to continue exploration and developments would be allowed. It is not realistic to expect absolute guarantees but assurance in the legislation that permits will not be arbitrarily denied. A revision to the amendments to provide for some additional certainty would be good.

Having only temporary permits creates uncertainty that new temporary permits may be denied. Long-term permits would be good to provide some certainty.

It is understandable that the City and YG should have an adequate security bond in place to provide for reclamation and also to compensate industry should expropriation of mineral rights or development of those rights be denied.

Having responsible mining in the Whitehorse Copper Belt has clear benefits and can be done safely and responsibly in Whitehorse.

The past Whitehorse Copper Mine provided many benefits to Whitehorse , the Yukon and its citizens – from employment, economic development construction of what have become ski trails to the War Eagle Pit which has served as the City's land fill for many many years.

The proposed temporary Development Permit regulations to require that temporary use permits for mineral exploration be used would cause uncertainty. There should be some certainty that if an exploration company does all work properly and responsibly there would be some guarantee they would be able to get new permits to continue exploration work and development. A revision to the amendments to provide for some additional certainty would be good.

It is not clear exactly how such revisions or additions to amendments should be legally worded but scenarios should be examined and options considered before amendments are decided upon.

We recommend that time be taken to consult further in technical working groups with industry and all stakeholders before final decisions are.

I look forward to future meetings and discussions.

Respectfully,

Grant Allan
President Yukon Prospectors Association