Department of Natural Resources

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Department of Environmental Conservation

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Re: Objection to Approval of Permit Applications

Request for Public Hearing

Request for Corrected Public Notice and New Public Comment Period

**Reclamation Plan F20232626RPA**

**Integrated Waste Management Permit 2023DB0001 for Manh Choh Mining Operation**

Dear Sirs:

I object to approval of the two permits listed above. I object to approval of any more permits on a piecemeal basis for the Manh Choh mining operation. There needs to be an EIS – or state equivalent - of the entire Manh Choh mining operation: extraction site, transportation sites, processing site, and all disposal sites. This operation is a large new mine and should be treated as such. It will generate acid mine Drainage (AMD).

I ask that a public hearing be conducted to explore all questions concerning the Manh Choh mining operation proposal. I ask for additional time for the public to comment on any proposed permit. The notice was confusing and incorrect. Many documents are not available online. They all should be available to the public online, and additional time for comment should be allowed for at least 30 days after all correct information is made available to the public, and a public hearing should be ordered.

1. **An EIS of the entire Manh Choh mining operation is required**

An EIS, an environmental impact statement, a look at the total cumulative impacts of the entire Manh Choh mining operation, is required before any single permit can issue. The state needs to stop piecemeal permitting tiny parts of the whole. The state needs to stop ignoring where problems go after leaving the extraction site, as well as stop ignoring the problems that will be left at the sites of extraction, transportation and disposal after mining ceases. But that is what the proposed waste management plan and proposed reclamation plan do. They both ignore all issues arising after ore, waste, trucks, etc. leave the extraction site.

This means the plans are incomplete and cannot be approved. Any truly “integrated” waste management plan and any reclamation plan for the Manh Choh mining operation must include the plan (not possibilities) of reclamation and of waste disposal at the extraction site, the transportation site, and the disposal site.

Since the state is constructing passing lanes and 5 new bridges to accommodate the trucking/transportation portion of the Manh Choh mining operation, that state/federal construction must also be included in waste and reclamation plans and in the overall environmental review/EIS of this proposed Manh Choh mining operation.

The area comprising the proposed Manh Choh mining operation is quite large. It includes over 1000 acres near Tetlin. But it also includes 248 miles of roads and city streets, and processing, waste disposal and tailings disposal sites north of Fairbanks at Fort Knox. The ore and potential problems associated with the ore do not disappear once they leave the extraction site. But that is what the review so far by ADEC and ADNR seems to indicate—that there is no need to look beyond the extraction site, or even examine what will be left at the extraction site.

Other examples of the type of review that should be required of a proposal for a large mining operation such as this one include: Red Dog, Greens Creek, Donlin and Pebble. Particularly here, where the ore is acid-generating and mineral-leaching, any reclamation plan must prevent the discharge of acid mine drainage (AMD).

What should be, but is not, happening here is that ADEC, ADNR, ADOT&PF are failing to undertake and complete a full and honest review of the entire Manh Choh proposal and applications for permits. What will the total Manh Choh mining operation’s cumulative effects be to human health and safety, to the health and safety of fish and wildlife, and to the quality of the air, water and lands that will be affected by the operations, transport and disposal of rock and soil that will generate acid and leach heavy metals? This is why an EIS should be undertaken -- of the entire mining operation, and not just of one-third of it - the extraction site.

