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Re: preliminary comments on the Galore Creek Mine Project

The Public Comment Period was inadequate:

We respectfully request an extension of the public review period until September 22nd, 2006. The Environmental assessment documents are voluminous and present an extraordinary amount of technical material. The comment period was scheduled during the busiest part of the year when Iskut families are out fishing, hunting, guiding and camping on the land. We have not had adequate time to review, absorb and comment on the many important issues presented in the Galore Creek Mine EA document. Related economic feasibility studies have not been circulated, nor have effluent standards and designs been finalized.

We have the following preliminary comments and wish to reserve the right to submit more by September 22nd, 2006.

Cassiar Watch Society is based in Iskut and concerned about the wild salmon and wild rivers of Northern British Columbia, particularly the Iskut River tributary of the Stikine watershed. We are also concerned about the overall pace and scale of proposed mining and energy development in the Iskut region, and impacts upon our community due to a sadly lacking comprehensive regional infrastructure inquiry and planning process.

We generally view the proposed Galore project, with access and infrastructure via the modified Northern Route to the Canadian port of Stewart, as the most independently comprehensive economic development opportunity for Tahltan communities, with many benefits to Northwest British Columbia mining service communities for the 2010-2030 time slot. While the Nova Gold/Tahltan participation agreement was adopted hastily without wide Tahltan support (most Tahltan that use and occupy the land did not vote), when the project is viewed on a stand alone basis for the 2010-2030 time period, it is a better project for Tahltan, than any of the other major energy and mining proposals that are out there attempting to go ahead on untreated Tahltan land.

This project brings with it the beginning of the era of open pit copper mining on a grand scale within Tahltan territories. The power requirements alone boggle the mind when compared to the 1.5 megawatts needs of the whole community of Iskut. Bringing the North American centralized electrical power intertie into Tahltan territory, will change the economics of doing business across a wide range of industrial applications previously bound to the southern half of British Columbia and North to Stewart BC. The vast region behind the Alaska panhandle becomes within the vision of lesser projects to follow, as

and when permitted to exist in a pre-treaty environment within Tahltan and other Northern First Nation territories.

The cumulative effects chapter Nine begins to touch upon the scope of potential industrial enterprise under active investigation in 2006, with an eye to the 2010-2030 planning horizon for a typical 20 year mining or energy extraction project. Together the potential combined effects upon Tahltan culture, health, lifestyle and environmental under pinning to traditional uses is huge. Some would say these impacts are all manageable given our know-how, while others would recognize the proposed pace and scale of development as a boom and bust scenario. Certainly it is beyond the scope of this cumulative effects assessment to consider the impacts of future projects that piggyback upon the infrastructure provided by the Galore Creek Project. Some say.

It is the firm belief of Cassiar Watch, and that of many wise indigenous elders that use and occupy the land, that a company proposing such wide spread change as the Galore Creek represents, must earn a certain social license to proceed with the good will of the host culture and community. What is the system of containment that will control the reaction started by the Galore project approval process. Does Nova Gold, it's consultants, contractors and government counter parts bear a social responsibility to balance the overall regional implications, as the bringer of monumental change to the region?

Nova Gold and the wider mining community should support a lasting conservation land use designation for the lower Iskut/Stikine River:

Cassiar Watch Society, many resident Tahltan traditional users, river rat, fishers, hunters and recreationalists have been long time advocates for protection of the Craig River headwaters, Lower Iskut River and Lower Stikine River, for their contiguous high quality grizzly/salmon values and unroaded, unlogged rainforests. Such a designation would balance the long term exploration and development of the huge mineralized landbase between the mainstem Stikine and the main stem Iskut Rivers. Such development could extend use of Galore project infrastructure to Shaft Creek for example, within this sizeable mining district.

Access recommendations from the 2000 CIS LRMP were to steer mining economic development into the Canadian economy and Canadian infrastructure (see CIS LRMP economic development strategies). While the preferred Galore access alternative indicates the modified Northern route out to Hwy #37, the cumulative effects section indicates that at a later date, industrial traffic could be heavy, if other non-renewable resource extraction projects are provided infrastructure to proceed to development during the same timeframe.

We request that Nova Gold be very clear in 2007, what their intentions are over the fullness of time, vis a vis support for river and riparian conservation in the lower watersheds. We therefore request that Nova Gold publicly support a lasting conservation designation for the lower Iskut/Stikine Grizzly/Salmon management zone that will assure maintenance of the roadless area status of the lower rivers rainforest and extensive

riparian habitats. Such support from Nova Gold would give the Galore project, a much broader social license to the energy intensive activity of extracting copper resources in the 2010 to 2030 time slot.

