APPENDIX C - GALORE CREEK PROJECT PUBLIC COMMENT TABLE TRACKING TABLE

Index #	Name / City / Affiliation / Submission Date	Correspondence	Issue	Proponent Response	Mitigation / Commitment	Government Response
1	Chris Zimmer US Coordinator Transboundary Watershed Alliance Vancouver, Whitehorse, Juneau September 8, 2006	Access route - it was encouraging to see NovaGold Canada Inc. (NovaGold) adopt the "northern route" for its access road and abandon plans for the "southern route" through critical salmon and wildlife habitat. We strongly urge that there continue to be no consideration of the "southern route" and that the Environmental Assessment Office (EAO) oppose any efforts, if such efforts are undertaken, to move the access route to the south.	Access road	No response required	No action required	Comment noted
2	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Access road: we favor the proposed northern access route more than the southern route that would have followed the Iskut and Stikine rivers.	Access road	No response required	No action required	Comment noted
3	Chris Zimmer US Coordinator Transboundary Watershed Alliance Vancouver, Whitehorse, Juneau September 8, 2006	VI. Toxicity Testing and Protecting Fisheries Several of the watersheds affected by the proposed Galore Creek Copper-Gold-Silver Project (Project) mine support traditional, commercial and sport fisheries. Several of these rivers currently have elevated background concentrations of metals. Project effluents will add many contaminants to surface waters. It is important to protect fisheries and fully understand all possible impacts from exposure to potential toxins. The toxicity testing to date focuses primarily on acute testing with minimal chronic toxicity testing. A full suite of chronic toxicity tests needs to be conducted in all areas that will receive any type of discharge from the mine to establish baseline conditions. A full suite of chronic and acute toxicity testing should be conducted on a regular basis during mine life and afterwards. These results should be readily available to all interested parties.	Aquatics - chronic and acute toxicity testing	As part of the baseline studies, a full suite of chronic and acute toxicity tests are being conducted on a quarterly basis to assess background toxicity to four major aquatic ecosystem components (algae, plants, invertebrates and fish) using standardized freshwater toxicity bioassays required under federal Metal Mining Effluent Regulations (MMER) for operational mines. These tests include two acute tests (using the waterflea Daphnia magna and rainbow trout fry) and four chronic tests (growth inhibition tests with green algae (Selenastrum capricornutum) and duckweed (Lemna minor), survival and reproduction testing with the invertebrate Ceriodaphnia dubia, and embryo survival testing with fertilized rainbow trout gametes). For comparison, the Alaska Department of Environmental Conservation regulations for toxicity testing entail the use of specific bioassays selected on a site-by-site basis. The Kensington project permit, for example, requires four tests per year with each of fathead minnow, C. dubia, and S. capricornutum. The test protocols used by U.S. EPA (Alaska) and MMER (Canada) are very similar. The Project uses two of these species, and substitutes fathead minnow with trout to better represent the local fish community (salmon, trout, char, whitefish; cold-water species). Site-specific water quality objectives are proposed for the Project, in light of the naturally high concentrations of many metals in waters of the region. These will allow assessment of changes in water quality signaling potential impacts.	Toxicity testing at end-of-pipe and in the receiving waters of the Galore/Scud and Iskut watersheds will continue throughout the life of the mine to ensure that downstream environments are not impacted by discharged effluents from the Project. A post-closure monitoring program will be developed in conjunction with Canadian and U.S. federal and B.C. and Alaska State agencies and the Tahltan Central Council during the permitting stage.	The Environmental Assessment Office (EAO) notes that as part of provincial permitting pursuant to the *Environmental Management Act*, NovaGold will be required to undertake environmental monitoring (collection and analysis of water, sediment, and biota, combined with chronic and acute toxicity testing of the receiving waters) throughout the life of the mine to ensure that downstream environments are not impacted by effluent discharged from the Project.

4	Marlene Clarke Wrangell, Alaska September 7, 2006	Several of the watersheds affected by the proposed Project support traditional, commercial and sport fisheries. These fisheries are important to local aboriginal people and commercial interests. Several of these rivers have elevated background concentrations of metals already, before additions of discharge from this proposed Project. The mine effluents will add many contaminants to surface waters; reagents, diesel run off, surfactants, metals and nutrients, etc. It is important to protect fisheries and fully understand all possible impacts from exposure to potential toxins. The toxicity testing to date focuses primarily on acute testing with minimal chronic toxicity testing. A full suite of chronic toxicity tests needs to be conducted in all areas that will receive any type of discharge from the mine to establish baseline conditions. We recognize that the B.C. water quality guidelines do not require chronic toxicity testing. This is not a conservative approach, especially in watersheds that already exceed the water quality guidelines. A full suite of chronic and acute toxicity testing should be conducted on a regular basis during mine life and afterwards. These results should be readily available to all interested parties.	Aquatics - chronic and acute toxicity testing	Refer to comment 3 & 8	Refer to comment 3 & 8	See response to 3
5	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Monitoring and Toxicity Tests: the Stikine River and the estuary it flows into support traditional, commercial and sport fisheries. These fisheries are important to local l people and commercial interests. Several of these rivers in the Stikine Watershed have elevated background concentrations of metals already, before additions of discharge from this mine. The mine effluents will add many contaminants to surface waters; reagents, diesel run off, surfactants, metals and nutrients, etc. It is important to protect fisheries and fully understand all possible impacts from exposure to potential toxins. The toxicity testing to date focuses primarily on acute testing with minimal chronic toxicity testing. A full suite of chronic toxicity tests needs to be conducted in all areas that will receive any type of discharge from the mine to establish baseline conditions. We recognize that the BC water quality guidelines do not require chronic toxicity testing. This is not a conservative approach, especially in watersheds that already exceed the water quality guidelines. A full suite of chronic and acute toxicity testing should be conducted on a regular basis during mine life and afterwards. These results should be readily available to all interested parties.	Aquatics - chronic and acute toxicity testing	Refer to comment 3 & 8	Refer to comment 3 & 8	See response to 3

6	Stan Tomandl & Ann Jacob Chair & Treasurer Friends of the Stikine Society Victoria, BC September 8, 2006	Several of the watersheds affected by the proposed Project support traditional, commercial and sport fisheries. These fisheries are important to local aboriginal people and commercial interests. Several of these rivers have elevated background concentrations of metals already, before additions of discharge from this mine. The mine effluents will add many contaminants to surface waters; reagents, diesel run off, surfactants, metals and nutrients, etc. It is important to protect fisheries and fully understand all possible impacts from exposure to potential toxins. The toxicity testing to date focuses primarily on acute testing with minimal chronic toxicity testing. A full suite of chronic toxicity tests needs to be conducted in all areas that will receive any type of discharge from the mine to establish baseline conditions. We recognize that the BC water quality guidelines do not require chronic toxicity testing. This is necessary approach, especially in watersheds that already exceed the water quality guidelines. A full suite of chronic and acute toxicity testing should be conducted on a regular basis during mine life and afterwards. These results should be readily available to all interested parties.	Aquatics - chronic and acute toxicity testing	Refer to comment 3 & 8	Refer to comment 3 & 8	See response to 3
7	Craig Olson Petersburg, Alaska September 7, 2006	Several of the watersheds affected by the proposed Project support traditional, commercial and sport fisheries. These fisheries are important to local aboriginal people and commercial interests. Several of these rivers have elevated background concentrations of metals already, before additions of discharge from this mine. The mine effluents will add many contaminants to surface waters; reagents, diesel run off, surfactants, metals and nutrients, etc. It is important to protect fisheries and fully understand all possible impacts from exposure to potential toxins. The toxicity testing to date focuses primarily on acute testing with minimal chronic toxicity testing. A full suite of chronic toxicity tests needs to be conducted in all areas that will receive any type of discharge from the mine to establish baseline conditions. We recognize that the BC water quality guidelines do not require chronic toxicity testing. This is not a conservative approach, especially in watersheds that already exceed the water quality guidelines. A full suite of chronic and acute toxicity testing should be conducted on a regular basis during mine life and afterwards. These results should be readily available to all interested parties.	Aquatics - chronic and acute toxicity testing	Refer to comment 3 & 8	Refer to comment 3 & 8	See response to 3

8	Kenneth Duckett Executive Director United Southeast Alaska Gillnetters Ketchikan, Alaska August 27, 2006	The issue of wild seafood being captured and marketed that contains naturally high levels of heavy metals that have bioaccumulated from a variety of industrial sources is receiving increased attention in our society today. BC and Alaska's marketing of salmon and other seafood from pristine waters of the Pacific Northwest is placed in jeopardy each time industry is allowed to dispose of its effluent in our rivers and streams. To continue to permit this is unacceptable.	Aquatics - bioaccumulation of metals in fish tissue	Modelling of predicted metal concentrations in sediment and water did not predict a measurable increase in metal concentrations downstream of the Scud River.	Tissue testing for heavy metals was conducted on fish from the mouth of Galore Creek and from the Scud River, and monitoring in Galore Creek will continue as part of the MMER for the life of the mine and beyond. Should monitoring reveal elevated tissue metal concentrations at these near-source sites, effluent management practices will be adjusted.	EAO and Canadian Environmental Assessment Agency (CEA Agency) note that NovaGold has committed to monitoring fish health and tissue quality, including, but not limited to, analysis of the full suite of 30 metals used in the baseline studies, in Galore Creek and other potentially affected rivers as part of the Aquatic Effects Monitoring Plan pursuant to federal Metal Mining Effluent Regulation and *the Environmental Management Act*. EAO notes that NovaGold has committed to establish an additional monitoring site downstream in the Stikine River at a depositional site to be determined during the permitting stage.
9	Tim Rutter Terrace, BC July 12, 2006 - Open House	Acid rock drainage (ARD) rock containment and runoff? I need more information on the holding ponds before I can comment.	ARD	The management of ARD is discussed in the following sections of the EA Application for an EA Certificate (Application) for the proposed Project: Section 5.3.6 (Project Description: Metal leaching & Acid Rock Drainage(ML/ARD)); 6.11.3 (Environmental Setting: Acid Rock Drainage & Metal Leaching); 7.6.3.1 (Environmental and Socio-Economic Effects Assessment: Metal Leaching & Acid Rock Drainage); 8.7 (Environmental Management and Mitigation Measures: ML/ARD Prediction & Prevention Management Plan)	No action required	EAO notes that NovaGold has committed to monitoring and managing, during operations and after closure, drainage from the tunnel, non-potentially acid generating dumps, ore and marginal storage stockpiles, pits, seeps and other mine areas, including the impoundment, and manage or treat problematic water sources as required to ensure site discharges meet both the *Environmental Management Act* effluent discharge permit limits and federal Metal Mining Effluent Regulation discharge criteria that are applicable at the time.
10	Chris Zimmer US Coordinator Transboundary Watershed Alliance Vancouver, Whitehorse, Juneau September 8, 2006	III. Waste Handling, Treatment and Disposal D. Ore Stockpiles If ore has any acid producing potential, ore and marginal ore stockpiles should be protected from rain and snowfall to prevent ARD.	ARD	The calculated time before acid generation is initiated exceeds the expected residency in the stockpile by many years; any marginal ore remaining in the stockpile at closure will be submerged in the impoundment.	Any remaining marginal ore stockpiles will be submerged in the waste rock storage impoundment at closure.	Comment noted
11	Craig Olson Petersburg, Alaska September 7, 2006	If ore has any acid producing potential, ore and marginal ore stockpiles should be protected from rain and snowfall to prevent/limit ARD production. (5.5.8-9).	ARD	Refer to comment 10	Refer to comment 10	Comment noted
12	Marlene Clarke Wrangell, Alaska September 7, 2006	If ore has any acid producing potential, ore and marginal ore stockpiles should be protected from rain and snowfall to prevent/limit ARD production. (5.5.8-9).	ARD	Refer to comment 10	Refer to comment 10	Comment noted

