

David Cornberg

I want to start my public comment with the obvious:

1. There needs to be an Environmental Impact Statement (EIS) - or state equivalent - to be completed, including the entire transportation route from Tetlin to Ft. Knox. The ore is considered potentially acid generating (producing sulfuric acid when exposed to oxygen) and mineral-leaching. Fugitive dust and mine can be toxic to animal aquatic life and wetlands.
2. DNR should do an Environmental Assessment to determine if mixing Manh Choh ore tailings with the non-acid generating tailings at Ft. Knox will require a review of the Ft. Knox closure plans and the associated assurance bond Kinross has to post to cover future mitigation costs.
3. Any plan must include dealing with truck crashes, ore spills, spent tires and garbage left along the corridor, and spill cleanup along the transportation route. Manh Choh solid wastes will apparently go to Tok, Delta Junction, Fairbanks and/or Glenallen, according to the Manh Choh Solid Waste Management plan. These dump sites need to be carefully studied to determine the potential dangers to humans, local flora and fauna, and waterways adjacent to or likely to be adversely affected by such dumping.
4. Permitting this mining operation is grossly inadequate, given the lies, misinformation, disinformation, lack of specific, science-based answers to questions posed to Kinross so I maintain that both a public hearing and additional time to review all the records are necessary.

Now, I want to share some of what have been published as News-Miner LIES.

1. On the Road: Impossible

On Friday, March 10, 2023, we received a Home Depot delivery of a new washing machine to our home at the top of Gilmore Trail. We had just finished shoveling out the driveway before the truck arrived. The weather forecast had been for less than one inch accumulation but we had gotten over six inches of snow. After the installation of our machine, I talked with the delivery men. The lead told me that they had had to deliver one new washer to Delta the day before. He said that after Eielson, the new snow had not been plowed from the road and the berms were so high and solid that the total road width was under opposite directions had to creep to prevent side scrapes while passing each other.

A new road is being built for ore haul trucks to avoid loading site at the Manh Choh Mine to AKCAN. Based on company manager calculations, allowing ore haulers to travel the existing road with local traffic creates a high probability of collision so a new road is being constructed.

The original local Tetlin traffic route is comparable in size to the AKCAN from past Eielson to Delta. On the Delta delivery day, the ore haulers would have turned the AKCAN into a one-lane road. Blocking each other from going both ways, they would have blocked other traffic, emergency vehicles, commercial semi, winter tourists from going both ways. The traffic congestion would have been large and long.

In other words, the transportation situation would have been impossible without many state maintenance vehicles and troopers on site.

Does anyone think that this situation is a one-off and that it is not going to happen repeatedly in our sub-arctic Interior? Is there no one in the Kinross/Peak Gold/Black Gold Transport consortium who can clearly see the insurmountable dysfunctions of the ore haul proposal?

2. The 1st Win Manh Choh Mine Road

In order to go into Tetlin and to the Manh Choh mine site, it is now necessary to stop at a check-point. Vehicles are searched for drugs and alcohol and only authorized vehicles can proceed on the road.

One reason for limiting public access is the beginning of the construction of a new road from the mine site to the Alaska Highway. The new road appears to have resulted from calculations made by Kinross.

With the specifications of the proposed ore haul trucks, now publicly available and featured on the Advocates for Safe Alaska Highways (ASAH) website, Kinross has reportedly decided that the size of the ore haul trucks would make vehicle collisions on the existing two-lane road a high risk. The existing road other vehicles servicing the village.

This normal traffic is like the traffic on the Alaska Highway. However, traffic on the Alaska Highway also includes large, wide school buses and large, wide RVs. So, if the risk of collision with normal traffic, not including school buses and RVs, is so high on the existing two-lane road into Tetlin that a twin anyone justly allowing the proposed ore haul trucks on the Alaska Highway?