Plans for hydropower development need to be fully revealed:

Access to power is the king pin for many other proposed development projects in the Stikine watershed and surrounding area. The method and location of power generation for this project could greatly impact fishery resources and conservation areas set out in the LRMP. Some power options discussed could have significant impacts to the Lower Iskut/Stikine Grizzly/Salmon Management zone's roadless area and open the area to more industrial development. Many proposals for power generation have been discussed for the Stikine region recently. Nova Gold's cumulative impacts assessment has not addressed how power infrastructure for this project will affect power generation and transmission line capacity in the region. This needs to be thoroughly discussed through publicly available reports and forums in a timely manner, along with other proposed regional industrial development infrastructure. Overbuilding infrastructure for Galore puts our Iskut community vision at risk to unwanted concurrent development closer to home.

What is Nova Gold's real plan relative to hydro development? Are you attempting to acquire the transmission line EA approval, right of way, and potential BC Hydro operating system modifications which would meet Galore Creek energy demands? Actual construction of the hydro site on the Iskut river main stem could then become the secondary asset, not all together required for the Galore project to proceed on schedule. Please fully explain your plans.

The Cumulative Impact Assessment is inadequate:

The cumulative effects assessment did not look at the summation of the currently proposed infrastructure projects in the Iskut region and wider Tahltan territories. It is the infrastructure projects which bring on secondary environmental and social impacts across the region. Too much industrial infrastructure capacity drains resources best left for future generations, and reduces society's ability to pay the ongoing maintenance of such infrastructure, such as miles and miles of remote road infrastructure in the North.

Non-renewable resource extraction from the Tahltan/Gitksan and surrounding territories are obviously not sustainable over the fullness of time, if these projects proceed concurrently. We have seen the near term dis-location of the forest economy in Northwestern British Columbia by unsustainable timber extraction policies. Sustainable mining is an oxymoron, as mining results in a hole in the ground. One mine at a time is sustainable use of dedicated regional industrial infrastructure.

We do not need to extract the Iskut region's minerals and petroleum resources concurrently, nor super-size the Iskut region industrial infrastructure for a boom and a bust. One major extraction project at a time, sets a long term vision for the community and region of Iskut, for current and future generations. It makes sense for the Galore Creek/Shaft Creek area to be considered as a planning unit for one mine and then the other, to extend the life of the infrastructure and contribution to the regional economy

over time. Iskut people could live with development East of the Stewart Cassiar Highway deferred for at least fifty years, to protect high value wildlife corridors and traditional uses. A transmission line North of Bob Quinn is not wanted or needed by Iskut people.

Discharging effluent to the Iskut River. Suggest full study and implementation of return pipeline to the mill rather than discharge to the river.

We are opposed to dumping the water from the slurry pipeline into the Iskut river. Many of the watersheds that were studied in the EA have naturally occurring elevated metals levels. Adding additional pollutants will stress fish and wildlife populations that the local residents rely on for food. We are opposed to any mixing zone in the Iskut, Scud or Galore watershed. We request that all water from the slurry pipeline be sent back to the mine site for re-use or treated to background levels before disposal by mixing this effluent into the Iskut River. Specific concerns:

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- 1) Water treatment details not released or finalized(8.6.2), therefore impossible to comment further than Cassiar Watch disapproves of dumping the 70 cubic meters per day liquid fraction into the Iskut River for the life of the mine.
- 2) Cost of return pipeline relative to overall project cost is small, and would greatly improve the social license to operate the mine. No design details of this alternative.
- 3) Access road and discharge location is significantly close to the Iskut River Hot Springs Protected Area, managed by BC Parks.
- 4) If discharge is allowed to proceed to development, (Which CW recommends against), then mitigation to obtain the social license to discharge to the Iskut River needs to be negotiated with the affected stakeholders and on a government to government basis with the Iskut people and their leadership. An effluent pipe discharging upstream of a major fish bearing river in Tahltan territory requires a level of consultation and accommodation specific to future use and occupation of that section of river. The use and enjoyment of the Iskut River Hot Springs and the recreational river running attributes of this scenic section of the Iskut River, combined with access to a put-in site and a take-out site along the Eskay Mine road, makes for some interesting opportunities for community based economic development.

Section 8.6.3

CIS LRMP considerations describe Iskut River Hot Springs as a public use area, while filter plant plans refers to closing access to the public, of this existing forestry road.

Again, we reserve the right to supplement these comments further. Thank you for your full attention and further consultation on these important matters.

Sincerely,

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