

# SEABRIDGE GOLD

December 19, 2016

*Via Email*

Review of Environmental Assessment Processes  
160 Elgin Street-8<sup>th</sup> Floor  
Ottawa, Ontario  
K1A 0H3

Attention:     Johanne Gelinias  
                  Expert Panel Chair

Dear Ms. Gelinias:

**Re:     Correction of the Record after Inaccurate Statements, Attributed to Ms. Jill Weitz of Salmon Beyond Borders, were Presented to the CEAA Review Panel in Prince Rupert, BC on December 9, 2016**

As a representative of Seabridge Gold, the company which owns the KSM Project, a proposed mining project located in northwestern BC, I want to take this opportunity to address several inaccurate statements regarding our project submitted to the CEAA Review Panel during your visit to Prince Rupert, BC, on December 9, 2016. Ms. Jill Weitz of Salmon Beyond Borders presented to the Review Board and within her presentation referenced the KSM Project and communicated the following inaccurate facts regarding KSM:

- The KSM Project only underwent a Provincial environmental assessment and the Federal government was not involved in an environmental review of the proposed project;
- That Alaska and Alaskan citizens asked for a full federal environmental assessment review and were denied this request;
- The potential cumulative effects associated with the KSM Project were not assessed;
- Potential water quality and quantity effects resulting from the project were not assessed;
- KSM was not assessed by independent experts; and,
- Alaskan citizens, including Indigenous and Tribal peoples were not involved in the environmental assessment review process.

The KSM Project underwent a joint BC-Canada environmental assessment as mandated by the BC Environmental Assessment Act and the Canadian Environmental Assessment Act (1992) respectively. The environmental assessment review process occurred over 70 months between March 2008 and December 2014 and concluded with receipt of the Federal Government's approval as signed by the Minister of Environment on December 19, 2014. The BC approval was granted on July 30, 2014 with signatures from the Minister of Energy and Mines and the Minister of Environment.

The EA/EIS document for the KSM Project was one of the largest documents ever submitted in the Canada for assessment purposes, totaling more than 35,000 pages collated in 42 large binders. The Canadian environmental assessment review process was undertaken as a “comprehensive study” review following the completion of two rounds of public consultation requesting public input on the type of assessment review that should be conducted (i.e. comprehensive study review or a panel review).

The Canadian Minister of the Environment, in her decision statement approving KSM, concluded *“The project is not likely to cause adverse environmental effects as defined in the former Act (referring to the Canadian Environmental Assessment Act), taking into account the implementation of mitigation measures described in the report”* and *“the mitigation measures and follow up programs described in the Report are appropriate for the project.”* This approval was granted following an independent review of the KSM’s environmental impact statement which described the potential residual effects associated with the project on all valued ecosystem components, including water quality and quantity. A regional cumulative effects assessment and alternative analyses were also completed, as required by CEAA. The Minister, in making her decision, relied upon a Canadian Environmental Assessment Agency scientific report which stated, *“the agency has concluded that no significant adverse impacts on water quality, water quantity, fish, or human health are expected on the Alaskan side of the Unuk River.”*

During the environmental assessment review process, Seabridge conducted more than 85 separate interactions with Alaskan State and US Federal regulators, Alaskan citizens and local Tribal representatives. This interaction was initiated in September 2008 and continues to this day, two years after conclusion of the environmental assessment review process. It is important to highlight that the concerns of the Alaskans associated with potential downstream risks and impacts were the same as those expressed by Canadian residents. The involvement of Alaskan regulators was documented in a 2014 *Juneau Empire* article which summarized the conclusions of these regulators, *“four of the same resource managers and specialists who reviewed Alaskan mines have examined KSM’s plan. They found no significant issues with the application.”*

The Canadian Minister, in making her favourable decision to approve the project, determined that the independent scientific review of the KSM Project was more than adequate and rejected the requests received in the fall of 2014 from Alaskan based non-governmental organizations for an “environmental panel review” of the project. These requests were not ignored as described in the submission to the Panel. The Minister in her decision and in private letters to various US based regulatory authorities explained why she concluded the environmental assessment of the KSM Project was deemed to be complete and she was confident in approving the project.

Seabridge has also worked diligently with Canadian Treaty and First Nations over the past eight years to address their concerns and has developed respectful and meaningful relationships with the groups in close proximity to KSM. We funded the participation of the various Indigenous groups in the environmental assessment review process so they could fully participate. Additionally, we signed a Benefits Agreement with the Nisga’a Nation in June of 2014; we have an Environmental Agreement with the Gitanyow First Nation also signed in 2104; we received a letter of support from the Gitxsan Hereditary Chiefs’ office during the environmental assessment review; and we addressed the environmental and social concerns of the Tahltan as stated within the report submitted by the Tahltan Heritage, Resources, Environmental Assessment Team (THREAT), which is on file at the BC Environmental Assessment Office. Discussions continue with the remaining groups to negotiate additional agreements.

For Seabridge Gold, protection of the environment in both Canada and in the US, is a guiding principle behind the design of the KSM Project. The company has put the KSM project through extensive environmental and technical evaluations by independent experts to ensure its operation will not cause harm to the surrounding environment, including waterways and fish, and has worked closely with all stakeholders, including Alaskans, to ensure that their concerns were acknowledged and addressed throughout the environmental assessment review. We are confident in our design and the robustness of the environmental assessment review processes that were mandated by BC and Canada, respectively. We continue to work closely with our stakeholders to ensure their ongoing questions and concerns regarding the KSM Project are addressed.

I want to thank the Panel for their time in receiving this letter and wish you success as you continue your deliberations on the future of environmental assessment in Canada. Wishing you a Happy Holiday Season and a Prosperous New Year.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "R. Brent Murphy". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

R. Brent Murphy, M.Sc., P.Geol.  
Vice President, Environmental Affairs

RBM/RS/...