

Brian Egan, PhD

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August 17, 2013

Dr. Bill Ross, Dr. George Kupfer, and Dr. Ron Smyth
Federal Review Panel on the New Prosperity Mine Proposal
Canadian Environmental Assessment Agency
160 Elgin Street, 22nd Floor, Place Bell
Ottawa, ON, K1A 0H3
NewProsperityReview@ceaa-acee.gc.ca

Dear Sirs:

Thank you for this opportunity to share my concerns about the proposed New Prosperity mine development. I have lived in British Columbia for almost 45 years and have spent much of my professional life working on land, natural resource, and environmental issues in this province. <identifiable information removed> I consider myself very well informed on BC land, resource, and environmental issues, particularly as they intersect with First Nations rights and interests. I have also spent some time in the area of the proposed mine, for purely recreational purposes, and have been greatly impressed and moved by the special beauty of the area.

Let me begin by saying that I was disheartened to hear that this mining proposal had been brought forward for consideration again after it had been rejected on the first application. I have followed this particular mine proposal, including the first proposal, quite closely for some years and although the proponent claims that this new proposal is different and improved from the first, my impression is that it is much the same as the first with respect to its likely negative environmental and socio-economic impacts. I have a hard time understanding how and why this mine proposal is back on the table given the serious impacts of the first proposal and the fact that the current proposal is little different. Particularly egregious is the impact on local First Nations—on the members of the Tsilhqot'in Nation in general and on the Xeni Gwet'in more particularly—who are forced once again to devote their precious time, energies, and resources to opposing this proposed mine in the heart of their traditional territory.

As was abundantly clear with the first proposal, the ecological impacts of the proposed New Prosperity mine will be very serious. The direct impacts on local waters and fisheries will be particularly acute, including what I believe will be the eventual destruction of Teztan Biny (Fish Lake) and its unique ecology. Equally worrisome are the longer-term impacts on salmon populations in the southern Chilcotin region. My worry is that the degradation of water resources due to the mine's construction and operation, and the lack of a credible program for the long-term containment of mine waste, will eventually negatively affect the Chilcotin River system, an important salmon tributary of the Fraser River. I also worry about the impact of the mine development on wildlife in the area. Having traveled in this

area, I know that there is a significant Grizzly Bear population in the southern Chilcotin mountains and that their survival depends on healthy salmon populations and, to a considerable extent, on their isolated location. The mine will bring more people and roads into the area, which generally has a negative impact on Grizzlies.

Equally problematic are the negative socio-economic impacts of the proposed New Prosperity mine. Most troubling is the impact on the Xeni Gwet'in and other Tsihqot'in groups, who have consistently and energetically opposed the construction of a mine in their territory. I find it very troubling that such a project continues to be advanced—pushed, really, in an aggressive manner—in an area where the local First Nations have clearly asserted their Aboriginal rights and title, and where their rights and title claims have received strong support and recognition in Canadian courts. Surely, at the very least, a project of such magnitude and which poses such serious risk to First Nations socio-cultural, economic, cultural values should not be advanced until the question of land title and jurisdiction is fully settled. To push ahead with this project in this highly contentious legal-political context demonstrates a troubling level of disrespect towards the Xeni Gwet'in and the Tsihqot'in Nation and underscores the inadequacy of the current Crown approach to consultation. Indeed, the repeated push to review and approve this development seriously undermines the Crown's duty to act in an honourable manner towards First Nations.

At the most fundamental level, I strongly oppose this proposal because I find it rooted in an approach, not unique to this project by any means, that privileges short-term monetary gains at the expense of long term social and ecological sustainability. I have no doubt that the project, if approved, will inject money into the local economy over the short period of the mine's construction and operation. I am not insensitive to the economic needs of the local peoples and communities and can understand why many local people are attracted to the proposal. My concern is that short-term economic gain will come at the expense of local economies and local (and regional) ecologies over the medium and longer term. Most critical, in my mind, is the need to protect renewable resources in the area—especially fisheries—as these provide the true foundation for a sustainable economy.

I sincerely hope that this mine proposal will not be approved and I urge you to fully take into account the long-term ecological impacts of this project and to respect the desires of the Xeni Gwet'in and Tsihqot'in peoples to not see this proposal proceed.

Sincerely,

[signed by Brian Egan]