

SEABRIDGE GOLD

September 28, 2015

Judith Lavoie

Writer

Via email @ editor@desmog.ca

Dear Ms. Lavoie:

Re: Correction of Inaccuracies Contained Within Your Article “The Trouble With Tailings: Toxic Waste “Time Bombs” Loom Large over Alaska’s Salmon Rivers”

I read with interest your September 3, 2015 article published on the DeSmog Canada Blog titled “The Trouble With Tailings: Toxic Waste “Time Bombs” Loom Large over Alaska’s Salmon Rivers” in which Seabridge Gold’s KSM Project was featured predominantly.

I want to take this opportunity to highlight some inaccuracies and provide clarification for future articles you may write.

1. Your suggestion that Seabridge Gold, the BC Environmental Assessment and the Canadian Environmental Assessment Agencies ignored the concerns of Alaskan citizens is not accurate. Over the course of the six-and-a-half-year review process, Alaskan regulators participated in 85 meetings including the Alaska Department of Fish and Game, Department of Natural Resources, Alaska Department of Environmental Conservatism, US Forest Service, US Environmental Protection Agency and the National Oceanic and Atmospheric Administration.

Over this same period there were also many opportunities for the general public in both Canada and Alaska to participate in the process, both through public comment periods prescribed by the BC Environmental Assessment Office and the Canadian Environmental Assessment Office, and during the 125 working group, community and public meetings conducted in Ketchikan, Alaska, Terrace, Smithers, Hazelton, and Stewart and within the communities of the Gitanyow, Gitksan, Tahltan and Nisga’a Nations.

In addition, Seabridge hosted a public meeting in Ketchikan and held several meetings with Tribal, village and NGO organizations through-out Alaska, including Rivers Without Borders, and Southeast Alaska Conservation Council during the EA review to listen to their concerns and to answer questions regarding the KSM Project.

The independent Canadian Federal and Provincial regulators both determined KSM will not have an impact on US waters and no outstanding concerns were expressed by the Alaska regulatory agencies.

2. The KSM tailings management facility (TMF) is not situated in waters upstream of the United States-Alaska border, as is evidenced in the attached figure. To suggest otherwise is simply incorrect. KSM's TMF is situated within the Bell Irving Watershed, not the Unuk River which is of concern to Alaskans.

It is true that the KSM mineral deposits are located in the vicinity of a small tributary which drains into the Unuk River, however; these waters are currently significantly impacted by natural erosion which results in elevated concentrations of many metals including copper, as evidenced in the attached photographs which show the natural difference of water quality at the site now. The operation of the KSM water management system will, in fact, improve the overall water quality flowing into the Unuk River.

3. During the environmental review process, Seabridge evaluated several types of tailing deposition methodologies, including dry stack methodologies, and ultimately elected to use tailings ponds or wet tailings as the "best available technology" suited to the site specific climate and characteristics of the KSM site. By selecting this technology Seabridge can with confidence ensure both the structural and chemical integrity of the tailings management system.

As evidenced within the attached letter from Dr. Van Zyl, one of the authors of the "Mount Polley Independent Panel Report", the approach selected for the KSM Project's tailings disposal systems is consistent with best practice in risk management strategies.

The proposed KSM tailings management facility is a completely different design from the tailings facility at Mount Polley. The KSM facility will be located in a u shaped valley with confining valley walls and gently sloping dams at either valley end. The dams will be constructed of sand from the tailings, as opposed to the Mount Polley facility which consists of a steeply sloping ring dyke constructed of locally sourced till material. In addition the KSM Tailings management facility will be completely lined to ensure there will be no discharge into the environment.

Most importantly, after treatment, water from the proposed KSM facility will be discharged on an annual basis, preventing the build-up of any water within the facility as occurred at Mount Polley where there was no treatment of water for discharge.

4. Immediately after the Mount Polley incident, Seabridge established an Independent Geotechnical Review Board for the KSM Project composed of world-renown experts as identified in the press release (which is attached for your information purposes). The establishment of this Board occurred well in advance of the BC Government's regulatory directive to do. Additionally, during the environmental assessment of the KSM project, the proposed tailings management system was evaluated by a team of independent geotechnical engineers who determined there were no "design flaws", including experts who worked for the Nisga'a and Tahltan Nations. Furthermore, it is important to highlight that the KSM Project received its Federal environmental assessment approval months after the Mount Polley incident, highlighting the thoroughness of the Canadian government's review of our proposed tailings management approach.

4. Seabridge has worked diligently with Canadian Treaty and First Nations to address their concerns including those associated with KSM's proposed tailings management approach and over the last half decade has established respectful and meaningful relationships with those groups in close proximity to KSM. As such we have signed a Benefits Agreement with the Nisga'a Nation in June of 2014; we have an Environmental Agreement with the Gitanyow First Nation; we received a letter of support from the Gitksan Hereditary Chiefs' office during the EA 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. In addition we have received letters of support from the communities of Terrace and Smithers.

I feel it is important to reiterate that 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 will continue to do as the project proceeds through construction and into operation

Seabridge will fully meet the standards set by the Canadian and Provincial governments to ensure the structural and chemical stability of the project's water and tailings management systems. Therefore, KSM will be able to operate without harming the environment, including the major watersheds in which we will operate.

I appreciate your time, and would be pleased to answer any questions you have regarding the KSM Project. I can be reached via email, brent@seabridgegold.net, or by mobile, (867) 445-5553.

Yours truly,



Brent Murphy
Vice President, Environmental Affairs
Seabridge Gold

RBM/...

Attachments