

Tom Paragi

Dear Ms. Adoko,

I just tried to submit comments and see that the comment period "closed" at 5PM, so I am sending them directly to you. When I saw the notice seeking comments I did not see a closing time so assumed 11:59 PM on 13 March 2023 was sufficient.

Through various sources I located several geochemical and hydrological engineering reports created by Peak Gold, some of which were several hundred pages. I reviewed the Waste Management Permit (ADEC #2023DB0001) and Reclamation Plan Approval (ADNR F20232626RPA) as well as correspondence during January through March 2022 between the U.S. Army Corps of Engineers (ACOE), Alaska District, and the U.S. Environmental Protection Agency (EPA).

Neither the permit nor plan approval for which you seek comment references waste management or reclamation planning for the Manh Choh ore processing that will occur at the Fort Knox gold mine northeast of Fairbanks. Fort Knox had an Environmental Assessment in 1993 for a proposed cyanide leaching process on ore from ground that does not contain acid bearing rock. Processing of acid bearing Manh Choh ore will occur at Fort Knox for a projected 4.5 years from a nearly continuous (every 15 minutes) trucking delivery. Fugitive dust from ore transfer and waste material from processing will be created within the containment area for Fort Knox.

A letter on 11 February 2022 from Amy Jensen (EPA) to Greg Mazer, Project Manager for the proposed Manh Choh mine (ACOE), recommended the ACOE follow precedent it set as the lead federal agency with several other hard rock mines in Alaska (Pebble Project, Donlin Gold Project, Greens Creek Mine, Red Dog Mine Extension – Aqqaluk Project, Pogo Gold Mine Project, and the Kensington Gold Project) by having project review under the National Environmental Policy Act (NEPA) of 1969. Mr. Mazer issued a memorandum of a phone conversation with Ms. Jensen on 18 March 2022 that noted

“ the NEPA scope of analysis for the project has been designated as the 1,064-acre project site [Manh Choh] and cannot include the highways or the Fort Knox Mine. The project site is where the direct impacts to jurisdictional waters would occur whereas the excluded areas would only involve hauling (on the highways) and ore processing (at Fort Knox). Thus, we should not and would not consider any secondary impacts that may occur in the excluded areas, which would likely be minimal anyhow .”

If the leachate containment system at Fort Knox were to be breached because of structural failure from excessive rain or snow melt, or an earthquake, acid bearing effluent from Manh Choh ore could ultimately enter the Chena River upstream of Fort Wainwright and Fairbanks. How such leachate would affect drinking water from wells that feed municipal supplies should be assessed by qualified civil and environmental engineers. Risk and effects of acid leachate on migratory chinook and chum salmon that spawn in the upper Chena, and of resident fish downstream of the Fort Knox mine, should be assessed by aquatic ecologists and fish biologists. The Chena River is navigable, thus included in waters of the United States and subject to NEPA review. In the event of a containment breach, mitigating potential acidic effluent from Fort Knox into the Chena River upstream from the 2 nd largest city in Alaska would far exceed the \$63 million listed for the Manh Choh mine site in the comparatively unpopulated upper Tanana drainage.

At the mine site, I am unclear whether Manh Choh ore will be loaded onto highway trailers at the mine site or whether large mine trucks will deliver ore to highway trailer vehicles at the Alaska Highway terminus of the Tetlin Road. In the latter scenario, this would result in fugitive dust of

acid bearing ore near the community of Tok and on the main highway corridor for vehicle traffic entering the state. The high volume of transfer (every 15 minutes) would mean substantial amounts of fugitive dust over the projected 4.5 years of the mine project. If that is the case, the reclamation plan does not describe steps to mitigate dust spread at the Tok transfer site.

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