

December 23, 2020

Government of Newfoundland and Labrador
Environment Assessment Division
Dept. of Environment, Climate change and municipalities
West Block, Confederation Building
P.O. Box 8700
St. John's, NL
A1B 4J6

EProjectcomments@gov.nl.ca
laac.valentine.aeic@canada.ca

RE: Marathon Gold Valentine Lake EIS Submission concerns

To Whom It May Concern:

February 2021 Snowshoe Lake Hunting and Fishing will be celebrating 28 years of successful business within the Outfitting Industry; an industry that has a long history in Newfoundland dating back to the 1800's and is the oldest form of tourism in Newfoundland and Labrador. Our primary activities is providing quality hunting and angling experiences to clientele worldwide. Within the tourism industry, the outfitting industry has the greatest yield and year over year inject brand new non recycled monies into the Newfoundland and Labrador economy, especially in rural parts of our great province. To continue to enjoy this it is very important to recognize key elements and characteristics on the landscape that must be protected and enhanced to ensure we have a product that is world class, otherwise we quickly lose our competitive edge in luring tourist to this area of the province.

Operations

Snowshoe Lake Hunting and Fishing's lodge is located at Snowshoe Pond 63 km's southwest of the town of Millertown, yet in viewing topographic mapping the Marathon Gold project is estimated to be 20 to 21 km's from our lodge as the crow flies.

Our business model is to spread hunting opportunities throughout a large portion of the moose management area as oppose to a small radius around lodge, such as is the case with fly in operations. This model help ensure continued high honor success rates, long term sustainability of wildlife resources our operations is based upon, thereby also ensuring sustainability of our operation as well. Historically, we have always had capacity or near capacity bookings, especially in terms of big game hunting. Demand has been upward in recent years in terms of customer interest in service offerings, big game and angling opportunities, etc. Moreover, interest in purchasing my operation has never been higher, and overall return on investment is highest it's ever been. However, I am fearful this could quickly change with impacts from further industrial activity such as expected with the Valentine Lake Gold Project.

To further clarify, reasons I believe return on investment is presently at an all-time high is as follows:

1. Overall number of game and opportunities.
2. High honor success rates. Have always enjoyed high honor success rates; however, over the last five years have averaged 90% on harvesting moose. Without high success rates we will quickly lose our competitive edge in marketing this product.

3. Professionalism. Snowshoe Lake Hunting and Fishing is a sought out operation whom are known for its high success levels, integrity, and attention to detail.
4. Quality of long term staffing, with great knowledge of the area.
5. Regulatory changes within the industry, and overall decent economy since 2008 with the exception of year 2020 covid-19 fallout, that paralyzed the industry considering border closures, travel restrictions, health concerns etc.

One hundred percent of our clientele are from outside of the province and about ninety percent are from outside of the country. Clientele are sensitive to the amount of game opportunities, and most sensitive to witnessing industrial activities such as wood harvesting, mining/exploration activities. In their mindset, it is unnatural, less pristine, impactful, and impediments to overall game opportunities.

In recent years, our operation has been affected by several current and past resource development projects. Examples of this would be Tech Resources mining site (lost hunting grounds), mining/exploration, new power station Granite Canal, construction of two transmission lines, forestry operations etc. A common theme indicate outfitting are often times preceding these industrial activities, somehow navigate the impacts during operation or development, and continues to exist long after these large industrial type activities take place. We are hopeful this will continue to hold true but yet it is imperative safeguards are put into place to minimize and/or mitigate impacts. The point is we are an industry that is worth standing up for, especially since it creates over 50 million in revenue and approximately 1300 seasonal jobs in rural Newfoundland.

In terms of the Valentine Lake Gold Project I understand what such a project can do for the local and provincial economy in creating a good number of paying jobs, increased household incomes, support for local businesses, surrounding communities etc. I am objective in acknowledging this and in some ways welcome such, especially if stringent measures are put in place to safeguard against impacts, and the proponent proves to be a good corporate citizen and compensate where and when necessary, without the element of hardball.

