



***City of Yellowknife's
MVEIRB Submission
for***

***Giant Mine
Remediation
Issues Scoping
Session***

EA0809-001

July 22 and 23, 2008

Prioritization of Issues

- The City believes that all issues raised at the scoping sessions in June 2008 are important
- However, certain aspects of the Project will require a higher level of scrutiny than others
- As such, the City will highlight the areas it feels require particular attention

City's Topics

- The topics that the City wishes to emphasize include:
 - Public health and safety
 - Long-term financial costs of maintaining the project
 - Alternatives to the current plan
 - Land quantum
 - Standard of Remediation
 - Need for independent monitoring of the project
 - Effects of global warming

Public Health and Safety

- The Giant Mine Site is located within the City boundaries and is therefore in close proximity to people and wildlife.
- The City submits that the following issues need to be clearly addressed:
 - Emergency Measure Plan – must be developed in consultation and cooperation with the City
 - Potential risks related to demolition and transportation of contaminated structures
 - Discharge of treated and untreated (flooding) water

Long-term Financial Costs

- The proposed remediation plan will continue indefinitely
- The City submits that the following questions need to be addressed in the plan:
 - Who will be responsible for the ongoing maintenance costs?
 - Who will be responsible for the costs associated with an emergency situation?

Alternatives to Current Plan

- The current plan simply maintains the contamination in a safer way than the current situation
- The plan should require the proponent to continue to assess any viable alternatives that may become available due to changing technology
- Security should be required to be set aside specifically for research and assessment of future alternatives

Land Quantum

- The Giant Mine Site encompasses 6.2% of the total municipal boundary or 8.3% of the total municipal land area
- It may not be possible to remediate all of the site to a productive state
- The removal of the Giant Mine lands represents a significant diminution of the City's land quantum
- The City needs to be compensated by
 - Changing municipal boundaries
 - Additional economic resources
 - Remediation to a residential level to maintain a comparable land quantum and comparable tax base

Standard of Remediation

- Proposed plan contemplates remediation to an industrial level
- City submits that portions of land should be remediated to a higher standard (residential)

Independent Monitoring

- The proponent is also a part of the government that is responsible for approving the plan and water license
- The City submits that it would be appropriate for the Board to ensure that the implementation of the plan and maintenance of site is monitored by an independent entity.

Effects of Global Warming

- Global warming is of concern as the proposed Frozen Block technique relies upon the ground at Giant Mine remaining frozen
- As an increase in ground temperature could jeopardize the stability of the system the Board should ensure that this eventuality has been addressed by the proponent

Conclusion

- Remediation of the Giant Mine Site must be commenced
- The City must ensure that the residents and interest of the City are protected
- The Board must ensure that all aspects of the proposed plan are adequate for the protection of all interested parties

The End

