



UNITED FISHERMEN OF ALASKA

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August 20, 2014

KSM (Kerr-Sulphurets-Mitchell) Project
Canadian Environmental Assessment Agency
410-701 Georgia Street West
Vancouver, British Columbia V7Y 1C6

Via email: KSM.Project@ceaa-acee.gc.ca

Re: KSM (Kerr-Sulphurets-Mitchell) Project Comprehensive Study Report

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 35 commercial fishing organizations participating in fisheries throughout the state and in federal waters off our coast. Thirteen of UFA's member organizations represent fishermen who fish for salmon, shrimp, crab and other species in the waters of Southeast Alaska, where water quality and fisheries are most likely to be affected by Canadian mine operations being proposed in the Alaska – B.C. transboundary region. Southeast fishermen employ hand troll, power troll, drift net, purse seine, longline, pots, and dive gear to harvest their catch

Salmon is by far the most highly sought after fishery resource in Southeast Alaska. According to the Alaska Commercial Fishery Entry Commission,¹ the 2013 salmon fisheries in Southeast waters involved 1,837 permitted skippers (not including crew members), produced over 400 million pounds of salmon, for which they were paid over \$213 million US dollars. This does not include the economic multiplier values associated with this product, as fishing dollars circulate within the support sector and coastal communities. Though Southeast Alaska fishermen are largely residents of the state, there are fishermen from 33 other U.S. States who hold permits to fish in the region. Our fisheries are multi-generational and we are committed to providing long term opportunity for future generations to come.

UFA is increasingly concerned with the risks posed by numerous existing and proposed mining projects in watersheds shared by British Columbia (B.C.) and Alaska, or rivers close to our borders that produce salmon shared by fishermen from both countries. The recent failure of a tailings dam at the Mt. Polley mine in the Fraser river headwaters highlights our concerns with long term storage of highly toxic mining tailings in salmon bearing waters that Alaska salmon fishermen depend upon for their livelihoods.

The proposed development of the Kerr-Sulphurets-Mitchell (KSM) mine in the Unuk and Nass River drainages will produce tailings that will remain toxic for centuries, in quantities nearly beyond comprehension. We have little confidence that this development can proceed without

¹ CFEC, http://www.cfec.state.ak.us/gpbycen/2013/00_ALL.htm

impacts from the mine's 50-odd year productive lifespan, and no confidence whatsoever that the tailings generated can safely be stored virtually forever to prevent future damage.

UFA requests a third-party Panel Review of KSM, to elevate the environmental review process to the highest and most thorough allowed in Canada. We also request that a thorough assessment of the long term financial risk of the project be conducted.

Should Canada proceed with development of the KSM project, or any other mine within the transboundary rivers watersheds, we urge you to ensure substantial and appropriate monitoring, enforcement, bonding, and mitigation measures be attached to any permit. This should include provisions to compensate fully the State of Alaska and its fishing industry in the event of not only catastrophic events, but anything that impacts the long-term viability of fish and wildlife resources that we all rely upon.

Thank you for your consideration,



Julianne Curry
Executive Director

CC:

Honorable John Kerry
Honorable Lisa Murkowski, U.S. Senate
Honorable Mark Begich, U.S. Senate
Honorable Don Young, U.S. House of Representatives
Honorable Sean Parnell, Governor, State of Alaska
Southeast Alaska Legislators
Alaska Department of Fish and Game
Alaska Department of Natural Resources

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Independent Fishermen's Marketing Association
Alaska Independent Tendermen's Association • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association
Alaska Whitefish Trawlers Association • Aleutian Pribilof Islands Community Development Association • Armstrong Keta • At-sea Processors Association
Bristol Bay Reserve • Cape Barnabas Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United
Douglas Island Pink and Chum • Freezer Longline Coalition • Golden King Crab Coalition • Groundfish Forum
Kodiak Regional Aquaculture Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association
Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner Association
Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance
Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional Aquaculture Association
United Catcher Boats • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association