

Valhalla Wilderness Society

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July 3, 2013

Ms. Robyn Roome, Regional Director
Environmental Protection
Ministry of Environment
Nelson BC

Dear Ms. Roome:

Valhalla Wilderness Society would like to bring to your attention a hazardous situation in Sandon that is getting worse yearly as government, industry and private landowners continue to ignore the threat of increasingly more devastating floods along Carpenter Creek. As you are probably aware during the spring flood of 2011 Carpenter Creek ate into Klondike Silver's maintenance yard at their office and concentrator site. This is shown in picture #2203 below.



As you can see this facility encroaches well into the flood plain and forms part of the creek bank. You can also see that there is a noticeable lack of armoring to protect against an even small flood event. We estimated that upwards of a 1/8th of the landing and marshalling area was washed away.

Now in 2013 Carpenter Creek has for each of the past three years had 1 in 75/100 year flood events. The creek has continued to eat into the concentrator maintenance yard to the extent that the office is undermined and poses a hazard to Carpenter Creek. This is shown in the following photograph:



Also seen is a paucity of armoring constructed since 2011. This mill yard has been in operation for close to 100 years if not more. All kinds of heavy equipment in various states of repair have been and are currently parked on this landing. Most likely there have been unreported fuel spills, fluid leaks from mine equipment and spills of chemicals from the concentrator such as cyanide used in the lead-zinc flotation tanks. All of this has been happening within the floodplain of the creek and much of it right on the creek bank. Some of these substances are carcinogenic and all of them are poisonous and they are all being washed downstream as the creek erodes this landing to Slocan Lake where they enter the lake within 20 meters of a public beach to the north and 100m to the south of the mouth of Carpenter Creek.

Not only that, but now Carpenter Creek is starting to cut into the base of several active tailings ponds, one shown in photograph #9435.



Valhalla Wilderness Society has been on written record since the mid 1990's, identifying the hazard posed by government agencies allowing these non armoured tailings ponds to be built into the flood plain of Carpenter creek, a creek notorious for extreme and destructive flood events. An old wing dam cribbing can be seen in this picture. A close up picture #9437 shows the dilapidated condition of the wing dam. These cribbings were built by the CPR to protect it's rail bed and are a minimum of 60 years old and many could date back to the late 1890's when the rail line was first built.



P#9437

Regardless of when exactly they were built they are definitely old enough that their integrity can no longer be relied on to armor embankments. Should these tailings ponds be breached there are thousands of cubic meters of crushed fines, probably containing hazardous chemicals and heavy metals that would be washed down to Slocan Lake. When are government agencies going to demand and insist that these tailings ponds be adequately armoured to protect residents and resources located downstream?

Another problem that is growing worse yearly is the parking and storing of heavy duty immobile equipment right up to the stream bank on allegedly private land. This year Carpenter creek eroded its banks to the point that this equipment was in danger of falling into the creek. Equipment parked on the stream banks is shown in the following photographs:



#9427



#9454



#9455

These pictures show some of the equipment parked in the flood plain and along the stream banks of Carpenter Creek. Much of this equipment contains fuel and well used lubricants that are known to be carcinogenic. Also can be seen are many old axles and wheel hubs, some of them installed on trucks, flatbed trailers and old busses. All these hubs are of an age that the brake linings are composed of asbestos and these hubs would contain quantities of asbestos dust generated as these linings have worn down. Asbestos even in small quantities is known to be carcinogenic. This is all perched on the stream bank and some equipment came a hairs breath from being washed downstream this year. The amount of immobile equipment is such that it cannot all be moved during an active flood event and it is only a matter of time that some of it will end up in the creek.

We have seen devastating flood events last month across south eastern BC and into southern Alberta. If Global warming predictions continue to be correct we can expect to see more devastating flood events. Although there is little or nothing we can do to prevent the occurrence of these floods there is much we can do to mitigate the damage caused. Mitigation starts with provincial and local government agencies enforcing some basic and common sense management along our stream banks and within flood plains. Along Carpenter Creek in Sandon we have identified some gross inadequacies in flood plain management conducted by government agencies, companies and individuals. Cleanup must start immediately as next spring could bring even larger floods. All equipment must be removed from the flood plain. All the tailings ponds require adequate armoring with suitable rip rap. The insistence on anything less would be negligent on the part of our government agencies.

A copy of this letter is being filed with our lawyer to establish a legal record of this warning.

Sincerely,

A handwritten signature in black ink that reads "Craig Pettitt".

Craig Pettitt, Director
Valhalla Wilderness Society

CC: Mr. Kenyon McGee, Barrister and Solicitor
Honourable Mary Polak, Minister of Environment
Honourable Bill Bennett, Minister of Energy and Mines
Honourable Steve Thomson, Minister of Forests, Lands and Natural Resource Operations
Mr. Garth Wiggell, District Manager, Ministry of Forests, Lands & Natural Resource Operations
Mr. John Kettle, Chair, Regional District of Central Kootenay
Ms. Anne Bunka, Mayor, Village of New Denver
Ms. Katrine Conroy MLA, Kootenay Boundary
Mr. Jason Hwang, Area Manager, Ecosystem Management Branch, Fisheries and Oceans Canada