

April 11, 2022

To Manager Annette Kreitzer
 Mayor Olerud
 Members of the Haines Borough Assembly
Cc: Alekka Fullerton

My name is Patty Brown and I am a twenty-five year full-time resident of Haines. I have a bachelor's degree in natural resources management earned at the same time that environmental impact statements for proposed developments became the law of the land. I am writing to address the promotion of the redevelopment of the Lutak dock to accommodate the delivery, storage, and subsequent transfer of Yukon ore concentrate to ships. I have deep concerns about both the process, as in "how did we get here?" and the implications of the plans to move forward with some haste, as in "what are you trying to do to the Chilkat Valley anyway?" There are some people who are extremely eager to assure the Yukon mining interests that their needs will be met by the rebuild of the Lutak dock, the one we thought was to serve our community's needs.

First, there is a risk of contamination of the local marine and fresh water ecosystems. Every time there is new construction there is some risk. That's why there are sampling and monitoring requirements. Additional and ever-increasing risk will continue as long as an ore concentrate transfer facility is in use. In fact, as Skagway has realized, even long after. Cleanup is costly and usually incomplete. Where are the companies that profited from all that ore transfer? Are they funding the cleanup? And it turns out, the ships moving in and out of the Skagway Harbor helped erode the shoreline and sent pollutants out into Taiya Inlet.

There are marine sediment pollution standards established by the federal Environmental Protection Agency. Do you know what they are? What plans are there to establish baseline levels of toxins by sampling sediments there right now? How much dredging will need to take place and how much old pollution will then be put into circulation in the very waters from which many of us eat? What practices will be in place to prevent any release of the very fine powder called ore concentrate, either shoreside or along the highway next to the Chilkat River? Even with the system described by agents of the mining industry, the dust will be exposed to the air as it is dumped into a chute. We have all seen what happens to dust when it is carried by the Chilkat Valley winds. And it seems there really has been no commitment by ore dock advocates to establish operation rules before an agreement is made.

Despite what has been reported, there also are articulated Alaska state standards for marine sediments in 18 AAC 70. Basically they say you cannot allow anything to enter the water that would threaten marine life. Period. And there is impetus within the Department of Environmental Conservation to establish cleanup levels that acknowledge and support subsistence uses. The Chilkat Valley has one of the highest rates of subsistence use of plants and animals in the country. British Columbia and Washington both have sediment standards that are worth considering. Have you looked into those? Is there a way you can assure us that no concentrate exposure will occur? That the toxicology of the substance is no threat? That there is no pathway that could impair our health?

I understand the intent of the enclosed shipping containers, but I am not naïve enough to think nothing bad will happen. As for the upland storage of the 750 containers (or up to 2500) awaiting a ride to Japan, I can't help remembering. Where were you in December 2020? Turns out heavy rain and gravity call the shots. And earthquakes and tsunamis await their turn to humble us. Major disturbance of the land west of the current Lutak dock will likely create yet another risk. Or maybe the risk of unstable bedrock is already there.

The surface of the portion of the Haines Highway in Alaska is more difficult and expensive to maintain because of the moisture and freeze-thaw cycles. Would the users of the trucks roaring down the highway pay for its maintenance? And the ambulance and fire equipment required for response

to more frequent accidents due to more traffic? Or a hazmat incident? Spilling a bunch of copper ore concentrate is not the same as dropping a pickup load of pennies. For example, copper ore concentrate is laced with lead and toxic hydrocarbons.

We have been told that there is an urgent need to rebuild the dock before we lose it completely and with it the key supply point for our community. And now, before even that need is met, leaders in our community are shaking hands with an industry in the Yukon before any input from us is solicited. Conversation over a beer or breakfast with a few like-minded friends is not the same as a community survey. The Port and Harbor Committee is comprised of our neighbors, some of whom are elected members of the Assembly or Borough employees who are bound to serve the interests of the entire community. If we don't even know a conversation between a select group of stakeholders is taking place, how do you know what we think? Do we who live here have a right to know about this alliance?

How can current residents of the Chilkat Valley, ancestral home of Tlingit people, turn the corridor we all use into a noisy, dirty, crowded place? How can we threaten the eagles, salmon, moose, berry crops with potential dust from ore concentrate and with vehicle collisions? The voice of local indigenous people should be heard.

I know there are those among the Assembly and all constituents who think the "lifestyle gurus" are just trying to carve out a cozy little nest here with no regard for people who need to work to support their families. But who really risks in this operation and who benefits? It is our backyard, the place where we hunt, fish, walk, collect berries, farm, and make connections with our culture, our families, and ourselves. We have seen that the attractiveness of living in Haines actually brings working people here. And even the retired people moving here who want to slow down usually bring a small but steady income with them. Skagway had an ore transfer operation for decades and only three Skagway residents worked there. It is not an economic boon, especially now with huge cleanup costs.

The company that owns the Minto Mine is a British one. The companies that buy the concentrate are Japanese. The mine just reopened in the past year and the last time it changed owners, the price the new guys paid was half what had been advertised. How secure and responsible do you think this operation is? Will they care what happens to us in a major mishap on the highway or on the shore or out on the windy inlet?

Let's slow down and think this through, really do ALL the homework. I think we will find it is not worth the risk.

Can we learn from our neighbors?

<https://dec.alaska.gov/spar/csp/sites/skagway-ore-terminal/>
https://www.cargohandbook.com/Ore_concentrates

I appreciate your serious consideration of my concerns.

Thank you.
Patty Brown