13	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	If ore has any acid producing potential, ore and marginal ore stockpiles should be protected from rain and snowfall to prevent/limit ARD production. (5.5.8-9).	ARD	Refer to comment 10	Refer to comment 10	Comment noted
14	Stan Tomandl & Ann Jacob Chair & Treasurer Friends of the Stikine Society Victoria, BC September 8, 2006	If ore has acid producing potential, ore and marginal ore stockpiles should be protected from precipitation to prevent or severely limit ARD (5.5.8-9).	ARD	Refer to comment 10	Refer to comment 10	Comment noted
15	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Access Road: we are very concerned with any road construction in the Stikine River watershed that could cause erosion and water quality issues. All rock that is moved during road construction that contains acid producing sulfide ore must be dealt with carefully and placed in lined/capped storage piles.	ARD	The ARD potential of the road corridor has been assessed using regional geological and mineral occurrence data, and was followed up with ground truthing in summer 2006. As a result, an ARD Construction Management Plan will be developed prior to the start of the construction period (refer to Sec. 8.8 in the EA: Access Corridor Preliminary ARD Management Plan – this plan will be finalized before road construction commences); ARD assessment (including visual screening and chemical analysis) will be conducted along the length of the road during construction where the road intersects bedrock and the pre-construction assessment indicated possible ARD and metal leaching issues; ARD potential will be identified, then evaluated against the threshold criteria to determine how it should be managed; management will include segregation and appropriate disposal which will be dictated by specific site conditions. Table 8.8-2 in the EA (Volume III, page 8-123) provides the "Preliminary Guidelines for Management of ARD Generating Rock." The Access Corridor Preliminary ARD Management Plan may be modified on the basis of a review of 2006 sampling results. A road construction management plan will also address the management of erosion and resulting sediment to ensure that water quality is protected.	Develop and adhere to Access Corridor ARD Management Plan	EAO notes that NovaGold has committed to assessing acid rock drainage potential of excavated faces during access road and diversion channel construction, using an on-site laboratory, and developing appropriate mitigation, including mitigation for closure, for any acid rock drainage encountered.
16	Lana Parker Wrangell, Alaska July 24, 2006	I am opposed to the development because I realize the impossibility of containing all exposed rainfall, seepage, spring water, etc. from interacting with the tailings and penetrating any reservoir established to contain those tailings. The best case scenario is that we end up with a highly toxic reservoir in 20 years, gradually leaching into the Stikine River as the long forgotten NovaGold corporation fades into memory and dissolves to reform under another name elsewhere.	Bonding	Discharge from the tailings impoundment will continue to be monitored post-closure. Dam integrity will also continue to be monitored post closure on an annual basis; the dam will be designed with a seepage collection system that pumps any water seeping from the dam back into the dam. Bonding is a requirement of the government and is reviewed every five years, even after closure of the mine, to ensure the amount is adequate to continue to manage the site in the event that the owner was to default.	Post-closure monitoring; maintain operation of seepage system post-closure	EAO notes that NovaGold has committed to the following: • plug wells and drains at mine closure; • monitor water quality after closure until regulatory agencies determine that conditions are stable and predictable; and • regularly monitor the water quality of Galore Creek, and

						the Scud, Iskut and Stikine rivers during operations and after closure to confirm modelling and ensure discharges meet permit criteria until regulatory agencies determine that conditions are stable and predictable.
17	Lana Parker Wrangell, Alaska July 24, 2006	I would like to know what steps there are to ensure that violating any conditions will be less lucrative than taking all appropriate safeguards if the proposed Project is awarded an EA certificate.	Compliance	NovaGold has developed corporate policy statements (Sustainable Development Policy Statement and Environmental Policy Statement - refer to Section 1 of the Application) which guide their business practices. Additionally, NovaGold views itself as a responsible corporate citizen and will apply best management practices at all times. Best management practices will not only ensure that the company's corporate image is protected, but also the environment.	NovaGold is a responsible corporate citizen and will apply best management practices throughout the construction, operation and closure of the Project.	EAO notes that NovaGold will be required to comply with the conditions identified in the EA Certificate.
18	Craig Olson Petersburg, Alaska September 7, 2006	Concentrate trucks and trailers will have tarpaulin or composite covers to reduce loss of concentrate due to dusting while underway. [Galore Creek EA, p. 5-148]. Concentrate trucks should not use tarpaulins, which are notoriously "leaky". Hard-top covers should be used on concentrate trucks.	Concentrate transportation	Tarpaulins are used worldwide. Problems arise with the use of tarpaulins when correct use procedures are not followed. NovaGold will develop an operating procedures manual and ensure that transportation contractors are trained in proper use of tarpaulins to guarantee their effectiveness. Arrow Transport, who presently hauls concentrate from Eskay Creek to the Port of Stewart, states that their tarp system is very effective. Additionally, the Galore Creek concentrate will be a filter cake rather than a dried product and therefore not particularly sensitive to dusting.	Develop an operating procedures manual for correct tarpaulin use and provide training for transportation contractors	EAO notes that NovaGold has committed to developing an operating procedures manual for correct tarpaulin use and provide training for transportation contractors if tarpaulins are used to cover concentrate trucks. NovaGold has also committed to participate with other industrial users of Highway 37 and government agencies to monitor the potential for metals contamination resulting from concentrate dusting along the highway.
19	Marlene Clarke Wrangell, Alaska September 7, 2006	Concentrate trucks and trailers will have tarpaulin or composite covers to reduce loss of concentrate due to dusting while underway. [Galore Creek EA, p. 5-148] Concentrate trucks should not use tarpaulins, which are notoriously "leaky". Hard-top covers should be used on concentrate trucks.	Concentrate transportation	Refer to comment 18	Refer to comment 18	See response to 18
20	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Water Quality: Truck Transport - Concentrate trucks and trailers will have tarpaulin or composite covers to reduce loss of concentrate due to dusting while underway. [Galore Creek EA, p. 5-148] Concentrate trucks should not use tarpaulins, which are notoriously "leaky". Hard-top covers should be used on concentrate trucks.	Concentrate transportation	Refer to comment 18	Refer to comment 18	See response to 18

21	Chris Zimmer US Coordinator Transboundary Watershed Alliance Vancouver, Whitehorse, Juneau September 8, 2006	II. Cumulative Effects - Proper cumulative effects analysis is critical to a complete environmental assessment. We were very disappointed that the assessment of the Tulsequah Chief project ignored the obvious potential for the access road to lead to significant additional industrial development. We urge the EAO to avoid this mistake in the analysis of this proposed Project. We have spoken to many people on both sides of the international border. We share their concerns with respect to the potential danger to downstream interests and the need for complete analysis of both the direct impacts from the proposed Project itself and the effects of any spin-off development fostered by the proposed Project and access road.	Cumulative effects	This is a government to government issue	Government to respond	CEA Agency notes that NovaGold's cumulative effects assessment meets federal requirements. In addition, NovaGold has committed to participate with the Crown and Tahltan Central Council to help expand collective knowledge of potential cumulative effects of resource development on all valued ecosystem components.
22	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Cumulative Mining Impacts and Mine Expansion: there are numerous mine proposals and mineral explorations in the Stikine River watershed. We are concerned that environmental assessment of these projects will be done in a "piecemeal" fashion that will fail to calculate the cumulative effects such developments will have on the water quality in the Stikine River.	Cumulative effects	This is a government to government issue	No action required	See response to 21
23	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	Cassiar Watch Society is based in Iskut and concerned about the wild salmon and wild rivers of northern BC, particularly the Iskut River tributary of the Stikine watershed. We are also concerned about the overall pace and scale of proposed mining and energy development in the Iskut region, and impacts upon our community due to a sadly lacking comprehensive regional infrastructure inquiry and planning process. We generally view the proposed Project, with access and infrastructure via the modified Northern Route to the Canadian port of Stewart, as the most independently comprehensive economic development opportunity for Tahltan communities, with many benefits to northwest BC mining service communities for the 2010-2030 time slot. While the NovaGold/Tahltan participation agreement was adopted hastily without wide Tahltan support (most Tahltan that use and occupy the land did not vote), when the proposed Project is viewed on a stand-alone basis for the 2010-2030 time period, it is a better project for the Tahltan than any of the other major energy and mining proposals that are out there attempting to go ahead on untreated Tahltan land. This proposed Project brings with it the beginning of the era of open pit copper mining on a grand scale within Tahltan territories. The power requirements alone boggle the mind when compared to the 1.5 megawatts needs of the whole community of Iskut. Bringing the North American centralized electrical power into Tahltan territory	Cumulative effects	The Galore Creek cumulative effects assessment followed the guidelines and requirements of the *Canadian Environmental Assessment Act* (CEAA). These guidelines require all adverse residual effects to be assessed and the level of significance of each to be determined. The selection of developments included in the EA for consideration of cumulative effects was guided by the Galore Creek Working Group, which includes Tahltan and Iskut representation. The assessment, as it appears in the Application, strictly follows CEAA requirements. The cumulative effects assessment of socio-economic issues highlighted that those effects would provide significant positive outcomes, especially in terms of opportunity and benefits to individuals, families and communities. The attainment of broad community support, and therefore a social license to operate, has been central to NovaGold's policies and activities including open house events in study communities as well as establishing a NovaGold office in Dease Lake. NovaGold have also signed a participation agreement with the Tahltan Nation to ensure social and environmental responsibility. Ratification of this agreement provides evidence of broad community support. The participation agreement has also been designed to work towards sustainability and an on-going legacy. This will assist the Tahltan in addressing many concerns regarding cumulative and on-going effects, such as boom and bust cycles.	CEAA to respond	See response to 21

		will change the economics of doing business across a wide range of industrial applications previously bound to the southern half of BC and north to Stewart. The vast region behind the Alaska panhandle becomes within the vision of lesser projects to follow when permitted to exist in a pre-treaty environment within Tahltan and other northern First Nation territories. The cumulative effects chapter (Chapter 9) begins to touch upon the scope of potential industrial enterprise under active investigation in 2006, with an eye to the 2010-2030 planning horizon for a typical 20-year mining or energy extraction project. Together the potential combined effects upon Tahltan culture, health, life style and environmental underpinning to traditional uses is huge. Some would say these impacts are all manageable given our know-how, while others would recognize the proposed pace and scale of development as a boom and bust scenario. Certainly it is beyond the scope of this cumulative effects assessment to consider the impacts of future projects that piggyback upon the infrastructure provided by the proposed Project. It is the firm belief of Cassiar Watch, and that of many wise indigenous elders that use and occupy the land, that a company proposing such widespread change as the proposed Project represents, must earn a certain social license to proceed with the good will of the host culture and community. What is the system of containment that will control the reaction started by the proposed Project approval process? Do NovaGold, its consultants, contractors and government counterparts bear a social responsibility to balance the overall regional implications, as the bringer of monumental change to the region?		Decisions regarding other developments and proposed projects in the study area are outside the scope of the EA. These are subjects for government to government discussions.		
24	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	Access recommendations from the 2000 Cassiar Iskut-Stikine Land and Resource Management Plan (LRMP) were to steer mining economic development into the Canadian economy and Canadian infrastructure (see CIS LRMP economic development strategies). The preferred access alternative is presented as the modified northern route out to Hwy 37. However, the cumulative effects section indicates that at a later date, industrial traffic could be heavy if other non-renewable resource extraction projects are provided infrastructure to proceed to development during the same timeframe.	Cumulative effects	Refer to comment 23	Refer to comment 23	See response to 21

25	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	The cumulative impact assessment is inadequate. The cumulative effects assessment did not look at the summation of the currently proposed infrastructure projects in the Iskut region and wider Tahltan territories. It is the infrastructure projects which bring on secondary environmental and social impacts across the region. Too much industrial infrastructure capacity drains resources best left for future generations and reduces society's ability to pay the ongoing maintenance of such infrastructure, such as miles and miles of remote road infrastructure in the north. Non-renewable resource extraction from the Tahltan/Gitxsan and surrounding territories are obviously not sustainable over the fullness of time if these projects proceed concurrently. We have seen the near term dislocation of the forest economy in northwestern BC by unsustainable timber extraction policies. Sustainable mining is an oxymoron, as mining results in a hole in the ground. One mine at a time is sustainable use of dedicated regional industrial infrastructure. We do not need to extract the Iskut region's minerals and petroleum resources concurrently, nor super-size the Iskut region industrial infrastructure for a boom and a bust. One major extraction project at a time sets a long-term vision for the community and region of Iskut for current and future generations. It makes sense for the Galore Creek/Shaft Creek area to be considered as a planning unit for one mine and then the other in order to extend the life of the infrastructure and contribution to the regional economy over time. Iskut people could live with deferring the development east of the Stewart Cassiar Highway for at least fifty years to protect high value wildlife corridors and traditional uses. A transmission line north of Bob Quinn is not wanted or needed by Iskut people.	Cumulative effects	Refer to comment 23	Refer to comment 23	See comment to 21
26	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	Again, we reserve the right to supplement these comments further. Thank you for your full attention and further consultation on these important matters.	EA process	Comment noted	None required	Comment noted

27	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	The public comment period was inadequate: We respectfully request an extension of the public review period until September 22nd, 2006. The environmental assessment (EA) documents are voluminous and present an extraordinary amount of technical material. The comment period was scheduled during the busiest part of the year when Iskut families are out fishing, hunting, guiding and camping on the land. We have not had adequate time to review, absorb and comment on the many important issues presented in the EA Application for the proposed Project. Related economic feasibility studies have not been circulated, nor have effluent standards and designs been finalized.	EA process	To be addressed by the EAO	To be addressed by the EAO	The length of the public comment period for the review of the Application was set out in an order issued by the EAO under section 11 of the *Environmental Assessment Act*. EAO considered request to extend the public comment period on the EA Application and decided no to extend the public comment period as representatives of the Tahltan Central Council, Iskut First Nation and Tahltan Band Council are participating on the Technical Working Group.
28	Bill Hesse General Manager Northern Thunderbird Air Inc. Smithers, Prince George, Vancouver, Mackenzie August 28, 2006	Letter of support	General support	No response required	No action required	Comment noted
29	C. Al McCreary President Hudson Bay Lodge Smithers, BC August 30, 2006	Letter of support	General support	No response required	No action required	Comment noted
30	Charles Northrup Partner Calderwood Realty Smithers, BC August 28, 2006	Letter of support	General support	No response required	No action required	Comment noted
31	Douglas McCrea President Central Mountain Air Ltd. Smithers, BC August 29, 2006	Letter of support	General support	No response required	No action required	Comment noted
32	Erica West Smithers, BC July 11, 2006 - Open House	The proposed Project sounds exciting. I believe the project will succeed and become prosperous. All studies have been closely examined.	General support	No response required	No action required	Comment noted
33	Glenn Bandstra President Frontier Chrysler Ltd. Smithers, BC September 6, 2006	I have lived in northern BC my whole life and welcome the new industry and business from responsible companies such as NovaGold. NovaGold's commitment to the community and the environment has been exemplary since their involvement in the proposed Project.	General support	No response required	No action required	Comment noted