90% of the proposed ore haul route is on two-lane rural roads with minimal shoulders, minimal pull-outs and, in inclement weather of rain or snow, impaired visibility. How can our state officials know about the twin Manh Choh mine road and still allow those big friggin trucks to haul ore on our two-lane highway, you, then please do whatever you can to tell Kinross, Peak Gold and the Alaska Department of Transportation: NO ORE HAUL!

3. Ore Haul Noise and Vibration Study

Peak Gold LLC commissioned Michael Minor & Associates, Portland Oregon, to do a noise and vibration study of the desired ore haul route from the Manh Choh mine to the Fort Knox Mine. The report is dated December 2021. The measurements taken for the study were done on 8/29, 8/30, 8/31 and 9/1 of one ore haul truck configuration going out to its outages. The report has insurmountable limitations as a document to either red or green light the ore haul proposal. First, no ore haul trucks of the proposed configuration were using the route at any time during the study. Second, the ore haul trucks are stated several times to be comparable to heavy trucks already on the road. Third, the study did not sample noise at multiple sites during an entire year which includes a significant increase in traffic during the summer months and a significant difference in sound transmission when trees are warm and very cold. Fourth, the study asked machines, not people, whether or not the noise and vibration is disturbing. This approach, standardizing and quantifying stimuli so they can be measured by machine rather than by personal account, avoids the diversity of human thresholds of sensitivity. And, fifth, the hearing and health impacts of noise and vibration accumulation are mentioned in my view, this report has absolutely no value for red lighting or green lighting the ore haul proposal. This report should not be considered a valid assessment of noise and vibration issues on the proposed ore haul route.

4. Respect and Law

I retired from social activism after many doings in the late 60s and early 70s. Then I heard about the Kinross/Peak Gold Manh Choh ore haul proposal and I thought "No way" this is not going to happen. I've since had many exchanges and conversations with many people (Advocates for Safe Alaska Highways), CCA (Citizens for Clean Air) and Save Our Homes, to all of whom I express gratitude.

I have heard that there are only two legally designated industrial haul roads in Alaska, the privately owned road at the Red Dog mine and the Klondike Highway. This is only hearsay for me since I've been to neither roads nor have I seen the documents pertaining to them but I consider the source of this infor of my learning. I discovered that Alaska State Statute 17 AAC 35.010 and following sections set out how the state can designate an industrial haul road. It has not been lost on our legislators that industrial trucking and commercial trucking are not the same. Ore haul trucks carrying ore from Manh Choh to Fort Knox are not the same as semi cabs pulling containers from the train yard water to people's houses or for the state to transport mail.

The process for legally designating a road as an industrial haul road is long, detailed and the potential user of the haul road must initiate it, apply for the process to happen and pay for it. To my knowledge, AKDOT has never required Kinross to respect and abide by our state laws by going through this process. Ca state or federal, explain to me and to the thousands of local residents whose lives would be severely hampered by this proposal why this legal process has not happened?

Next in my barrage of opposition not only to the ore haul proposal but also to permitting operation of the mine is the following:

Six points against any permitting of the Manh Choh ore haul proposal.

1. Air pollution. 2. Noise pollution. 3. Driving danger. 4. Deforestation. 5. Truck maintenance waste disposal; and, 6. Watercourse and wetlands damage. I hope that you are willing and able to read my explanations of each of these reasons.

1. Air Pollution. Diesel combustion emissions are more toxic to human health than are regular gasoline emissions. The World Health Organization, in a survey of causes of the many chronic, severe disease of civilization afflicting people worldwide, concluded that one out of four or five of those diseases in air pollution. WHO identified the two most toxic components of dangerous air pollution as emissions from coal-fired power plants and diesel combustion emissions. To overcome this objection to the ore haul proposal Kinross would, in my view, have to take several steps. First, it would have to find a trucking company with either trucks already equipped with minimum emissions equipment trucks with such equipment. Second, it would have to find an independent inspector to inspect each truck to confirm that the equipment was installed and in good working order. Third, it would have to hire specialist mechanics to keep such equipment in good working order for the duration of the project. And, finally, because I have been lied to by so many corporations and government agencies, it would have to present me with a written report documenting in detail the accomplishment of these steps. If Kinross did the project without diesel emission reduction, I am quite sure that it would be vulnerable to prosecution under public nuisance, willful negligence and reckless endangerment statutes. Kinross could also expect a class action lawsuit seeking a permanent injunction a perhaps including a high dollar fine for injury to human health.

