



DATE: May 14, 2019

TO: Haines Borough Assembly and Mayor

RE: Palmer Project Draft Waste Management Permit (2019DB0001),
Draft Reclamation Plan Approval Amendment 1 (J20185690RPA),
Phase II Plan of Operations

The Takshanuk Watershed Council's (TWC) primary concern with the draft Waste Management Permit and Application, with the draft Amended Reclamation Plan, and with the Alaska Mental Health Trust Land Office Phase II Plan of Operations, is that they are lacking analysis of a number of critical project operational components, specifically:

- 1) alpine and winter conditions at the Palmer Project site,
- 2) the efficacy of the Land Application Disposal (LAD) system with regard to preventing ground and surface water contamination, and
- 3) an analysis of wastewater flows from the full length of the proposed tunnel, including the Kudo Fault zone.

Because of these shortcomings in the permit documents, TWC is requesting that DEC require, under 18 AAC 15.040, that Constantine Mining withdraw their application and provide additional information before resubmitting their permit applications, plans, and supporting documentation. The draft WMP should then be amended accordingly, and a public comment period of at least 90 days should follow, providing sufficient time for the public to assess and respond to a new application document and Phase II Plan of Operations. A full discussion of this request will be included in TWC's comment submission to the DNR joint agency public notice.

The objective of these comments is to be pro public process, not anti development or mining.

Thank you,

Ben Kirkpatrick, President
On behalf of the Takshanuk Watershed Council Board of Directors