34	Ian Richeits General Manager Bulkley Valley Wholesale Smithers, BC August 28, 2006	Letter of support	General support	No response required	No action required	Comment noted
35	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	We generally view the proposed Project, with access and infrastructure via the modified northern route to the Canadian port of Stewart, as the most independently comprehensive economic development opportunity for Tahltan communities, with many benefits to northwest BC mining service communities for the 2010-2030 time slot. While the NovaGold/Tahltan participation agreement was adopted hastily without wide Tahltan support (most Tahltan that use and occupy the land did not vote), when the project is viewed on a stand alone basis for the 2010-2030 time period, it is a better project for Tahltan than any of the other major energy and mining proposals that are out there attempting to go ahead on untreated on Tahltan land.	General support	No response required	No action required	Comment noted
36	John Brown President Trails North Holdings Ltd. Smithers, BC August 29, 2006	Letter of support	General support	No response required	No action required	Comment noted
37	Laird Ongman President Three Peaks Enterprises Ltd. Smithers, BC September 9, 2006	Letter of support	General support	No response required	No action required	Comment noted
38	Mark McKay President Northern Metals Fabricating and Machining Ltd. Smithers, BC August 31, 2006	Letter of support	General support	No response required	No action required	Comment noted
39	Michael Mehr Certified Accountant Edmison Mehr Chartered Accountants Smithers, BC August 30, 2006	Letter of support	General support	No response required	No action required	Comment noted

40	Phil Bandstra Bandstra Transportation Systems Ltd. Smithers, BC August 29, 2006	We write in support of the Project proposed by NovaGold We believe that the construction and development of a new mine in northwestern BC is essential to the continued economic well-being of this part of the Province, particularly with the cessation of the operations of Barrick Gold's Eskay Creek in 2007. We do not pretend to have the necessary sills to review and assess the extensive materials filed by NovaGold in support of the proposed Project; but are confident that with appropriate checks and balances in place, the proposed Project can be developed in a responsible manner. We trust that your office will ensure that those checks and balances are put in place; but encourage you to do so promptly and efficiently to ensure that northwestern BC does not miss out on the current mineral cycle. In short, we would like to express our support for the certification of the proposed Project.	General support	No response required	No action required	Comment noted
41	Robi McKnight Fireweed Motor Inn Smithers, BC August 29, 2006	Letter of support	General support	No response required	No action required	Comment noted
42	Sandra Hinchlitte Secretary Steelhead Excavating Ltd. Smithers, BC August 29, 2006	Letter of support	General support	No response required	No action required	Comment noted
43	Wayne Lillies Purchasing Smithers Lumber Yard Ltd. Smithers, BC August 29, 2006	Letter of support	General support	No response required	No action required	Comment noted
44	Gary E. Lockwood Salem, Oregon July 12, 2006 - Stewart Open House	Very professional and thorough presentation by all presenters.	General support	No action required		Comment noted
45	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	Volume 3 Final Report (Section 8.5.4.3) Access road and discharge location is significantly close to the Iskut River Hot Springs Protected Area, managed by BC Parks.	Iskut River Hot Springs - Land Use Planning	NovaGold conducted noise and visual modeling to assess potential effects of the filter plant on Hot Springs Provincial Park.	NovaGold will construct a pull-out on the access road in front of the filter plant	EAO notes the Cassiar Iskut-Stikine Land and Resource Management Plan requires opportunities for the public be maintained. NovaGold has committed to provide a pull-out for visitor traffic near the filter plant so opportunities for the public to the park are maintained.

46	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	Volume 3 Final Report (Section 8.5.4.3) If discharge is allowed to proceed to development, (which Cassiar Watch recommends against), then mitigation to obtain the social license to discharge to the Iskut River needs to be negotiated with the affected stakeholders and on a government to government basis with the Iskut people and their leadership. An effluent pipe discharging upstream of a major fish bearing river in Tahltan territory requires a level of consultation and accommodation specific to future use and occupation of that section of river. The use and enjoyment of the Iskut River Hot Springs and the recreational river running attributes of this scenic section of the Iskut River, combined with access to a put-in site and a take-out site along the Eskay Mine road, makes for some interesting opportunities for community-based economic development.	Iskut River Hot Springs - Land Use Planning	During the Application review, NovaGold provided additional information to the Technical Working Group on the diffuser design.	NovaGold will conduct environmental monitoring (collection and analysis of water, sediment and biota) combined with chronic and acute toxicity testing of the receiving waters) throughout the life of the mine to ensure that downstream environments are not impacted by effluent discharged from the Project.	EAO notes that NovaGold has also committed to: modify the filter plant water treatment process if adverse effects are noted; work with Fisheries and Oceans Canada and use best management practices during the installation, operation and maintenance of the diffuser; and work with Fisheries and Oceans Canada and the Tahltan Central Councill, to ensure the design of the diffuser minimizes potential impacts on fisheries resources and waterborne traffic.
47	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	Section 8.6.3. Cassiar-Iskut-Stikine (CIS) LRMP considerations describe Iskut River Hot Springs as a public use area, while filter plant plans refer to closing public access to this existing forestry road.	Iskut Hot Springs - access	The existing Devil Creek FSR will be gated at kilometre 8.3, the proposed location of the filter plant. NovaGold has discussed this access restriction with regulators and it has been agreed that NovaGold will locate a pull out area just before the filter plant. This area will provide safe parking for those visiting the hot springs. Additionally, as per the Participation Agreement, NovaGold and the Tahltan Nation will jointly develop procedures and protocols relating to the use of the access road	Develop pull out area for safe parking just before the filter plant; develop Access Road Protocol	See response to 45
48	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	NovaGold and the wider mining community should support a lasting conservation land use designation for the lower Iskut/Stikine River. Cassiar Watch Society, many resident Tahltan traditional users, river rat, fishers, hunters and recreationalists have been long time advocates for protection of the Craig River headwaters, Lower Iskut River and Lower Stikine Rive, for their contiguous high quality grizzly/salmon values and unroaded, unlogged rainforests. Such a designation would balance the long-term exploration and development of the huge mineralized landbase between the main stem Stikine and the main stem Iskut Rivers. Such development could extend use of proposed Project infrastructure to Shaft Creek for example, within this sizeable mining district.	Land use planning	Comment noted	No action required	The Province in consultation with the public, First Nations and government agencies, undertakes land use planning. The Cassiar Stikine-Iskut LRMP sets out the management direction for the area as well as strategies and objectives relating to protected areas and specific management areas, including the Lower Stikine-Iskut Coastal Grizzly/Salmon Zone.

49	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	We request that NovaGold be very clear in 2007 regarding what their intentions are over the fullness of time, vis a vis support for river and riparian conservation in the lower watersheds. We therefore request that NovaGold publicly support a lasting conservation designation for the lower Iskut/Stikine Grizzly/Salmon management zone that will assure maintenance of the roadless area status of the lower rivers rainforest and extensive riparian habitats. Such support from NovaGold would give the proposed Project a much broader social license to the energy intensive activity of extracting copper resources in the 2010 to 2030 time slot.	Land use planning	Refer to comment 48	Refer to comment 48	See response for 48
50	Chris Zimmer US Coordinator Transboundary Watershed Alliance Vancouver, Whitehorse, Juneau September 8, 2006	VII. Mine Size NovaGold used rather conservative mineral price estimates for its costing: a copper price of US$0.90/lb, a gold price of US$375/oz and a silver price of US$5.50/oz. This suggests that the mine might actually be twice as large as now proposed. The implications of this Project on both tailings and waste rock storage, and pit size, are not discussed in the EA. If there is a potential for the Project to be larger than discussed in the EA, the EA should specifically analyze the implication of this and develop methods to ensure the largest Project does not have harmful effects on fish, wildlife and water quality.	Mine expansion	Any significant modification to the project description as described in the EA (for example, as a result of increased reserves), would require an amendment to the EA certificate of the Project or perhaps another EA.	No action required	Comment noted
51	Craig Olson Petersburg, Alaska September 7, 2006	NovaGold used rather conservative mineral price estimates for its costing: a copper price of US$0.90/lb, a gold price of US$375/oz and a silver price of US$5.50/oz. Mineral prices are approximately double those quoted at present. This suggests that the mine might actually be twice as large as now proposed. The implications of this Project on both tailings, waste rock storage and pit size are not discussed in the EA.	Mine expansion	Refer to comment 50	Refer to comment 50	Comment noted
52	Marlene Clarke Wrangell, Alaska September 7, 2006	NovaGold used rather conservative mineral price estimates for its costing: a copper price of US$0.90/lb, a gold price of US$375/oz and a silver price of US$5.50/oz. Mineral prices are approximately double those quoted at present. This suggests that the mine might actually be twice as large as now proposed. The implications of this Project on both tailings, waste rock storage and pit size are not discussed in the EA.	Mine expansion	Refer to comment 50	Refer to comment 50	Comment noted

53	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Cumulative Mining Impacts and Mine Expansion: NovaGold used rather conservative mineral price estimates for its costing: a copper price of US$0.90/lb, a gold price of US$375/oz and a silver price of US$5.50/oz. Mineral prices are approximately double those quoted at present. This suggests that the mine might actually be twice as large as now proposed. The implications of this Project on both tailings, waste rock storage and pit size, are not discussed in the EA	Mine expansion	Refer to comment 50	Refer to comment 50	Comment noted
54	Stan Tomandl & Ann Jacob Chair & Treasurer Friends of the Stikine Society Victoria, BC September 8, 2006	NovaGold calculated mine life and size using very conservative mineral price estimates: copper at US$0.90/lb, gold at US$375/oz and silver at US$5.50/oz. Mineral prices doubled with increasing demand, especially from Asia, and promise to stay higher than the above estimates. This suggests that the mine might actually be twice as large as now proposed due to mining ore bodies not considered in their proposal and mining might go on for much longer than estimated. The implications of this prospect on both tailings and waste rock storage, pit size and monitoring are not discussed in the EA.	Mine expansion	Refer to comment 50	Refer to comment 50	Comment noted
55	Kenneth Duckett Executive Director United Southeast Alaska Gillnetters Ketchikan, Alaska August 27, 2006	The Application for the proposed Project indicates in a number of places that there will be continuing monitoring of the Project during construction, operation and decommissioning. We would like to see a section in the Application or an addendum to it that summarizes exactly what the monitoring program will consist of, such as: what will be monitored, on what schedule, done by whom, evaluated by whom, and what actions will be taken if such monitoring reveals a problem with the design or operation of the Project.	Monitoring - water quality	Detailed monitoring programs will be a condition of permits; several detailed monitoring schedules are provided in the EA (e.g., Table 10.6-1 Aquatic Effects Monitoring Program) and it is anticipated that permits will include conditions for additional monitoring	Conduct monitoring as described in the EA and to comply with permit conditions for monitoring	EAO notes that NovaGold has committed to continue conducting environmental monitoring (collection and analysis of water, sediment, and biota, combined with chronic and acute toxicity testing of the receiving waters) throughout the life of the mine to ensure that downstream environments are not impacted by effluent discharged from the Project. NovaGold will also provide annual reports and raw data from monitoring to appropriate Canadian and U.S. federal, B.C. and Alaska State agencies and the Tahltan Central Council.

