

November 10th, 2008

Kathy Eichenberger
Project Assessment Director
Environmental Assessment Office
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Victoria BC V8W 9V1

Dear Kathy Eichenberger;

I am writing this letter in regards to the Blue Pearl Mine that is in development near Smithers BC. I realize that the project is currently in the EA process, and that there is opportunity to for public comment up until November 12th. I would like to take this opportunity to make comments on this project.

First of all I would like to make clear that I am not apposed to mining, or in fact this particular mine. I work in the mining industry, and I realize how important the development of new mining projects are for the growth of the industry and for this province. I do want to see this mine develop, but I want to see the right mine develop to suite the needs of the community and Blue Pearl, and not just the needs of Blue Pearl at the expense of the community.

My first concern is with Blue Pearl's plan to enter the deposit from the front of the mountain. If Blue Pearl enters the deposit from the front of the mountain, they will likely never build a fully functioning mine at that location and they will always have to truck the rock to Endako to be processed. This means that as commodity prices drop and trucking prices rise, they are ore likely to stop mining sooner. If they enter the deposit from the back side of the mountain they would have better opportunity to create a larger and more sustainable operation and would be able to operate the mine for a longer period. Trucking to Endako means taking only high grade ore, while mining from the back of the mountain could possibly mean building a full mine site that could still be viable with lower grade ore. Blue pearl's strategy looks to me as they want to get to the richest part of the deposit right away and then be gone. What then of what is left behind? The town of Smithers will be left with the legacy of a closed mine and a scar on the face of our beautiful mountain. We will have faced the environmental risks of this mines operation while benefiting very little. With the current plan to truck ore to Endako,

there will be far less employment opportunity at the mine. Many of the jobs will go to specialists who have to move to Smithers to work in the mine, and most of the jobs that will go to the local population will be as truck drivers. In full production this mine will not likely employ as many people (or stay in operation as long) as our local Canadian Tire store. We will be expected to live with the health and environmental risks of noise pollution, increased road traffic, acid rock drainage, and the contamination of a domestic watershed and our beloved Bulkley River. When I compare the small number of jobs (for a possibly small amount of time) that the community would gain with the large long term risks that it is expected to take, I do not see this project as beneficial for the community of Smithers.

My other concerns for this project are centered on public safety. I have received training and have worked in various industries as a Health & Safety auditor, and I have worked at mine sites. I realize that mine site safety standards are regulated by the Mines Act, and that everything is clearly laid out in the “green book” as it is called. Contrary to people’s thoughts, I have found that mines sites are very safe work environments and I have always been impressed by the resources and respect given to creating a safe work site and culture. My concern is not actually in the mine site but in the surrounding areas. Typically a mine (such as Huckleberry or Eskay Creek) is in a remote area and they do not have to worry about people’s personal safety outside the mine site because there are no people to worry about. At the Blue Pearl site they are in close proximity to an established population. I have no doubt that the people working at the mine will have good safety training, emergency response procedures will be in place, and all the resources needed on hand. I am concerned for residents in the surrounding area. Will they be trained to the same level as the people working on the mine site? Will they have resources on hand to address emergency situations? Is there a communication plan in place for the mine to contact these people in the event of an emergency? Will this all be done to the same level as is required for the mine itself? There are inherent risks in living close to an active mine site and I feel that the residents personal health and safety should receive the same respect and resources as the people working at the mine site.

My other safety concern is in the way that Blue Pearl may address some of the safety concerns. When hazards have been identified there are three possible ways to control them. You can use Personal Protective Equipment (PPE), administrative controls, or engineered controls. PPE are items such as steel toe boots, and hardhats. PPE is used in a situation where a risk can not be controlled so you wear protective equipment to reduce the effect of a hazard if it does take place. Administrative controls refer to the training, inspections, documentation and safe work procedures that are developed for Health and Safety Programs. They are more effective than PPE but not as effective as Engineered Controls. Engineered controls are the most effective type of controls, and can be described as the ones that physically remove the hazard all together. Examples of this would be building guards or protective barriers around moving machinery or relocating a road that has been identified as a hazard due to wash out or

avalanche. These are the three controls that are identified by Health and Safety Professionals, and all hazard controls can fit into one of these three categories. My concern is that when a hazard to the general public and environment has been identified that Blue Pearl may propose an easier and inexpensive Administrative control in a place where as a Engineered control is what is truly needed to eliminate the hazard. An example of this would be the road accessing the mine site, and its potential to be wiped out by avalanche. What if there is avalanche danger of wiping out a fuel truck on the road to the mine? Would steps be taken to eliminate the risk or just to lower the risk? My biggest concern is that if a risk was identified that could be eliminated through engineered controls, that administrative controls would be put in place to lower (but not eliminate) the risk. This would put local residents at risk unnecessarily, and only to make the project more cost effective for Blue Pearl. I don't think it is fair to the community to have local residents assume some of the risk involved in this project without directly benefiting from the project. If my property was in the vicinity of the Davidson Mine and I found out that they put me at risk when the risk could have been avoided I would quite upset. It would be upsetting to inherit the risk of someone else's work without actually receiving any of the benefits and gains that they do.

Thank you for considering my concerns in the EA process. I do want this project to go ahead but I want to make sure that it is the right project for our community. People move to Smithers for the quality of life and I would hate for a project to move ahead without fully realizing its impact on the community.

If I am needed for further comment or follow up, my contact information is listed below and you are welcome to call or email.

Thank you

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