



Working to conserve Maine's wildlife and wildlife habitat

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MAINE AUDUBON
TESTIMONY IN OPPOSITION
TO PROPOSED CHAPTER 200 RULES: METALLIC MINERAL EXPLORATION,
ADVANCED EXPLORATION AND MINING
BEFORE THE BOARD OF ENVIRONMENTAL PROTECTION
THURSDAY, SEPTEMBER 15, 2016

Good morning, Chair Parker and members of the Board of Environmental Protection. My name is Jenn Gray and I represent Maine Audubon and our 30,000 members and supporters in opposition to the proposed Chapter 200 rules.

As you know, Maine Audubon has consistently opposed the various versions of the proposed Chapter 200 rules because they haven't been strong enough. The Department of Environmental Protection (DEP) has made some positive changes to the rules. However, they still fall short.

Maine is a wonderful place that is blessed with precious natural resources that provide a rich foundation to our economy. It's essential that these resources are adequately protected. The rules as proposed do not provide sufficient protection for our natural resources, particularly Maine's aquatic resources including our clean lakes, streams, groundwater, and world class brook trout fishery and don't provide ample protection of taxpayer dollars.

In reviewing the proposed rules, Maine Audubon keeps in mind that they are not just about one particular site in Aroostook County but would apply to the entire state. You've seen the Maine Geological Survey's map before (attached) identifying volcanic and sedimentary deposits that are potential mining sites located across the state including Moosehead Lake, Cobscook Bay and the Western foothills. We need to make sure the rules are strong enough for the entire state.

The key weaknesses of the rules include allowing wet mine waste units during the operation of the mine. Most accidents that occur with tailings impoundments or wet mine waste units occur during the life of the mine, not after it's been closed down. Furthermore, if wet mine waste units are barred after closure, they really need to be banned from the start. Converting from wet storage to dry is exceedingly challenging. Dry storage should be utilized from the start and should be utilized throughout the life of the mine. Should a tailings impoundment accident occur at the Bald Mountain site for example, it would threaten the precious aquatic resources of the Fish River and Fish River Chain of Lakes and beyond including the groundwater and brook trout habitat.

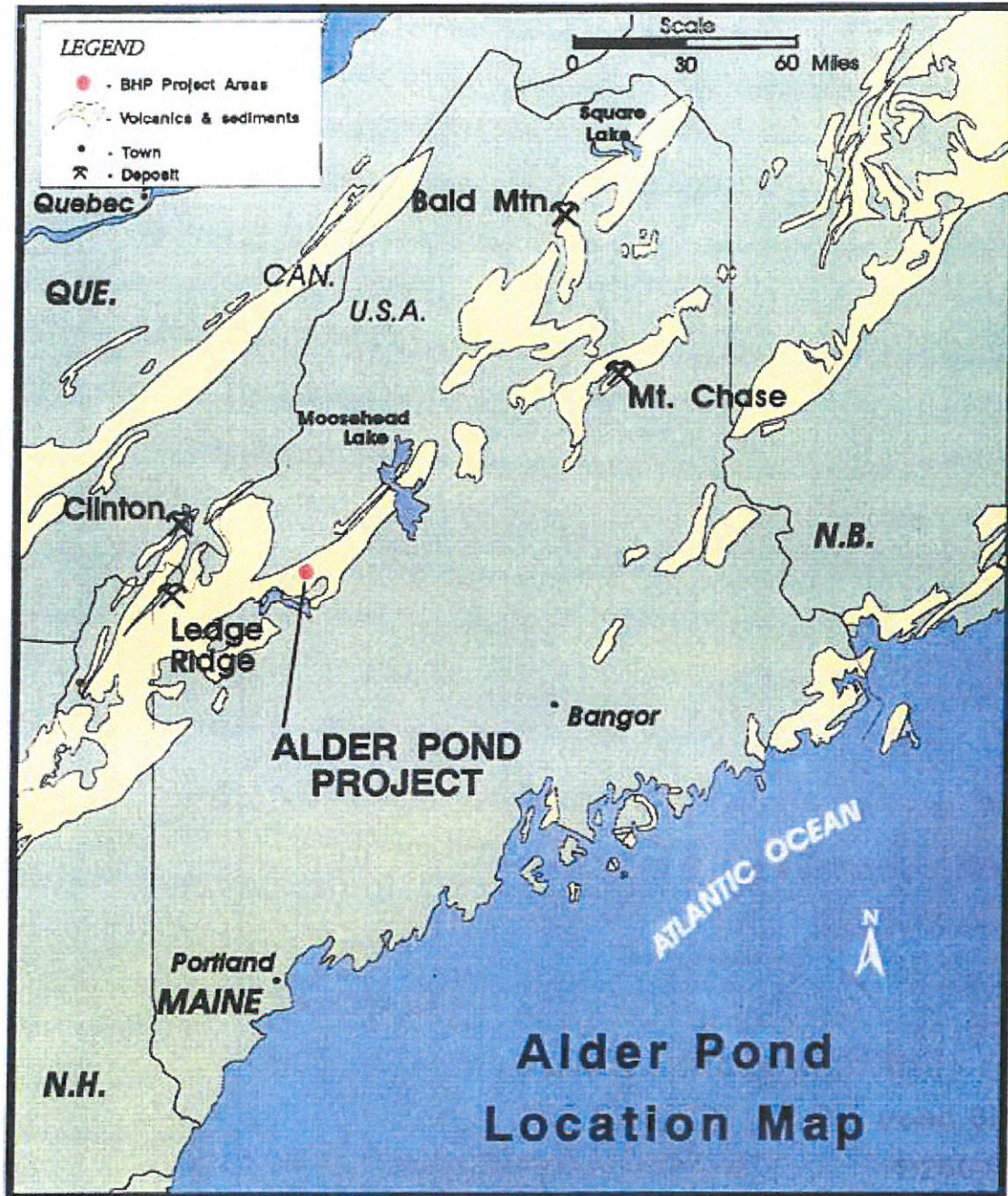
Allowing the location of mining operations in flood plain and flood hazard areas makes no sense at all. These are areas that have been identified as being susceptible to flooding. Locating a highly hazardous activity such as industrial metallic mineral mining in such locations is inviting disaster.

The history of metallic mineral mining tells us that taxpayers often get left paying for clean-up. Maine has experienced just this situation in the past. Haven't we learned? The full cost of clean-up including after a large scale accident must be required up front to protect public dollars.

Open-pit mining in Maine could result in arsenic, lead and other toxic chemicals contaminating our lakes, rivers, streams and soils. Maine Audubon is also concerned about potential adverse impacts to wildlife and wildlife habitat. We urge the BEP to oppose the proposed rules.

Thank you for your consideration.

Metallic Mineral Deposits in Maine



This Maine Geological Survey map depicts areas with the kind of rocks where metal ores in which copper, silver, zinc and gold are likely to occur. Very large deposits of volcanic and sedimentary rocks (shown in yellow) are spread throughout the state. Volcanic and sedimentary deposits often hold massive sulfide deposits, which are what open pit mining companies will be looking for in Maine. These metallic mineral deposits are located near some of Maine's most precious natural areas, including on both sides of Moosehead Lake, throughout the North Woods, and next to Cobscook Bay.

Map Source: <http://www.state.me.us/doc/nrimc/mgs/explore/mining/sites/nov05-1.htm>