

Katie McClellan

March 13, 2023

I am submitting the following comments in response to the tentative approvals of the DEC Integrated Waste Management Permit 2023DB0001 and DNR Reclamation Plan F20232626RPA for the Manh Choh mine. More thorough review is needed to fully understand the many components of these permits and the overall mine plan, most especially, the transportation and ore processing and storage that will take place off-site, and which is conspicuously absent from consideration in these permits.

These permits do not consider the full scope of this project, and as such, are incomplete assessments of the mine and its impacts and necessary management and reclamation. As proposed, the project includes significant movement of ore off-site, and its operation depends on infrastructure that is separate from the mine itself. However, none of this additional infrastructure, including transfer stations, the transportation corridor, or the final destination at the Fort Knox mill and waste storage areas, have been included in these permits, despite their absolute “necessity” for the project’s successful operation. Due to the lack of inclusion of the ENTIRE project within these permits, they are incomplete, and as such, the permits should not be approved in their current state.

The waste management permit doesn’t assess spills that will occur outside of the immediate Manh Choh mine site, nor does it consider the intermediate and final destinations of the ore. Because these points of impact are critical components of the ore’s transfer from mine to mill, they absolutely must be included in the data collection process, state agency assessment, and the mine’s management plans. The EPA in August 2022 urged the US Army Corps to look at data that was in error or lacking at the mine site, plus collect baseline data to inform the scope of the ENTIRE project, including the transportation corridor and Fort Knox. These permits from the state should not be issued until USACE, DEC, and DNR heed this advice and complete a more thorough assessment of baseline environmental quality data at both the Manh Choh mine site and all areas between the mine and the mill. Further, the project proponents should reevaluate their permit applications and include impacts outside the immediate mine site and include provisions to mitigate and manage waste beyond the mine itself before DEC and DNR consider authorizing a permit. In addition to spills outside the mine site, DEC and DNR must consider the impacts of heavy-metal laden fugitive dust. Currently, no management plans are included in the permit applications to address mitigation and remediation of fugitive dust and spills outside the mine. Beyond covered loads, no other plans are in place to reduce the amount of dust spread outside the mine and along the transportation corridor, which includes multiple agricultural, rural, suburban, and urban communities as well as significant tracts of wildlife habitat and numerous waters of the United States, all of which will experience increased impacts from heavy-metal buildup as dust blows off the trucks. DEC and DNR absolutely must require collection of baseline data outside the mine site where ore will be transported in order to inform mitigation and reclamation practices, as well as to track the impacts of the toxic dust. The landscape, wildlife, water quality, vegetation, and communities will all suffer the consequences if further efforts are not made to address the impacts of fugitive dust beyond the mine site. This critical data and response plans are missing from the waste management permit and it should not be issued until these data and management gaps are filled in.

Manh Choh ore is acid-generating and heavy metal leaching, which is considered in these permits, but not adequately enough. The permits only look at ore at the mine site, but it will be handled outside of the mine site and transported over 250 miles to Fort Knox, which does not manage

acid-generating ore. In order for these permits to be complete, they must address the management of the Manh Choh ore wherever it is located, not just where it is extracted. The transportation plan has been proposed as a way to make the mine economically viable (proven to be a lie by a 2018 economic assessment completed before Kinross' involvement in the project) and to reduce its environmental footprint. While not requiring the construction of a mill or tailings facilities at the mine site does reduce the footprint there, it spreads the impact and burden across a much larger area, which requires MORE planning to manage, yet these permits do not address this.

Contaminated materials, including effluent must be captured and treated before they cause environmental impacts, but these permits include no measures to do so beyond Manh Choh, despite the potential for much broader impacts to be felt by the surrounding landscape and communities. Groundwater contamination is a significant risk from the acid-generating ore, and the current plans for waste rock management at the north and south pits on the mine site are inadequate. While backfilling and covering with water will reduce oxidation, there is still high potential for effluent from the pits to leach into surrounding groundwater and cause contamination. Due to the mine's proximity to the Tetlin National Wildlife Refuge, with its abundance of wildlife habitat, especially for migratory waterfowl, having open pit lakes with toxic water is a serious threat to the health and safety of these wildlife. More needs to be done to reclaim the pits and ensure that groundwater contamination and wildlife habitat and health are not issues. Moving beyond the mine site, the ore will be processed and stored at Fort Knox, which does not manage or store acid-generating ore, nor was it designed or permitted to do so. The waste management and reclamation plans do not contain any management measures for Fort Knox, despite the majority of ore ending up there. Kinross has proposed an 80:20 or 70:30 mix of Fort Knox: Manh Choh ore to reduce oxidation and acid-generation, but there are no measures outlined in the permits to address what happens if these proposals do not mitigate acid-generation to the degree needed. What will happen to groundwater and downstream resources at Fort Knox? How might this affect our local waterways, including the Chena River watershed or the Tanana? The waste management and reclamation plans absolutely must consider EVERY site where Manh Choh ore will move, but especially must consider Fort Knox in the plans. This means that Fort Knox must update its own waste management and reclamation plans as part of this process in order to accommodate for the different metallurgy and the different management practices that must be incorporated in order to protect the surrounding landscape and the mine's neighboring communities. Their current reclamation plan shows that in 100 years, the Fort Knox mine will no longer need to be monitored, but acid-generating ore and its effluent must be monitored in perpetuity, even at lower concentrations like what might be found from the mixed ore at this site.

The plans for monitoring the mine site after closure are also inadequate. As previously stated, acid-generating ore and effluent must be monitored forever, but the permits only allocate 5-7 years of monitoring post-closure. Adaptive management must be addressed to account for the variables not currently considered in these permits.

Because of the shortcomings of these permits, and the fact that they do not address major components of the project outside the mine site that are critical to its function, I request that DEC and DNR reject these permits until more baseline data can be collected, the plans can be updated to include impacts along the transportation corridor and at Fort Knox, and the public has a greater opportunity to review, comment, and decide for itself whether this project is in our best interest. As currently proposed, these permits do not sufficiently protect the safety and health of the community and ecology of Interior Alaska and should not be approved. More thorough review is necessary, whether from the federal government or state agencies. Further, closure plans must be updated and strengthened in order to ensure that future generations do not pay the price for short term gains.

Katie McClellan Fairbanks, AK

