



MiningWatch Canada

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**To: Fisheries and Oceans Canada, Oceans, Habitat and Enhancement Branch
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Attn: Suzanne Thorpe

Sent by electronic mail to: mountmilligancomments@dfo-mpo.gc.ca

From: Ramsey Hart, Canada Program Coordinator, MiningWatch Canada

Re: Preliminary comments on EA Application by Terrane Metals for the proposed Mt. Milligan Gold Copper Mine (CEAA Registry # 08-03-39778)

June 23, 2009

MiningWatch Canada, is a funded participant in the CEAA review process of the proposed Mt. Milligan Gold Copper Mine. On June 19 we were informed by CEAA staff in Ottawa that a request for comment on the adequacy of the EA for the comprehensive review process was underway with a deadline of June 23. A further delay occurred as we waited to receive the confirmation of the approved scoping document for the comprehensive assessment.

We find it to be very problematic, and contrary to standard practice that MiningWatch was not directly notified of the comment period when it was posted to the CEAA registry website last month.

Because of the extremely short amount of time available for us to conduct our preliminary review of the documents, and because we have not yet signed a contribution agreement with CEAA that will allow us to hire expert consultants to review the documents, we regret that we have not been able to conduct a full assessment of the adequacy of the EA for the comprehensive assessment.

The aforementioned challenges notwithstanding, we have examined several key chapters of the EA and found it to be inadequate in a number of crucial areas that are specifically identified in the scoping document. Below is a preliminary list of concerns.

Alternatives Assessment

- An option for tailings management by the Nak'azdli is dismissed without detail explanation of the option or why it is not viable.
- Only conventional tailings ponds are considered. Alternative tailings management approaches that could further reduce the mine footprint and impacts associated with tailings and waste rock disposal were not considered.

Effects on sensitive species

- Despite the presence of two sensitive aquatic species, Arctic grayling and bull trout within the study area, environmental effects and mitigation measures are only considered for rainbow trout.

Cummulative effects

- The potential of the project to promote further development of the area through the extension of electricity supply and road improvements is not considered.
- The cumulative effects of increased access for hunting and fishing via improved roads and the electricity corridor on already diminished populations of sensitive fish and wildlife species is not adequately evaluated or mitigation measures proposed.
- Cumulative effects on First Nations should be considered in light of historic developments that have created long-standing struggles to preserve their cultural identity, physical territories and natural resources.

These concerns in no way reflect the breadth or depth of our commentary on the proposed project and we will continue to evaluate the EA application and look forward to participating in the comprehensive review process. We trust that future announcements regarding the EA process will be sent directly to us by email, fax or letter in a timely fashion.

Regards,



Ramsey Hart

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