

23 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 and stoogood@reviewboard.ca

Dear Mr. Edjericon:

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

I am writing as a member of the Yellowknife public who is deeply concerned about the proposed plan to 'remediate' Giant Mine. Like many residents, I have been aware of some of the issues around the legacy of Giant Mine, but it wasn't until I attended the Community Hearing on September 11th that the magnitude of the situation really became clear to me. It is my hope that I can add my voice to the growing volume of concern about the proponents' plans to deal with this grave situation.

I am a Yellowknifer, born and raised. My family moved away, and I have now been back for 10 years, and am raising my own family: in this town, on this lake, next to this contaminated site. I have a photograph of myself on the first day of Grade 1 at the Latham Island causeway, in front of a gigantic sign warning of the dangers of swimming in or drinking this water that is still such a part of my daily existence. We weren't allowed to swim in Back Bay as kids; that was just a reality. I would like to hope that my kids never have to question that level of complacency about massive and very near environmental and human health risks, when they grow up and wonder about the decisions made today about Giant Mine.

I have several major concerns about the proponents' plans, all of which point to the need for more information and planning to be done to minimize the risks and uncertainties present.

1. Project scope

This does not appear to be a remediation plan. In-situ freezing should be considered a temporary solution until remediation technology develops enough to deal with the arsenic trioxide in a permanent manner that poses less risk to human health and environment. I was disturbed to hear from the proponent at the Community Hearing that their plan includes no money for further research into alternative and emerging technologies.

There are still too many unknowns about the extent of the contamination: where is it, and will it be, safe in Yellowknife to pick berries? Swim? Tap birch trees? Drink the lake water? Eat fish? Nobody knows the answers to these kinds of questions, and no work appears to be planned to answer them, although they are all important considerations in cleaning up this particular contaminated site. Aboriginal or non-aboriginal, all residents of this community deserve to trust that our health and interests are looked after by the responsible entities, and that the land and water will not poison us.

I was stunned by the number of questions that the proponents were either unwilling or unable to answer at the very non-technical Community Hearing, and at the number of times the answer was

'that's outside the scope of the project'. Of course, a line has to be drawn somewhere, but with the number and magnitude of potential risks that this site poses, much more information, research and planning is needed. Please exercise your authority to order an Environmental Impact Review of this project so that additional work can be done to develop a true remediation plan that involves true collaboration of all parties, including residents.

2. Perpetual care and independent oversight

Others expressed their understanding and concerns about the concept of 'perpetuity' relative to contaminated sites far more eloquently at the Community Hearing, but I would like to say once more that a 25-year plan falls far short of FOREVER. I urge the Review Board to require the proponents to develop creative and effective solutions to dealing with the concept of perpetuity, including the multidisciplinary studies required to communicate danger hundreds of generations into the future, and legally binding all future governments of Canada and the NWT to adequately resource the maintenance, monitoring and research that will be required to actually solve the problem of 237,000 tonnes of arsenic trioxide dust stored underground.

Local people need to have the opportunity to be meaningfully involved in the oversight of this project. Nobody involved will care as much about dealing with this problem as those who are living so close to this problem. I urge the Review Board to require the creation of an independent, local oversight body.

3. Water Quality

I am extremely concerned that the proponents plan to discharge treated water (which is still contaminated) via a diffuser into the middle of Yellowknife Bay, just off the tip of Latham Island. A new water treatment plant is an improvement, but it is unthinkable that this proposal should go ahead without modeling or trials to determine where and how much change will occur in local sedimentation, water currents, ice thickness, turbidity, and I don't even know what else. This area is heavily used by residents, summer and winter. We need a complete picture of the possible impacts this will have on people and aquatic life, and every effort must be made to ensure there is no catastrophic release of contaminants into Yellowknife Bay, Great Slave Lake, the Mackenzie River, and northward. Also, the Review Board needs to take into consideration the impact this discharge will have on the City of Yellowknife's drinking water intake by requiring the proponents to help finance the replacement of infrastructure at the current water intake location.

Giant Mine is a huge problem, and the Review Board has such a critical responsibility to do right by current and future residents of Yellowknife, the NWT, and Canada by making sure we are collectively required to do our utmost to solve it. I feel confident that significant public concern was expressed at the Community Hearing, and I thank you for your diligence in listening.

Sincerely,



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