56	Marlene Clarke Wrangell, Alaska September 7, 2006	Ongoing monitoring needs to be done on all ore and marginal ore stockpiles throughout the mine life and afterwards to determine if contaminants are being released.	Monitoring	During operations, drainage from the ore and marginal ore stockpiles will not flow into the receiving environment. It will be diverted to, and stored, in the tailings and waste rock storage facility. Water from the tailings and waste rock storage facility will be discharged according to a discharge schedule (mid-May to mid-October) and in a fashion that will meet receiving water criteria and permit levels. Ongoing monitoring will confirm that water discharged meets water quality criteria as defined by the MMER under the *Fisheries Act* and the regulatory and permit conditions. NovaGold is committed to maintaining the quality of downstream receiving environment water quality as stated in "Contingency for Non-Compliant Effluent" (Chapter 8, Environmental Management and Mitigation Measures, page 8-67). Once the mine is closed, the ore and marginal ore stockpiles will cease to exist as they will have already been processed in the mill, i.e. valuable ore minerals extracted and residual tailings produced. There will be a contingency plan for any marginal ore that may not be processed, such as submergence under water in the tailings and waste rock storage facility.	Monitoring	See response for 55
57	Stan Tomandl & Ann Jacob Chair & Treasurer Friends of the Stikine Society Victoria, BC September 8, 2006	Ongoing monitoring needs to be done on all ore and marginal ore stockpiles throughout the mine life to determine if contaminants are being released.	Monitoring	Refer to comment 56	Refer to comment 56	See response for 55
58	Craig Olson Petersburg, Alaska September 7, 2006	Ongoing monitoring needs to be done on all ore and marginal ore stockpiles throughout the mine life and afterwards to determine if contaminants are being released.	Monitoring	Refer to comment 56	Refer to comment 56	See response for 55
59	Chris Zimmer US Coordinator Transboundary Watershed Alliance Vancouver, Whitehorse, Juneau September 8, 2006	III. Waste Handling, Treatment and Disposal D. Ore Stockpiles Ongoing monitoring needs to be done on all ore and marginal ore stockpiles throughout the mine life and afterwards to determine if pollution is occurring.	Monitoring	Refer to comment 56	Refer to comment 56	See response for 55
60	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Monitoring and Toxicity Tests: ongoing monitoring needs to be done on all ore and marginal ore stockpiles throughout the mine life and afterwards to determine if contaminants are being released.	Monitoring	Refer to comment 56	Refer to comment 56	See response for 55

61	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Monitoring and Toxicity Tests: the only monitoring location on the Stikine River is an area with high flow, likely an erosional environment. This is an inadequate location to determine if metals and other pollutants are accumulating in depositional areas. We would like to see more monitoring locations on the Stikine River and better placement of monitoring sites.	Monitoring - aquatics	Aquatic baseline studies of water, sediment, primary and secondary production, and fish communities have been conducted at several sites along the Stikine River extending from above the confluence of Galore Creek with the Scud River to Alaskan waters. These studies provide a background assessment of environmental conditions in the Stikine River and will be used to monitor any potential changes to the Stikine River related to development of the Project. However, any change to water quality or biological communities would first manifest upstream, closer to the mine site in the Galore and Scud watersheds long before changes would be expected to occur in the Stikine River 30 km downstream. NovaGold is firmly committed to environmental monitoring throughout the life of the mine, and would respond promptly to any detected changes. Furthermore, modelling of the tailings impoundment discharge, and resulting receiving environment concentrations of metals and other constituents, predict that there will be no impacts to the Stikine River water and sediment quality.	In consultation with both American and Canadian regulators, the aquatics studies for the Galore Creek project were designed to characterize and assess potential changes to downstream water quality and biota. Monitoring of water, sediment, and biota, combined with chronic and acute toxicity testing of the receiving waters, will continue throughout the life of the mine to ensure that downstream environments are not impacted by effluent discharged from the Project.	EAO notes that NovaGold has committed to adding an additional monitoring site downstream on the Stikine River in Alaska at a depositional site to be determined during the permitting stage.
62	Chris Zimmer US Coordinator Transboundary Watershed Alliance Vancouver, Whitehorse, Juneau September 8, 2006	V. Mine Closure The post-closure monitoring program will be designed to continue the sampling of seeps monitored during operations. Monitoring will be relatively infrequent, possibly every five years, immediately after mine closure. Monitoring once every five years, especially after mine closure, will not be adequate to detect problems in time to devise and implement effective remediation measures. A detailed post-monitoring plan should be devised that adequately outlines the monitoring requirements to detect environmental and structure-related maintenance issues and the budget needed to support these activities should be incorporated into post-closure funding.	Monitoring - post-closure	During operations, an Operation, Maintenance and Surveillance (OMS) plan will be developed in accordance with the Canadian Dam Association guidelines. This plan will outline plans for surveillance, maintenance and monitoring of the dam during operations, which include: • Daily visual inspections/monitoring by dam operators • Monthly water quality sampling of seepage areas from main tailings dam, surface water in the open water diversion systems and surface water in the tailings and waste rock impoundment • Annual safety inspections, to be conducted by a qualified Professional Engineer • Safety inspections following severe events such as flooding, windstorms, severe icing, extreme rainfall, seismic events, etc., to assess structural stability • Safety reviews by a qualified Professional Engineer every 5 years during construction of the main tailings dam and up to every 15 years after it is completed Details of these inspections are outlined in Section 8.4.3.2 of the Application. As a part of the closure program, a separate OMS manual will be developed for the dam. The closure plan must be reviewed and approved by geotechnical engineers from the Ministry of Energy, Mines and Petroleum Resources. During post-closure, the structural integrity of the main tailings dam and auxiliary facilities such as the operating spillway and seepage collection system will be inspected annually and maintained regularly (Section 14.4.1.4). Seepage from the dam will also be monitored during post-closure. The sampling frequency during post-closure will be established in conjunction with government agencies.	Conduct annual dam inspections and regular dam maintenance post-closure; monitor and sample dam seepage post-closure at a frequency established by the government	See response for 55

Comment [B1]: Anne, did NG recently agree to add an additional monitoring site?

63	Craig Olson Petersburg, Alaska September 7, 2006	The post-closure monitoring program will be designed to continue the sampling of seeps monitored during operations. Monitoring will be relatively infrequent, possibly every five years, immediately after mine closure. Monitoring once every five years, especially after mine closure, will not be adequate to detect problems in time to devise and implement effective remediation measures. A detailed post-monitoring plan should be devised that adequately outlines the monitoring requirements to detect environmental and structure-related maintenance issues and the budget needed to support these activities should be incorporated onto post-closure funding.	Monitoring - post-closure	Refer to comment 62	Refer to comment 62	See response for 55
64	Marlene Clarke Wrangell, Alaska September 7, 2006	The post-closure monitoring program will be designed to continue the sampling of seeps monitored during operations. Monitoring will be relatively infrequent, possibly every five years, immediately after mine closure. Monitoring once every five years, especially after mine closure, will not be adequate to detect problems in time to devise and implement effective remediation measures. A detailed post-monitoring plan should be devised that adequately outlines the monitoring requirements to detect environmental and structure--related maintenance issues and the budget needed to support these activities should be incorporated into post-closure funding.	Monitoring - post-closure	Refer to comment 62	Refer to comment 62	See response for 55
65	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Monitoring and Toxicity Tests: further post-closure monitoring programs will be designed to continue the sampling of seeps monitored during operations. Monitoring will be relatively infrequent, possibly every five years, immediately after mine closure. Monitoring once every five years, especially after mine closure, will not be adequate to detect problems in time to devise and implement effective remediation measures. A detailed post-monitoring plan should be devised that adequately outlines the monitoring requirements to detect environmental and structure-related maintenance issues and the budget needed to support these activities should be incorporated into post-closure funding.	Monitoring - post-closure	Refer to comment 62	Refer to comment 62	See response for 55

66	Stan Tomandl & Ann Jacob Chair & Treasurer Friends of the Stikine Society Victoria, BC September 8, 2006	Benefits accrued to NovaGold shareholders need to be matched by a provision for long-term protection of the environment and fisheries. Proposed monitoring will be relatively infrequent, possibly every five years, immediately after mine closure. There have been too many tailings ponds failures all over the world. Monitoring once every five years, especially after mine closure, will not be adequate to detect problems in time to devise and implement effective remediation measures. A detailed post-monitoring plan should be devised that adequately outlines the monitoring requirements to detect environmental and structure related maintenance issues and the budget needed to support these activities should be incorporated into post-closure funding. We propose monitoring every six months in perpetuity.	Monitoring - post-closure	Refer to comment 62	Refer to comment 62	See response for 55
67	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	Discharging effluent to the Iskut River: suggest full study and implementation of return pipeline to the mill rather than discharge to the river. We are opposed to dumping the water from the slurry pipeline into the Iskut River. Many of the watersheds that were studied in the EA have naturally occurring elevated metals levels. Adding additional pollutants will stress fish and wildlife populations that the local residents rely on for food. We are opposed to any mixing zone in the Iskut, Scud or Galore watershed. We request that all water from the slurry pipeline be sent back to the mine site for re-use or treated to background levels before disposal by mixing this effluent into the Iskut River.	Pipeline - slurry	The development of a return pipeline to the mine site to carry the treated water from the filter plant is not a good use of resources, no only due to the estimated cost of $30M, but also due to the additional energy requirements to operate; the water that will be discharged from the filter plant into the Iskut River will be treated to meet the MMER; refer to comment 96 for a discussion on characterization of impacts relating to effluent discharge to the Iskut River from the filter plant given the worst case scenario; NovaGold is committed to maintaining the quality of downstream receiving environment water quality as stated in “Contingency for Non-Compliant Effluent” (Chapter 8, Environmental Management and Mitigation Measures, page 8-67).	Ongoing monitoring will confirm that water discharged meets water quality criteria as defined by the MMER under the *Fisheries Act* and the regulatory and permit conditions.	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
68	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	Volume 3 - Final Report (Section 8.5.4.3) The cost of a return pipeline relative to overall Project cost is small and would greatly improve the social license to operate the mine. No design details of this alternative are provided.	Pipeline - slurry	Refer to comment 67	Refer to comment 67	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
69	Chris Zimmer US Coordinator Transboundary Watershed Alliance Vancouver, Whitehorse, Juneau September 8, 2006	IV. Slurry Pipeline and Transportation A rupture of the slurry pipeline at a stream crossing could result in the discharge of the equivalent of many truckloads of concentrate into the environment. Unlike dried concentrate, the slurry concentrate would be highly mobile. The potential of spills and spill size must be assessed and measures developed to prevent spills from harming water quality and aquatic life.	Pipeline - slurry, spill response	Industry experience has demonstrated that the transportation of liquids through pipelines is a safer alternative than overland transportation, from both an environmental and human perspective, thereby greatly reducing the likelihood of spills from a buried pipeline when compared to trucking (estimated to be 20-50 trucks per day one-way); Section 5.7 (Spill Avoidance) discusses pipeline design with respect to avoiding identified geohazards; provisions for managing spills will be put in place that include double lined pipes at bridge crossings, monitoring system and emergency shut-off valves, remotely operated emergency drain and reservoir, placed at the lowest point in the pipeline, to drain and contain the maximum content of the pipeline in the event of a rupture; development of a Spill Response Plan prior to pipeline operation and as a permit condition; persons trained in spill response on site at all times.	Develop Spill Response Plan and provide training in spill response	NovaGold has committed to equipping the pipelines with leak detection systems to permit rapid detection and response to leaks or ruptures due to erosion of the pipe or damage from external sources such as debris flows. NovaGold will also provide shutdown procedures, shutoff valves, a spill response plan and an emergency drainage sump at the low point of the slurry pipeline alignment to minimize the extent and consequence of any spillage from the pipeline following a breach to the line.

70	Craig Olson Petersburg, Alaska September 7, 2006	A rupture of the slurry pipeline at a stream crossing could result in the discharge of the equivalent of many truckloads of concentrate into the environment. The possible spill size needs to be assessed along with adequate preparation for spill response (personal training, containment, impact assessment and clean-up). Unlike dried concentrate, the slurry concentrate would be highly mobile. In this particular location, with avalanche danger and rock slides, the slurry pipeline could actually pose more potential environmental danger than trucking the concentrate in hard-topped trucks.	Pipeline - slurry, spill response	Refer to comment 69	Refer to comment 69	See response for 69
71	Marlene Clarke Wrangell, Alaska September 7, 2006	A rupture of the slurry pipeline at a stream crossing could result in the discharge of the equivalent of many truckloads of concentrate into the environment. The possible spill size needs to be assessed along with adequate preparation for spill response (personal training, containment, impact assessment and clean-up). Unlike dried concentrate, the slurry concentrate would be highly mobile. In this particular location, with avalanche danger and rock slides, the slurry pipeline could actually pose more potential environmental danger than trucking the concentrate in hard-topped trucks.	Pipeline - slurry, spill response	Refer to comment 69	Refer to comment 69	See response for 69
72	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Water Quality - slurry pipeline: a rupture of the slurry pipeline at a stream crossing could result in the discharge of the equivalent of many truckloads of concentrate into the environment. The possible spill size needs to be assessed along with adequate preparation for spill response (personal training, containment, impact assessment and clean-up). Unlike dried concentrate, the slurry concentrate would be highly mobile. In this particular location, with avalanche danger and rock slides, the slurry pipeline could actually pose more potential environmental danger than trucking the concentrate in hard-topped trucks.	Pipeline - slurry, spill response	Refer to comment 69	Refer to comment 69	See response for 69
73	Stan Tomandl & Ann Jacob Chair & Treasurer Friends of the Stikine Society Victoria, BC September 8, 2006	Possible pipeline spills needs to be assessed along with preparation for spill response: personnel training, containment, impact assessment and clean-up. With avalanche and rock slide danger, the slurry pipeline could pose more potential environmental danger than trucking the concentrate in hard-topped trucks.	Pipeline - slurry, spill response	Refer to comment 69	Refer to comment 69	See response for 69

