

14 September 2012

Mr. Richard Edjericon, Chairperson
Mackenzie Valley Environmental Impact Review Board
Box 938, 5102-50th Ave.
Yellowknife NT X1A 2N7

By e-mail: aehrlich@reviewboard.ca

Dear Mr. Edjericon:

Re: Giant Mine Remediation Project (EA 0809-001) - Public Hearing Submission

Please consider this letter as a submission of comments from a Yellowknife resident to the ongoing public hearing on the Giant Mine Remediation Project (GMRP). I had hoped to present my comments verbally during one of the public comment periods this week, but was unable to attend the hearing.

I have been a resident of Yellowknife for more than 26 years. I have also been a cabin-owner on the Ingraham Trail for 21 years, and have driven through the Giant Mine site via the Trail thousands of times during this period. On these trips I have often wondered how many bad decisions were made in the past to allow not only one of Canada's most contaminated sites to be created within the limits of the City of Yellowknife, but also a source of potential deadly and widespread toxicity to be created on the shores of Great Slave Lake that could threaten life downstream to the Beaufort Sea and beyond.

What a mess we have to deal with, and no band-aid approach will be adequate to sufficiently minimize the risks. Current residents of the Yellowknife area, including the Yellowknives Dene, have had this problem imposed upon us without our consent. We should not be allowed to pass the problem on to future generations, which means we must make the hard decisions required to fix the problem now. Temporary or partial remedies without plans for identifying a permanent solution should not be accepted by the Review Board.

I am gravely concerned that the current proposed GMRP is utterly inadequate to reduce the chances that an environmental disaster will occur in future. Furthermore, I have no confidence that sufficient funding will be provided by the federal government to manage the site in perpetuity using the proposed in-situ freezing technique. Commitments for management and monitoring for 10 or 25 years are certainly not good enough, and even that seems unlikely given the federal government's recent actions to reduce environmental protection and cut funding for environmental programs.

In no way should the in-situ freezing method be viewed as more than a temporary, interim solution while concerted efforts are made to find a permanent, management-free and safe way to deal with the arsenic trioxide. Research should continue to search for a method that neutralizes the toxicity of the arsenic trioxide to reduce the potential contamination to levels at which the health of people and wildlife are no longer at risk. I am particularly concerned, therefore, about the lack of funding included in the GMRP's current plans for research into alternative approaches.

I would also like to offer a comment on how crucial the decisions made during this environmental assessment by the Review Board are to the future of Yellowknife, Dettah and N'dilo. Without substantially greater reduction in the uncertainty and risks than what is offered with the current proposed GMRP, I expect that a lot of Yellowknifers who have a choice about where they live will leave. For those of us who are retired or nearing the end of our full-time working lives, why would we stay if the best scenario is that contamination of the land and waters will be "managed" for a couple of decades? At the least this will be a major consideration when people are deciding whether or not to stay here or to move here from elsewhere. Other considerations for the City of Yellowknife should include whether tourism programs or plans for luring new residents to the City will be effective, once word gets out that serious contamination of our waters is a real possibility. Who will want to live here next to a looming environmental disaster if they can choose otherwise?

The utmost effort should be required of the Developer to ensure that further degradation and losses do not occur for the area's Aboriginal peoples, including the Yellowknives Dene and the Metis who do not want to leave because this area is their traditional homeland.

The analogy has been made that living next to the Giant Mine site is like living next to a volcano. For me it is more like living on an earthquake fault line, as there could be little or no warning if disaster occurs and arsenic trioxide is released in significant amounts into adjacent waters, and the effects could occur along a large corridor through the NWT. This is why the only solution that is acceptable to me is a permanent one that removes the ongoing risk of serious contamination.

I urge the MVEIRB to conclude, based on the input you have received during this environmental assessment, that the proposed GMRP is cause of significant public concern and consequently requires that you exercise your authority to issue an order for an environmental impact review. This additional level of review is required because further assessment and collaboration by all parties and their technical experts is needed to develop an adequate remediation plan.

If the current proposed GMRP is approved by the Review Board, unacceptable uncertainty and risk would persist for the people and environment in the Yellowknife area as well as for the people, wildlife, lands and waters downstream. Much planning and research still needs to be done to reduce the uncertainty and risks sufficiently, to minimize chances of an environmental disaster occurring, and to give the public confidence that the situation is under control.

Thank you for the opportunity to provide input to this environmental assessment.

Sincerely,

A handwritten signature in dark ink, appearing to read 'L. Wakelyn'.

Leslie Wakelyn
11 Taylor Road.
Yellowknife NT X1A 2K8