1. **All permits and plans must include all parts of the Manh Choh mining operation: extraction, transportation and processing/disposal**

To be complete, any proposed plan must include all parts of the Manh Choh mining operation, not just the ore extraction portion of the operation. This is required by statute, which defines a reclamation plan as covering the proposed “mining operation.” The “mining operation” means each and every facility and activity in connection with the development, extraction and processing of a mineral deposit and each use reasonably incident to the development, extraction and processing of the mineral deposit. AS 27.19.100 provides (emphasis supplied):

## AS 27.19.100. Definitions. In this chapter,

**(5)** "mining operation"

**(A)** means each function, work, facility, and activity in connection with the development, extraction, and processing of

**(i)** a locatable or leasable mineral deposit except oil, gas, or coal;

**(ii)** other materials or of a sand and gravel deposit; and

**(iii)** each use reasonably incident to the development, extraction, and processing

of a locatable or leasable mineral deposit or materials;

**(B)** includes the construction of facilities, roads, transmission lines, pipelines, and other support facilities;

**(6)** "reclamation plan" means a plan submitted by a miner under regulations adopted by the commissioner for the reclamation of a proposed mining operation;

Both plan proposals and applications are incomplete and inadequate, as they only discuss the extraction site. By law, they must include a plan for waste management and reclamation for every part of the mining operation: the extraction site, the 248 miles of roads that will be used between extraction and processing, and the processing and disposal site.

In the meantime, a public hearing should be held to allow public comment on the entire proposed mining operation, including the transportation operation and the processing/disposal operation.

Attached and incorporated into this comment are the comments of the Environmental Protection Agency (EPA) to the Army Corps of Engineers (ACOE) about one year ago. The comments are still very valid even though ACOE disregarded them all and chose to ignore anything but 5 acres of wetlands in Tetlin. I incorporate by reference the EPA’s comments into my own. I direct the EPA’s comments to the DEC and DNR and ask that the two plans under consideration also respond to these requests and suggestions outlined by EPA for better protecting public health, safety and the environment. I believe other agencies may comment and ask that their comments also be addressed before any permits are allowed.

1. **The acid-generating nature of the Manh Choh ore requires special oversight and handling which is lacking in both plans.**

Neither plan adequately addresses the type of ore that the Manh Choh mine operation will excavate, transport 248 miles across Alaska, and process and dump as tailings near Fairbanks, in the Chena River drainage. Attached and incorporated by this reference into my own comments are those of Randy Brown. Unlike ore at Fort Knox, the Manh Choh ore will be acid-generating. It poses health and environmental additional issues at each portion of the mining operation.

A. Extraction

At the extraction site, the “reclamation” plan is to leave an open south pit. EPA recommended filling this pit just as the north pit will be filled and covered with an impermeable layer. Otherwise, the waste rock and pit walls can generate sulfuric acid. There are no measurements or studies to show this will not happen at the open pit at Tetlin, even if it were filled with water. The pit water level could fluctuate, could overfill, and could leach or drain as acid mine drainage (AMD) from the pit site. (See article written by Randy Brown.) There is no discussion of rainfall, global warming effects on rainfall in this area, or seismic activity and how they will affect drainage of AMD from both pits.

As noted, AMD can last for hundreds or thousands of years after the mineral prospect has been exhausted and requires perpetual mitigation and monitoring to preserve water quality downstream. The applicant admits that groundwater from the pit will seep into perennial streams that flow into Tetlin Lake and the Tok River. The seven years of monitoring contained in the reclamation plan is inadequate for the extraction site, as is the amount of the bond. But certainly, monitoring and reclamation at the transportation and disposal sites need to be included.

There is inadequate identification of lessors/owners/ lessees/operators/managers and parties liable under any permits affecting the extraction location.

B. Transportation

The Manh Choh mining operation includes all the territory within 248 miles of public roads and city streets between the Manh Choh extraction operation and the Manh Choh processing and disposal operation. These roads and city streets cross numerous wetlands, streams, lakes, ponds, sloughs and rivers. In addition, the sheer number and size of the trucks will create hazards to public health and safety of those travelling on, living or being near the roadway.

The ownership of the land for this portion of the operation is different from the extraction site. The ramifications of differing ownership interests should be explored when considering waste management and reclamation duties of the applicant.