74	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	Plans for hydropower development need to be fully revealed. Access to power is the kingpin for many other proposed development projects in the Stikine watershed and surrounding area. The method and location of power generation for this Project could greatly impact fishery resources and conservation areas set out in the LRMP. Some power options discussed could have significant impacts to the Lower Iskut/Stikine Grizzly/Salmon Management Zone's roadless area and open the area to more industrial development. Many proposals for power generation have been discussed for the Stikine region recently. NovaGold's cumulative impact assessment has not addressed how power infrastructure for this Project will affect power generation and transmission line capacity in the region. This needs to be thoroughly discussed through publicly available reports and forums in a timely manner, along with other proposed regional industrial development infrastructure. Overbuilding infrastructure for this Project puts our Iskut community vision at risk to unwanted concurrent development closer to home.	Power	As outlined in Section 5.13.7 of the Application, the development of the Project is based on power being available near Bob Quinn Lake to service the Galore Creek Mine. At Bob Quinn an interconnection substation will be constructed that will transfer the power to the Galore Creek 138 kV transmission system which will deliver it to the mine site. Power will be purchased under a contract with BC Hydro to service the Project. In August of 2006, NovaGold acquired Coast Mountain Power Corp., which was developing the Forrest Kerr Hydroelectric Project located on the lower Iskut River as well as the necessary infrastructure to link to the hydroelectric site to the closest BC Hydro interconnection point at Meziadin Junction. It should be noted that power generated at the Forrest Kerr site has been pre-sold to BC Hydro under a long-term energy contract. Coast Mountain is now held as an independent Company of NovaGold, and by utilizing its expertise in project construction and financing, NovaGold plans to construct the Forrest Kerr Project independent of the Galore Creek Mine and meet the timeline requirements stipulated in Forrest Kerr Project's contract with BC Hydro. By ensuring the development of the Forrest Kerr Project, NovaGold is providing a much needed green –renewable energy source for the Province, which will help to offset the power shortage BC Hydro is currently facing.	None required	Comment noted
75	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	What is NovaGold's real plan relative to hydro development? Are you attempting to acquire the transmission line EA approval, right of way, and potential BC Hydro operating system modifications which would meet the Project's energy demands? Actual construction of the hydro site on the Iskut River main stem could then become the secondary asset, not altogether required for the Project to proceed on schedule. Please fully explain your plans.	Power	Refer to comment 74	Refer to comment 74	Comment noted
76	S. Ross Rettie Director, Professional Practices and Ethics Association of Professional Engineers and Geoscientist of BC Burnaby, BC August 15, 2006	My comment is positive in nature and is to advise the EAO that NovaGold and their coordinating technical consultant/report authors, Rescan Environmental Services Ltd., have been extremely responsive in ensuring that the Project application is fully compliant with the *Engineers and Geoscientists Act*, concerning the requirements that each contributing professional engineer and professional geoscientist identify the areas of the report that each is responsible for, complete with the application of their professional seal/stamp, date and signature.	Professional conduct	No response required	No action required	Comment noted

77	Craig Olson Petersburg, Alaska September 7, 2006	It is good that topsoil is to be salvaged in two lifts (root zone and then lesser developed materials below it). However, the mine should salvage two lifts of material from all areas disturbed by mining. Section 5.5.7 excludes numerous large areas and no area should be excluded from soil salvage. Plant re-establishment is greatly improved by increased depths of soil and sub-soil. Nurse-crops should be established on all topsoil storage piles to protect the piles from erosion and compaction and improve biotic potential when replaced. This will increase the available material for redistribution described in Section 14.3.3.	Reclamation	Soil will be salvaged from all areas disturbed during the mining operation except the tailings pond. It is estimated that salvage from these areas will result in a net positive balance of topsoil (Section 14.3.3.3). Use of topsoil in reclamation will contribute toward establishing self-sustaining revegetation. The topsoil stockpiles will be revegetated with appropriate plant species to prevent erosion (Section 14.3.2.2).	Salvage and stockpile topsoil for use in reclamation; protect topsoil stockpiles through revegetation and other practices as described in the Application	Comment noted
78	Craig Olson Petersburg, Alaska September 7, 2006	The proposal to use "just enough organic matter to allow native seed propagation" (8.2.2.5) on waste rock piles is insufficient. Maximum available soils and organics should be calculated based on available materials and depth thereby maximized. The documents mention "excavated surface soils, organic matter" in numerous places but it is only in Section 6.12.3.6 that organic forest soils (organics and A and B horizons) are salvaged. It is unclear whether the volumes will be sufficient for intended placement and whether or not the salvaged materials will be of suitable pH (forest soils and organics are often acidic, which may inhibit plant growth).	Reclamation	It is estimated that a net positive balance of topsoil will be salvaged for use in reclamation / revegetation (Section 14.3.3.3). If required, soil amendments will be added to correct soil fertility deficiencies (Section 14.3.6.1).	Salvage and stockpile topsoil for use in reclamation; through assessment of reclamation, determine if soil amendments will be required.	Comment noted
79	Marlene Clarke Wrangell, Alaska September 7, 2006	The proposal to use "just enough organic matter to allow native seed propagation" (Section 8.2.2.5) on waste rock piles is insufficient. Maximum available soils and organics should be calculated based on available materials and depth thereby maximized. The documents mention "excavated surface soils, organic matter" in numerous places but it is only in Section 6.12.3.6 that organic forest soils (organics and A and B horizons) are salvaged. It is unclear whether the volumes will be sufficient for intended placement and whether or not the salvaged materials will be of suitable pH (forest soils and organics are often acidic, which may inhibit plant growth).	Reclamation	Refer to comment 78	Refer to comment 78	Comment noted

80	Stan Tomandl & Ann Jacob Chair & Treasurer Friends of the Stikine Society Victoria, BC September 8, 2006	Soil salvage: Section 5.5.7 excludes numerous large areas and no area should be excluded from soil salvage. Plant re-establishment is greatly improved by increased depths of soil and subsoil. Native plant nurse crops should be established on all topsoil storage piles to protect the piles from erosion and compaction and improve biotic potential when replaced. The proposal to use "just enough organic matter to allow native seed propagation" (Section 8.2.2.5) on waste rock piles is insufficient. Maximum available soils and organics should be calculated based on available materials and depth thereby maximized. The documents mention "excavated surface soils, organic matter" in numerous places but it is only in Section 6.12.3.6 that organic forest soils (organics and A and B horizons) are salvaged. It is unclear whether the volumes will be sufficient for intended placement and whether or not the salvaged materials will be of suitable pH Forest soils and organics are often acidic, which may inhibit pioneer plant growth.	Reclamation	Refer to comments 77 and 78	Refer to comments 77 and 78	Comment noted
81	Marlene Clarke Wrangell, Alaska September 7, 2006	It is good that topsoil is to be salvaged in two lifts (root zone and then lesser developed materials below it). However, the mine should salvage two lifts of material from all areas disturbed by mining. Section 5.5.7 excludes numerous large areas and no area should be excluded from soil salvage. Plant re-establishment is greatly improved by increased depths of soil and sub-soil. Nurse-crops should be established on all topsoil storage piles to protect the piles from erosion and compaction and improve biotic potential when replaced. This will increase the available material for redistribution described in Section 14.3.3.	Reclamation	Refer to comments 77 and 78	Refer to comments 77 and 78	Comment noted

82	Chris Zimmer US Coordinator Transboundary Watershed Alliance Vancouver, Whitehorse, Juneau September 8, 2006	III. Waste Handling, Treatment and Disposal C. Tailings Dam The dam is currently designed to contain the 1 in 200 wet year discharge volume. Overflow the dam would release contaminated water into the environment via the emergency spillway. For this reason, the dam and impoundment should be designed to hold water generated by the Probable Maximum Flood plus residual snowmelt.	Tailings dam - design	The Probable Maximum Flood (PMF) is a hydrological concept that is used for dam safety design. It is assumed to be the most extreme flood event that could be produced within a watershed and is often considered to be an event with a 1 in 10,000 year or higher probability of occurrence. A dam needs to be able to pass the PMF through a spillway without overtopping of the dam and the main tailings dam in Galore Creek will be designed with such a spillway. The PMF, with its associated low probability of occurrence, is used for dam safety design due to the large consequences of a dam failure. It is not a suitable design criteria for other water management structures (e.g. diversion channels), for dam storage calculations or for the development of water management plans. When designing water management structures, hydrological events with lower return period (e.g. 1-in-100 year or 1-in-200 year return periods) are used. The Galore Creek tailings facility is designed to be able to retain water without discharge from 15th October to 15th July (i.e., 9 months) in any year of mine operations, under runoff conditions up to 1 in 200 wet year conditions. These design criteria were chosen as the winter months were considered the critical months for water quality in the Galore Creek watershed. The design criteria provides for a very large volume of available storage within the tailings facility (>45 Mm3 for most of the operational life of the mine). Figure 7.5-13 of the Application illustrates the available storage volume within the storage facility and compares it to the volume of water produced in a 1 in 200 year storm event. It is clear that the facility will easily store a Q200 with no discharge through the spillway. The emergency spillway for the facility is designed to safely pass peak flows from the PMF (assumed to derive from a PMP or Probable Maximum Precipitation event) without overtopping the dam and conservatively assuming a full reservoir (water level at spillway level) at the start of the PMF event. The storage available within the impoundment will be a maximum in October each year decreasing to minimum values in the following spring and summer prior to completion of the next raise of the dam crest. Therefore, although the tailings facility is not designed to store inflows from a PMF, depending on the time of year when the PMF occurs, there may or may not be significant amounts of storage available within the reservoir. Whenever a PMF occurs during any year of operation, the combination of available storage and spillway capacity will always be sufficient to prevent overtopping of the dam. It should also be noted that high flow events are not considered the critical hydrological conditions for water quality. Under flood flow conditions, there will be high rates of runoff from natural watersheds surrounding the storage facility	As described in the Application, NovaGold will ensure that the dam will hold a one in 200 wet year nine month discharge volume and that the dam will safely pass a PMF (a 1 in 10,000 year event) in a scenario when the impoundment is already full.	The Ministry of Energy, Mines and Petroleum Resources notes the failure of the dam would result in very high environmental consequences. MEMPR is confident that the dam has been designed using conservative criteria for maximum credible earthquake and followed the Canadian Dam Association Safety Guidelines (1999). EAO and CEA Agency note that NovaGold has committed to established an ongoing initiative with the Tahltan Central Council, and relevant Canadian and U.S. federal and B.C. and Alaska State government agencies to assess, at a conceptual level, the potential effects of a catastrophic dam failure and develop a plan for remediation of those effects.

				and within the rivers downstream of the facility. These will provide dilution for any releases from the facility.		
83	Craig Olson Petersburg, Alaska September 7, 2006	The dam is designed to contain the 1 in 200 wet year discharge volume (Project Application, p. 5-158). Overflow/overtopping the dam would release contaminated water into the environment via the emergency spillway. For this reason, the dam and impoundment should be designed to hold water generated by the Probable Maximum Flood plus residual snowmelt. The final dam design is one that will contain the Probable maximum flood and there is not-Potentially Acid Generating (PAG) material available throughout the mine life (which is stored in external waste dumps). The tailings dam should be constructed so that it will also contain the Probable Maximum Flood during operation instead of the 1 in 200 year event as the dam design basis storm. (Section 5.9.3.2)	Tailings dam - design	Refer to comment 82	Refer to comment 82	Refer to response for 82

84	Marlene Clarke Wrangell, Alaska September 7, 2006	The dam is designed to contain the 1 in 200 wet year discharge volume (Project Application, p. 5-158). Overflow/overtopping the dam would release contaminated water into the environment via the emergency spillway. For this reason, the dam and impoundment should be designed to hold water generated by the Probable Maximum Flood plus residual snowmelt. The final dam design is one that will contain the Probable maximum flood and there is not-PAG material available throughout the mine life (which is stored in external waste dumps). The tailings dam should be constructed so that it will also contain the Probable Maximum Flood during operation, instead of the 1 in 200 year event as the dam design basis storm. (Section 5.9.3.2).	Tailings dam - design	Refer to comment 82	Refer to comment 82	Refer to response for 82
85	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Water Quality: Tailings Dam - the dam is designed to contain the 1 in 200 wet year discharge volume (Project Application, p. 5-158). Overflow/overtopping the dam would release contaminated water into the environment via the emergency spillway. For this reason, the dam and impoundment should be designed to hold water generated by the Probable Maximum Flood plus residual snowmelt (Section 5.9.3.2).	Tailings dam - design	Refer to comment 82	Refer to comment 82	Refer to response for 82
86	Stan Tomandl & Ann Jacob Chair & Treasurer Friends of the Stikine Society Victoria, BC September 8, 2006	The dam is designed to contain the 1 in 200 wet year discharge volume (Project Application, p. 5-158). Overflow/overtopping the dam would release contaminated water into the environment via the emergency spillway. For this reason, the dam and impoundment should be designed to hold water generated by the Probable Maximum Flood plus residual snow melt. The final dam design is one that will contain the Probable maximum flood and there is not PAG material available throughout the mine life (which is stored in external waste dumps). The tailings dam should be constructed so that it will also contain the Probable Maximum Flood during operation instead of the 1 in 200 year event as the dam design basis storm. (Section 5.9.3.2)	Tailings dam - design	Refer to comment 82	Refer to comment 82	Refer to response for 82

