

# Richard Tilly

March 13, 2023

Department of Environmental Conservation  
610 University Avenue Fairbanks, AK 99709  
907/451-2136

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

Dear Sirs,

I have been studying the Kinross Mahn Choh mining plan at the Tetlin location and I will state that I am pro mining in Alaska. However, it appears the mining conglomerate has failed to properly apply for the necessary permits as well as to include the entirety of their proposed plan of action. Presently, there are three segments; ore extraction, potential ore trucking, then ore waste disposal.

A permit application for the mine site at Tetlin is just one portion of the process. That is the extraction of the mine ore. Kinross has touted a proposed trucking plan segment to the Fairbanks area (i.e., Ft. Knox), but has neglected to include the transportation segment in the permit application process. Kinross has also neglected to include the process and procedures for mine ore waste disposal at Ft. Knox within the permitting process.

Recent information has surfaced which brought forth some previously undisclosed facts regarding potential acid bearing materials during the extraction process. And, if the mine ore is to be trucked to Ft. Knox, the trucking consideration will expose ~248 miles of roadway travel to potential acid bearing ore dust and earthen materials on the trucks themselves along the highway routes and adjacent lands and waterways. The third portion of the process is the ore waste disposal. It appears the application for permitting is lacking all consideration for the trucking and waste disposal.

Therefore, the application should be denied as incomplete. It would appear that the Kinross plan of action is lacking pertinent information and a formal and complete Environmental Impact Study is warranted and should be completed prior to any issuance of permits.

Per DEC's stated mission, that of, "Conserving, improving, and protecting Alaska's natural resources and environment to enhance the health, safety, and economic and social well-being of Alaskans", it would behoove the agency to follow through with a complete and thorough review of all aspects of this mine's plan of action. Once all aspects are upfront and transparent, then consideration of a permit issuance may be warranted.

Mining in Alaska should be promoted and applauded for all of its economic benefits, both locally, statewide and nationally. However, it must be done professionally and legally for all parties concerned, to ensure of attaining the projected economic goal properly.

Respectfully submitted,  
RT

Richard S. Tilly  
Owner/Member  
RTI, LLC