The Manh Choh mining operation will create from 100 - 200 new point sources of contamination - every day – on and alongside the roads used to truck the ore from Tetlin to Fort Knox. Trucking ore on 248 miles of highway will release (1) solids: rocks, sands and debris, as well as the acid-producing ore escaping from the trucks; (2) gaseous pollutants: dust, silica, particulate contamination, and greenhouse emissions; and (3) liquids. Liquids from ore and the trucks will include: process wastewater used in transportation (such as for dust mitigation and cleaning), surface runoff from precipitation falling onto the trucks, ore, and roadways used, and leakage from incidental water used for machinery cleaning, cooling and dust suppression. The solids, gases and liquids all have the potential of travelling across and overland to surface water systems and to percolate into aquifers. Solids, liquids and gaseous pollutants will be deposited directly onto roads and bridges, and from there, into creeks, ponds, sloughs, lakes and rivers. The highways will become sources for contaminating the waters nearby. The highways and adjacent waters will become a disposal site for the ore from Tetlin, and a source for contaminants to spread to land, air and water nearby.

The applications and plans are incomplete by failing to include waste management and reclamation for this transportation part of the Manh Choh mining operation.

C. Processing and disposal

The Manh Choh mining operation’s processing and final disposal site is the Fort Knox gold mine, where the Applicant will process and dispose of Manh Choh tailings and wastewater. Fort Knox is a totally different location and watershed than Tetlin, with different ownership interests. Again, there is no identification of owners, lessors, lessees, operators, or managers for this portion of the Manh Choh mining operation.

The soils, ores, weather, pollutants and contaminants at Fort Knox are not the same as those at Tetlin. (See, Brown article.) The mine processes and disposal safeguards at Fort Knox are not adequate or appropriate for acid-generating ore that is brought from Tetlin. The applicant assumes that its mill and waste sites at Fort Knox can handle ore from a different location without undertaking any study, analysis or disclosures about this, and without planning any additional mitigation or protection from AMD and other potential problems.

The Manh Choh mining operation also will also cause soils and pollutants from Fort Knox to be spread along the highway route all the way back to the Tetlin Extraction Site. There needs to be full disclosure and study of the pollutants and contaminants coming from the Fort Knox Mine Site to the rest of the mining operation locations before any plan is permitted. There needs to be full disclosure and study of the pollutants, contaminants and ores coming from both Tetlin and from Fort Knox.

**IV. Acid-Generating Ore Contaminants, Heavy Metals and Other Pollutants Will be Released from the Trucks and Deposited On the Highways and Adjacent Aquatic Ecosystems**

The Manh Choh mining operation will transport acid-generating ore on 248 miles of public roads miles to the Manh Choh processing and tailings dump at Fort Knox. The remnants of the ore remaining in the trucks after they are off-loaded, will then be hauled back to Tetlin. The contaminants in the ore will be released at all three locations: extraction, transportation and disposal sites.

These releases will be substantial within the transportation corridor, and the cumulative effects of the releases must be considered. The applicant has given varying numbers for truck transits but it has generally remained at 3-4 deliveries of ore per hour, 24/7/365. With the return trip to the extraction site, that means 52,560 to 70,080 ore truck transits per year (3 x 2 x 24 x 365 = 52,560; or 4 x 2 x 24 x 365 = 70,080). The number is staggering.

The trucks and the road will become new point sources for pollution. This many ore truck transits will be a significant source of pollution along the route and cause the highway and surroundings to become new sources of pollutants. The highway and adjacent land and waters will become a “disposal site” for the ore extracted from the Tetlin Extraction Site. This cannot be permitted without a full evaluation, and factual findings that the discharges will not adversely affect aquatic ecosystems adjacent to the highway corridor. Unless the Applicant proves there will be no harm, we must assume there will be harm.

Until the Applicant proves that its discharges of ore, pollutants and contaminants all along the transportation route will comply with federal and state law and regulations, they cannot be permitted. In evaluating whether the highway systems can be used for an industrial ore hauling operation, the state should identify and evaluate the characteristics of the roads, including how they relate to their living communities and human uses, and whether they are suitable for such an industrial ore haul.

