

December 18, 2020

Cory Foster, Executive Director  
Newfoundland and Labrador Outfitters Association

Good Morning,

As you are aware, the Newfoundland and Labrador Outfitters Association (NLOA) is the provincial non-profit outfitting industry association. We currently represent 118 outfitting businesses located all throughout NL and advocate on their behalf to ensure that our industry continues to move forward in a positive successful manner.

I am sure by now that you have received submissions from some outfitters who are deeply concerned with the proposed Valentine Lake Gold Mine. Most of our outfitters in Central are remotely located and offer some of the best wilderness hunting in Newfoundland because of their location. They offer premium products/services at premium prices and can do so because of their remoteness and the animals available to them in these remote areas. These outfitters are located from less than 4kms to 50+kms away from the project site, they hunt and fish the areas near the site (some of them have been doing so for more than 30 years), and they will feel significant effects from this project. Thus, there is certainly fear that this project will negatively change what some have spent decades to build.

The NLOA has had numerous meetings over the past few months with Marathon Gold, Provincial Officials from Wildlife and Tourism, Federal Political Officials, stakeholders nationwide, as well as with our own members who echo concerns. Based on our review of the EIS and findings from our meetings, we have identified 6 key areas of concern with the project. These areas are Woodland Caribou, other wildlife including moose and Atlantic Salmon, acoustic disturbance, the potential for devaluing of outfitting businesses, the effects of increased traffic on wildlife and our outfitting businesses, and the lack of an Outfitters Environmental Effects Monitoring Plan to protect the outfitting industry in the area.

### **Our Primary concern – The Woodland Caribou**

We have concerns over the impacts to all wildlife that may be impacted by this project, but the primary species of concern is the Woodland Caribou. We have four caribou herds - Lapoile herd, Grey River Herd, Buchans Herd, and Gaff Topsails, that we know are within or very near the area of this proposed mine throughout different parts of the year but the potential for impacts is most likely with the Buchans Herd. This project has the only migration path for the Buchans Herd to access their south coast calving grounds

situated right next to one of the proposed open pits and if in operation during the migration to or from the grounds, the herd could be jeopardized. Our Woodland Caribou are already in crisis, federally listed as a Species of Concern, and the last thing we need is added pressure on this species. Marathon Gold have identified the Woodland Caribou, specifically the Buchans herd, as the one value for the entire project where there is potential for significant adverse affects. We understand that they are doing a lot research on the Woodland and working closely with our Government in doing so, which we certainly appreciate, but we would like to see more. For example, a solid plan needs to put in place that would stop all work in any part of the project area when caribou are nearby. This policy would be in place for the entire lifespan of the project and pertain to even just one caribou at any given time. This process has been used by companies in the past doing mega projects in the wilderness of NL, i.e., when Emera was building their section of the L-ITL they would shutdown work in that area completely if caribou were near and not start-up again until the animal(s) had left, and thus, we believe the same should be guaranteed for this project by Marathon Gold and would like to see that guarantee in all of their plans moving forward.

### **Other Wildlife**

There will no doubt be impacts to other wildlife. In terms of big game resources, we rely on, there will be impacts to moose and to black bear within the project area. Although we do not anticipate significant effects here to these species as they do not seem to be as affected by major environmental changes as compared to the Woodland Caribou, we are already seeing affects. There is one outfitter, Notch Mountain Outfitters, that has been working with Marathon Gold for the last number of years because they are located less than 4kms from the project site and were immediately affected by the project as soon as it got underway. What we ask here is for a continued monitoring plan for the life of the project for these species and a mitigation plan ready to go should severe adverse effects take place.

From the fish side, there are no immediate threats to our primary species including Atlantic Salmon and Brook Trout, but worst-case scenario from a project catastrophe at Valentine Lake could potentially cause severe challenges to both. Thus, same as with other big game species aside from the Woodland Caribou, we ask for a continued monitoring plan for the life of the project for these species and a mitigation plan ready to go should severe adverse effects take place.

### **Acoustic Disturbance**

Another major concern is acoustic disturbance. We all know that sound disturbs wildlife in all capacities. The louder the sound, the bigger the impacts. There is now doubt that a lot of wildlife will abandon the area completely, but our concern is for how far and what

will the impacts be to this disturbance. Impacts as a result of acoustic disturbance are already being seen with this project and we are only in the development stages where the majority of the sound is from construction and heavy equipment. Add blasting to this, and the effects become far more reaching. From this perspective, we also ask for a continued monitoring plan for the life of the project on all wildlife within the acoustic disturbance zone of the project and a mitigation plan ready to go should severe adverse effects take place.

### **Increased Traffic & Business Devaluing**

Outfitting is one of the very first forms of tourism to ever formally take place in NL. The NLOA dates back more than 50 years and the industry well beyond that. We have outfitting operations located all throughout Central Newfoundland including in areas that will either see direct impact from the mine site operations itself, from the significant increase in traffic flow to and from the mine site or changes in wildlife. This increase in traffic will lead to disturbances of wildlife including shifts in where they live, disturbances for hunters accessing hunting areas and finding animals in these traditional hunting areas, and other disturbances for outfitters. Where once an outfitter could sell a unique, remote wilderness hunt where a hunter would not be disturbed by any local pressure, they may no longer be able to as a result of the increased traffic and increased human activity. Taking all of this into account, there is a significant possibility that outfitting businesses in the area will lose some value, and worst-case scenario take a complete loss to part of their business such as what has already happened to previously mentioned Notch Mountain Outfitters.

### **Lack of an Outfitters Environmental Effects Monitoring Plan**

Outfitting has been in this area for decades, will be there during the life of the project, and will hopefully be there well after the project is gone. This does not however take away from the fact that this project has already negatively changed and could potentially cause much more negative change to outfitters and outfitting in the area of Central Newfoundland. Outfitters who have or will be negatively impacted by this project need to be compensated for all loss as a result of this project. We expect that Marathon Gold and/or any future owners of the Valentine Lake Project will put a compensation plan in place to be available at anytime for outfitters negatively impacted by the project now or into the future. We expect that for outfitters identified, the owners of Valentine Lake will work one on one with these impacted outfitters and compensate accordingly. We fully expect them to be an upstanding commercial operator who values the importance of our industry, our outfitters, and our resources and not take this responsibility lightly. Based on this, we ask for the addition of an **Outfitters Environmental Affects Monitoring Plan** containing a specific section on compensation to be added to the EIS prior to approval. This plan would be specific to

the outfitting industry only where Marathon Gold works with the NLOA to identify all potentially impacted outfitters and begins work with these identified outfitters immediately.

### **In conclusion**

This project has the potential to have devastating impacts to wildlife located in, around, and that migrate past the project site regularly. We are deeply concerned about the impacts to Woodland Caribou and much more work needs to be done to ensure that impacts to the Woodland Caribou from this project are zero. This project has also devastated a portion of one outfitters business and will potentially be the cause of significant negative impacts to other outfitting businesses including devaluing of their businesses. Therefore, once again, we highly recommend that this project should have an **Outfitters Environmental Effects Monitoring Plan** with a component focused solely on full compensation for all loss to those outfitting businesses impacted. We see the Valentine Lake Gold Project as a great project for the economy of Central NL but if permitted to go ahead, it needs to be done right and the proper mitigation plans put in place well before the first break of ground for minerals.

Thank you and should you wish to discuss any of this further, please feel free to contact me at your earliest convenience.

Cory

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