



## **Alaska Trollers Association**

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Sent via email: [KSM.Project@ceaa-acee.gc.ca](mailto:KSM.Project@ceaa-acee.gc.ca)

### **RE: Kerr-Sulphurets-Mitchell (KSM) Mine Proposal EIS**

Dear Mr. Cooper:

The Alaska Trollers Association's (ATA) is concerned about the potential permitting of the large scale Kerr-Sulphurets-Mitchell Mine (KSM) in the Unuk River watershed. We offer these brief comments, but note that the comment period was far too short, and not well-timed, for those who could be negatively impacted by the KSM Mine.

ATA and other associations whose members may have concerns about this project had inadequate time to review the voluminous Environmental Assessment, because the comment period has been held during the heart of the fishing season. While hearings were conducted and obvious care was taken to discuss the project with select Canadian communities and tribal nations, there has been no outreach to the Alaskan fishing communities most likely to suffer the downstream effects of KSM mine.

ATA represents a fleet of commercial hook and line salmon fishermen who fish for Chinook, coho, and chum salmon off the coast of Southeast Alaska. There are over 2,000 troll permits and about half are fished each year. The Unuk River and its tributaries provide an important component of the season's harvest for our fleet and many others along the coast. The troll fleet is known for delivering fine quality salmon from nearly pristine watersheds. Our concerns with projects like KSM include protection of critical habitat and fish populations and market implications for Alaska seafood, which is widely recognized for its sustainability and wholesomeness. Healthy salmon equates to thousands of jobs each year for families in Alaska's coastal communities.

ATA works to sustain fisheries stocks and is an active participant in both state and federal resource management arenas and Pacific Salmon Treaty (Treaty) negotiations. The Treaty addresses issues relative to salmon stocks shared by fishermen from the US and Canada. Each country invests a tremendous amount of money and energy into protecting habitat, conducting

research, and managing fisheries, domestically and under the auspices of the implementing body of the Treaty, the Pacific Salmon Commission. This commitment must be supported by 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. Despite Unuk River stocks being subject to the Treaty, it appears that little work has been done to analyze the impact of KSM on these salmon or the fishermen that harvest them.

It is our understanding that the State of Alaska has been participating in a technical working group for at least one portion of the EA review, but to my knowledge this work has not yet been made available to the public. Our association's inability to muster the resources necessary to adequately analyze the full set of assessment documents, in addition to a short comment period, makes it exceedingly difficult to provide a proper set of comments.

It is shocking to think that a mine of this magnitude could sit at the headwaters of an important salmon watershed. At 130,000 tons of ore per day, for 55 or more years, this mine would dwarf the production seen at any of the mines we are familiar with in Alaska. To help put that into perspective, consider Green's Creek Mine near Juneau. The recent expansion for tailings disposal made room for an additional 20 million tons of tailings and waste rock. This expansion is anticipated to increase the life of the mine by about 10 years. If I understand the proposal correctly, 20 million tons would take KSM contractors just 154 days to amass.

At the scale envisioned, the KSM mine is likely to have far reaching impacts. However, you also need to factor in the additive effect of related infrastructure and necessary land preparation. Couple that with the cumulative impacts of the numerous mine and development permits that are pending for the surrounding area. It's hard to imagine what all this will ultimately mean to the critical habitat that supports the region's bounty of fish. All anticipated and cumulative impacts must be analyzed.

KSM has detailed plans to carve up a portion of Mitchell Glacier should it not recede according to the mine's timeline. As fishermen, we see first-hand significant signs of climate change and, regardless the reasons, it's obvious that we are in a time of transition. Glaciers are crucial to the physical and biogeochemical make-up of our region's streams. Prompting early glacial recession and interfering with important nutrient, temperature, and water volume control mechanisms could have devastating effects on fish and wildlife populations.

A 1,000 year dam is envisioned for the containment of waste water from KSM, along with a treatment plan that will be needed for another 200 years after the mine is exhausted. Will this structure stay sound and withstand significant geophysical events? If the system design fails at one or multiple stages, is there a detailed back up plan to handle the sheer volume of water that KSM intends to process and store each day? Are there robust risk analyses and substantial liability coverage planned for treatment plants and the dam? What happens after 200 years?

History shows that mines change hands frequently and clean-up issues haunt most, if not all, states and countries that have permitted acidic mines of this scale. Who will be responsible for securing this site over time? Who is liable for future problems? Is there significant bonding attached to the project, or will Canadian's and Alaskan's be left holding the bag in the end?

Our members have far more questions than time to seek answers. So, setting environmental risk aside, why is this mine needed? It's obvious that speculators are interested, but while forecasts suggest demand will grow and boost copper prices, this metal has always been subject to boom and bust cycles and appears to be down about 9.7% in the current calendar year. With several other large scale mines about to start up in China and elsewhere, will the production at KSM be profitable and sustain jobs over time?

Many supporters point to substantial employment for communities near the mine. Alaskan's understand well the need for good paying jobs in small, often disconnected communities. What the caliber of KSM jobs will be is a question worth asking for Canadian's, since here in Alaska we've often find it difficult to find skilled labor locally and folks are brought in from outside. Again, we understand the quest for jobs, but urge you to also consider the array of possible outcomes that could result from the development envisioned here.

In Alaska, we rely on healthy salmon and other species of fish to fuel both our rural and urban communities. Commercial fishing is the largest private sector employer in Alaska. In Southeast Alaska there are well over 6,000 permit holders who provide revenue for the state, crew members and support sector businesses. Guided sportfishing contributes significantly to the jobs base, and sport fishing and subsistence/personal use fisheries are critical to Alaskan's sustenance and quality of life. Large scale development in sensitive terrestrial and marine habitats does not, on its face, seem conducive to productive ecosystems that feed our families and towns.

We encourage you to conduct a better analysis of downstream effects and more outreach with the affected public, no matter where they live, as you move forward in the decision process. It is our hope that the government of Canada will work closely with the State of Alaska and the United States government, to protect our natural resources and citizens of both countries from any ill-effects stemming from this project.

Best regards,

Dale Kelley  
Executive Director