



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

October 13, 2004

Anne Currie
Project Assessment Director
British Columbia Environmental Assessment Office
P.O. Box 9426 Stn Prov Govt
Victoria, B. C. V8W9V1

Re: Galore Creek
Draft Terms of Reference

Dear Ms. Currie:

The National Marine Fisheries Service (NMFS) has reviewed the *Application Terms of Reference With Respect to: An Application for an Environmental Assessment Certificate Pursuant to the Environmental Assessment Act, S.B.C. 2002, c. 43 for the Environmental Assessment of the NovaGold Canada Inc. Galore Creek Gold, Silver, Copper Project* and offers the following comments.

Section 2.1 Consultation

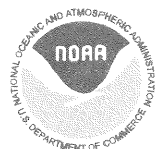
The Environmental Assessment Office (EAO), NovaGold, and Rescan Environmental Services Ltd., have done an exceptional job of informing and consulting with Federal and State agencies in Alaska. The draft Terms of Reference, however, does not mention this type of consultation. The second paragraph under Background highlights coordination between the EAO and the Canadian Environmental Assessment Agency. Sections 2 and 2.1 highlight First Nation consultation; consultation with communities (Dease Lake, Telegraph Creek, Iskut, Stewart, Meziadin, Terrace, Wrangell and Smithers); and consultation with industrial, recreational, environmental, and other individuals, groups and organizations who have an interest in the proposed development. The document includes no specific mention of the consultation that has occurred and will continue with the Federal and State agencies in Alaska. We recommend including this consultation in Section 2.

Section 5.1.4 Water Quality and Quantity

5.1.4 IV. b.

Include fish in the list of water quality impacts to be evaluated. NMFS recommends this section be written as follows:

b. a description of the predicted impacts of release of any effluents, surface runoff and seepages that may be directed to land (including consideration of surface ponding), with particular attention to impact linkages on vegetation, soil, fish and wildlife;

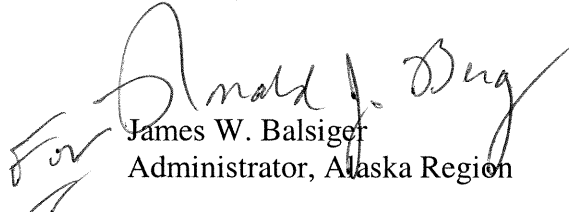


Section 5.1.5. Aquatic Habitat

The document should clarify that the assessment of impacts to aquatic habitat will include an evaluation of effects to fish and habitat located downstream (i.e., including Alaska).

If you have any questions regarding our comments please contact Cindy Hartmann at (907) 586-7585 or at cindy.hartmann@noaa.gov.

Sincerely,


James W. Balsiger
Administrator, Alaska Region

cc: Clem Pelletier, Rescan Environmental Services Ltd., Sixth Floor, 1111 West Hastings Street,
Vancouver, B.C. Canada V6E2J3
Bruce Halstead and Deborah Rudis, USFWS, Juneau
Pamela Bergmann, USDOI, 1689 C. Street, Room 119, Anchorage, AK 99501-5126
Ed Fogels, Alaska DNR, OMPM, 550 West 7th Avenue, Suite 900D, Anchorage, AK 99501
Jim Cariello, ADNR, OHMP, Petersburg
Robert Erhardt, USDA Forest Service, Wrangell Ranger District
Lynn Brunson - lynn.brunson@gems8.gov.bc.ca
Bob Hart - bob.hart@gems4.gov.bc.ca