**III. The Public Highways Proposed for Conversion to the Manh Choh Industrial Ore Haul Roads are not Suitable or Safe for Hauling Ore**

The Manh Choh mining operation plan is to transport gold ore from the Tetlin Extraction Site to the Manh Choh processing and disposal site at Fort Knox, thereby incorporating into the Manh Choh mining operation footprint, the following highways:

* Alcan Highway, Tetlin to Delta Junction
* Richardson Highway, Delta Junction to Mitchell Expressway
* Mitchell Expressway, from Richardson Highway to Peger Road
* Peger Road, from Mitchell Expressway to Johansen Expressway
* Johansen Expressway to Steese Highway
* Steese Highway to Fort Knox

About 200 miles of these highways are two lanes only; about 40 miles from Eielson Air Force Base through Fairbanks to Fox, have four lanes. The Applicant provides no assessment of these roads for its proposed industrial ore haul operation. The applicant provides no transportation plan, no traffic counts, no traffic impact analysis, no traffic safety analysis. It provides no safety plan. It does not discuss hazards created by weather, including snow, ice, wind, fog, rain and ice fog. It ignores the lack of daylight for much of the year. Between Tetlin and Eielson, the route is a two-lane highway, with narrow or no shoulders, dangerous curves, steep hills and short sight distances. It has a very few, very short, passing lane areas. Even if additional passing lanes are built, there is no explanation how the travelling public can safely pass vehicles that are 95 feet long, especially if two or more are travelling together.

The Applicant ignores the safety of school children that school buses pick up and drop off twice a day, every school day, at the 100+ school bus stops on the highway corridor. This factor alone makes the road corridor proposed unsuitable for hauling ore on an industrial level.

The last 8 miles to Fort Knox from Fairbanks are very challenging and dangerous to drive. The two-laned road ascends to Cleary Summit at a very steep grade and has a hairpin curve at Skoogie Gulch. Single loads cannot negotiate that curve without crossing over into the oncoming lane. Residents at Cleary are worried about the lack of safety of this stretch of road. During ski season, Skiland Resort brings many skiers to Cleary every weekend, holiday and at Christmas and Easter breaks. Twice a day, employees of Poker Flat Research Range will be forced to follow these large trucks as they slowly climb up to Cleary Summit. Even worse, they will have to avoid a head-on collision with a truck that has crossed over the center line to negotiate the curve at Skoogie Gulch. While the applicant posed the possibility of building a separate road to Fort Knox from Fox, that plan has not been confirmed.

The Applicant’s transportation portion of its mining operation presents an unacceptable danger to highway users at this location and elsewhere along the proposed route. If the Proposal and Permit requests are not denied outright, then a hearing is desperately needed to understand these safety issues, have an independent review of them, and to protect the public.

Each truck is projected to weigh 80 tons loaded and 30 tons unloaded.

The Applicant provides no analysis of the roads and bridges it proposes to use, and whether they can accommodate and hold up to the equipment size, weight and number of trucks it proposes. Three bridges were built in 1944 along the route. Can they withstand the number of truck trips and weight the Applicant plans to haul? Since the state plans to replace 5 bridges along the route, it hardly seems suitable for such an industrial ore haul before the bridges have been replaced.

Will the weight and number of truckloads of ore and returning trucks cause the bridge structures to fail? What damage will be done to road surfaces by the weight and numbers of trucks across 248 miles? What plan for repairing this damage does the Applicant offer? What safety improvements does the Applicant propose, to shore up, maintain and restore the infrastructure? None.

