

Mary Farrell

Please see attached file.

1) Comments on DEC Waste Permit (Manh Choh)

The biggest thing that struck me when I read through the Waste Management plan is, it is incomplete.

Where is the discussion about how the developer is going to control waste along the 248 miles of the transportation corridor from Manh Choh Ft. Knox?

- We know the ore at Manh Choh is of the potentially acid generating (PAG) and mineral-leaching type. What about fugitive dust that will come off of the loaded and empty trucks all along the route? Even tarped, the high wind speeds along the route (especially in the Delta Junction area) will blow dust out of the trailers. I see there is a tire-cleaning station mentioned to keep the dirt off of the public highway. Does that work in winter conditions?
- What is the spill cleanup plan for when one of these trucks slides into the ditch or is involved in an accident and dumps its load on the ground? Will Kinross be required to stage equipment at intervals to respond to accidents?
- These trucks each have 52 tires. What about the rubber tire dust that will come off of them and potentially land in waterways and wetlands? We know the chemical in this dust is toxic to fish and aquatic animals. Will there be any monitoring required? Will blown tire pieces be retrieved from the roadway and adjacent areas? The Richardson is a Scenic Byway enjoyed by tourists from around the world.
- Kinross has a corporate Climate Change Policy wherein reduction of greenhouse gases is stated as a goal. Hauling ore 500 miles roundtrip 24/7/365 (with 64 roundtrip miles through the Fairbanks North Star Borough's PM2.5 Non-attainment Zone) doesn't seem to fit well with this goal.

The Waste Management Plan submitted treats the 248-mile transportation corridor as if it is not an integral part of this project. It absolutely is and it requires an Environmental Impact Statement or whatever the equivalent of that is for the State of Alaska. **Perhaps a separate Waste Management Plan for the corridor should be requested of Peak Gold and a separate permit issued for this portion of the project.**

There is no mention of the seismic conditions that exist at the mine. It is located in an area known for large earthquakes and fault lines. Where is the discussion of potential seismic activity that could damage the mine or the disposal areas for PAG material that aren't being trucked to Ft. Knox?

Leaving the PAG tailings at Ft. Knox also concerns me. Peak Gold talks about mixing them together with non-PAG tailings at Ft. Knox, although it is obvious they haven't made up their mind on how they will do this, exactly. Doesn't this change the terms and conditions of the Ft. Knox DEC permits?

Using waste water for dust control seems to be a good way to spread acidic water over a greater area at the mine. Clean water should be required to be used, even if it needs to be trucked in from Tok.

2) Comments on DNR Reclamation Permit (Manh Choh)

The biggest thing that struck me when I read through the Mine Reclamation and Closure plan is, it is also incomplete.

There doesn't appear to be any discussion of this in the plan, but will Ft. Knox mine require extended environmental monitoring after the PAG material is added to the tailings mix? What about after Ft. Knox closes? Contaminating the NAG tailings with PAG tailings surely has ramifications (?)

No discussion of steps to be taken to prevent leakage of acid mine drainage from the pits in the event of a large earthquake.

For the North Pit, on page 41 the plan says "*An impervious cover system (yet to be designed) will consist of either an amended soil layer, or geomembrane to reduce infiltration.*" How does one permit something that has yet to be designed?

Kinross' Climate Change Policy states they are "Commissioning a third-party assessment on climate risks across its global portfolio in 2020." I didn't see any reference to an assessment of climate change risks mentioned in the Reclamation Plan. Do the reclamation plans account for increased precipitation and hydrological changes that could result in flooding and potentially toxic acid mine drainage?

In conclusion, I believe no further permits should be issued until after the DOT Corridor Study has been completed. An Environmental Impact Statement or state equivalent of the entire transportation route is needed. A public hearing and extension of the comment period is also needed. There is a lot of material to review. It is the DOT's (and others') opinion that several bridges along the route cannot safely take these heavy loads and their replacement has been given #1 priority. However, replacements cannot be completed before the trucks are scheduled to roll. Therefore, there is no need to rush these permits.