

October 10, 2024

Via Email:

Attention: Louie Wagner Jr.,
Representative, Southeast Alaska Indigenous Transboundary Commission

Dear Mr. Wagner Jr.:

RE: Misleading comments about the KSM Project made at the Peace and Unity Summit, Prince Rupert, BC, July 12 – 15, 2024

I am writing to address the concerning and misleading claims you made regarding the KSM Project during your session at the recent Peace and Unity Summit, during which you also mentioned me by name. As the Senior Vice President of Environmental Affairs at Seabridge Gold Inc. (Seabridge), owner of the KSM Project, I would like to correct the record and provide you with accurate, up-to-date information about our project, our commitment to responsible development, and our engagement with Alaskan regulators and Tribes to ensure their project-related concerns are heard and addressed.

First, and most importantly I am concerned that those who attended your session might walk away with the mistaken belief that the KSM Project is a working mine, as you suggested – currently, there are two mines on Unuk River – Brucejack and KSM. **To be clear, the KSM Project is a proposed copper, gold, silver and molybdenum mine. No mining activity is taking place on-site, and while we are currently undertaking construction activities, any mining activity is still years away.**

Furthermore, you indicated that the water quality in the Unuk River has deteriorated and turned black as a result of activities related to the KSM Project. Given that the KSM Project is not in operation, and there is no mining activity along the river, hence your statement and the underlying implication that mining activity is somehow responsible for impacting the Unuk River is concerning and misleading. Seabridge Gold has been conducting ongoing water quality monitoring water on the Unuk River at the BC/Alaska border spending approximately \$1-1.5 M million annually and during this time, we have seen no degradation in water quality. You can read our report [here](#). Any degradation in water quality as noted by yourself would have been caused solely by natural causes.

However, based on the data collected, it has been determined that Mitchell and Sulphurets creeks (flowing into the Unuk River in Alaska) contain elevated concentrations of selenium and other metals within the water, due to the natural erosion of the Mitchell Deposit, situated in the upper reaches of the Mitchell Creek.

The pictures below demonstrate the existing natural conditions around the KSM Project and the current water quality issues in this region.



Photo 1: Confluence of Sulphurets Creek with the Unuk river depicting the impact of the natural erosion of the upstream mineral deposits on the regional water quality. The confluence is located approximately 22 miles upriver from the Alaska/BC border.



Photo 2: The Mitchell Deposit highlighting the natural erosion and oxidation processes at work. Please note the presence of "green" copper sulphate staining in the middle left portion of the photograph.



Photo 3: Existing conditions at the KSM and downstream areas. Seep water near the Mitchell Glacier Toe.

Furthermore, the British Columbia and Alaska Technical Working Group on Monitoring (TWGM), tasked with collecting transboundary water quality data, directly contradicts the unsubstantiated claims of pollution in the Unuk River, which were repeated by you. Their [report](#) found that samples collected downstream from the British Columbia-Alaska border did not exceed Alaska water quality standards and that overall aquatic conditions in the Taku, Stikine and Unuk transboundary rivers support and sustain aquatic life.

Engagement with Alaska

Given the proposed KSM mine site is located in the upper geographical reaches of Sulphurets and Mitchell creeks, tributaries of the transboundary Unuk River (approximately 27 miles upstream from the BC/Alaska border), as you may recall the Seabridge team engaged extensively with Alaskan regulators, Tribes and other stakeholders throughout the environmental assessment

review and permitting phases of the Project to ensure that downstream waters in Alaska would not be impacted by the proposed KSM operations. Some of these engagements include -

- More than 140 different ongoing meetings, interactions and correspondence with Alaskan State agencies and US Federal agencies.
- Formed the Alaska Working Group.
- Presented at the Central Council of the Tlingit and Haida Indian Tribes of Alaska conference in Craig, Forum for Ketchikan Business Leaders in Prince Rupert, Alaska Miners Association in Anchorage and Juneau, Southeast Conference, Juneau Chamber of Commerce and Prince of Wales Island-Wide Mining Symposium, and joint business conference for British Columbia and Alaska in Prince George.
- Met with Alaskan ENGOs including the Southeast Alaska Indigenous Transboundary Commission, Tlingit-Haida Central Leadership Council, the Organized Village of Kasaan, the Southeast Alaska Conservation Council and Rivers Without Borders.
- Organized site tours for working groups, Alaskan media, Alaska Department of Natural Resources Mining, Land and Water and US Environmental Protection Agency.
- The Canadian Environmental Assessment Agency received and Seabridge addressed over 400 comments related to BC-Alaska transboundary concerns.

It must be noted that Alaskans expressed the same concerns as Canadians during the environmental assessment review, and the Alaskan concerns were given equal weight in the assessment process and ultimately were fully mitigated within the design of the proposed project, adding more than \$300 million in design changes to the Project's capital cost. **Key design changes include** –

- Incorporating lined centre cell in Tailings Management Facility to store sulphide-rich tailings.
- Changed the water management approach on the mine side of the Project, to time the discharge of mine impacted waters with high seasonal flows.

These measures reflect our commitment to mitigating potential impacts and ensuring that the KSM Project adheres to the highest standards of environmental stewardship.

The independent Canadian Environmental Assessment Agency (CEAA) Report acknowledged and summarized the 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."* You can access the report [here](#).

An April 2014 article in the Juneau Empire described the US's review of the KSM Project as follows: *"Four of the same resource managers and specialists who review Alaskan mines have examined KSM's plan, said Kyle Moselle of the Alaska Department of Natural Resources. They found no significant issues with the application."*

In conclusion, Seabridge Gold remains fully committed to transparency, safety, and sustainability in all aspects of the KSM Project. The Project successfully underwent a rigorous, joint harmonized Environmental Assessment review process, including a detailed cumulative effects analysis, as mandated by the [British Columbia Environmental Assessment Act](#), the [Canadian Environmental Assessment Act](#), and in accordance with the Nisga'a Lisims Treaty. This review, conducted over seven years (2008-2014), involved more than 250 scientists, engineers, First Nation partners, and regulators who meticulously developed and reviewed all relevant information pertaining to the KSM Project. Additionally, over 15,000 people from British Columbia and Alaska actively participated in public meetings, consultations, and Project information sessions before the Project received approval.

The decisions and designs we have implemented for the KSM Project are the results of decades of rigorous analysis, expert input, and meaningful engagement across BC and Alaska and we stand by the integrity of our work. We value the fact-based, productive input of all stakeholders, including our neighbours in Alaska, and we are dedicated to addressing any concerns with the same rigor and responsiveness that has guided our work thus far. I invite you to engage with us directly if you have any further questions or would like to discuss the KSM Project in more detail. I also respectfully request that you and other members of your organization stop spreading incorrect and misleading information regarding the KSM Project.

You can reach me via email brent@seabridgegold.com or telephone at (416) 367 9292.

Respectfully yours,



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Seabridge Gold

RBM/RS/...

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