

September 1, 2020

**Submitted comments re:**

Flag Resources (1985) Limited- Mineral exploration permit  
Instrument type: Mineral exploration permit  
ERO number 019-2230  
Ministry reference number PR-20-000244

**Submitted to:**

Brian Laine  
Mineral Development Office (Sudbury)  
brian.laine@ontario.ca, and via the ERO [on-line comment form](#).

**Submitted by:**

Friends of Temagami, Earthroots, Sudbury Naturalists Club, Coalition for a Liveable Sudbury  
- Members of the [Wolf Lake Coalition](#) Steering Committee

**Comments**

Wolf Lake is a very heavily used recreational lake, as well as a globally significant ecological area. Three of the four sites on the two applications at Wolf Lake (019-0593 & 019-2230) are favoured campsites. All of the sites have significant old red pine ecosystems. **Exploration activity in this area will have unacceptably high disturbance to the ecological and social values. This application should not be approved.**

Twenty-one years ago, the provincial government made a commitment to protect Wolf Lake old growth forest. In 1999, the province committed to bring Wolf Lake into the Chiniguchi Waterway Provincial Park as existing mining leases and claims lapsed. On March 13th 2012, the Minister of Natural Resources announced that the Forest Reserve status would remain for Wolf Lake, and that the land would be protected once the claims and leases lapsed. Further, the Ministers of both MNR and MNDM committed that Flag Resources claims and leases would not be transferred to any other company. Despite not meeting the criteria mandated for lease renewal, the leases were extended 21 years in the heart of the old growth area and Wolf Lake itself (now due in 2031 and 2033). At the time, no reasons were provided for the extension and the minister refused to meet with concerned citizens.

Wolf Lake Coalition supports the inclusion of Wolf Lake old growth forest within the Chiniguchi Waterway Provincial Park. We urgently submit that the best course of action would be to move forward on steps to accomplish this goal, and that this area is not suitable for mining exploration.

This application proposes mechanized stripping, pitting and trenching, and line cutting within the heart of the old growth, adding to impacts from past applications within Wolf Lake and in adjacent areas. The proposed activities would cause heavy and unacceptable damage including new access and trails causing erosion and habitat fragmentation, damage to creek beds and shorelines, damage to and removal of trees (including old growth), removal of vegetation and soil, use of heavy equipment, excavation, and disturbance of campsites and canoe routes.

We submit the following additional comments regarding Flag Resources' mineral exploration permit at Wolf Lake.

- The application should be thoroughly reviewed to ensure adequate information has been provided to make a decision. For example, how and when is access proposed for the two new work sites, where there are no existing trails or roads?
- No new work should be permitted until damage and debris from past work by Flag Resources are cleaned up and reclaimed properly. Historic workings in the Jess Lake area left heavy cables, barrels, oily debris, and other drilling detritus on site.
- Flag Resources has a poor record of stewardship during mining exploration at this site and nearby areas. For example, oil spills, rutting of soils (including streambeds) by movement of heavy machinery, and abandoned equipment and refuse have been observed. We are concerned that it is possible this may be repeated and that roads and trails may not conform to what is permitted, that impacted areas may not be properly cleaned and restored, and that activities, including wastewater management, may not be handled properly. We are also not confident that the capacity exists to monitor and enforce conditions, since enforcement has not happened in the past.
- If this application is approved, conditions should be included to minimize damage, including: (a) prohibit removal of trees greater than 10cm dbh (these small trees can be very old due to local growing conditions); (b) specify where work is permitted (excluding the most sensitive areas and favoured campsite, and not permitting work elsewhere within the lease or in adjacent claims); (c) require winter operations only (e.g Dec, 21- March 31) and require access across the frozen lake (to avoid creating new trails/roads or exacerbating past damage and erosion on trails and creek crossings); (d) require that damage and material from past or current exploration activities be cleaned up.
- Clarity is needed on the status and viability of Flag Resources.
- Consultation is required with Wahnapiite First Nation. Communication is also expected with the Wolf Lake Coalition.
- MNRF should be included in setting, monitoring and enforcing conditions, especially related to trails. E.g. The proposed water crossing is within the regulated Chiniguchi Waterway Provincial Park.

Wolf Lake is the largest known old growth red pine forest in North America, the missing link in the Chiniguchi Waterway Provincial Park, and, as intended for Forest Reserves, will be brought into the parks system as existing mining leases and claims lapse. Cumulative impacts of mining exploration within the Forest Reserve and on adjacent lands should not be permitted to degrade the health of this unique ecosystem, or its recreational and social value as a park and canoe route.

Thank you for this opportunity to comment, and to continue the conversation throughout the process.

**Contact:**

PJ Justason

President, Friends of Temagami

[pjustason@friendsofemagami.org](mailto:pjustason@friendsofemagami.org); (705) 796-3724

**Signatories:**

PJ Justason

Friends of Temagami

Gord Miller

Earthroots

Franco Mariotti

Sudbury Naturalists Club

Naomi Grant

Coalition for a Liveable Sudbury

- Members of Wolf Lake Coalition Steering Committee