Barry Santana

March 12, 2023

I strongly oppose permitting the Manh Choh Mine project as it stands in this review.
I appreciate the opportunity to comment on the proposed Manh Choh Mine Project; however the Project Submissions and Draft State Decisions appears to be a small part of a much larger permitting process for a mine of this nature. To put it bluntly, it appears to be the proverbial cart before the horse approach. Waste Management and Reclamation permits would logically be done after the rest of the mine project is fleshed out and at least a draft EIS available to better understand the scope of the project.

The description of the project at the ADNR website that makes provision for the Public Review and Comment has little information on the details required to make a permitting decision. Information in the Fairbanks Daily News-Miner and other publications, as well as Peak Gold's outreach to investors, clearly indicates that the milling process will occur over 200 miles away at Kinross' Fort Knox site. This means that the Manh Choh Mine Project will at least span that distance. There is no mention in the state documents on anything beyond the mine site boundaries. For this reason alone, the current permitting should be placed on pause.

I have read the Solid Waste Management Plan, Rev. 1 developed by Peak Gold. It appears to do a reasonable job for solid waste management at the mine site. Apparently the potential acid generating (PAG) rock is not included as solid waste or hazardous solid waste.
I have also read the Reclamation and Closure Plan (RCP) prepared by SRK Mining Consultants, an international mining consulting firm, for Peak Gold. This plan needs to incorporate ore material transported by truck along Alaska public highways and address mill waste the process generates at Fort Knox. Section 3.3, Proposed Project Disturbance of the RCP states the ore will be "subsequently trucked to the Fort Knox Mine for processing." This certainly exports disturbance to Alaska highways in the form of fugitive dust, noise and traffic. It is interesting that in Section 3 Project Description, paragraph 3, the document states: "Construction of a new road (Manh Choh Twin Road) parallel to the Tetlin Village Road is needed to improve safety and separate non-mining related traffic from the mine traffic." Why is this different than the non-mining related traffic on Alaska highways?

As I understand it, the waste from the potential acid waste generating rock at Manh Choh is different than the product milled currently at Fort Knox. Does Kinross really want to contaminate the Fort Knox non-PAG mill site (to the best of my knowledge) with PAG waste from Manh Choh? Reading comments by businesses and employees of Kinross, they are well respected for their mining decisions. Why risk this reputation by fast-tracking this project in the current form?

Section 3.4 General Environment discusses the mine site location at an elevation between 2,000 and 3,300 ft. above MSL surrounded by Tetlin Lake to the east and the Tok River valley to the west. Waste rock will be categorized, sorted and handled as required based on PAG status. This will mean stockpiles of rock and pit storage based upon anticipated future ground water surface levels. The waste rock storage and water management is key to the level of contamination at the site and in the drainages to Tetlin Lake and the Tok River, including habitat in the Tetlin National Wildlife

Refuge. Pits at the mine site will be backfilled with waste rock and either covered with a liner or filled with water to reduce oxidation of the ore. It is not clear to me how the surface and groundwater will be prevented from ultimately reaching these destinations clean enough to not affect aquatic life and fish into the future. For Acid Mine Waste, this future is measured in thousands of years or in perpetuity. The assumptions and predictions for PAG rock and contact water chemistry made today cannot be risk free due in part to our changing climate.

The Reclamation and Closure Plan addresses water (surface and ground) monitoring in Section 8. Section 3.9 Water Management discusses baseline data, but in little detail. Details of reclamation and closure monitoring for the open pit, TSF, WRF, surface water, and groundwater are provided in the Manh Choh Monitoring Plan (Piteau 2022b). The plan appears reasonable, with the exception of monitoring frequency and duration after closure. Post-closure monitoring of surface and groundwater from PAG and heavy-metal leaching waste rock stockpiles and pits should be monitored in perpetuity. References to "occasional construction materials monitoring" in Section 2.3 and "periodic audits" for the purpose of reviewing performance are too vague for a monitoring plan. Quarterly monitoring of groundwater wells and surface water points during operation and for 2 years after closure is not adequate in my opinion. Semi-annual and annual monitoring respectively for groundwater wells and surface points beyond 3 years after closure is also grossly inadequate. Based on Section 6.3 Monitoring Reports and Submission Schedules, the reports would have only one data point for each report! Clearly, this important subject needs to be revisited by the authors and Peak Gold to be a viable part of the permitting process.

The overshadowing shortcomings of this permit submittal is the timing of the subject permits, the lack of scope for the permits, limiting them only to the mine site, complete omission of the transport corridor and Fort Knox processing mill from the permit process. Items such as:
• Waste management for spills, dropped PAG gravel and fugitive dust along the transportation corridor as well as management of waste rock from the PAG material ending up at Fort Knox.
• How will permitting to manage PAG and heavy-metal leaching material at Fort Knox be addressed?

These permits need to be put on pause until the rest of the project permitting catches up. Where is the EIS? Why is the permitting process being deliberately handled piecemeal? How can the project be justified using Alaska state roads when there are no remedial actions proposed for repair of the damage after mine closure? Why has Kinross been allowed to use the existing marginal state road system in proposing this project when an on-site mill is economically viable as shown in 2018 disclosures by Kinross?

The Tetlin Community and Tribes certainly have the right to develop their land as they see fit and they have managed to obtain concessions with the developer. But the project would likely create more jobs, be more valuable and have a better researched/planned outcome if it was a complete mine and milling facility on their leased land. The project should not be subsidized by the state or public money when State taxes and other revenue is a pittance for mine projects.

For these reasons I am strongly opposed to these permits being approved by ADNR and ADEC.

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