

Response to Comments

on

Department of Environmental Conservation
Draft Waste Management Permit No. 2026DB0002

&

Department of Natural Resources
Draft Plan of Operations Approval (F20269852POOA)

&

Department of Natural Resources
Draft Reclamation Plan Approval No. (F20269852RPA)

Fairbanks Gold Mining Inc.
Fort Knox Mine

Public Noticed May 8, 2026 – June 7, 2026

September 10, 2026

Introduction

Public notice start: May 8, 2026

Public notice end: June 7, 2026

The Fort Knox Mine is an open pit gold mine located 15 air miles northeast of Fairbanks, Alaska in the Fish Creek drainage. Mine operations are conducted by Fairbanks Gold Mining Inc. (FGMI), a wholly owned subsidiary of Kinross Gold USA Inc. The project area encompasses about 12,400 acres of State and private land, including about 6,657.5 acres under the Millsite Lease ADL 422542. FGMI applied for renewal of the following state authorizations: the mine's Waste Management Permit, Plan of Operations, and Reclamation and Closure Plan.

This document summarizes and addresses comments received on Alaska Department of Environmental Conservation (DEC), draft Waste Management Permit (WMP) No. 2026DB0002, Alaska Department of Natural Resources (DNR), draft Plan of Operations Approval (POOA) No. F20269852POOA, and DNR, draft Reclamation Plan Approval (RPA) No. F20269852RPA. The WMP regulates the containment and disposal of mine tailings, waste rock, wastewater, and other mine-related wastes at the Fort Knox Mine, the POOA regulates mining activities on State land, and the RPA regulates activities associated with the reclamation and closure of the mine.

General Comments

The State received comments from 22 parties, the majority of which were general comments that did not concern permit-specific requirements. Instead, general comments included objection to or support for the mine, interest in a public hearing, or other aspects outside the scope of the permits. The State did not respond to general, non-substantiated comments or to comments outside the scope of or beyond regulatory authority of these permits.

Comment Overview

Permit-specific, substantive comments concerning requirements of DEC's WMP permit, DNR's POOA, or DNR's RPA, and the State's responses are contained in the following pages.

Response to Comments on draft Waste Management Permit No. 2026DB0002, draft Plan of Operations Approval No. F20269852POOA, and draft Reclamation Plan Approval No. F20269852RPA for the Fort Knox Mine

Quoted comments are in *italics*.

Comment #	Comment	Agency Response
1	<i>The project has grown substantially beyond what was originally permitted.</i> <i>Fort Knox was originally permitted in 1994 with an anticipated net disturbance area of approximately 1,749 hectares. By 2022, the combined disturbance footprint of Fort Knox and the Gil satellite mine had grown to over 4,000 hectares — more than double the original projection — and that figure does not include the recently added Manh Choh ore haul operation. Permit renewals should not be treated as routine administrative actions when the scale and character of operations have changed this significantly. The public and regulators deserve an updated, comprehensive evaluation that reflects what Fort Knox actually is today, not what it was proposed to be thirty years ago.</i>	The footprint has grown since the inception of Fort Knox Mine to include Gil, Victoria Creek, and most recently Pedro Creek. Each time, public notice has been provided by the Department of Natural Resources' (DNR's) Mental Health Trust or Mineral Property Management Sections requesting public comment before a lease was issued for state land. Other areas of expansion were on private property, owned by Fairbanks Gold Mining Inc. (FGMI) and are included as part of the area that encompasses Walter Creek Heap Leach Facility. Regarding the Manh Choh ore storage, it is staged on the Tailings Storage Facility (TSF), which is designated as a treatment works and its disturbance area has already been accounted for without increasing the mine's footprint. Regulators are continually updated and informed of the mine's operations during regularly scheduled meetings. Agency site inspections are conducted to verify compliance. There is no statute or regulation preventing mines from expanding their footprints when developing a mineral resource. However, a mining operation shall be reclaimed as contemporaneously as practicable with the mining operation to leave the site in a stable condition (AS 27.19.030), which FGMI has done (documented in inspection reports) and continues to do. No changes to the Plan of Operations Approval (POOA) or Reclamation Plan Approval (RPA) resulted from this comment.
2	<i>The restoration plans without tree (the original cover) planting is ludicrous. Cost/availability of such should have been considered before commencement of the projects.</i>	The reclamation plan satisfies regulations under 11 AAC 97.200. For the purposes of AS 27.19.100(6) and this section, a stable condition that "allows for the reestablishment of renewable resources on the site within a reasonable period of time by natural processes" means a condition that can reasonably be expected to return waterborne soil erosion to pre-mining levels within one year after the reclamation is completed, and that can reasonably

