

Public Comment Period Extended to May 30th, 2019, 5:00PM

Constantine North, Inc. is applying for a [Waste Management Permit and amendment to the Reclamation Plan Approval](#) for their Phase II exploration activities in the Chilkat Watershed. Because Constantine has concentrated their activities on Mental Health Trust land with few environmental regulations, there is very little public process available to us. This is a rare opportunity for you to influence the state's permitting process on a project that poses serious threats to our Watershed and the salmon, wildlife, peoples, and cultures it supports. Our staff scientist has been working hard to analyze the permit applications—about 2,000 pages of technical documents. Read on for some key points to help you develop your own comments, followed by some local actions you can take.

Submit your comments by 5:00 PM Alaska Time on May 30^h to:

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Alaska Department of Natural Resources
Office of Project Management and Permitting
PO Box 111030
Juneau, AK 99801
Phone:(907) 465-6849
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Be sure to include your name, address, telephone number, and a concise statement of your comment and the relevant facts upon which it is based. For maximum impact, cc our state legislators, [Senator Jessie Kiehl](#) and [Representative Sara Hannon](#).

More information on the application and public process can be found at the Alaska Department of Natural Resources (ADNR) [website](#).

Key Points for Public Comment

We developed these points to help inform your comments. Please **use your own words** to draft your comments—cutting and pasting our points makes for ineffective comments.

Make sure to reference “Draft Waste Management Permit No. 2019DB0001” and “Draft Reclamation Plan Approval (J20185690RPA) Amendment 1

(Estimate of Financial Assurances)” at the top of your comment, and start with a brief summary of your comment.

- **Ask ADNR to withdraw the application until such time as a complete application can be submitted** - the current permit application is incomplete and rushed. The application presents inadequate baseline data and analysis for measuring the long-term impacts of mine exploration and development, making it impossible for Alaska Department of Natural Resources (ADNR) or the public to make an informed decision.
 - The application does not provide sufficient surface water quality data to establish an adequate baseline for natural conditions - groundwater wells were only sampled twice in an 11 day period, and many of the surface water monitoring sites were only sampled 4 times total.
 - There is no assurance that surface water will not be contaminated - the permit fails to demonstrate that the groundwater and surface water are not connected at the site of the Land Application Disposal (LAD) system diffusers.
- The application fails to adequately explain how its proposed discharge system and monitoring system will work in freezing temperatures, under snow cover, during avalanches, or even during periods of avalanche risk.
 - The application is based on a Plan of Operations (POO) that includes avalanche diversions, with two on top of the lower LAD diffuser, but it fails to address their effectiveness, stability, and long-term performance.
 - The application does not include actual snow and avalanche data, but states that they are available on request. The snow and avalanche data presented to the Haines Borough Assembly Committee of the Whole regarding this application on May 7, 2019 excluded 2011-2013, years of heavy snowfall. How will avalanche diversions and the LAD diffuser hold up in years of heavy snowfall?
 - In 2019, an avalanche damaged a bridge onsite over Concrete Creek, and adjacent roadway washed into Glacier Creek at 25% of average snowpack. How will infrastructure be protected in average or above-average snow years?
 - The application includes a 10,000 gallon fuel tank at the base of an avalanche chute, but there is inadequate information to

demonstrate that it will be sufficiently protected from avalanches. (POO 2.2.3 at 14)

- If an avalanche or heavy snow fall disrupts power generators, how will the pumps for the LAD system function?
- According to the POO, the LAD is based on gravity-operated ponds, diffusers, and inverted syphons that will not work in sub-freezing temperatures, meaning water will not be treated year-round.
- **Ask ADNR to extend the comment period to at least 90 days.** The comment period is too short. ADNR gave the public 30 days to analyze approximately 2,000 pages of technical documents and provide comment, and then extended the period by 15 days because they provided the wrong mailing address in their public notice. The public comment period should allow a lay person enough time to examine the documents and to seek clarification where needed.
- **Ask ADNR to ensure meaningful consultation and consent with impacted downstream Tribal Governments and communities before approving any permit applications.**