Our philosophy always has been that no value should be at the detriment of other values. It is important to try and maximize all values, while being detrimental to none, which will require much diligence. Where impacts undermine another, and value is lost, compensation should be a component and requirement in the approval of such industrial activities. We strongly feel this must be a requirement in the approval of this project.

In looking at the Marathon Gold Project, in my opinion it could not be located in a more sensitive area for both wildlife and aquatic values.

Wildlife values

From a wildlife point of view, it is located in a very important corridor area in terms of movement through the area for the woodland caribou, especially affecting the Buchans, Lapoile, and Grey River herds. How this is addressed is critical, especially since it is a species of concern and further declines could give it a different designation in 2024 when COSEWIC does a review. If it becomes listed as endangered, hunting opportunities for the woodland caribou island wide will cease to exist. I am pleased to realize Marathon Gold are doing some collaring to garner further insight how the caribou utilize the area. It is well known this species do not respond well to any industrial activity, disturbances, etc.

In 2008 our operation lost its ability to hunt the woodland caribou within management area CMA63 known as Grey River, which also encompass the area of the Marathon Gold Project, due to steep declines of woodland caribou populations. At the time I lost the caribou licenses there was hope of short term pain for long term gain in hopes of the herd rebounding to huntable levels. My thinking at the time is if herd was so low to forfeit hunting then there should not be any industrial type disturbances or habitat lost affecting the caribou which they are very sensitive toward. However, since 2008 there has been major increase in industrial activity that has further impacted the resource. Consequently, any hope of hunting again in the future is dashed or put in jeopardy and this project has the potential to be the most impactful of all in my opinion. In regards to moose hunting, impacts will be lost hunting grounds, major traffic, and unprecedented noise levels, etc.

Aquatic values

As for the aquatic side, Marathon Gold Project is located very near Victoria Lake and Valentine Lake. Victoria Lake in itself is probably the most major insular watershed that can affect Victoria River, Red Indian Lake, Red Cross, Hospital Pond, Blizzard Pond, Wilding Lake, Rogerson Lake, etc. Extending from the other side of Victoria Lake it could affect water networks such as Granite Lake, Meelpaeg Lake, Cowy Lake, Snowshoe Pond, Noel Paul Brook, and Exploits River. Most of these watersheds are connected in some way to Victoria Lake.

Ways in which my business could be adversely affected are:

- Lost hunting grounds.
- Noise (while hunting and traveling throughout the area on access road south side of Red Indian Lake and tangents extending from this road).
- Potential for lower success rates.
- Heavy equipment traffic.
- Heavy civilian traffic.
- Possibility of road accidents (I and my staff have had many close encounters with industrial traffic activity within the area).
- Woodland caribou impacts. Located in very sensitive caribou corridor.
- Habitat lost.
- Shift in wildlife dynamics, densities.
- Possible staffing lost for outfitting businesses such as mine and the outfitting industry which already has a lean guiding pool.
- Clientele dissatisfaction (overall less of an experience due to lost resources, habitat, noise levels etc.)
- De-valuing of business when selling hunting/angling packages.
- Overall less return on investment upon selling.
- Potential water contamination effecting aquatic values throughout the watershed system which encompasses the most insular part of Newfoundland, and ultimately lead to the Atlantic Ocean.

In conclusion, we solicit your understanding to ensure the right kinds of mitigations are in place as a requirement prior to the approval of this project. Having lived through a few industrial projects, I must admit I have a measure of skepticism. Similar to the approval of the Labrador Island transmission link, I would highly recommend an “Outfitter Environmental Effects Monitoring Plan” to be an important component for approval that mandate fair compensation from all losses due to impacts of the project. Conversely, it is important the proponent incorporate this within their operational plans, mitigation plans, and yes compensation plans. This component needs to be a part of their feasibility plan. If any questions, please feel free to reach out to me at any time.

Regards

SNOWSHOE LAKE HUNTING AND FISHING

Ron Hicks

41 Bouzane Street
Grand Falls-Windsor, NL
A2A 2W7

1-709-489-3017