87	Kenneth Duckett Executive Director United Southeast Alaska Gillnetters Ketchikan, Alaska August 27, 2006	The potential for the greatest impact to the salmon, crab and shrimp resources on which our fleet depends is from a catastrophic failure of the tailings and waste rock impoundment dam. This will indeed be a significant structure. We believe the dam must be designed and built to the most conservative standards. The plan states "The intent will be to leave all the PAG waste in a flooded condition for perpetuity". Therefore not only would a dam breach result in the impacts from the event itself but it would uncover the PAG waste rock which would result in the flow of a high-level acid waste into the Scud River system for a long-term period. The fact that a dam breach would only be seen as a 50-year event at the mouth of the Stikine River does not bring any comfort. The tailings sediment, with its load of settled heavy metals, would be deposited all along the watercourse and potentially significantly increase the absorption of these metals throughout the ecosystem. Obviously, none of this is acceptable to anyone. Leaving aside the issue of how damages would be paid to users of the affected resources, it must be assured that a catastrophe such as this does not occur. We request that the design and construction criteria for the dam structure be reviewed with the appropriate U.S. and Alaska government agencies and that all concerned be in accordance on the final design and construction standards. We trust that the most conservative criteria will be used and that those conservative criteria will result in the highest probability that the dam structure will indeed last into perpetuity.	Tailings dam - integrity	The tailings dam has been designed to meet or exceed the Canadian Dam Associations – Dam Safety Guidelines. The final outer dam slopes have been designed to withstand ground motions associated with the Maximum Credible Earthquake (MCE) without allowing catastrophic failure. Estimates of permanent displacements and crest settlements of proposed rockfill dam during this MCE were estimated using various pseudostatic methods including: Seed, 1979; Newmark, 1969; Swaisgood, 1998 and Bureau et al., 1985. Using these methods, the estimated deformations range from 0.1 to 0.3 m. These deformations are considered to be moderate and will be accommodated by ensuring sufficient freeboard and crest width, as well as by thick filter zones flared onto the abutments. The freeboard on the proposed Galore tailings dam will vary from 12 to 9 m over the life of the mine, so the estimated seismic displacements are far less than the freeboard. In addition, the ultimate crest width is 30 m wide and the two downstream filter zones are each 4 m wide so any lateral displacements caused by an earthquake will not impair the functionality of the filters. Lastly, BGC Engineering Inc. has retained two renowned senior geotechnical engineers to review the geotechnical engineering design for this project: Dr. N.R. Morgenstern & Dr. A. M. Robertson.		NovaGold has committed to constructing the tailings dam to Canadian Dam Association guidelines (19990 to withstand a 1 in 10,000 year earthquake and avalanche induced wave and to safely pass a Probable Maximum Flood. U.S. federal and Alaska State government agencies will have opportunities to review and comments on key provincial permit applications such as the *Mines Act* and *Environmental Management Act* permits.
88	Gayle Gross Wrangell, Alaska September 8, 2006	As a resident of Wrangell, Alaska, I can understand the importance of resource development in our state as well as in Canada. That being said, my concern is from the standpoint of living downriver of this Project. Any breach or failure of the proposed earthen dam will affect our side of the river. I understand that this dam will rank third highest for earthen dams in the world, when complete. I ask that you consider your downstream neighbors, as well as the Canadians living and working the lower end of your border on the Stikine River, during this assessment process.	Tailings dam - integrity	Refer to comment 87	Refer to comment 87	See response for 87
89	Angela Brand Danuse Stewart, BC Mayor, District of Stewart July 12, 2006 - Open House	The Council of the District of Stewart does not have any concerns regarding the Project. As Mayor, I talk to the community and the majority of comments I receive are favorable and in anticipation of the Project starting. As for the projected number of trucks that would be going though the community, because other projects (current ones) will be stopping before this one is up and running, we will be welcoming trucks. Very informative presentation and great slides that help visualize the discussion.	Truck traffic - Stewart	No response required	No action required	Comment noted

90	Frank Kamermans Debbie Kremzar Bitter Creek Mercantile Ltd. Ripley Creek Inn Ltd.	As a resident, business person and significant landholder in Stewart, I believe that the secondary and tertiary environmental effects that this Project might have are serious and have not been addressed forthrightly. It appears a lot of work has been done to mitigate environmental concern directly on or adjacent to the Project site and special attention has been given to the enviro/sociocultural impacts of that neighbourhood, all to the company's credit. However, to simply leave Stewart as a beneficiary of the transportation and shipping in the positive light of "jobs" neglects to identify their impacts. The number of trucks and those anticipated from other projects will have a significant and dramatic detrimental effect on our main street. My wife and I have seven buildings with businesses on this route, all of which are historically significant and have been restored in the past ten years (or continue to be restored) to create a context and provide a livable community as opposed to a boom/bust this town otherwise devolves into after "the mine closes". We have occupied them with either lease purchase operators in the case of the gas station and a grocery store or our own businesses which include hotel buildings, a gift shop, a museum, one of the finest restaurants in the northwest and currently finishing up the restoration of a bus depot and gallery. Our efforts and investments are generally tourism supported and grow despite a declining population and are no major 'part-time' employer. Our vision entails sustainable incremental growth and is not based on anticipation of another boom and the short-term windfalls that are inherent in the long term pains of such development.	Truck traffic - Stewart	An analysis of all alternatives was undertaken during the development of the Project design and supporting infrastructure. This analysis included consideration of transportation options. The currently most viable route is the one which is proposed. However, should the construction of a by-pass in Stewart proceed as outlined in the official Community Plan, NovaGold would be in support and alter its current transport route to take advantage of the by-pass. The effects assessment considered potential effects of the Project on Stewart. From an issues scoping exercise, which included direct input from public open house events and interviews with key informants in Stewart, the following valued components were identified: economic development, business development, employment, incomes and traffic. The effects assessment reported that positive effects would result for all valued components, with the exception of traffic and transportation in Stewart. The analysis showed that adverse traffic and transportation effects would be experienced during the operational phase of the Project. However, balanced against the positive gains of employment, incomes, business opportunities and economic development, the significance of the adverse transportation effects was reduced. This balance is especially important in light of the forthcoming closures of the Huckleberry and Eskay Creek mines which generate significant taxes and income in Stewart.	No action required	EAO notes that NovaGold has committed to participate with other Port of Stewart users and the Ministry of Environment in a joint air monitoring program. NovaGold is also willing to use an alternate access route through Stewart if one is developed.

91	Frank Kamermans Debbie Kremzar Bitter Creek Mercantile Ltd. Ripley Creek Inn Ltd.	It has been suggested by local government representation and the bulk terminal owner on many occasions and again with the possible increase in traffic that a bypass of Main Street across the Bear River estuary and wetlands is an option. I would like to identify that my wife and I own 500 feet of estuary frontage (from 5th Avenue to 3rd Avenue and a block across), which includes two salmon rearing and spawning streams as well eight more of our buildings, many historical and some that were moved to avail themselves of the site and all of which are adjacent to the main street holdings. Our Ripley Creek Inn had four separate buildings that front the estuary and preserve a natural boundary for wildlife and waterfowl to everyone's benefit. We maintain and promote good stewardship of this invaluable asset, however are often stymied by local authorities that continue to erode the fringes of the wetlands, often in direct contravention of protection agencies and with impunity. This may be beside the point, but after years of effort and investment in the natural values of Stewart, values that seem self-evident to any visitor, we are no longer prepared to idly stand by and watch an unholy league of company, local politician and port operator lay waste to it. In defense of the wetland and its denizens and to use an apropos analogy, we are no longer willing to let you 'crap in our nest'.	Truck traffic - Stewart	Refer to comment 90	Refer to comment 90	See response to 90

92	Frank Kamermans Debbie Kremzar Bitter Creek Mercantile Ltd. Ripley Creek Inn Ltd.	I need to be satisfied that every option and every possible alternative is soundly considered free of prejudice; that the environmental issues here confront the same rigorous scrutiny that they would be subject to on the mine site if it was in downtown Whistler. I believe this company independently (or more likely as a soon to appendage of a huge faceless and soulless multinational) has even more obligation to satisfy every person and community touched by its process. So much so that beyond the traffic and estuary/wetland destruction issues, maybe marine transport issues like, where they flush toilets? Ultimately who does what with the product when and where. The cost of being big.	Truck traffic - Stewart	Refer to comment 90	Refer to comment 90	See response to 90
93	Gody Appenzeller Owner & Operator Harbour Lights General Store Stewart, BC September 4, 2006	My wife and I own & operate the Harbour Light General Store in Stewart. We hope and commend NovaGold for choosing Stewart as their seaport destination. Any increase in the community of Stewart would be a blessing in our store. The concern my wife and myself have is with the increased traffic that would come along 5th Avenue (Stewart's main street downtown; also known as 37A). It could potentially have a negative impact on our business. If NovaGold chooses to use property from the District of Stewart on the eastern seaboard of the harbour, these concerns would be eliminated. If you need more information, I would gladly provide it to you.	Truck traffic - Stewart	Refer to comment 90	Refer to comment 90	See response to 90

94	Gody Appenzeller President Stewart Harbour Authority Stewart, BC September 4, 2006	Firstly, I would like to thank NovaGold for considering the Port of Stewart for their shipping needs. If it comes to fruition, we will have tremendous opportunities to support each other. As of today, we don't know which properties NovaGold is considering to receive, store and load their ore onto ocean-going vessels; this is where one of our concerns lies. If truck traffic comes through downtown on Highway 37A over to Stewart Bulk, it will pass by our harbour, which is situated on a very narrow stretch of highway. Presently this area has insufficient access to parking, loading, unloading of supplies and equipment and no boat-launch facility. This has been, and is today, a contentious issue with the traffic we have now. As of today we have approximately 40,000 to 50,000 tourists annually crossing the Canadian border from Hyder to Stewart (using highway 37A), not counting local commercial truck traffic coming and going to Stewart Bulk Terminal. At the same time more and more traffic is also happening in our harbour as people choose Stewart as their new home; all of this in a three-km perimeter. The Stewart Harbour Authority and the Portland Canal Stewart Yacht Club 2000 are both nonprofit corporations run totally by volunteers with a very small budget. Many Harbour Master Presidents from Stewart Yacht Club have addressed these issues with Land and Water BC, Ministry of Highways, Fisheries and Oceans, and mayor and council of the District of Stewart, with their support to mitigate the problems (i.e. access to parking, loading, unloading and a boat-launch). If required, I have many letters and blueprints from the past from the various government departments in my office and can make them available to you. If NovaGold should choose the second option and negotiates a proposal for the property at the District of Stewart to lease and build their own multi-purpose docking facility over on the eastern seaboard of the Stewart Harbour, it would eliminate most of the commercial truck traffic concerns, as this access would bypass the town. Over five years ago, the Stewart Yacht Club built a boat-launch ramp on the eastern seaboard, but over time, the Bear River silt has built up and the accessibility is limited.	Truck traffic - Stewart	Refer to comment 90	Refer to comment 90	See response to 90
95	Bonnie Demerjian Stikine River Books Wrangell, Alaska September 5, 2006	As a Wrangell resident and one who cares deeply about the future of the Stikine River, I want to remind you that "everyone lives downstream". I am aware that you have conducted environmental studies; in what depth and in what measure of caring, I can't begin to know. I only hope that something besides the bottom line is ruling the expected decision to open this mine. So far, BC	Water quality	NovaGold has committed to monitoring of water, sediment and aquatic organisms of receiving water sites. Weekly water sampling is conducted during freshet, quarterly sampling at a suite of sites through the area, and monthly sampling at key sites, to characterize spatial and temporal variability in water quality.	Site-specific water quality objectives are proposed for the Project, in light of the naturally high concentrations of many metals in waters of the region. These objectives will allow assessment of changes in water quality signaling potential impacts. Monitoring will continue through the	EAO notes that NovaGold has committed to continue conducting environmental monitoring (collection and analysis of water, sediment, and biota, combined with chronic and acute toxicity testing of the receiving waters) throughout the life of the mine to ensure that downstream environments

		has evidenced extreme nonchalance in regard to the sustainability of its natural resources and the maintenance of wilderness areas in the south. Now the north is being made ready for despoliation. In the past, Wrangell and the upper river had a closer connection that faded some with the building of Highway 37, but there is a growing awareness here of the importance of the Stikine as a wild place. The salmon too, are a valuable and mutual resource. Have you truly addressed the problem of keeping the water pure? I will be following with great interest the future of the Project, as will the entire town of Wrangell. After all, we're downstream.		Water quality modelling of the controlled release of effluent from the tailings impoundment facility into Galore Creek indicated that potential impacts to water quality would be low in magnitude and would be restricted to the upper section of the Scud River immediately below its confluence with Galore Creek.	life of the mine and following closure to ensure that downstream environments are not impacted by effluents discharged from the Project. Monitoring results will be reported to government agencies.	are not impacted by effluent discharged from the Project. NovaGold will also provide annual reports and raw data from monitoring to appropriate Canadian and U.S. federal, B.C. and Alaska State agencies and the Tahltan Central Council.
96	Chris Zimmer US Coordinator Transboundary Watershed Alliance Vancouver, Whitehorse, Juneau September 8, 2006	III. Waste Handling, Treatment and Disposal B. Filter Plant The treatment proposed for the effluent discharge from the filter plant requires a 0.7km mixing zone in the Iskut River. We recommend that full characterization of impacts needs to be done using maximum discharge with least dilution, i.e. worst case scenarios. The use of additional treatment to remove metals and other possibly toxic substances in the discharge needs to be fully discussed in the EA and measures developed to ensure there are no water quality impacts or dangers to fish and wildlife from discharge.	Water quality - Iskut River / filter plant	In the Application, characterization of impacts relating to effluent discharge to the Iskut River from the filter plant addressed the worst case scenario to be encountered on an annual basis, i.e. annual seven-day low flow. During annual seven-day low flow, model calculations determined a dilution factor of 140:1 between river water and effluent at 7 m to 51 m downstream of the discharge point (Table 7.6-18). Using the hazard quotient calculations (Table 7.6-20), it was determined that at worst, there is potential for low-level effects to aquatic receptors under the seven-day low flow scenario. According to Table 7.6-18, the worst case scenario would be encountered during a seven-day Q10 scenario, i.e. lowest flow rate over seven days in ten years. Characterization using this worst case scenario was not presented in the Application. Upon re-evaluation of the data using the seven-day Q10 scenario (Table 1- available from NovaGold), it was found that HQ values ranged from 0 to 4.3, indicating that at worst, the potential exists for low-level effects to aquatic receptors due to changes in water quality from filter plant effluent release. The maximum HQ value was for copper, which is the primary component of the concentrate. Thus, the conclusions of the effects assessment for the worst-case scenario, i.e. seven-day Q10 scenario, is the same as presented in the Application. Site-specific water quality objectives for the receiving environment will be established in conjunction with BC Ministry of Environment regulators. Effluents will meet these objectives to ensure that the downstream environments are protected. Treatment of discharges from the concentrate filter plant will produce effluent meeting MMER requirements and discharge permit levels.	Monitoring of water, sediment, and biota, alongside chronic and acute toxicity testing of the receiving waters, will continue through the life of the mine and following closure to ensure that downstream environments are not impacted by discharged effluents from the Project.	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.

