

March 10, 2022

*Via Email*

[alex.robinson@camdenmedia.com](mailto:alex.robinson@camdenmedia.com); [letters@outdoorlife.com](mailto:letters@outdoorlife.com)

**Attention:** Mr. Alex Robinson, Editor in Chief, Outdoor Life Magazine

Dear Mr. Robinson:

**Re: Incomplete/misleading information about the KSM Project published in an article in Outdoor Life magazine**

I am writing to highlight incomplete/misleading information about Seabridge Gold's KSM Project that was published in the article titled '*British Columbia's Mega Mine Gold Rush Threatens Wilderness, Salmon, and the Outdoor Lifestyle in Southeast Alaska*' by Bjorn Dihle.

In the article, to raise and support alleged concerns about the historic and future mining activities on the BC side of the Unuk River, Mr. Dihle used examples of BC-based mining and exploration projects, including the KSM Project owned by Seabridge Gold. However, he failed to mention that the proposed KSM Project underwent one of the most comprehensive Environmental Assessments (EA) ever undertaken in Canada and British Columbia. In 2014, after a seven-year review process, the KSM Project received approvals under the British Columbia Environmental Assessment Act, the Canadian Environmental Assessment Act (1992) and the Nisga'a Final Agreement.

The Canadian Government, as represented by the former 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 1992), 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.*"

Furthermore, 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.*" This independent conclusion of the KSM Project was also excluded from the article.

Mr. Dihle also failed to report that Alaskans were closely involved with the KSM EA review including extensive discussions on water quality concerns, despite there being no US regulatory triggers, as Seabridge deemed it important for the Alaskans' concerns to be identified and mitigated. Throughout the EA review period, Seabridge engaged in regular communications with

---

---

US Federal and State agencies who represent the views of their constituents. Between 2008 and 2020, Seabridge had 109 interactions (including meetings and correspondence) with at least ten US Federal and State agencies. Additionally, Seabridge worked with Alaskan environmental non-governmental organizations and communities, to ensure their concerns were acknowledged, addressed, and reflected in the KSM Project record throughout the Environmental Assessment (EA) process. Our efforts included: public notices, public information sessions, meetings with NGOs, an open house in Ketchikan, and tribal meetings and presentations. 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.”*

Moreover, the Canadian Environmental Assessment Agency (CEA Agency) received and addressed over 400 comments related to BC-Alaska transboundary concerns during the public comment opportunity on the Environmental Impact Statement Summary portion of the EA. The CEA Agency Comprehensive Study Report acknowledges and summarizes these comments for the public record as follows: *“Residents of the United States, including tribal groups, raised concerns over the Project’s potential transboundary impacts on fish, recreational and commercial fisheries, and human health from degraded water quality and changes in water quantity in the Unuk River. The Agency is satisfied that identified mitigation measures for the Project would address potential impacts in Alaska on fish; recreational and commercial fisheries and human health from changes to water quality and quantity in the Unuk River.”* This report can be accessed here - [https://ksmproject.com/wp-content/uploads/2014/07/34-081-CEAA\\_KSM\\_EN\\_R4\\_X4.pdf](https://ksmproject.com/wp-content/uploads/2014/07/34-081-CEAA_KSM_EN_R4_X4.pdf)

For Seabridge Gold, protection of the environment in both Canada and in the US is a guiding principle behind all our Projects. We are committed to sustainably developing all our Projects and would like to reiterate that the KSM Project has been 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 project design and the robustness of the independent environmental assessment review processes that were mandated by BC, Canada, and the Nisga’a Lisims governments, respectively.

Over the past 14 years, Seabridge has worked hard to gain the support of local communities and Indigenous groups living in the KSM Project area through early, frequent, and transparent communication. We have signed benefits agreements with the Nisga’a and Tahltan Nations, the two main Indigenous groups near the KSM Project, and the Gitksan Hereditary Chiefs office have also endorsed the Project with a letter of support for the Project during the EA review process. We have also received letters from Mayors and Councils of Smithers and Terrace supporting the Project.

---

---

We believe in free speech and the right for individuals to openly share their opinions. However, we also believe, Mr. Dihle intentionally left out critical facts about the KSM Project, specifically related to the EA approvals, our responsible project design, and our engagement with Alaskan regulators, tribes and local communities with the intent to harm Seabridge Gold and the KSM Project's reputation. By purposefully sharing incomplete information, your readers are involuntarily being persuaded to draw invalid and unsubstantiated conclusions about the Project.

We request you as the editor or Mr. Dihle, to either delete the information about the KSM Project or add accurate Project facts, so the readers can draw an informed conclusion. In closing, I would be happy to answer any questions you have about how we are sustainably advancing the KSM Project. You can reach out to me via email [brent@seabridgegold.com](mailto:brent@seabridgegold.com).

Thank you for your time.

Sincerely,



R. Brent Murphy, M.Sc., P.Geo  
Senior Vice President, Environmental Affairs  
Seabridge Gold

RBM/RS/...

CC. Kyle Moselle, Executive Director, Alaska Department of Natural Resources

Roy Millen, Legal Counsel, Blake, Cassels & Graydon LLP

---