

Marathon Platinum Group Metals and Copper Mine Project: Comments to the Joint Review Panel on the Sufficiency of Information Provided in Stillwater Canada Inc's Environmental Impact Statement

Submitted by the Lake Superior Binational Forum

December 2, 2013

In October 2012, the Lake Superior Binational Forum and Great Lakes United submitted comments to the Joint Review Panel on the “sufficiency” of the information presented in the EIS [Doc # 332]. That submission contained many questions to Stillwater Canada Inc., asking them to further explain the contents of their EIS and to address additional issues.

Stillwater Canada Inc. has now provided supplemental information as a result of the many questions sent to Stillwater by the Joint Review Panel, which compiled the questions from the many commenting organizations. This letter is written by the Lake Superior Binational Forum¹ in response to the Joint Review Panel’s November 19, 2013 request for comment on whether Stillwater’s EIS is now “sufficient to proceed to public hearing.”

The Commenting Organization

Started in 1991, the Lake Superior Binational Forum is comprised of Canadian and U.S. stake-holders representing sectors such as forestry, land use, Tribal/First Nations, local government, economic development, environmental, recreational, tourism, academics, and research. Members reside in communities around the entire Lake Superior basin, in both Canada and the U.S.

The Lake Superior Binational Forum is part of the broader Lake Superior Binational Program to Restore and Protect the Lake Superior Basin Ecosystem as agreed to by all state and provincial governments around Lake Superior as well as by the federal governments of Canada and U.S. The program is focused on the entire ecosystem of Lake Superior, its air, land, water, human life and wildlife. The Lake Superior Binational Forum is the “Stakeholder Committee” called for in the Bi-National Program to Restore and Protect the Lake Superior Basin.

¹ Great Lakes United is not part of this submission because that organization disbanded on June 30, 2013. This changed situation means that the Forum no longer has participant funding to hire technical experts, for travel, etc for participating in this process. We are now participating solely on the basis of volunteer resources.

Our Focuses in this Assessment

Because of our mandate, we have two areas of focus with respect to this project:

1. Consistency of the project and project approach with the principles laid out in the documents that set the guidelines for our work in Lake Superior: the Great Lakes Water Quality Agreement, the Binational Program to Restore and Protect Lake Superior, and the Lakewide Management Plan for Lake Superior; and
2. Potential cumulative impacts on Lake Superior, including the cumulative impacts of the Project in combination with other industrial and development activities, past, present and possible future ones.

Our Conclusion on Sufficiency

Upon reviewing Stillwater Canada Inc's supplemental information, we conclude that the information now provided on these two issues is sufficient to proceed to the hearing. This conclusion applies, of course, only to the two issue areas that we are focusing on. It in no way prejudices the sufficiency of information for the myriad of other issues that are in the EIS that we are not reviewing.

We also want to be clear that our conclusion that there is a sufficiency of information should not be interpreted as meaning that we agree with Stillwater Canada Inc's conclusions on these topics. That matter will be addressed in our submissions at the hearing stage of this process.