



## **Alaska Trollers Association**

130 Seward #205  
Juneau, AK 99801  
(907)586-9400 phone  
(907)586-4473 fax  
ata@gci.net

July 27, 2010

The Honorable Gordon Campbell  
PO Box 9041  
Stn Prov Govt  
Victoria, BC V8W9E1  
Fax 250 387-0087

Dear Premier Campbell:

It is Alaska Trollers Association's (ATA) understanding that the Trustees for Redfern Resources, Ltd. (Redfern) have requested a transfer of the Environmental Assessment Certificate MO2-01 for the Tulsequah Chief Project (Tulsequah) to Chieftain Metals (Chieftain).

Given the Transboundary nature of the Taku River watershed, and the significance of its bounty of fish and wildlife to both countries, we request that the Government of British Columbia postpone transfer of Certificate M02-01 to Chieftain, or any other potential buyer, pending a thorough review of both the company and the anticipated impacts of its plans to re-open the mine.

ATA has monitored the Tulsequah and participated in permitting and public hearings for many years. However, we were only recently advised of the pending transfer request. While it appears that the British Columbia Environmental Assessment Office is no longer soliciting comments on the transfer, ATA respectfully requests that this letter be incorporated into the record of decision.

The Alaska Trollers Association (ATA) represents commercial hook and line salmon fishermen in Alaska. The Taku River provides an important component of the season's harvest for our fleet and many others. As you know, Canadian fishermen also rely on salmon produced in the Taku River.

ATA is an active participant in both state and federal resource management arenas and Pacific Salmon Treaty negotiations relative to Transboundary Rivers. The US and Canada put a tremendous amount of money and energy into protecting habitat, researching salmon stocks, and managing fisheries, both domestically and under the auspices of the Pacific Salmon Commission. This commitment should be furthered through sound habitat decisions, on each side of the border, to maintain a sustainable environment for fish and wildlife and those who live, work, and recreate in the region.

Significant environmental, transportation, and financial questions have plagued the Tulsequah project. Most of those questions remain unresolved and are of concern to our members and fishermen of both countries, all who rely on a healthy and productive Taku River watershed.

The poor track record of previous Tulsequah contractors, along with an array of impractical and potentially harmful proposals, have heightened concerns about rejuvenating a large scale mine at the headwaters of the Taku River. Some of ATA's concerns include:

- Acidic mine drainage and metal leaching from the mine workings and waste materials is a longstanding problem that has yet to be resolved.
- Groundings of conventional barges and tugs have occurred under relatively good conditions, heightening concerns about industrial barging and potential harms to water quality and spawning and rearing habitat.
- There appears to be no body of research developing on changing climactic conditions we are witnessing in the watershed, or how that could affect various transportation proposals.
- Sufficient bonding with assignment of liabilities, and an arms length analysis of the company's emergency and mediation plans should be a matter of large concern to both countries. Does Chieftain have the financial wherewithal and commitment to adequately address, correct, and mitigate any damage done?

A series of letters from the state of Alaska and the US State Department was sent to the British Columbia Minister of the Environment and Environmental Assessment Office. To our knowledge, those letters have not yet been answered. ATA endorses those comments and would greatly appreciate receiving your responses when they become available. Additionally, we ask to be kept informed of your ongoing decision-making process. Hopefully those most affected will be given reasonable opportunities to weigh in. For the record, fishing season would not be considered reasonable to ATA.

In order to best serve the interests of residents on both sides of the border, ATA urges the government of British Columbia to work cooperatively with the State of Alaska and Taku River stakeholders on all outstanding issues and future proposals related to the Tulsequah. It is essential that a diligent review of Chieftain and its development and operational plans and anticipated impacts be part of that cooperative effort, before any permits are issued to a new Tulsequah contractor.

In conclusion, ATA requests your assistance to protect instream and shoreside habitat and water quality in the Taku River by using extreme caution when permitting mining or any other development activity in this vital watershed. Healthy and productive fisheries resources will continue to provide intrinsic value and economic opportunity for communities in both nations for many years to come.

If I can answer questions regarding ATA's position on this or other related issues, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Dale Kelley". The signature is written in a cursive, flowing style.

Dale Kelley  
Executive Director

Cc:

The Honorable Berry Penner, Minister of the Environment  
The Honorable Bill Bennett, Minister of Energy, Mines and Petroleum Resources  
The Honorable Pat Bell, Minister of Forests and Range  
Steve Carr, President & Chief Executive Officer, Integrated Land Management Bureau  
Governor Sean Parnell  
Denby Lloyd, Commissioner, ADFG  
David Bedford, Deputy Commissioner, ADFG/ Alaska Commissioner, PSC  
Tom Irwin, Commissioner, DNR  
Southeast Alaska Legislators  
AK Senate Resources Committee  
AK House Resources Committee  
Alaska Congressional Delegation  
Deputy Assistant Secretary of State John Balton