



# Friends of Casco Bay Casco BAYKEEPER

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17 State House Station Augusta, ME 04333-0017  
[miningcomments2016.dep@maine.gov](mailto:miningcomments2016.dep@maine.gov)

December 15, 2016

RE: Comments of Friends of Casco Bay regarding proposed changes to Chapter 200 rules

Dear Chairman Parker and Board of Environmental Protection,

Please accept these written comments on behalf of Friends of Casco Bay and our nearly 2400 members and supporters, in opposition to Section 20 of the proposed major substantive mining rules. Specifically, draft section 20(B)(3) removes the prohibition from mining **under** (while still prohibiting mining in or on) great ponds, rivers, brooks, streams, and coastal wetlands.<sup>1</sup> **Friends of Casco Bay strongly opposes allowing mining under these water resources.**

For over a quarter century, Friends of Casco Bay has studied Casco Bay and applied its scientific findings to promote policies and laws that protect and enhance the health of Casco Bay. No metallic mining has occurred in, on or under Casco Bay. We are familiar, however, with the defunct Callahan Mine Superfund site in Goose Pond Estuary in Brooksville, Maine. According to a 2013 study, Callahan is the only open pit mine in an estuary in the country. Scientists who evaluated the site found that toxic metals (including copper, zinc, cadmium and lead) from the mine contaminated nearby sediment, water and fish, and probably harmed transient marine and coastal animals that feed on the contaminated organisms. Scientists also found surprisingly high metal concentrations in distinct areas of the marsh, indicating that the metals continue to seep from the mine's waste rock piles and debris.<sup>2</sup>

Maine depends on its iconic coastal wetlands for valuable ecological and economic roles, including serving as nursery grounds for commercial fisheries, providing critical habitat, and acting as buffering and filtering systems to promote healthy marine waters. It is impossible to envision how mining **under** such valued resources could occur without degrading them and the surrounding coastal environment. Mining must and should be prohibited in, on **and under** these state treasures. **Friends of Casco Bay urges this Board to redraft section 20(B)(3) to prohibit mining in, on and under great ponds, rivers, brooks and streams and coastal wetlands.**

<sup>1</sup> Draft Section 20(B)(3) prohibits the removal of ore, preparation, washing, cleaning or other treatment of metallic minerals **in or on** great ponds, rivers, brooks and streams and coastal wetlands, but removes the prohibition from mining **under** those waters. The prohibition against mining in or on those waters should remain intact.

<sup>2</sup> <https://www.sciencedaily.com/releases/2013/09/130920094752.htm>.

Thank you for considering our comments.

Sincerely,



Ivy Frignoca  
Casco Baykeeper  
Friends of Casco Bay

cc: Jeffrey Crawford