97	Marlene Clarke Wrangell, Alaska September 7, 2006	Filter plant - the filtration and precipitation treatment proposed for the effluent discharge from the filter plant will require a 0.7km mixing zone in the Iskut River (Section.7.2.3 of the Application - Water Treatment and Discharge, p. 5-146). It appears that a dilution of 120 will be required for copper, which is highly toxic to fish. Full characterization of impacts needs to be done using maximum discharge with least dilution scenarios. The use of additional treatment to remove metals and other possibly toxic substances in the discharge needs to be fully discussed in the EA.	Water quality - Iskut River / filter plant	Refer to comment 96	Refer to comment 96	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
98	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Water Quality - filter plant: the filtration and precipitation treatment proposed for the effluent discharge from the filter plant will require a 0.7km mixing zone in the Iskut River (Section.7.2.3 of the Application - Water Treatment and Discharge, p. 5-146). It appears that a dilution of 120 will be required for copper, which is highly toxic to fish. Full characterization of impacts needs to be done using maximum discharge with least dilution scenarios. The use of additional treatment to remove metals and other possibly toxic substances in the discharge needs to be fully discussed in the EA.	Water quality - Iskut River / filter plant	Refer to comment 96	Refer to comment 96	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
99	Craig Olson Petersburg, Alaska September 7, 2006	Filter plant - the filtration and precipitation treatment proposed for the effluent discharge from the filter plant will require a 0.7km mixing zone in the Iskut River (Section.7.2.3 of the Application - Water Treatment and Discharge, p. 5-146). It appears that a dilution of 120 will be required for copper, which is highly toxic to fish. Full characterization of impacts needs to be done using maximum discharge with least dilution scenarios. The use of additional treatment to remove metals and other possibly toxic substances in the discharge needs to be fully discussed in the EA.	Water quality - Iskut River / filter plant	Refer to comment 96	Refer to comment 96	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
100	Stan Tomandl & Ann Jacob Chair & Treasurer Friends of the Stikine Society Victoria, BC September 8, 2006	Our family commercial fishes on the lower Stikine River. We have observed that the Iskut salmon runs have not recovered from the hovercraft operation in the 1990s. Great care must be taken to protect the Iskut. Filtration and precipitation treatment proposed for the effluent discharge from the filter plant will require a 0.7km mixing zone in the Iskut River (Section.7.2.3 of the Application - Water Treatment and Discharge, p. 5-146). It appears that a dilution of 120 will be required for copper, which is highly toxic to fish. Full characterization of impacts needs to be done using maximum discharge with least dilution scenarios. The use of additional treatment to remove metals and other possibly toxic substances in the discharge needs to be fully discussed in the Environmental Assessment.	Water quality - Iskut River / filter plant	Refer to comment 96	Refer to comment 96	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.

101	James Bourquin Wild River Director Cassiar Watch Iskut, BC September 8, 2006	Volume 3 Final Report, Section 8.5.4.3 1. Water treatment details not released or finalized (Section 8.6.2), therefore impossible to comment further than Cassiar Watch disapproves of dumping the 70 cubic meters per day liquid fraction into the Iskut River for the life of the mine.	Water quality	Water treatment plans for the filter plant will be detailed in the feasibility study and will be a requirement of permit conditions	NovaGold will develop final designs for the filter plant water treatment facility in the feasibility studies	See response for 55. In addition, NovaGold has specifically committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
102	Craig Olson Petersburg, Alaska September 7, 2006	Tailings Pond Discharge: in addition to Galore Creek, the Scud River will be used as a mixing zone for ammonia, selenium and cadmium mine effluent discharge. There is no treatment proposed for the tailings pond discharge to Galore Creek/Scud River, which requires a mixing zone in the Scud River for many constituents, most notably ammonia, lead, zinc and cadmium (Section 7.6.4.1 Effluent Discharge, p. 7-231, and Table 7.6-16). There is no prediction of the length of the mixing zone required for the Scud River.	Water quality - Galore Creek, Scud River/ tailings discharge	Hydrodynamic modelling was performed to predict Galore Creek dilution in the Scud River. Winter low-flow and summer high flow conditions were modeled for both baseline and operational, i.e. effluent discharge, scenarios. Please refer to Section 7.6.2.2 for an overview of the model. Section 7.6.4.1 (pages 7-233 to 7-247) presents the results of the model, including mixing lengths for selected parameters.	Ongoing monitoring will confirm the accuracy of the models	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
103	Marlene Clarke Wrangell, Alaska September 7, 2006	Tailings pond discharge: in addition to Galore Creek, the Scud River will be used as a mixing zone for ammonia, selenium and cadmium mine effluent discharge. There is no treatment proposed for the tailings pond discharge to Galore Creek/Scud River, which requires a mixing zone in the Scud River for many constituents, most notably ammonia, lead, zinc and cadmium [Section 7.6.4.1 Effluent Discharge, p. 7-231, and Table 7.6-16). There is no prediction of the length of the mixing zone required for the Scud River.	Water quality - Galore Creek, Scud River/ tailings discharge	Refer to comment 102	Refer to comment 102	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
104	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Water quality - tailings pond discharge: in addition to Galore Creek, the Scud River will be used as a mixing zone for ammonia, selenium and cadmium mine effluent discharge. There is no treatment proposed for the tailings pond discharge to Galore Creek/Scud River, which requires a mixing zone in the Scud River for many constituents, most notably ammonia, lead, zinc and cadmium [Section 7.6.4.1 Effluent Discharge, p. 7-231, and Table 7.6-16). There is no prediction of the length of the mixing zone required for the Scud River.	Water quality - Galore Creek, Scud River/ tailings discharge	Refer to comment 102	Refer to comment 102	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
105	Stan Tomandl & Ann Jacob Chair & Treasurer Friends of the Stikine Society Victoria, BC September 8, 2006	Unlike other rivers, sockeye salmon spawn in the numerous side channels of the Stikine and Scud. Tailings pond discharge: in addition to Galore Creek, the Scud River will be used as a mixing zone for ammonia, selenium and cadmium mine effluent discharge. There is no treatment proposed for the tailings pond discharge to Galore Creek/Scud River, which requires a mixing zone in the Scud River for many constituents, most notably ammonia, lead, zinc and cadmium (Section 7.6.4.1 Effluent Discharge, p. 7-231, and Table 7.6-16). There is no prediction of the length of the mixing zone required for the Scud River.	Water quality - Galore Creek, Scud River/ tailings discharge	Sockeye have not been found to spawn in the Scud River further than ten km upstream from the confluence of the Scud and Stikine Rivers. This does not overlap with the mixing zone at the confluence of the Scud River and Galore Creek; refer to comment 102 for discussion on mixing zone in the Scud River	On-going monitoring will confirm the accuracy of the models	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.

106	Kenneth Duckett Executive Director United Southeast Alaska Gillnetters Ketchikan, Alaska August 27, 2006	The planned discharge from the mine site into Galore Creek seems to present a very acceptable situation in most cases. It is interesting that the predicted sulphate and zinc concentrations during the summer high flow when the effluent is being discharged will be lower than those in Scud River during winter low flow conditions when no effluent is being discharged. At least this is what the flow and dilution model in the Application suggests. From tables 7.6-14 through 7.6-16, it is apparent that the ammonia residue from blasting agents and zinc have significant hazard quotients (HQ). Some heavy metals such as cadmium, lead, and others also demonstrate HQ greater than one under the worst-case model of water quality in the mine discharge area. We understand that some heavy metals have an HQ actually lower in Galore Creek than in the Scud River due to the settling of particulates in the tailings impoundment area. The Application states: "For dissolved zinc and ammonia, the potential exists for moderate effects to aquatic life at the mouth of Galore Creek". The Application does not indicate what steps will be taken to mitigate this issue. The view seems to be that because there are high levels of metals naturally occurring in the Galore Creek/Scud River aquatic environment, the elevated levels of ammonia, zinc and other metals do not have to be addressed and mitigated. We do not agree.	Water quality - Galore Creek, Scud River/ tailings discharge	With respect to effluent release from the tailings and waste rock storage facility, NovaGold is committed to meeting or exceeding all water quality criteria and maintaining water quality downstream as stated in “Contingency for Non-Compliant Effluent” (Chapter 8, Environmental Management and Mitigation Measures, page 8-67). The following mitigative measures for the release of effluent from the tailings and waste rock storage facility into Galore Creek were listed in the Application (Table 7.6-4): • Restricted periods of effluent discharge (May to October), with option to delay for up to three months, pending effluent quality • Environmental effects monitoring of water (refer to Section 10.6, Aquatic Effects Monitoring Program).	Extensive and on-going water quality monitoring during operation	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
107	Kenneth Duckett Executive Director United Southeast Alaska Gillnetters Ketchikan, Alaska August 27, 2006	We oppose the concept of mixing zones and believe that the receiving water environment should be protected from development activity and that the development activity should be able to support the treatment of effluent that results from its operations. This should be the case with this Project as well.	Water quality	Site-specific water quality objectives for the receiving environment will be established in conjunction with MOE regulators. Effluents will meet these objectives to ensure that the downstream environments are protected. Treatment of discharges from the concentrate filter plant will produce effluent meeting MMER requirements and discharge permit levels.	Monitoring of water, sediment, and biota, alongside quarterly chronic and acute toxicity testing of the receiving waters, will continue through the life of the mine and following closure to ensure that downstream environments are not impacted by discharged effluents from the Project.	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
108	Kenneth Duckett Executive Director United Southeast Alaska Gillnetters Ketchikan, Alaska August 27, 2006	The proposal to discharge effluent from the concentrate filter plant at a concentration of 0.02 mg/L for dissolved copper and 0.15 mg/L for particulate copper into the Iskut River, whose natural level of copper is as low as 0.0003 mg/L, is unacceptable. The use of a mixing zone to dispose of industrial waste should not be permitted. The fact that the natural concentration of copper is as high as "0.018 mg/L during freshet" indicates that it is at that elevated level for relatively short periods of time. The effluent should be processed to the point of the mean concentration (measured on a weighted time basis) of the receiving water to protect the aquatic habitat of the respective systems. This will avoid any increased impacts due to future aggregations of projects, each with their respective "mixing zones" which could add to total levels of heavy metals in the watershed.	Water quality - Iskut River/filter plant	The protection and maintenance of water quality and aquatic habitat in the Iskut River downstream of the filter plant will be maintained and mitigated through monitoring of sediment, benthos, water quality, fish and toxicity test results, as outlined in the Aquatic Effects Monitoring Program (Section 10.6).	Aquatic effects monitoring	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.

