

From: FOS Stan & Ann Tomandl [friendsofthestikine@islandnet.com]  
Sent: Monday, February 19, 2007 4:20 PM  
To: Bakelaar, Margaret [CEAA]  
Subject: Comment on Comprehensive Study Report for the Proposed Galore  
Creek Mine Project

2007 February 19  
Margaret Bakelaar  
Canadian Environmental Assessment Agency margaret.bakelaar@ ceaa-acee.gc.ca

Re: Comment on Comprehensive Study Report for the Proposed Galore Creek Mine  
Project

Dear Margaret,

Thanks you for your attention and work on this important proposal.

I write as Chair of Friends of the Stikine Society and as a fisher on the lower Stikine and  
Iskut Rivers.

Our main concern is in regards to Part B. 2.4 - 2.8

We are very concerned about water quality issues on the Scud, Stikine, and Iskut  
Rivers. NovaGold, despite having experienced personnel and good intentions, is a  
junior mining company without a proven good record on water quality. The Summary of  
NovaGold's commitments to surface and groundwater quality and quantity sediment  
(Nos. 60 - 115) and aquatic and wildlife resources and related habitat (Nos.116 - 142)  
are thorough and demonstrate the number of details that need to be attended to that  
may not be attended to, regardless of good intentions. We have included below [in  
brackets] a summary of recent research on mining company water quality predictions as  
compared to actual outcomes. The promise to maintain water quality standards is  
relatively cheap, maintaining those standards is expensive and requires due diligence,  
and the failure to maintain standards is devastating to habitat, water, wildlife, fisheries,  
economy, and people.

[A report released in December 2006, by the natural resources consulting firms Kuipers  
and Associates of Butte, Mont., and Buka Environmental of Boulder, Colo., for the  
environmental group Earthworks looked at the water quality predictions, made by  
Western US mining companies for environmental assessments, prior to their mining  
operations. They then compared these predictions with the actual water quality after  
mining was under way. "Comparison of Predicted and Actual Water Quality at Hardrock  
Mines" is a detached examination of the impact of hardrock mines on water quality, full  
of facts, refreshingly free of hysteria.

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The report was released in early December, 2006, but attracted little media attention, perhaps because it is so densely packed with data.

In nearly every assessment, the mining operators predicted that there would be no impact or minimum impact to water quality as a result of their operations. But in 76% of the cases, these predictions were wrong, resulting in either surface or groundwater quality deterioration in excess of established water quality standards.

The report looked at 183 major modern era hard rock mines in 14 states including Alaska, Arizona, California, Colorado, Idaho, Michigan, New Mexico, South Carolina, South Dakota, Utah, Washington, and Wisconsin.

The report makes chilling reading. Hecla Mining's Grouse Creek Mine in Idaho, for instance, predicted no impacts to water quality prior to mining. In fact, the mine's tailings impoundment leaked into groundwater, exceeding standards for aluminum, copper, arsenic, selenium, silver, zinc and cyanide.

Barrick Gold's Golden Sunlight Mine in Montana predicted the risk to groundwater was slight. The actual result was contamination of downgradient wells with cyanide and copper. Or TVX Gold's Mineral Hill Mine in Montana predicted no impacts to water quality. But they ended up exceeding standards for cyanide, nitrate, manganese, sulfate, arsenic and total dissolved solids.

This litany of water quality failures goes on in detail for 277 pages, not including the statistical and detailed information in two appendixes available online.

Seventy-three percent of the mines in the study predicted in advance that they would have little or no adverse effect on surface water quality after they had taken steps to mitigate their impact. But after mining started, 60 percent of the mines had exceeded surface water quality standards. The numbers are similar for groundwater impacts: 77 percent predicted low impacts, but 52 percent of the mines actually exceeded groundwater quality standards.

In other words, a person who knew nothing about either hard rock mining or water quality would have a more accurate prediction rate simply by flipping a coin than the combined wisdom of some of the Western US' hard rock mining companies. There are, after all, only two possible outcomes: either water quality gets worse, or it doesn't. If you flip a coin, you'll predict the correct outcome half the time. But the mining companies, after careful technical analysis, were right only about one-quarter of the time.

Alan Septoff, research director of Earthworks, the group that commissioned the study, says, "There's a perverse incentives structure set up. The people who make the predictions are in the employ of the prospective mining operators, who want a prediction that will allow a regulator to sign off. As long as this incentive is in place, you're going to get these predictions ... No matter how well intentioned you are, you can't be responsive to your shareholders and responsive to the public interest...The public needs to be represented by somebody who puts the public interest first, which is not the mining companies."

In a white paper on the issue, Alan Septoff wrote, "100 percent of mines predicted compliance with water quality standards before operations began ... 76 percent of mines studied in detail exceeded water quality standards due to mining activity."

Indeed, a mining company whose business and investment decisions were right only about 25 percent of the time would not be in business for long.]

Respectfully submitted,  
Stan Tomandl

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For the Rivers that Carry us ~ ~ ~  
Stan Tomandl & Ann Jacob  
Chair and Treasurer of  
Friends of the Stikine Society

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