Special skills are required to drive long wheelbase, double trailer trucks in Alaska. How will the Applicant find specialized drivers when there is a nationwide shortage of regular truck drivers? What will happen in case of an equipment breakdown, or need to stop on a highway that provides no space to pull over? In inclement weather, 17 AAC 25.014(e)(1) requires long combination vehicles, like those the Applicant will use, to stop operations. There are very few places along the road where a truck can pull over and get off the road surface safely. Will they have to stop on the highway? During snow periods, think of how dangerous it will be for other drivers to meet or follow – much less pass - one of these trucks billowing snow.

How will the Applicant control the timing and spacing of the trucks on the highway? They will naturally bunch and stack up, as will traffic behind them. This will not only increase the likelihood of motorists being forced to pass one or more of these 95-foot trucks on the two-lane highway, but will be a genuine inconvenience to the motoring public. Within communities along the route, the additional traffic will undoubtedly cause traffic congestion, and more air pollution in the Fairbanks-North Pole serious non-attainment area.

The Applicant also fails to analyze how this number of additional truck trips can be accommodated in view of substantial construction projects planned for the same time period when the trucks will be operating. The Alaska Department of Transportation has announced the reconstruction of the bridges over the Robertson, Johnson and Gerstle Rivers, the northbound Richardson bridge over the Chena Flood Control Project, and the Steese bridge over Chena Hot Springs Road. There will also be construction on the Richardson and at the GARS and Steese/Johansen intersections. If the mining operation does not wait for these projects to be completed, how will traffic be accommodated? How will the Applicant deal with the delays and prevent traffic congestion and stack-up of vehicles at these locations? We doubt it would be possible.

The Applicant’s mining operation plan is clearly contrary to the public interest and should be denied approval.

Before any determination is made concerning the traffic and public safety of this Plan, an independent review of all its aspects - a risk analysis, a highway safety analysis, a cost-benefits analysis – needs to be completed. One has commenced but may not be completed before the Manh Choh mining operation’s hoped-for starting date in 2024. We submit that the dangers, adverse impacts and inconvenience of the Manh Choh mining operation to the public and the environment will clearly outweigh the benefits the mine owners hope to achieve. The Manh Choh mining proposal is contrary to the public interest, and all permits allowing it to proceed should be denied.

**IV. Waters of the United States and Their Aquatic Ecosystems Will be Adversely Affected by the Manh Choh Mining Operation**

The following are waters, including anadromous waters, that could easily be harmed by the Manh Choh mining operation.

1. Navigable Waters

Chena River, Little Chena River and Noyes Slough

Tanana River and its sloughs

Chatanika River

1. Lakes. At least two of these are stocked with fish by the State of Alaska.

Tetlin Lake

Quartz Lake

Birch Lake

Lost Lake

Harding Lake

1. Ponds

Bathing Beauty Pond

Gravel pits

1. Streams, Creeks, and Rivers with Bridges Across. **\*** signifies those bridges to be replaced with state/federal funds for the “Tetlin to Fort Knox Corridor”

Tok River

Yerrick Creek

Cathedral Rapids # 1, 2, 3

Sheep Creek

\*Robertson River (bridge built in 1944)

Bear Creek

Chief Creek

Berry Creek

Sears Creek

Dry Creek (bridge built 1957)

\*Johnson River (bridge built in 1944)

Little Gerstle River

\*Gerstle River (bridge built 1944)

Sawmill Creek

Tanana River Big Delta

Shaw Creek

Banner Creek

Salcha River

Clear Creek

Munson Slough

Little Salcha River

Moose Creek

Chena Flood Channel

Chena River

\*Richardson northbound bridge at Chena Flood Control Project

\*Steese bridge over Chena Hot Springs Road

1. Wetlands.

**V. The Communities Along the Highways Will Be Adversely Affected by Dangerous Traffic, Noise and Pollution**

The Manh Choh mine’s transportation proposal using ore haul trucks will cause unnecessary and dangerous hazards for communities along the route, and for all humans anywhere near the highways – the driving public, people living nearby, and anyone anywhere in the vicinity of the truck route. These communities include Tok, Tanacross, Dot Lake, Delta Junction, Whitestone Farms, Birch Lake, Lost Lake, Harding Lake, Salcha River, Eielson Air Force Base, Moose Creek, North Pole, Fairbanks and Fox.

