

Opposition and Request for Hearing as  
to POA-2013-00286 TANANA RIVER

January 28, 2022

**TO:**

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**Reference Number POA-2013-00286 TANANA RIVER**

**FROM:**

Barbara Schuhmann



**Objection to Peak Gold LLC Application for Permit and  
Request for Hearing**

Dear Project Manager Mazer:

I ask for denial of the requested permit because it is contrary to the public interest. I request a public hearing at which all public health and safety and environmental issues relating to the applicant's Manh Choh Project can be analyzed and determined, as contrary to the public interest.

A hearing is necessary to assure that all aspects of the Manh Choh Project and all locations where the applicant will conduct activities for the Project, are reviewed for their negative impacts on public health and safety, and the environment. When that is done, the Project should be denied approval for this permit and denied permission to convert public roads and highways into a new, industrial ore haul use.

**I. The Manh Choh Project Footprint**

**A. Applicant's "Project Location" is Not Only the Tetlin Extraction Site, but Also Includes 240 Miles of Public Highway, and the Ft. Knox Mine, Where Ore Processing and Dumping of Waste Will Occur**

The Project Location listed in the notice and proposed permit incorrectly limits the "Location" to lands south of the Alcan Highway. This is not correct. The Project, known as Manh Choh, does not end at the Alcan Highway. The extraction process proposed in the notice and application is only the beginning of the project and "project location." The extracted gold ore begins its journey south of the Alcan, but its journey does not end when it reaches the Alcan. The application makes clear that Applicant will not process and dispose tailings waste south of the highway on the land described in the notice, although that would be a better alternative than trucking it 240 miles.

Instead, the Manh Choh Project Project footprint includes 240 miles of public roads and highways over which the Applicant wants to transport gold ore by truck. The Manh Choh Project also includes the Ft. Knox Mine location north of Fairbanks, where Applicant proposes to extract and process the ore's 1%

mineral content and dump 99% as waste. From Fort Knox, the trucks would drive 240 miles back to the Tetlin Extraction Site. The Notice of Application, p.2, states the proposed work requested for approval would “develop the infrastructure necessary to conduct the operation including hauling the ore to Fort Knox.” All ore would be hauled to Fort Knox for processing; no milling or tailings would occur at the Tetlin Extraction Site.

The entire Manh Choh Project location should be reviewed before determining whether any permit should be approved. That review should not be limited to the Tetlin Extraction Site, but should include the transportation footprint of 240 miles to Fort Knox, and the Fort Knox mine itself, for a determination whether it is an appropriate site for processing and final disposal of the wastes.

But the Application does not provide enough information for anyone to analyze the Tetlin Extraction Site for the activities proposed there. The request provides no mention or details of the Applicant’s trucking plan, or its effects upon the Tetlin properties and wetlands there. There is no mention of the number (192 per day), size (95’-120’ long), width or weight of the trucks (40 T unloaded, 80T loaded), the fuel they will use, or where on the Tetlin site they will be stored, fueled, washed, maintained, or repaired. How and where on the Tetlin Extraction Site will the Applicant service its vehicles? Where and how will it store and dispose of tires, oils, lubricants, and solvents needed there to maintain the equipment?

There is no disclosure of the constituents contained in the ore, but we assume it will include heavy metals, gold, arsenic, silica, rock, and sand. The Applicant offers no steps to mitigate against dust or protect against releases of oils and other contaminants and pollutants to the area. The roads are designed assuming a 20.5’ wide design vehicle, single lane. The Applicant’s design may well be inadequate to accommodate the actual size and weight of the vehicles it will use for the project. We need a transportation plan and exact truck configuration to determine this. Since the Applicant does not supply such details, the permit should be denied.

The Applicant implies that if it uses public roads and its Fort Knox Mine for processing and disposal, it needs no other permits or review (safety or environmental) for the transportation and processing/waste disposal portions of its Project. If Applicant is correct, then the review of this permit application is the only opportunity for the Corps, other public agencies with oversight on these matters, and the public to review the Manh Choh Project as a whole, and its impacts. For this reason alone, a public hearing should be held, to study the entire project and the impacts it will have on public health and safety and the environment.

**B. The Manh Choh Project Footprint Includes 240 Miles of Public Highway, and Will Adversely Impact Many Waters of the United States**

The Manh Choh Project includes all the territory within 240 miles of public roads and highways between the Tetlin Extraction Site and the Ft. Knox processing and disposal site - a huge footprint for a Project. These roads and highways cross numerous wetlands, streams, lakes, ponds, sloughs and rivers. In addition, the sheer number and size of the trucks will create hazards to public health and safety of those travelling on, living or being near the roadway.

