

June 28, 2010

Mr. Bryan Evans
Technical Working Group
Taku River Tlingit First Nation
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Atlin, BC V0W 1A0
Via email: bryan@dovetailconsulting.com

Mr. James Cuell
Technical Working Group
Integrated Land Management Bureau
Bag 5000, 3726 Alfred Avenue
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Via email: james.cuell@gov.bc.ca

Dear Mr. Evans and Mr. Cuell:

Re: Further BC Mineral Exploration Sector Recommendations on Atlin Taku Draft Land Use Plan

On behalf of the Association for Mineral Exploration British Columbia (AME BC), I first wish to thank you for convening the Community and Stakeholder Workshop on June 11 and June 12 in Atlin regarding the draft Atlin Taku Land Use Plan. The workshop provided an excellent venue to meet with you and members of the Atlin community and Taku River Tlingit. I also appreciate the opportunity to comment specifically on the June 4 compiled draft and the summary of stakeholder comments regarding the draft zoning proposal.

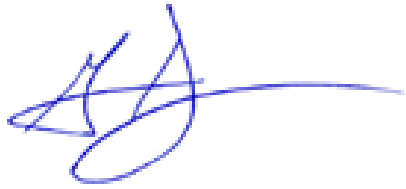
As mineral explorers, members of AME BC remain committed to the “Two-Zone” land use model. This model defines the Mineral Zone and Protected Zone areas of the province so that areas open or closed to mineral exploration are clearly separated and described. The compiled draft plan shows a trend toward clarity regarding how the Atlin Taku Land Use Plan will follow the Two-Zone model. However, we remain concerned that 22% of lands currently deemed high mineral potential are being sterilized and not available for responsible mineral exploration. This represents a lost opportunity to realize potential benefits that may exist for everyone.

Furthermore, although several access corridors have been fully described in the draft plan, the mineral exploration sector still requires clarity regarding access provisions through the Taku/Nakina/Inklin, Upper Gladys and Tulsequah Valley/Atlin Park/Sloko area before AME BC provides its final comments on the plan.

In the following document, we highlight significant mineral potential areas that have been proposed as protected areas and access corridors. We are encouraged that many of our comments to date are under consideration according to the summary of stakeholder comments. Once again, we invite the Province of British Columbia and the Taku River Tlingit First Nation to reconsider the scope or nature of these highlighted areas so that responsible mineral exploration may occur as an acceptable land use activity. AME BC remains hopeful that the Atlin Taku Land Use Plan will achieve a fair balance between values and provide greater certainty to mineral explorers, developers and investors.

We urge the Province and the Taku River Tlingit First Nation to consider the following comments and recommendations that will provide greater land use certainty and lead the way to shared benefits and opportunities from mineral resources in the Atlin Taku region.

Respectfully,



Gavin C. Dirom, President & CEO
Association for Mineral Exploration British Columbia

cc: Honourable Randy Hawes, Minister of State for Mining
John Ward, Spokesperson, Taku River Tlingit First Nation
Kevin Kriese, Integrated Land Management Bureau
Robert A. Duncan, Manager, Exploration, Kiska Metals Corporation
Gary Sidhu, Project Geologist, BCGold Corp.
Tim Termuende, President & CEO, Eagle Plains Resources Ltd.
Linda Dandy, Consulting Geologist, Yellowjacket Joint Venture
Clive Aspinall, Geologist
Fionnuala Devine, Geologist
Land Use Committee, AME BC
Board of Directors, AME BC

Recommendations on Atlin Taku Draft Plan and June 8 Summary of Stakeholders Comments

Mineral Lands in Protected Areas

The activities associated with mineral exploration and development generally occur over a substantial area, following geologic formations that can cover many kilometres. Due to the nature of this work, the mineral exploration sector requires access to a large land base to search for rare and hidden mineral deposits. The increase in protected areas from 7% to 25% of the plan area will significantly limit the ability of the mineral exploration sector to discover and develop mineral deposits that could benefit the Atlin area, the Taku River Tlingit First Nation and the Province of British Columbia.

