

**To: British Columbia Environmental Assessment Office**  
**From: Salmon Beyond Borders**  
**Re: Comments on Canagold's Initial Project Description for New Polaris Gold Mine**  
**Date: June 8, 2023**

To Whom it May Concern,

Salmon Beyond Borders appreciates the opportunity to submit comments regarding the proposed Initial Project Description for the New Polaris Gold Mine Project ("New Polaris"). Based in Southeast Alaska, Salmon Beyond Borders is focused on protecting and restoring healthy, productive watersheds and resilient ecosystems, and on responsible industrial development. For almost ten years, we have worked closely with communities, fishermen, businesses, scientists, and conservation organizations, alongside Tribes and First Nations on both sides of the Canada-U.S. border, who are already or will potentially be impacted by mining activity in British Columbia—including and especially along the B.C.-Alaska transboundary Taku, Stikine-Iskut, Unuk, and Nass Rivers.

Salmon Beyond Borders has serious concerns about Canagold's proposed New Polaris Gold Mine. New Polaris is located along the west bank of the Tulsequah River in the transboundary Taku River watershed, just 10 miles upstream from the U.S.-Canada border, and almost within sight of the long-polluting and abandoned Tulsequah Chief mine on the east bank of the Tulsequah River. We are particularly troubled by Canagold's plans to make 150-170 yearly barge trips across the U.S.-Canada border carrying fuel and cyanide on the Taku and Tulsequah Rivers to and from the mine site, and to anchor a "Transfer Barge Facility" in the middle of Taku Inlet, on the Alaska side of the border. Salmon Beyond Borders urges the Province of British Columbia to deny Canagold's proposal to reopen this gold mine, especially in light of the nearby Tulsequah Chief mine continuing to discharge toxic sludge into the Taku watershed—as it has, unabated, for more than 65 years.

The mighty Taku is the largest producer of wild salmon in northwest British Columbia and Southeast Alaska—and the Taku salmon runs are shared by Indigenous Nations, several communities, two countries, and a province and state on both sides of the international boundary. The Taku wild salmon know no borders. New Polaris is located only a few miles upstream of Flannigan Slough, a vast wetland near the confluence of the Tulsequah and Taku Rivers that is one of the most productive wild salmon spawning and rearing habitats on the West Coast of North America. Thus, a barging mishap or accident with toxic chemicals could wipe out this international treasure.

From 2007-2011, Redfern Resources and Chieftain Metals were only able to successfully transit the shallow, dynamic Taku and Tulsequah Rivers via barge a few dozen times each year when these two companies recently went bankrupt trying unsuccessfully to reopen the Tulsequah Chief mine. The barging attempts of these companies caused much controversy in downstream Alaska, as docks and the Alaska Department of Fish & Game fish wheel sustained damage after being struck by barges, and the activities of river users in Taku Inlet and on the Taku River

were interrupted by barging traffic. There were numerous reports of tugs and barges grounding in wild salmon habitat, and a Redfern Resources tug towing a barge almost capsized on the Taku in July 2008. Former Chieftain Metals COO Ketih Boyle testified to the Taku River Task Force, a citizen's group convened by Alaska State legislators in 2011, that Chieftain Metals ultimately determined that barging on the Taku is impractical and that investors were not supportive of barging.

Moreover, we have concerns about arsenic, antimony, and cyanide water pollution resulting from Canagold's plans to employ bio-oxidation and cyanide leaching processes at the New Polaris Gold Mine. Canagold states that the company will use flotation of the ore to produce a concentrate (60% to filtered tailings, 40% to cemented backfill), and then use bio-oxidation to eliminate sulfide minerals from the concentrate. Canagold then plans to neutralize the acid produced by the bio-oxidation process with lime. According to experts with whom we've consulted, because arsenic and antimony are present in the ore, the bio-oxidation process will likely put these metalloids into solution.

Canagold states the company will use cyanide leaching to produce gold doré bars. Once the gold is removed, the waste byproduct will contain elevated levels of cyanide, arsenic, and antimony (and perhaps additional toxins). It is not clear from Canagold's Initial Project where and how this toxic waste will be disposed of. Salmon Beyond Borders is not comfortable with Canagold's statements that pollution from cyanide, as well as arsenic and antimony in solution, will not be a problem, especially as Whitewater Creek runs right through the New Polaris Gold Mine site before entering the Tulsequah River approximately 1 km downstream of the mine. We ask for Canagold to clarify and elaborate on how the company will prevent cyanide, arsenic, and antimony from polluting water bodies at and near the mine site.

Additionally, Salmon Beyond Borders, Tribes, elected leaders at every level of government, businesses, sport and commercial fishing groups, conservation organizations, and thousands of individual citizens on the Alaska side of the international boundary have called repeatedly for the involvement of the U.S. and Canadian federal governments and the International Joint Commission under the Boundary Waters Treaty in order to ensure the evaluation of potential industrial development along shared rivers meaningfully involves all jurisdictions. Despite this outcry, neither B.C. nor Canada has yet agreed to an international forum in which all jurisdictions in this transboundary region develop binding watershed protections for these iconic transboundary rivers. This current situation is unacceptable.

Salmon Beyond Borders fully supports the more than fifteen resolutions recently passed by [Southeast Alaska Tribes](#) and [municipalities](#) calling on President Biden to secure, with Prime Minister Trudeau, two key provisions along the B.C.-Alaska transboundary Taku, Stikine-Iskut, and Unuk-Nass Rivers: **(1) an immediate, temporary pause on permits for new British Columbia mines until binding watershed protections developed by communities and Indigenous and federal governments are in place; (2) a permanent ban on earthen mine waste ("tailings") dams.**

This provincial Environmental Assessment Process for the New Polaris Gold Mine is in direct conflict with these current requests from Alaska Tribes and municipalities, and with requests that they, and decision-makers at every level of government in the U.S., as well as tens of thousands of U.S. and Canadian citizens, have made for almost ten years. The B.C. EA process is not an international forum through which Tribes and communities downstream have a meaningful say or give free, prior, and informed consent to B.C. development along transboundary rivers.

Of course, Salmon Beyond Borders supports any and all frameworks and agreements between the Province of B.C. and the Taku River Tlingit First Nation. Yet, without the involvement and consent of Indigenous nations and communities downstream in Alaska, the provincial Environmental Assessment process remains a wholly inefficient means through which to evaluate a potential mine in a transboundary watershed that affects multiple jurisdictions.

Salmon Beyond Borders does not support the proposed New Polaris Gold Mine moving forward in this permitting process until there is an international forum in place that is aligned with long-standing requests from Alaska Tribes and communities. This forum will be led by Indigenous nations and communities on both sides of the political border to develop and implement binding, enforceable watershed protections.

Finally, we request that Salmon Beyond Borders be invited to participate on the Community Advisory Committee for the New Polaris Gold Mine. Salmon Beyond Borders also requests that representatives from the B.C. EAO and Canagold co-host in-person public meetings about the New Polaris Gold Mine in Juneau, Alaska, in the near future.

Thank you for considering our comments on the New Polaris Gold Mine and Alaskans' specific concerns and calls for an inclusive, robust way to steward the globally significant transboundary Taku, Stikine-Iskut, Unuk, and Nass watersheds.

Respectfully,

Breanna Walker  
Director  
Salmon Beyond Borders