

To: British Columbia Environmental Assessment Office

From: Salmon Beyond Borders

Re: Comments on Skeena Resources' Eskay Creek Revitalization Project Application

Date: September 25, 2025

To whom it may concern,

Salmon Beyond Borders appreciates the opportunity to submit comments on Skeena Resources' application for the proposed Eskay Creek Revitalization Project. Based in Southeast Alaska, Salmon Beyond Borders is focused on protecting and restoring healthy, productive salmon habitat, and helping to facilitate connections between people across the Canada-U.S. political border in B.C.-Alaska transboundary watersheds. For over a decade, we have worked closely with communities, fishermen, businesses, and scientists, alongside Tribes and First Nations, who are already or will potentially be impacted by Canadian mining activity along the transboundary Taku, Stikine-Iskut, Unuk, and Salmon Rivers, as well as the transboundary Portland Canal.

The transboundary glacier-fed Unuk, Taku, Stikine, and Salmon Rivers, as well as the transboundary Portland Canal, have long been critically important for cultures and communities on both sides of the political border. These vast watersheds are still largely intact, are biodiversity hotspots, home to all five species of Pacific salmon, and have been stewarded for thousands of years by multiple Indigenous nations. The Unuk has historically been in the top five Chinook-producing rivers in the region. Alaskans are concerned about potential mine contamination of these transboundary salmon watersheds that could lead to degraded water quality and lethal or sub-lethal effects to salmon and other fish that would subsequently cause cascading negative effects across the entire international region.

Many Alaskans continue to have serious concerns about the proposed Eskay Creek Revitalization Project, including the sheer amount of toxic waste this project will generate in pursuit of very small amounts of gold and silver—especially when gold is not needed for renewable energy production—and Skeena Resources' proposal to build two earthen tailings dams upstream of wild salmon habitat and Alaska communities. This revitalized gold mine will also add to the existing and potential cumulative effects of dozens and dozens of Canadian gold-copper mine projects in some phase of exploration, development, or operation across the B.C.-Alaska transboundary region.

In addition to our project specific concerns, reflected in part here, and in more detail via the attached technical comments compiled by the Center for Science in Public Participation, it is notable that Tribes and Alaskans have long called for First Nations, Tribes, and communities on both sides of the political Canada-U.S. border to develop watershed-scale, binding protections

for shared B.C.-Alaska watersheds before Canadian mining activity continues to be proposed along these iconic rivers that are shared by many jurisdictions.

In its Eskay Creek application, Skeena Resources has not detailed how this project will add to and exacerbate the real and potential impacts of the operating Brucejack mine and the proposed KSM mine, also in the Unuk watershed, much less the impacts of multiple proposed and operating B.C. mine projects across the Taku, Stikine, and Salmon watersheds. Gold is not needed for a clean energy transition; gold is the most toxic metal to mine, and over 90% of newly mined gold becomes jewelry or gold bars. Furthermore, in the case of the ore deposits at the Eskay Creek Revitalization Project, the average gold grade is very, very low: 2.5 g/ton. This project, if built as proposed, is not so much about gold mining as it is about managing huge amounts of toxic waste.

Additionally, it appears that Skeena Resources is not fully prepared to treat mine wastewater for all forms of selenium. Selenium pollution in the transboundary Elk-Kootenai watershed has traveled over 350 miles downriver, negatively impacting water quality and aquatic ecosystems. Alaskans greatly fear this selenium pollution scenario will replicate itself in B.C.-Alaska transboundary river systems, due to large-scale hardrock metal mining at the headwaters of these rivers, including at the Eskay Creek gold mine project. It was also concerning for us to hear Skeena Resources representatives state a number of times during an information session that they had decided to propose to convert the Eskay Creek mine to open pits, to flood rather than backfill the North Pit at mine closure, and to build two tailings dams to hold back “forever” large amounts of acid-generating waste underwater because it is too costly to continue to operate Eskay Creek as an underground mine, to backfill the North Pit at closure, and to filter and drystack tailings.

Reports published in 2022 detailed the specific existing and proposed B.C. mine waste dams that are predicted to destroy ecosystems, wipe out infrastructure, and/or kill people when they fail. In his report, “The Risk of Tailings Dam Failure in British Columbia: An Analysis of the British Columbia Existing and Future Tailings Storage Database,” geophysicist Steve Emerman, Ph.D., highlighted that six of the twelve existing and planned B.C. mine waste dams of greatest concern are located along B.C.-Alaska rivers, including those at the proposed Eskay Creek and KSM gold mines in the Unuk and Nass River headwaters. The Canadian Dam Association has given the proposed Eskay Creek tailings dams a Failure Consequence Category of “High,” meaning that the breach of an Eskay Creek dam is predicted to cause “Significant loss or deterioration of *important* fish or wildlife habitat” and the loss of “10 or fewer” human lives. Emerman also refers to a quote of B.C. Mount Polley review panelist Steven G. Vick, Ph.D.: “For closure [of every tailings dam], system failure is inevitable....”

The proposed revitalization of the Eskay Creek mine includes tailings dams that are guaranteed to ultimately fail according to tailings dam experts Emerman and Vick. Additionally, there is no mention of a liner for the tailings storage facility in Skeena Resources’ application materials. We find this to be alarming, as a liner in the tailings storage facility is a bare minimum requirement, especially as the tailings dams are located near the upper drainage of Tom MacKay Creek, a

critical tributary of the Unuk watershed. Safety, not economic concerns, should come first when planning mine closure and when designing mine waste storage and management systems.

Salmon Beyond Borders and Tribes, elected leaders at every level of government, businesses, sport and commercial fishing groups, and thousands of individual citizens on the Southeast Alaska side of the international boundary have called repeatedly for the Canadian and U.S. federal governments to uphold the Canada-U.S. Boundary Waters Treaty and ensure the evaluation of potential projects along shared rivers meaningfully involves all jurisdictions tied to the transboundary rivers, including the Unuk River. Despite this outcry, neither B.C. nor Canada has yet agreed to an international forum in which all jurisdictions in this transboundary region develop binding watershed protections for these iconic rivers.

During a public information session, a Skeena Resources representative explained that Skeena Resources details in the project application that the Eskay Creek Revitalization Project will not restrict Canada's ability to meet obligations and targets laid out in several international protocols, including the Convention on Biological Diversity, and the Canada-U.S. Boundary Waters Treaty. However, the Boundary Waters Treaty is not currently being upheld in the Unuk watershed, nor across the B.C.-Alaska region—and could be.

The substituted B.C. EA process is not an international forum through which Tribes and communities downstream have a meaningful say or give free, prior, and informed consent to mining activity in shared watersheds. Importantly, Salmon Beyond Borders is in full support of the consent-based agreement between the Province of B.C. and the Tahltan Central Government for the Eskay Creek Revitalization Project. Yet, without the involvement and consent of Indigenous nations and communities downstream, the substituted provincial Environmental Assessment process remains an unsatisfactory means to evaluate a potential mine in a transboundary watershed that affects multiple jurisdictions, and an unsatisfactory means to ensure the health and productivity of the full watersheds of the B.C.-Alaska transboundary region long into the future.

For the reasons listed above and for additional specific reasons outlined in the attached letter from the Center for Science in Public Participation, Salmon Beyond Borders does not support the Eskay Creek Revitalization Project moving forward as proposed.

Thank you for considering our comments and the potential negative impacts the Eskay Creek Revitalization Project could have on a unique and globally significant salmon bearing watershed, as well as on the entire British Columbia-Alaska transboundary region.

Sincerely,

Breanna Walker

Director, Salmon Beyond Borders