The Project will create about 200 new point sources of contamination - every day - along the highway it uses. Trucking ore on 240 miles of highway will release (1) solids: rocks, sands and debris, as well as ore escaping from the trucks; (2) gaseous pollutants: dust, silica, particulate contamination, and greenhouse

emissions; and (3) liquids. Liquids from ore and the trucks will include: process wastewater used in transportation (such as for dust mitigation and cleaning), surface runoff from precipitation falling onto the trucks, ore, and roadways used, and leakage from incidental water used for machinery cleaning, cooling and dust suppression. The solids, gases and liquids all have the potential of travelling across and overland to surface water systems and to percolate into aquifers. Solids, liquids and gaseous pollutants will be deposited directly onto roads and bridges, and from there, into creeks, ponds, sloughs, lakes and rivers. The highways will become sources for contaminating the waters nearby. The highways and adjacent waters will become a disposal site for the dredged/extracted gold ore from Tetlin, and a source for contaminants to spread to land, air and water nearby.

### **C. The Manh Choh Project Footprint Includes the Ft. Knox Mine**

The Manh Choh Project's processing and final disposal site is the Ft. Knox gold mine, where the Applicant will process and dispose of tailings and wastewater. Fort Knox is a totally different location and watershed than Tetlin. The soils, ores, weather, pollutants and contaminants at Fort Knox are not the same as those at Tetlin. The mine processes and disposal safeguards at Fort Knox may not be adequate or appropriate for ore that is brought from Tetlin. The applicant assumes that its mill and waste sites at Fort Knox can handle ore from a different location without undertaking any study, analysis or disclosures about this, and without planning any additional mitigation or protection from possible difficulties in this regard.

The Manh Choh Project will also cause soils and pollutants from Fort Knox to be spread along the highway route all the way back to the Tetlin Extraction Site. There needs to be full disclosure and study of the pollutants and contaminants coming from the Fort Knox Mine Site to the rest of the Project location before this plan is permitted. There needs to be full disclosure and study of the pollutants, contaminants and ores coming from both Tetlin and from Fort Knox, before this plan can be approved.

## **II. The Ore Contaminants and Pollutants Will be Released from the Trucks and Deposited On the Highways and Adjacent Aquatic Ecosystems**

The Applicant provides no analysis of what the ore will contain as it is transported the 5 miles to the Alcan, the 240 miles to Fort Knox, and the distance within Fort Knox to the processing site. The remnants of the ore remaining in the trucks after they are off-loaded, will then be hauled back to Tetlin. Whatever may be in the ore will escape from the trucks, whether the trucks are loaded or empty.

We expect the ore will contain, at a minimum, heavy metals (gold and other metals), arsenic, and silica. In addition to that ore will be the emissions and dust released from the trucks. We discuss this further under subpart V, below.

These releases will be substantial, and the cumulative effects of the releases must be considered. The attached Table 1 shows the estimated number of truck trips and the weight expected to be hauled, as provided by the Applicant to date. On average, there will be 96 - 192 truck trips per day. That means 32,256-64,512 truck trips per year, and 145,152 - 290,304 truck trips over the 4.5-year lifetime of the Project. The number is staggering: nearly 150,000 to 300,000 truck trips, and each trip over 240 miles of Alaska.

The trucks will become new point sources for pollution. This many truck trips (145,152 - 290,304 ) will be a significant source of pollution along the route. This Project will then cause a new, non-point source

of this ore and its contaminants and pollutants: the highway itself. The highway and adjacent land and waters will become a “disposal site” for the ore extracted from the Tetlin Extraction Site. This cannot be permitted without a full evaluation, and factual findings that the discharges will not adversely affect aquatic ecosystems adjacent to the highway corridor. Part 230 – Section 404(b)(1) guidelines contain a presumption against the discharge. Unless the Applicant proves there will be no harm, we must assume there will be harm.

Until the Applicant proves that its discharges of ore, pollutants and contaminants all along the transportation route will comply with the guidelines, they cannot be permitted. In evaluating whether the highway systems can be used for an industrial ore hauling operation, the Corps also should identify and evaluate the characteristics of the highways, including how they relate to their living communities and human uses.