What emissions and noise will each truck cause? What volume of emissions and noise will the large numbers of trucks and trips cause? The Applicant supplies no analysis of this. Yet, additional emissions will impact both North Pole and Fairbanks, which are listed as “Serious Non-Attainment Areas” for particulates. What effects will the additional particulates have on the status of each community with regard to air quality regulations? Will they cause the two communities to be limited as to other economic development because of the Manh Choh pollution? How much more ice fog will the trucks generate as they travel through the middle of North Pole and Fairbanks? No decision on the Manh Choh mining operation should be made without an analysis of the volume of particulates and other emissions that will be added to the communities along the highway route.

In addition to particulates, the communities should know what to expect in terms of additional noise and emissions: dust, particulates, greenhouse gases, silica, ice fog, etc. The Applicant needs to disclose what will be released within the communities along the highway route. Everyone near the route - schoolchildren at their 208 school bus stops twice a day, military personnel in open convoys, the motoring public, tourists and residents – all will be adversely impacted by the emissions from the huge volume of new industrial truck traffic.

The proposed huge increase in industrial ore haul traffic everywhere along the route will cause additional accidents and additional problems for emergency services providers. The Applicant provides no plan for addressing these concerns.

The Alcan and Richardson Highways are very important links in Alaska’s limited road infra-structure. They provide links to the Lower 48 through Canada and to tidewater at Valdez and to Anchorage. Many communities rely upon this road corridor even though they sit some distance from it: Eagle, Healy Village, Fort Greeley, and Paxson, to name a few. The Alcan/Richardson is the only road link for some of these communities to food, medical and other services. A closure of the road or a bridge would be a devastating event for these communities, but the trucking plan proposed by the Applicant makes such a closure a very real possibility. What alternatives does the Applicant propose if one or more of its trucks or truck trips causes a bridge failure or road closure? None are suggested by the Applicant. To adequately analyze all safety aspects of the Applicant’s ore hauling plan, we ask for an independent analysis to be undertaken of the Manh Choh transportation plan. All traffic, health and safety concerns must be analyzed, before any permits are approved for the Manh Choh mining operation, or any portion of it.

As mentioned previously, the Applicant supplies us with no reliable and comprehensive analysis of the impacts of the noise/vibration, traffic and pollution that the transportation portion of its mining operation will cause, whether upon human populations, fish and aquatic ecosystems, wildlife and vegetation along the route. These all will be impacted by noise, vibration and pollutants caused from the trucks. One only has to wonder how many moose and other animals, aquatic species and birds will be killed directly by 70,000 truck transits across 248 miles of Alaska. We doubt that figure will be insignificant. The Applicant should provide an answer to these questions, so that these impacts are analyzed and considered in any determination on any permits for the Manh Choh mining operation. Without the information and analysis, all applications must be denied.

**VII. The Applicant Refuses to Consider Alternatives, But They Exist**

We just asked, “How many moose will die?” But the real question for me is, “How many people will die?” How many people will die or be injured because of 70,000/year industrial ore haul truck trips across 248 miles of Alaskan highways? Even one would be too many. Yes, there are the environmental and health concerns. But for me, the public safety issue is uppermost. The Manh Choh mining operation’s transportation operation will jeopardize human lives, human health and the environment. Because of this, any permits for the Manh Choh mining operation should be denied. The Applicant should be required to develop an alternate plan that does not put the public at such an unreasonable risk for adverse impacts.

