John Brown

After reviewing the draft Reclamation Permit, I have several objections and concerns. First, the review and comment period has been too short. Comments should be accepted for a much longer period.

Second, a permit with such broad scope should be subject to public hearings in affected communities. A suitable comment period should commence after these meetings. Third, the plan does not cover the extensive off-site operations proposed by the mine operator. The plan should specify actions and responsibilities for events such as vehicle accidents that may occur off the mine site. The mine operator's history suggests that they may attempt to avoid responsibility for any events that involve their extensive roster of subcontractors. This reclamation permit is the appropriate place to unambiguously establish a chain of responsibility for any such events, on or off site.

Most importantly, before waste can be disposed of at the existing Fort Knox site, a public review of the existing Fort Knox Reclamation Permit should be undertaken. The introduction of material from the Manh Choh Mine into the Fort Knox waste will most likely cause a significant change to the chemical makeup of the tailing piles and wastewater at the Fort Knox site.

I hope to see all the parties at a public hearing.