### **III. The Public Highways Proposed for Conversion to the Manh Choh Industrial Ore Haul Roads are not Suitable or Safe for Hauling Ore**

The Manh Choh Project proposes to take gold ore from the Tetlin Extraction Site to the Fort Knox gold mine, thereby incorporating into the Project footprint, the following highways:

- Alcan Highway, Tetlin to Delta Junction
- Richardson Highway, Delta Junction to Mitchell Expressway
- Mitchell Expressway, from Richardson Highway to Peger Road
- Peger Road, from Mitchell Expressway to Johansen Expressway
- Johansen Expressway to Steese Highway
- Steese Highway to Fort Knox

About 200 miles of these highways are two lanes only; about 40 miles from Eielson Air Force Base through Fairbanks to Fox, have four lanes. The Applicant provides no assessment of these roads for its proposed industrial ore haul operation. The applicant provides no transportation plan, no traffic counts, no traffic impact analysis, no traffic safety analysis. It provides no safety plan. It does not discuss hazards created by weather, including snow, ice, wind, fog, rain and ice fog. It ignores the lack of daylight for much of the year. Between Tetlin and Eielson, the route is a two-lane highway, with narrow or no shoulders, dangerous curves, steep hills and short sight distances. It has a very few, very short, passing lane areas. Even if additional passing lanes are built, there is no explanation how the travelling public can safely pass vehicles that are 95-120 feet long, especially if two or more are travelling together.

The Applicant ignores the safety of school children that school buses pick up and drop off twice a day, every school day, at the 208 school bus stops on the highway corridor. This factor alone makes the road corridor proposed unsuitable for hauling ore on an industrial level.

The Applicant hopes to continue with a double trailer configuration north of Fox to the mine, even though we understand that current regulations prohibit this. Whether single or double, the last 8 miles to Fort Knox from Fairbanks are very challenging and dangerous to drive. The two-laned road ascends to Cleary Summit at a very steep grade and has a hairpin curve at Scoogie Gulch. Single loads cannot negotiate that curve without crossing over into the oncoming lane. Residents at Cleary are worried about the lack of safety of this stretch of road. During ski season, Skiland Resort brings many skiers to

Cleary every weekend, holiday and at Christmas and Easter breaks. Twice a day, employees of Poker Flat Research Range will be forced to follow these large trucks as they slowly climb up to Cleary Summit. Even worse, they will have to avoid a head-on collision with a truck that has crossed over the center line to negotiate the curve at Scoogie Gulch.

The Applicant's transportation plan presents an unacceptable danger to highway users at this location and elsewhere along the proposed route. If the Proposal and Permit request are not denied outright, then a hearing is desperately needed to understand these safety issues, have an independent review of them, and to protect the public.

Each truck is projected to weigh 80 tons loaded and 40 tons unloaded. This means a minimum of 9,434,880 to 18,869,760 tons of weight would travel on all 240 miles of public highway over the 4.5-year Project. This translates to 18,869,760,000 to 37,739,520,000 pounds of weight over the 4.5-year Project.

The Applicant provides no analysis of the roads and bridges it proposes to use, and whether they can accommodate and hold up to the equipment size, weight and number of trucks it proposes. Three bridges were built in 1944 along the route. Can they withstand the number of truck trips and weight the Applicant plans to haul? Some of these may have width restrictions that would only allow one-way traffic with large vehicles. Will the equipment even fit within the height, weight and width restrictions of all the bridges along the transportation corridor? The road also has many other bridges, as listed below in IV.D. Will the weight and number of truckloads of ore and returning trucks cause the bridge structures to fail? What damage will be done to road surfaces by 9,434,880 to 18,869,760 tons (18,869,760,000 – 37,739,520,000 pounds) of weight, and 145,152 – 290,304 truck trips across 240 miles? What plan for repairing this damage does the Applicant offer? What safety improvements does the Applicant propose, to shore up, maintain and restore the infrastructure? None.

Special skills are required to drive long wheelbase, double trailer trucks in Alaska. How will the Applicant find specialized drivers when there is a nationwide shortage of regular truck drivers? What will happen in case of an equipment breakdown, or need to stop on a highway that provides no space to pull over? In inclement weather, 17 AAC 25.014(e)(1) requires long combination vehicles, like those the Applicant will use, to stop operations. There are very few places along the road where a truck can pull over and get off the road surface safely. Will they have to stop on the highway? During snow periods, think of how dangerous it will be for other drivers to meet or follow – much less pass - one of these trucks billowing snow.