There are several alternatives that the Applicant has advised it is not considering:

* **Process on or near Extraction Site.** The Applicant originally considered a plan to process the ore at the Tetlin Extraction Site. This would lessen the mining operation’s Footprint by more than 248 miles, and eliminate the need to address AMD at the processing/disposal site at Fort Knox. Processing on site is the traditional method for dealing with gold ore, and usually proves to be the only economic way to mine for gold. The Applicant wants to use infrastructure it has developed at Fort Knox, 248 miles away. But to get there, the environmental footprint of its operation expands by that same 248 miles, putting communities at risk, adversely impacting human health and safety and the environment all along the way. Processing at or near the extraction site is the logical, better alternative to the mining operation proposed by the Applicant. The footprint would be much smaller. The land can be reclaimed. And residents and visitors all along the proposed corridor and in the drainage below Fort Knox will not have to face all the adverse effects that the proposed transportation and processing/disposal components of the Manh Choh mining operation.

The Applicant has claimed that building a mill and tailings disposal facility near Tetlin would make the project unfeasible. This is not true. The enclosed notice of a 2018 feasibility study by the prior owner of Peak shows that such an alternative is feasible, particularly since gold is now at about $1800/ounce, rather than $1250 when the study was completed.

* **Extend the Railroad to Tetlin.** The Alaska Railroad already has an approved Record of Decision from the Surface Transportation Board to extend the railroad from North Pole to Delta Junction. The Alaska Railroad could apply to further extend the railroad from Delta Junction to Tetlin. It has long been a dream of Alaskans to have a rail link to the Lower 48 and extending the line to Delta Junction and Tetlin would advance that goal. Railroads are traditionally the method of hauling ore, coal and similar materials, in a safer manner than highway trucking.
* **Create a Pioneer Road along the Railroad Right-of-Way, or Elsewhere, Between Fort Knox and Tetlin.** AIDEA is in the business of building industrial roads. It finances construction of roads to a new development, and then the developer repays AIDEA over time, as part of the cost of developing a viable, safe, and reliable transportation route to the mine or other operation. There are other potential gold mining sites in or off the Richardson Highway/Alcan road corridor. We understand these include prospects include Richardson, Shamrock, Eagle-Hona-Triple Z, and Lucky Shot. There may be others. These could be tied into such a development road, and all that traffic kept off the public highways. The Alaska Railroad right-of-way, already in existence, could be used for a pioneer road, and later built with a railroad line. Or, a spine road from Chicken to Fort Knox could be built. In this way, if trucking is preferred to rails, the trucks could operate on an industrial road and not put the public at risk by using public highways or converting them to ore haul roads.
* I have wondered what new technologies, used elsewhere, might more safely transport Manh Choh ore or concentrates than our public highways. Long distance conveyors have been used elsewhere. And one Canadian firm plans to use a hybrid air ship, to provide transportation for ore concentrates from the extraction to the processing site. But the most logical and common sense alternative is to process the ore at or near the Tetlin Extraction site, thereby eliminating any need to transport ore 248 miles at risk to the public.

In summary, I ask DEC and DNR to find that the proposed permits for, and the Manh Choh mining operation, consisting of the Tetlin extraction Site, 248 miles of public highway and adjacent waters, and the processing/disposal site at Fort Knox, would be contrary to the public interest. The permits must be denied.

In separate letters, I have outlined other reasons for denying the permits. But for this reason alone, they should be denied. The state should conduct an EIS of the entire proposed mining operation first. The EIS should include the state’s plans to use federal and state money to construct bridges and passing lanes to accommodate Manh Choh. All supervisory agencies and the public should analyze the plans and the negative impacts they will have on public health, safety and the environment. When that is done, and the alternative methods of conducting the mining operation are considered, this plan to transport acid-producing ore and dispose of it 248 miles away from the extraction site, should not be permitted, as it is contrary to the public interest.

I also ask for a public hearing and for additional time to comment after the public notice is corrected and all studies and reports are made available to the public online.

Sincerely,

Barbara Schuhmann

EPA Requests to ACOE

Randy Brown article

2018 Royal Gold press release re: Peak Gold

Reqt EIS