2. Noise Pollution. The mainstream medical community now recognizes that noise pollution is a direct cause of stress in the human body and that stress is one of the most common underlying factors in the chronic, severe diseases of civilization. I am aware of no noise abatement technology that could significantly reduce the noise level of the ore haul trucks. So, the only way I can see to surmount this objection to your proposal is to drop the proposal.

3. Driving danger. As far as I know, there is no trucking company either in Alaska or in the lower 48 that can supply two hundred truck drivers who know what black ice is and who have significant experience driving a heavily loaded tandem carrier on a subarctic two-lane highway, with many other kinds of around it, in winter. It is dangerously naive, in my view, to suppose that training and electronic communication devices can replace sound judgment formed by years of experience. If Kinross does follow that supposition, then at least three things are bound to happen. First, the rigs are going to break down in ways that your drivers do not anticipate and in locations on the route that they can't get to. Second, the drivers are going to lose control of their rigs. If one of the trucks jackknifes and rolls so that it blocks both traffic lanes, again serious congestion will occur and, if an emergency vehicle trying to get from point A to point B to save someone's life, cannot drive past the stopped truck, someone collisions most likely involving fatalities. The ongoing influx of air force and other military personnel into the Fairbanks area brings people with little or no experience driving in subarctic conditions that include roads with unpredictable and dangerous frost heaves. With the current shortage of truck drivers nationwide, I see no way to overcome this objection other than dropping the proposal.

4. Deforestation. The current scientific consensus on global warming is that upper atmosphere concentration of certain gases, especially carbon dioxide and methane, is preventing the earth's surface from reflecting back into outer space enough of the sun's incoming heat to stop increasing global warming. It is draw carbon dioxide down from the atmosphere and sequester it in the ground where it belongs. People world-wide are planting many kinds of trees to take advantage of this natural atmospheric cleaning process. At a time when tropical rainforests are being destroyed and the ocean, a major source of biospheric oxygen, is being seriously compromised, the boreal forest is one of our last order to make the changes in the ore haul route. DOT is going to have to deforest land to create staging areas for road reconstruction, to extract appropriate rock, sand and gravel for bed construction and to widen the roadway for passing lanes. In my view, there could not be a worse time than now to do any unnecessary deforestation in the boreal forest. The only way to avoid this is to drop the proposal.

5. Truck maintenance waste disposal. Along with other significant flaws in the Kinross proposal, as noted recently by the EPA, there is no discussion of how the broken parts and used fluids from over 200 diesel trucks are going to be safely disposed. This disposal is solely Kinross' responsibility and its omission is a good reason to reject the proposal but also a good reason not to trust this company to take the quality of local human life and wilderness environment into account in their voracious search for profit from gold.

6. Watercourse and wetlands damage. It does not seem credible that five to six years of ore hauling from Tetlin to Fort Knox and five to six years of mineral extraction at Manh Choh will not significantly damage both watercourses on the route and wetlands in the Tetlin area. This inevitable damage seems to take Alaska gold and send most of its profits out of our state and our country.

And, last, I want to share some comments I made on the following document: CEPOA-RD (File Number, POA-2013-00286) Page 1 of 46 MEMORANDUM FOR RECORD SUBJECT: Department of the Army Environmental Assessment and Statement of Findings for the Above-Referenced Standard Indivi constitutes the Environmental Assessment, Section 404(b)(1) Guidelines.

Evaluation, Public Interest Review, and Statement of Findings for the subject application.