How will the Applicant control the timing and spacing of the trucks on the highway? They will naturally bunch and stack up, as will traffic behind them. This will not only increase the likelihood of motorists being forced to pass one or more of these 95'-120' trucks on the two-lane highway, but will be a genuine inconvenience to the motoring public. Within communities along the route, the additional traffic will undoubtedly cause traffic congestion.

The Applicant also fails to analyze how this number of additional truck trips can be accommodated in view of substantial construction projects planned for the same time period when the trucks will be operating. The Alaska Department of Transportation has plans to reconstruct the bridges over the Johnson and Gerstle Rivers, and to reconstruct the Johansen-Steese intersection. If construction actually happens, it will not be complete before the Applicant's trucks operate. How will temporary bridge

structures hold up to this truck traffic? How will the Applicant deal with the delays and prevent traffic congestion and stack-up of vehicles at these locations? We doubt it would be possible.

The sheer numbers of ore trucks the Applicant proposes to add to the highways is unprecedented. To that it will add the traffic of transporting equipment, supplies, materials and employees. The roads will become industrial ore haul roads, not public highways. This conversion will present unprecedented dangers to the motoring public and users of the roads that are not justified. The Applicant's project plan is clearly contrary to the public interest and should be denied approval.

Before any determination is made concerning the traffic and public safety of this Plan, an independent review of all its aspects - a risk analysis, a highway safety analysis, a cost-benefits analysis – needs to be completed. Once reviewed, we submit that the dangers, adverse impacts and inconvenience of the Manh Choh Project to the public and the environment will clearly outweigh the benefits the mine owners hope to achieve. The Project is contrary to the public interest, and all permits allowing it to proceed should be denied.

#### **IV. Waters of the United States and Their Aquatic Ecosystems Will be Adversely Affected by the Manh Choh Project**

Although the application does not mention them, the following are waters, including anadromous waters, that sit along the roads and drain the watersheds within the footprint of the Manh Choh Project. Each of these should be studied and a determination made as to the effect of the Project on their aquatic ecosystems, since the trucks will release ore, and solid, liquid and gaseous pollutants and contaminants to each of them.

- A. Navigable Waters
  - Chena River and Noyes Slough
  - Tanana River and its sloughs
  - Chatanika River (the Fort Knox watershed)
- B. Lakes. At least two of these are stocked with fish by the State of Alaska.
  - Quartz Lake
  - Birch Lake
  - Lost Lake
  - Harding Lake
- C. Ponds
  - Bathing Beauty Pond
  - Gravel pits
- D. Streams, Creeks, and Rivers with Bridges Across
  - Tok River
  - Yerrick Creek
  - Cathedral Rapids # 1, 2, 3
  - Sheep Creek
  - Robertson River (bridge built in 1944)
  - Bear Creek
  - Chief Creek
  - Berry Creek
  - Sears Creek

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Dry Creek (bridge built 1957)  
John River (bridge built in 1944)  
Little Gerstle River  
Gerstle River (bridge built 1944)  
Sawmill Creek  
Tanana River Big Delta  
Shaw Creek  
Banner Creek  
Salcha River  
Clear Creek  
Munson Slough  
Little Salcha River  
Moose Creek  
Chena Flood Channel  
Chena River

- E. Wetlands. We suspect that there are numerous wetlands over which the Corps asserts jurisdiction in the 240 miles between the Tetlin Extraction Site and the Fort Knox Gold Mine, as well as wetlands within or that will be affected by the Tetlin Extraction Site and the Fort Knox processing and disposal site. While our focus is chiefly upon public health and safety along the highway route, this is another area that should be analyzed, and findings made. Since there is no information contained in the application about this, it should be denied.

**V. The Communities Along the Highways Will Be Adversely Affected by Dangerous Traffic, Noise and Pollution**

The Project's ore haul trucks will cause unnecessary and dangerous hazards for communities along the route, and for all humans anywhere near the highways – the driving public, people living nearby, and anyone anywhere in the vicinity of the truck route. These communities include Tok, Tanacross, Dot Lake, Delta Junction, Whitestone Farms, Birch Lake, Lost Lake, Harding Lake, Salcha River, Eielson Air Force Base, Moose Creek, North Pole, Fairbanks and Fox.

What emissions and noise will each truck cause? What volume of emissions and noise will the large numbers of trucks and trips cause? The Applicant supplies no analysis of this. Yet, additional emissions will impact both North Pole and Fairbanks, which are listed as "Serious Non-Attainment Areas" for particulates. What effects will the additional particulates have on the status of each community with regard to air quality regulations? Will they cause the two communities to be limited as to other economic development because of the Manh Choh pollution? How much more ice fog will the trucks generate as they travel through the middle of North Pole and Fairbanks? No decision on the Manh Choh Project should be made without an analysis of the volume of particulates and other emissions that will be added to the communities along the highway route.

