

Department of Environmental Conservation  
610 University Avenue  
Fairbanks, AK 99709

Department of Natural Resources  
550 W. 7th Avenue, Suite 1430  
Anchorage, AK 99501-3577

Re: Objection to Approval of Permit Applications  
Integrated Waste Management Permit 2023DB0001  
Reclamation Plan Permit F20232626RPA

Dear Sirs,

I ask that you deny the above permit applications. Below I have listed just a few of the reasons why, and issues that need further examining.

### 1. Liability

The permittee should be companies that are registered and authorized to do business in Alaska. Parent companies should sign on to a bond so that they share the responsibility for debts of their limited liability subsidiaries in this project. Before approving these permits, DNR and DEC should make sure that the named permittees are the actual responsible and liable entities, and that any collateral or property to support that bond exists and is actually owned by them. Include all phases of this project, the mine site, roads and highways ore is hauled on, and the mill, disposal and reclamation sites.

### 2. Acid Production and Metal Leaching Management

Hauling away the ore will not remove all acid production or metal leaching at the Manh Cho mine site. Water testing should continue beyond ten years after closure. EPA identified inconsistencies in water sampling data that was used in the project planning phases, and has concerns about the hydrologic modeling which might underestimate the potential for groundwater contamination.

This permit totally ignores the introduction of acid-producing ore and the effects of a different geologic material on the Fort Knox site. How will that change the toxicity of leach material at the existing site? Shouldn't there be a new permit for Fort Knox that includes these new parameters? The permit for the Manh Choh project should include reclamation of the processed ore waste at Fort Knox, and be included in any bond.

### 3. Waste Management and Local Communities

Are local communities, such as Tok and Delta, prepared for increased use at their landfills? Although toxic substances are not supposed to be sent there, it isn't clear how much material will be disposed of at these sites. Communities such as Fairbanks and Glennallen are also listed as possible disposal sites, but a complete picture of what substances, and in what amounts, is needed. Will ADEC be monitoring waste disposal and be in contact with these communities?

The tire issue also needs more examination. Disposal is mentioned but toxicity and the quantity need to be clarified. In addition, with this configuration of haul truck, the increased scrubbing action by the wheels when turning means more tire particles on the roads. These particles wash into local waterways and are particularly harmful to Coho salmon. Streams draining into the Tanana river host spawning Coho.

#### 4. Permit Renewals

Manh Cho has the potential to become a much larger, longer-lasting operation than what is presented in this permit. The Fort Knox mine and the use of that site and development of surrounding claims has had a much longer life and bigger footprint than what was originally permitted. While that has been beneficial economically, those who live nearby or below the growing mountain of tailings might feel they were misled from the start as to the scale and limitless time period. Extension of permits seem to have been automatic. The big picture has been overlooked to focus on smaller increments. And now there will be a fundamental change with the introduction of more-toxic metals and acid-producing rock, which is not being addressed. Will the same process occur with Manh Cho, and how will that affect the long term impact at the mine site and the rest of the Interior?

#### 5. Conclusions

This ore haul plan sets a precedent in turning our existing highways into industrial haul roads long into the future. It puts profit over the safety of the traveling public. It plays a shell game with environmental problems by moving them around and suggesting that environmental studies are not needed. This is exactly why an EIS or its state equivalent is needed. The complete project needs to be examined, from Tetlin to Fort Knox, and taking into consideration expansion continuing for at least twenty years of this one mine.

The Integrated Waste Management Permit 2023DB0001, and Reclamation Plan Permit F20232626RPA should be denied, and public hearings held.

Sincerely,  
Michelle Gillette