We note that the banning of mineral exploration and mine development activities is not necessary to maintain fish and wildlife values in this area. Mineral exploration activities must follow the *Health, Safety and Reclamation Code for Mines in British Columbia* (HSR Code) as well as federal Department of Fisheries and Oceans (DFO) regulations, which are designed to protect fish and fish habitat. We respectfully request that existing regulations be the primary mechanism used to protect fish and wildlife values in the following areas and throughout the Atlin Taku plan area.

- 1. Hoboe Creek-Nelson Lake.** AME BC is encouraged that the rezoning for this area of historical exploration activity and high mineral potential values in rare earths, copper, molybdenum and gold is under consideration. There is much interest in the under-explored intrusive and volcanic rocks along the Llewellyn Fault and geologic splays branching out from the fault which may contain Engineer Mine type deposits.
- 2. Trapper Lake.** AME BC is appreciative of the proposed continuation of floatplane access to relatively nearby mineral exploration sites. This provision will allow for low-impact exploration access to the adjacent Trapper Lakes/Tatsamenie Resource Management Zone. As noted, however, we recommend that the HSR Code and DFO regulations be the primary mechanisms used to protect fish and wildlife values.
- 3. Taku/Nakina/Inklin.** AME BC understands that existing mineral tenures in this proposed protected area are being considered for exemption. We propose that realignment of these boundaries would provide greater certainty regarding mineral tenure for the industry rather than a save-and-except mechanism.
- 4. Whiting.** AME BC is very concerned about the new request made by the Canadian Parks and Wildlife Society (CPAWS) to protect a portion of the Whiting watershed in the Atlin Taku land use plan. It is not clear why the relatively inaccessible Whiting is proposed as a park. Based on past exploration and government reviews, this is a large area with moderate-to-high or high mineral potential that should be kept available for low-impact mineral exploration and potential mine development. Although there are currently only two mineral tenure holders, considerable copper-molybdenum and gold-silver exploration programs have been conducted in this area.

Access to Mineral Lands:

The draft plan addresses many questions regarding access in the Atlin Mountain – Graham Inlet and Golden Gate areas clearly. We also note that Atlin residents had similar concerns regarding access through proposed protected areas.

As you are aware, we require clarification regarding specific access routes (land, water and air) through the Taku/Nakina/Inklin, Upper Gladys, and Tulsequah Valley/Atlin Park/Sloko areas. General access by industrial users (mineral exploration and mining) and commercial users (tourism, guide outfitting) should not be treated differently. In many cases, the potential impact is often very similar and can be managed in the same manner.

The draft land use plan states, “Access to Tulsequah Valley through [Sloko Resource Management] Zone is currently under discussion” (section 7.2.7) and that “a single industrial access route” will be allowed to link the Blue Canyon area with the upper Nakina area (section 8.5.11). As a general principle, AME BC believes that economically realistic access should be considered and potentially developed in areas where the net environmental impact is lowest and the benefits are greatest. As a case in point, access through the existing Atlin Park could be considered more reasonable, in terms of sustainable development, as compared to other proposals.

We also note that the area open to mineral exploration and future mine development west of Willison Bay in the proposed Hoboe Creek-Nelson Lake protected area may require water access along Atlin Lake via Torres Channel and Willison Bay and then land access west of Willison Bay. If the Hoboe Creek-Nelson Lake protected area comes into effect, a provision for access of Willison Bay westward would be required.

Going forward, specific information clarifying the nature of access (land, water and air) throughout the Atlin Taku region will be required for mineral explorers to have confidence in accessing and developing current and future prospective sites. As well, mineral potential and access at the borders of the plan area (specifically Yukon, Alaska, but also adjacent BC plan areas) should be assessed to evaluate how geology outside the plan area relates to mineral prospects within the plan area.