

Philip Marshall

Dear Ms. Adoko,

As a retired geologist, I am writing you to reject the Peak Gold application for Draft Waste Management Permit 2023DB0001 (unable to access the public application documents digitally) at the Manh Choh mine next to Tetlin. If DNR proceeds, I am requesting a public hearing to air my reservations and seek tighter regulation and monitoring of the project.

The Manh Choh project and its permitting has been flawed from the start. It should always have been considered a large mine project and thus should have undergone NEPA scrutiny with an EIS. The cart before the horse where the AK Dept of Public Safety should have been in closer consultation with DOTPF concerning the trucking of the ore from Tetlin to Ft. Knox has been mismanaged (and the latter probably violates existing regulations). Both of these missteps will likely lead to court injunctions by concerned locals.

Major problems with the proposed waste management plan start at Tetlin and end at Ft.

Knox. Acid-generation and heavy-metal leaching at the Manh Choh mine site at the pits and tailings dump sites threaten clean water bodies, especially in proximity to the grand Tetlin National Wildlife Refuge. Perforation of tailings membranes or covers is just a matter of time, not if. And the insult is unlikely to be known since the water-quality monitoring is for a mere five-year period. What remediation plans are there for pumping mine waste waters in perpetuity? What is the amount of bonding for such work? Is it realistic?

The highway haulage presents substantial threats from spills, air and water pollution (to say nothing of the traffic hazards).

As to Kinross' Ft. Knox, this mega-industrial scar upon the land will have compounded the problems of Manh Choh in a totally different locale by seeking "admendments" to its waste management plan/permit to accomodate Manh Choh's processed ore and residues. The settling ponds dams will have to be raised with its ensuing threats. And the entire water-quality monitoring program needs to be revamped to handle this increased volume with its changed chemistry. This entire question of sampling- types, frequency, duration, funding and emergency management plans & protocols in the event of failure or seepage- needs to rescrutinized. It is currently underregulated and favors the corporate entities.

The "divide and conquer" strategy where one State agency does not interact meaningfully with another State agency for a rigorous and objective analysis and review in the permitting process only leads to a forgone outcome- promote the mine. But this pigeon-holing does a disservice to the health and well-being of the State over the longterm. Sadly, this project may set the precedent for a host of similarly designed projects in this region.

In summary, this project creates a host of longterm problems for a short-term, inconsequential gain of raw material for jewelry. Why place Alaska in such a position? It makes more sense to either drop the scheme or at least to reengineer it to reduce its deleterious effects.

Sincerely,

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