In addition to particulates, the communities should know what to expect in terms of additional noise and emissions: dust, particulates, greenhouse gases, silica, ice fog, etc. The Applicant needs to disclose what will be released within the communities along the highway route. Everyone near the route - schoolchildren at their 208 school bus stops twice a day, military personnel in open convoys, the

motoring public, tourists and residents – all will be adversely impacted by the emissions from the huge volume of new industrial truck traffic.

The proposed huge increase in industrial ore haul traffic everywhere along the route will cause additional accidents and additional problems for emergency services providers. The Applicant provides no plan for addressing these concerns.

The Alcan and Richardson Highways are very important links in Alaska's limited road infra-structure. They provide links to the Lower 48 through Canada and to tidewater at Valdez and to Anchorage. Many communities rely upon this road corridor even though they sit some distance from it: Eagle, Healy Village, Fort Greeley, and Paxson, to name a few. The Alcan/Richardson is the only road link for some of these communities to food, medical and other services. A closure of the road would be a devastating event for these communities, but the trucking plan proposed by the Applicant makes such a closure a very real possibility. What alternatives does the Applicant propose if one or more of its trucks or truck trips causes a bridge failure or road closure? None are suggested by the Applicant. To adequately analyze all safety aspects of the Applicant's ore hauling plan, we ask for an independent analysis to be undertaken of the Manh Choh transportation plan. All traffic, health and safety concerns must be analyzed, before any permits are approved for the Manh Choh Project.

#### **VI. Recreation and the Aesthetics of the Highway Route Will be Adversely Impacted by the Manh Choh Trucking Proposal**

The Corps of Engineers Guidelines for determining issues concerning 404 permits require an analysis of impacts of a proposal on recreational opportunities and aesthetics. The highway corridor proposed as a truck route includes recreational (fishing, boating, swimming) and aesthetic resources, including those listed below, that will be adversely impacted by the introduction of a huge volume of new industrial truck traffic, and the dangers, noise, vibration and pollutants the trucks will cause.

The Alcan brings tourists to Alaska through Canada, from both Whitehorse and Dawson City. Tourists will likely avoid the route if it becomes an industrial ore haul road, to the detriment of all communities along the corridor. The Richardson Highway from Delta to Fairbanks is the Richardson North Scenic Byway, with views of the Alaska Range and Tanana River Valley. The noise alone from trucks passing every 7.5 minutes will destroy the enjoyment of anyone trying to absorb Alaska's scenic wilderness at waysides, parks and lookouts along the highway corridor.

Alaskans escape the "city" to enjoy the outdoors and Alaska's rivers and lakes. There are many state and local parks, boat launches, and waysides on the highway corridor or nearby: Gerstle River Wayside, Big Delta State Historical Park, Quartz Lake Recreation Area, Delta-Clearwater River and Lake, Goodpaster River accessed by boat from the Tanana/Delta River crossing area, Richardson-Clearwater River accessed by boat from Shaw Creek, Birch Lake State Recreation Area, Harding Lake State Campground, Salcha River Wayside and boat launch, and Chena River Recreation Area (Chena Lakes). Additionally, there are many private residences and summer homes along these and other rivers, and all the lakes listed in Part IV.B., above. People like to fish and ice fish in lakes and rivers all along the highway corridor. The pollutants and contaminants emitted will have detrimental effects upon the waters and fish along the highway corridor.



The highway corridor is the only access to bring boats, supplies, emergency and other services to serve highway and recreational communities, unless they are brought in by air. During summer, the highway is filled with tourists and residents driving motor homes and vehicles towing boats and other recreational equipment. Alaskans use this route to access hunting and fishing grounds off the road. Residents tow 4-wheelers, watercraft and snowmachines. An industrial ore haul plan over this corridor, with 200 trucks per day, and as many as 290,000 trips over the proposed life of the project, is not compatible with pre-existing uses and users of the highway.

As mentioned previously, the Applicant supplies us with no analysis of the impacts of the noise/vibration, traffic and pollution that its ore haul plan will cause, whether upon human populations, fish and aquatic ecosystems, wildlife and vegetation along the route. These all will be impacted by noise, vibration and pollutants caused from the trucks. One only has to wonder how many moose and other animals, aquatic species and birds will be killed directly by 290,000 truck trips across 240 miles of Alaska. We doubt that figure will be insignificant. The Applicant should provide an answer to these questions, so that these impacts are analyzed and considered in any determination on any permits for the Project. Without the information and analysis, the application must be denied.