109	Kenneth Duckett Executive Director United Southeast Alaska Gillnetters Ketchikan, Alaska August 27, 2006	We are pleased to have the opportunity to comment on the proposed Project. This is a very significant project and appears well capable of providing significant economic opportunity to the area in which it is located, as well as good economic returns. United Southeast Alaska Gillnetters does not support or oppose the Project. Our main concern, similar to that of the native peoples in the area, is that the Project be developed in such a way that it protects the existing lifestyles and industries that have existed for a long period of time on the resources that area provides, or, in the case of salmon, nurtures. We are, of course, concerned mainly about potential and actual impacts on the salmon, and to a lesser extent, the crab and shrimp resources that depend on the Stikine estuary and its tributary systems.	Water quality	Most of the salmon fisheries occur on the Stikine River, approximately 40 km downstream of the mine site. Our modelling predicts that the mine will have no impact on water, sediment, or fish tissue quality in the Stikine, or lower Scud River.	Long-term monitoring of water at the discharge point, and sediment and tissue quality in the near-source receiving environment will ensure that the mine has no impact on these parameters. Should an effect be detected, tailings and effluent management practices will be adjusted.	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream. NovaGold has committed to maintain intensive receiving environment, aquatic, fisheries and wildlife monitoring programs, developed in cooperation with university researchers, regulatory agencies and the Tahltan Central Council, to ensure aquatic, water quality and wildlife resources are not impacted by the Project and protected for future generations. NovaGold has also committed to add an additional monitoring site downstream on the Stikine River at a depositional site to be determined during the permitting stage.. NovaGold will continue conducting receiving environment monitoring (collection and analysis of water, sediment, and biota, combined with chronic and acute toxicity testing of the receiving waters) throughout the life of the mine to ensure that downstream environments are not impacted by effluent discharged from the Project.
110	Lana Parker Wrangell, Alaska July 24, 2006	I am a resident of Wrangell, Alaska and am concerned about the Project. I would like to know what assurances we have downstream that there will be zero outflow from this Project. Open pit mining brings tailings to the surface where they are crushed and exposed to the elements. This exposure ensures that the release of (sometimes) toxic (in large quantities) chemicals are released into the surroundings. I would like to know how these elements will all be retained on the site.	Water quality	Modelling of water and sediment quality of the tailings impoundment discharge and resulting receiving environment concentrations of metals and other constituents predicts that there will be no impacts to the Stikine River. Site-specific water quality objectives (WQOs) will be established in conjunction with MOE regulators. Effluents will meet discharge permit conditions and receiving waters will meet these WQOs to ensure that the downstream environment is protected. Treatment of effluent from the concentrate filter plant will follow MMER requirements.	In consultation with both American and Canadian regulators, the aquatics studies for the Project were designed to characterize and assess potential changes to downstream water quality and biota. Monitoring of water, sediment, and biota, alongside quarterly chronic and acute toxicity testing of the receiving waters, will continue through the life of the mine and following closure to ensure that downstream environments are not impacted by discharged effluents from the Project	See response for 109.
111	Lana Parker Wrangell, Alaska July 24, 2006	The Stikine is a jewel and it is hard for me to imagine what possible fortune might be worthy of its jeopardy. It is irreplaceable, whatever amount of gold and copper reside in Galore Creek.	Water quality	Comment noted	No action required	Comment noted
112	Chris Zimmer US Coordinator Transboundary Watershed Alliance Vancouver,	III. Waste Handling, Treatment and Disposal A. Tailings Pond We recommend that NovaGold treat discharges from the tailing pond to meet background water quality levels in the Scud and Iskut rivers. Currently, there is no treatment proposed for the	Water quality	Site-specific water quality objectives will be established in conjunction with MOE regulators. Effluents will meet these objectives to ensure that the downstream environment is protected.	Monitoring will continue throughout the life of the mine and following closure, to ensure that downstream environments are not impacted by discharged effluents from the Project. Monitoring results will be reported to	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.

	Whitehorse, Juneau September 8, 2006	tailings pond discharge to Galore Creek and Scud River. With natural background for many metals and other constituents greater than water quality guidelines in both the Scud and Iskut rivers, there may be little assimilative capacity for additional load from the effluent discharges. Increasing metal and other constituent even more could be harmful to aquatic life.			government agencies.	
113	Craig Olson Petersburg, Alaska September 7, 2006	With natural background for many metals and other constituents greater than water quality guidelines in both the Scud and Iskut rivers, the contaminants discharged add to the total contaminant load of the rivers. Since the rivers already are carrying metals in excess of water quality guidelines, there may be little assimilative capacity for additional load from the effluent discharges. Increasing metal and other constituent concentrations even more cannot be conducive to sustaining aquatic life, and could be detrimental to any species on the edge of survival. The best discharge scenario would be for the mine to treat discharge effluent to meet background water quality levels in the Scud and Iskut rivers.	Water quality	Refer to comment 112	Refer to comment 112	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
114	Marlene Clarke Wrangell, Alaska September 7, 2006	With natural background for many metals and other constituents greater than water quality guidelines in both the Scud and Iskut rivers, the contaminants discharged add to the total contaminant load of the rivers. Since the rivers already are carrying metals in excess of water quality guidelines, there may be little assimilative capacity for additional load from the effluent discharges. Increasing metal and other constituent concentrations even more cannot be conducive to sustaining aquatic life and could be detrimental to any species on the edge of survival. The best discharge scenario would be for the mine to treat discharge effluent to meet background water quality levels in the Scud and Iskut rivers.	Water quality	Refer to comment 112	Refer to comment 112	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.

115	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Water Quality: Tailings Pond Discharge: with natural background for many metals and other constituents greater than water quality guidelines in both the Scud and Iskut rivers, the contaminants discharged add to the total contaminant load of the rivers. Since the rivers already are carrying metals in excess of water quality guidelines, there may be little assimilative capacity for additional load from the effluent discharges. Increasing metal and other constituent concentrations even more cannot be conducive to sustaining aquatic life and could be detrimental to any species on the edge of survival. A better discharge scenario would be for the mine to treat discharge effluent to meet background water quality levels in the Scud and Iskut rivers.	Water quality	Refer to comment 112	Refer to comment 112	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
116	Stan Tomandl & Ann Jacob Chair & Treasurer Friends of the Stikine Society Victoria, BC September 8, 2006	With natural background for many metals and other constituents greater than water quality guidelines (in both the Scud and Iskut rivers, the contaminants discharged add to the total contaminant load of the rivers. Since the rivers already are carrying metals in excess of water quality guidelines, there may be little capacity to assimilate additional load from effluent discharge. Increasing metal and other constituent concentrations even more cannot be conducive to sustaining aquatic life and could be detrimental to any species on the edge of survival. The Scud River shrimp especially come to mind here. The best discharge scenario would be for the mine to treat discharge effluent to meet background water quality levels in the Scud and Iskut rivers.	Water quality	Refer to comment 112	Refer to comment 112	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
117	Kenneth Duckett Executive Director United Southeast Alaska Gillnetters Ketchikan, Alaska August 27, 2006	First a general comment on the Application: from our cursory review of this extensive document, we believe it to be a very thorough and comprehensive report. We have only reviewed sections of specific interest and we apologize if we raise concerns that are addressed elsewhere in the Application. It is apparent to us that this Project will go forward based on current market prices. We hope the models used in the analysis prove to be correct and the Project indeed operates with minimum environmental damage. If the models prove inaccurate, we trust that the Canadian authorities will make the necessary adjustments to assure that environmental degradation is minimized.	Water quality - prediction models	On-going monitoring will confirm the accuracy of the models	NovaGold will work with authorities to ensure compliance	See response for 55.

118	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	This Project would be located in Canada, east of Wrangell, Alaska near the Galore Creek and Scud rivers, both of which lead to the Stikine River. The Project has the potential to impact other streams and rivers that are part of the Stikine River watershed. The Stikine River flows into southeast Alaska and many people here rely on this river for clean healthy salmon, Dungeness crabs, other fish and seafood, commercial tourism and recreation. The Stikine River supports all five pacific salmon species. The Stikine Flats are extremely important to Alaskans; they make up the largest estuary ecosystem in southeast Alaska and the Dungeness crab and dive fisheries rely directly and indirectly upon this estuary. Further, residents of Wrangell and Petersburg depend on the Stikine River for high-quality fishing, hunting, and other wilderness experiences. Any pollution or degradation of fish habitat in the Stikine watershed will adversely harm the people in southeast Alaska, and developments on the Canadian side of the Stikine River, like the proposed Project, have the potential to adversely affect our members' and constituency's quality of life, yet provide no economic benefits to Alaskans. For these reasons, we are very concerned about developments in the Stikine River watershed and have concerns about the Project.	Water quality	Mr. Camus's concerns have been documented and addressed in full throughout this table.	n/a	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
119	Marlene Clarke Wrangell, Alaska September 7, 2006	Please note that I am a resident of Wrangell, Alaska, which sits at the mouth of the Stikine River. Our community depends on the fish runs up the Stikine River. Five species of salmon use the Stikine as a highway to their spawning grounds. Eulachen, trout, migratory birds and river wildlife which use the river and depend on the land abutting the river, could be irreversibly damaged from this mining proposal. To think of the mighty Stikine becoming a poisoned waterway saddens me. Of what use would this beautiful river be to anyone if the waters were so poisoned it was no longer a resource for food and recreation? My family not only uses the Stikine for hunting and fishing, but also to play and travel on. Please seriously consider my comments.	Water quality	Ms. Clark's concerns have been documented and addressed in full throughout this table.	n/a	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.

120	Kenneth Duckett Executive Director United Southeast Alaska Gillnetters Ketchikan, Alaska August 27, 2006	Our concerns cover four major areas: the design and maintenance of the tailings dam; the discharge of effluent into Galore Creek from the mine site; the discharge of effluent into the Iskut River from the slurry dewatering process; and the continued monitoring of the Project during construction and operation to assure that the assumptions made for the models in the Application are appropriate. If they are found to be in error, the proper adjustments should be made to bring the operation into compliance with Metal Mining Effluent Regulations permit levels. A fifth concern would have been the construction of the access road to the mine, but we believe that with the proper project design and administration, the potential impacts from this activity will be relatively short lived and minimal compared to the others mentioned above.	Water quality	Mr. Duckett's concerns have been documented and addressed throughout this table.	n/a	See response for 55 and 87.
121	Kenneth Duckett Executive Director United Southeast Alaska Gillnetters Ketchikan, Alaska August 27, 2006	This is a very significant project that should provide economic benefits to the area in which it is located, the regional economy in general and its owners. We believe some of these economic resources should be used to further improve the effluent treatment for the Project, eliminating mixing zones and providing for increased project monitoring. We appreciate the opportunity you have afforded us to comment on this project and its EA. We hope the long-term results of your efforts produce a project that protects the environment and of which all affected parties can be proud.	Water quality	Mr. Duckett's concerns have been documented and addressed in full throughout this table.	n/a	See response for 55. In addition, NovaGold has committed to meeting or exceeding all water quality criteria and maintain water quality downstream.
122	Chris Zimmer US Coordinator Transboundary Watershed Alliance Vancouver, Whitehorse, Juneau September 8, 2006	V. Mine Closure The tailings pond will be left in perpetuity to preserve a reducing environment. It is unclear whether or not there is adequate planning to protect terrestrial wildlife and birds from contacting contaminated tailings materials or contaminated water.	Wildlife exposure pathway from tailings	The tailings and all potentially acid-generating rock from the mine will be submerged by at least four m of water in the tailings impoundment. The water quality model, presented in Section 7.6 of the Application, predicted that the concentrations of the parameters analyzed in water will approach baseline soon after closure, given the dilution effect of the large tailings facility. The addition of large amounts of water to the tailings facility will raise the water level; subsequently a new non-contaminated shore line will be created. Nevertheless monitoring of the facility will be ongoing. The approach of Section 7.13.7 (Chemical Hazards wildlife assessment) was to therefore identify the chemicals of potential concern for wildlife in association with the tailings pond and to highlight the need for monitoring of these chemicals in the soil, vegetation and water. The specific monitoring programs will be established during the project permitting phase. If the concentrations of any of these chemicals are shown to increase over time due to mine activities or if any of these chemicals do not return to near baseline levels soon after closure a formal risk evaluation and identification of appropriate management measures for valued ecosystem component (VEC) species will be undertaken. If at any point risks are identified, appropriate mitigation	Ongoing monitoring and appropriate mitigation and management measures if risks are identified	See response for 55. NovaGold has committed to maintain intensive receiving environment, aquatic, fisheries and wildlife monitoring programs, developed in cooperation with university researchers, Canadian and U.S. federal and Alaska State government agencies and the Tahltan Central Council, to ensure aquatic, water quality and wildlife resources are not impacted and protected for future generations. NovaGold has committed to add an additional monitoring site downstream on the Stikine River at a depositional site to be determined during the permitting stage.

				and management measures would then be evaluated and implemented to protect wildlife and birds from contacting contaminated tailings materials or water.		
123	Craig Olson Petersburg, Alaska September 7, 2006	The tailings pond will be left in perpetuity (water capped?) to preserve a reducing environment. It is unclear whether or not there is adequate planning to protect terrestrial wildlife (along the shoreline) and birds from contacting contaminated tailings materials or contaminated water.	Wildlife exposure pathway from tailings	Refer to comment 122	Refer to comment 122	See response for 55 and 122.
124	Marlene Clarke Wrangell, Alaska September 7, 2006	The tailings pond will be left in perpetuity (water capped?) to preserve a reducing environment. It is unclear whether or not there is adequate planning to protect terrestrial wildlife (along the shoreline) and birds from contacting contaminated tailings materials or contaminated water.	Wildlife exposure pathway from tailings	Refer to comment 122	Refer to comment 122	EAO notes that NovaGold has committed to continue conducting environmental monitoring (collection and analysis of water, sediment, and biota, combined with chronic and acute toxicity testing of the receiving waters) throughout the life of the mine to ensure that downstream environments are not impacted by effluent discharged from the Project
125	Rob Cadmus Water Quality and Mining Organizer Southeast Alaska Conservation Council Juneau, Alaska not dated	Water quality: tailings dam - the tailings pond will be left in perpetuity (water capped?) to preserve a reducing environment. It is unclear whether or not there is adequate planning to protect terrestrial wildlife (along the shoreline) and birds from contacting contaminated tailings materials or contaminated water.	Wildlife exposure pathway from tailings	Refer to comment 122	Refer to comment 122	See response for 124.
126	Stan Tomandl & Ann Jacob Chair & Treasurer Friends of the Stikine Society Victoria, BC September 8, 2006	It is unclear whether or not there is adequate planning to protect terrestrial wildlife along the shoreline and birds from contacting contaminated tailings materials or contaminated water.	Wildlife exposure pathway from tailings	Refer to comment 122	Refer to comment 122	See response for 124.