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Smithers, BC

Bulkley Valley Community Resources Board
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Thompson Creek

At the Davidson Project May 9, 2013 Public Liaison Committee meeting Thompson Creek Metals presented a Draft Care and Maintenance Plan and Closure Report Update for public comment. The Plan proposes to not carry out the Closure Plan incorporated in the 2006 Notice of Work, but instead to enter into a Care and Maintenance Plan for some period of time. The BVCRB has been interested in this Project since at least 2005. We have some concerns around the proposal.

The Bulkley LRMP management unit 10-2, Glacier Gulch, specifies water and access issues, and general management direction in the LRMP seeks to ensure social and environmental values are not compromised by commercial activities on public land.

Some issues around the social and environmental impacts of the Project persist; adit closure, access issues and water quality are ongoing concerns. Knowledge gaps identified in the 2008 public comment period in the Environmental Assessment process then underway still exist, hampering a full understanding of the status quo or any path forward.

The rationale behind construction of an adit bulkhead as set out in the Closure Plan includes reduction of adit water flow. A decision to forgo this move seems inevitably to lead to an unknown, unmanaged and inadequately assessed future flow regime from this source. This is unwise.

Road access to the site now brings casual and nuisance visitors who have removed barriers and created unsanitary and potentially dangerous conditions. These include disposal of domestic and other kinds of trash, including carcasses. In a 2008 report for Blue Pearl, KRB Engineering assessed the adequacy of proposed culverts to manage water flow to avoid terrain instability. Their conclusion was that the proposed culverts were necessary and sufficient. Those culverts have not been installed and the road has sloughed. The potential for terrain instability was raised by Jim Schwab in 2008 and clearly persists.

Water flowing from the waste rock pile is lower in metals (arsenic in particular) than inflow water. The metals are clearly accumulating. The behaviour of this concentrated body of metals under future precipitation or terrain instability upset conditions is not known but it does not seem as if any benign scenarios exist. To reprise a concern from our 2008 comment letter to the BC EAO, aluminum levels in the Bulkley River nearby are already in excess of Pollution Control Objectives. A Plan that proposes to do nothing about this and other effluents seems inevitably to result in making matters worse.

Environment Canada is now reviewing its Metal Mine Effluent Regulation. The discussion paper anticipates expanding the scope of substances regulated and monitored. This Plan does not address this

imminent need.

It is not clear to the BVCRB that a legally mandated Closure Plan can in fact be converted to a Care and Maintenance Plan.

Thompson Creek states in its May 9th proposal that it wishes to continue with its Care and Maintenance Plan until it decides to discontinue it (section 3.1.3.1). The indefinite term and unknown criteria for discontinuing the Plan are significant shortcomings.

The BVCRB thanks Thompson Creek for the opportunity to comment and looks forward with considerable interest to plans to address the issues raised here.

Dave Stevens
for the Board