To whom it may concern: Residents and tourists to the Fairbanks area of Alaska are facing a very dangerous ore haul proposal advanced by Kinross/Peak Gold to transport ore in enormous trucks on public roads from Manh Choh near Tetlin to the Fort Knox mine north of Fairbanks. This message is the first ACCOE report that responds to an EPA requirement for further information. I hope that, if I have misdirected this email, you will be so kind as to redirect it to the appropriate person(s) in EPA. In my view, the report is seriously defective, especially in its statement that an EIS is not required. The main reason that the report contains this statement against an EIS is that Greg Mazer, the local / he had no responsibility to assess the entire route from Manh Choh to Fort Knox.

but only the local Manh Choh mining area. In fact, so many Alaskans have expressed opposition to the ore haul proposal that the state is formalizing a contract with Kinney Engineering of Anchorage, Alaska. Kinney estimates that nine to twelve months will be needed to assess the entire route for all aspects / persons, property, waterways, wild land, flora, fauna and, of course, transportation infrastructure, especially including aging bridges and many miles of two lane roads that are regularly damaged by rapidly melting permafrost. A report on this contract can be found at the following Fairbanks Daily News-Miner site: https://www.fairbanksdailynewsminer.com/news/local_news/dot-contractor-to-kick-off-tetlin-to-fort-knox-corridor-analysis

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You wrote "The project is located on primarily forested lands within the 23-million-acre Interior Alaska Lowlands Major Land Resource Area (MLRA, USDA 2006)." You then wrote "Construction of a mill and a permanent tailing storage facility would have much greater footprint and a wide array of impacts to both land and water resources. Compared to the proposed alternative, this alternative would have much greater impacts to aquatic resources and possibly other environmental water management.

You can't have it both ways. Either 23-million-acres is enough to accommodate a mill and related structures or it is not. Your writing is insidious and pernicious: you set the reader up to accept that the little of five plus acre gold mine is no big deal because there's so much land and then you contradict your own "much greater footprint". Peak Gold would have to pay to prevent and mitigate impacts on any size footprint but they don't want to pay and you are recommending letting them get away with it.

You wrote "The need to produce gold, the demand and price per ounce of which remains relatively high compared to historical values. Worldwide, the amount of gold bought annually has roughly tripled since the early 1970s. According to the World Gold Council, the demand for gold and gold-based liquid compared to Q1 of 2021, at least in part due to the value of gold as a hedge against inflation, which rose sharply in the latter half of 2021. Adjusted for inflation, the August 2022 price per ounce of gold is over three times the value it had been in 2001."

So, besides the 5.1 billion in gold reserves estimated to be in the Fort Knox mining area, Kinross/Peak Gold is trying to get even more gold worth more money. You seem to be ignorant of a professional geologist's estimate that the Manh Choh gold deposit is so deep and so pure that the mine would become a your report.

You wrote "The potential alternative to include constructing an ore processing mill, tailings disposal facilities, power plant sufficient to run the mill, and associated infrastructure would have caused much greater impacts to jurisdictional waters and other environmental resources compared to the proposed alternative was not feasible, mainly due to the logistics and cost of constructing a suitably sized power plant."

What precisely, Mr. Mazer, does "feasible" mean? Well, you probably can't answer that question because the word came out duplicitous official vocabulary before you were born. It is a weasel word. In this context, it is the very word that Jeremy Brans used when he dismissed building a mill, etc. at Manh Choh when he was pressed to explain his statement, he told the audience assembled in the Pioneer Park meeting room that Kinross did not want to pay to put a mill there. They don't want to pay to put a mill there; they don't want to pay for any highway upgrades or repairs; they don't want to pay the assessed value of their Fort Knox property. Does the fox want to pay for the chicken it takes from farmers asleep at the wheel? Don't you get the picture yet, Mr. Mazer? Kinross wants Alaskans to pay for everything while they walk away with the profits.

That seems like enough from me. Happy reading! Sincerely, David Cornberg, PHD

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acid mine drainage (AMD) from the
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