#### **VII. The Applicant Refuses to Consider Alternatives, But They Exist**

We just asked, “How many moose will die?” But the real question for me is, “How many people will die?” How many people will die or be injured because of 290,000 industrial ore haul truck trips across 240 miles of Alaskan highways? Even one would be too many. Yes, there are the environmental and health concerns. But for me, the public safety issue is uppermost. The trucking plan will jeopardize human lives, human health and the environment. Because of this, the Manh Choh Trucking Plan should be denied any permits to proceed. The Project should be required to develop an alternate plan that does not put the public at such risk for adverse impacts.

The Advocates for Safe Alaskan Highways (ASAH), of which I am a member, has proposed several alternatives that the Applicant has advised it is not considering:

- **Process on Site.** The Applicant originally considered a plan to process the ore on site at the Tetlin Extraction Site. This would lessen the Project Footprint by more than 240 miles. Processing on site is the traditional method for dealing with gold ore, and usually proves to be the only economic way to mine for gold. The Applicant wants to use infrastructure it has developed at Fort Knox, 240 miles away. But to get there, the environmental footprint of its project expands by that same 240 miles, putting communities at risk, adversely impacting human health and safety and the environment all along the way. Processing on site is the logical, better alternative to the plan proposed by the Applicant. The footprint would be much smaller. The land can be reclaimed. And residents and visitors all along the proposed corridor will not have to face all the adverse effects that the proposed transportation plan would impose upon them.
- **Extend the Railroad to Tetlin.** The Alaska Railroad already has an approved Record of Decision from the Surface Transportation Board to extend the railroad from North Pole to Delta Junction. The Alaska Railroad could apply to further extend the railroad from Delta Junction to Tetlin. It has long been a dream of Alaskans to have a rail link to the Lower 48 and extending the line to

Delta Junction and Tetlin would advance that goal. Railroads are traditionally the method of hauling ore, coal and similar materials, in a safer manner than highway trucking.

- **Create a Pioneer Road along the Railroad Right-of-Way, or Elsewhere, Between Ft. Knox and Tetlin.** AIDEA is in the business of building industrial roads. It finances construction of roads to a new development, and then the developer repays AIDEA over time, as part of the cost of developing a viable, safe, and reliable transportation route to the mine or other operation. There are other potential gold mining sites in or off the Richardson Highway/Alcan road corridor. We understand these include prospects include Richardson, Shamrock, Eagle-Hona-Triple Z, and Lucky Shot. There may be others. These could be tied into such a development road, and all that traffic kept off the public highways. The Alaska Railroad right-of-way, already in existence, could be used for a pioneer road, and later built with a railroad line. In this way, if trucking is preferred to rails, the trucks could operate on an industrial road and not put the public at risk by using public highways or converting them to ore haul roads.
- I have wondered what new technologies, used elsewhere, might more safely transport Manh Choh ore or concentrates than our public highways. Long distance conveyors have been used elsewhere. And one Canadian firm plans to use a hybrid air ship, to provide transportation for ore concentrates from the extraction to the processing site. But the most logical and common sense alternative is to process the ore at the Tetlin Extraction site, thereby eliminating any need to transport ore 240 miles.

In summary, I ask the District Commander to determine that the proposed Manh Choh Project, consisting of the Tetlin Extraction Site, 240 miles of public highway and adjacent waters, and the Fort Knox gold mine, is contrary to the public interest, and must be denied permits allowing it to construct infrastructure to truck ore to Fort Knox. Dredged or fill materials coming from the Tetlin Extraction Site should not be discharged at Tetlin or anywhere along the 240 miles of highway between Tetlin and Fort Knox, or at Fort Knox. The application is deficient in describing the location and footprint of the project, and the project's negative impacts to human health and safety and the environment. The proposal is contrary to the public interest.

If the permit application is not denied outright, then I ask for a public hearing. All supervisory agencies and the public should analyze the plan and the negative impacts it will have on public health and safety and the environment. When that is done, the Application, which asks for approval to build infrastructure to truck ore over public highways, should be denied as contrary to the public interest, for all the reasons outlined in this letter.

Sincerely,

Barbara L. Schuhmann

A black rectangular redaction box covering the signature area.

**Enclosure: Table One. Computations of Number of Truck Trips and Weights on Public Highways**