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		be expected to achieve revegetation, where feasible, within five years after the reclamation is completed, without the need for fertilization or reseeding. If rehabilitation of a mined site to this standard is not feasible because the surface materials on the mined site have low natural fertility or the site lacks a natural seed source, DNR recommends that the miner fertilize and reseed or replant the site with native vegetation to protect against soil erosion; however, AS 27.19 does not require the miner to do so. Rehabilitation to allow for the reestablishment of renewable resources is not required if that reestablishment would be inconsistent with an alternate post-mining land use approved under AS 27.19.030(b) on state, federal, or municipal land, or with the post-mining land use intended by the landowner on private land. DNR determined that the financial assurance adequately funds any reclamation and closure costs that can reasonably be anticipated. No changes to the POOA or RPA resulted from this comment.
3	The bond is underestimated due to the potential for dam failure, the need for monitoring, maintenance, and water treatment in perpetuity, inflation, the cost of power, and all aspects of remediation. The state needs to ensure that the bond is in place and will be sufficient to cover long-term monitoring and potential dam failure. Concerns were noted regarding the use of the "State's Bond Insurance Fund."	Alaska Statutes require financial assurance to be based upon "reasonable and probable" estimates of reclamation costs. It is the duty of DNR to determine the required reclamation bond using the guiding principle of a "reasonable and probable" analysis. If conditions change prior to the completion of reclamation, DNR may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC 97.415(b) "After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current calendar year, plus any area mined in a previous year that has not yet been reclaimed." Under AS 27.19.040(b), Fort Knox is not eligible to participate in the statewide bond pool. Through AS 27.19.040(e),

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		11 AAC 97.400, and 11 AAC 97.410, the company provided approved financial assurance to cover the cost to reclaim the site as per the approved reclamation plan. The financial assurance will be updated prior to commencement of activities associated with the approvals under this public notice. As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. DNR and the Department of Environmental Conservation (DEC) determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or Waste Management Permit 2026DB0002 (WMP) resulted from this comment.
4	The cost of water treatment has been understated due to exceedances of water quality standards. Existing and forecasted water quality exceedances and uncertainties for the cost estimate have been identified and may affect the amount of bonding required as noted in environmental reports (SRK Consulting 2019 and SRK Consulting (2026)). Assumptions for potential post-closure water treatment are not included, yet ground or surface water exceedances along with the pump-back system may require use beyond the proposed time limit. If sampling events note water quality exceedances, the site may require costs associated with addressing those exceedances. The time expectation for pit infill and proposed monitoring timeframe may not be adequate to address the exceedances for water quality.	Alaska Statutes require financial assurance to be based upon “reasonable and probable” estimates of reclamation costs. It is the duty of DNR and DEC to determine the required reclamation bond using the guiding principle of a “reasonable and probable” analysis. If conditions change prior to the completion of reclamation, DNR and DEC may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC 97.415(b) “After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current calendar year, plus any area mined in a previous year that has not yet been reclaimed.” As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and

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	The recent pit lake evaluation study indicates active water treatment may be needed post closure. This cost is not addressed. Additionally, long-term costs are provided a 4.3% real rate of return addressed in the “memorandum of understanding” from the Alaska Department of Revenue with a subject line “Recommended 4.3% real rate of return for Red Dog Mine funds.” While prudent and conservative financially, the document is between Red Dog Mine and the State of Alaska, not between FGMI and the State of Alaska.	water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or WMP resulted from this comment.
5	<i>Reclamation bonding must reflect current, realistic costs.</i> <i>Past audits have identified gaps between FGMI's reclamation cost estimates and the true third-party contractor costs required to execute closure, including the absence of adequate demolition planning and cost estimates. As the operation has grown, bonding must be updated to reflect the mine as it currently exists — including Gil and any Manh Choh-related infrastructure — so that Alaska taxpayers are not left holding the bag if Kinross exits the operation.</i>	Alaska Statutes require financial assurance to be based upon “reasonable and probable” estimates of reclamation costs. It is the duty of DNR to determine the required reclamation bond using the guiding principle of a “reasonable and probable” analysis. If conditions change prior to the completion of reclamation, DNR may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC97.415(b) “After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current calendar year, plus any area mined in a previous year that has not yet been reclaimed.” The company has provided a cost-estimate for Gil Mine, which has been included with the Fort Knox submission. Manh Choh Mine has a separate cost estimate, and financial assurance, and approval. As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No

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		changes to the POOA, RPA, or WMP resulted from this comment.
6	The plan and appropriate funding for reclamation appear to be low in the case of a mine or natural disaster. A plan for catastrophic events and associated costs should be included.	Alaska Statutes require financial assurance to be based upon “reasonable and probable” estimates of reclamation costs. It is the duty of DNR to determine the required reclamation bond using the guiding principle of a “reasonable and probable” analysis. If conditions change prior to the completion of reclamation, DNR may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC 97.415(b) “After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current calendar year, plus any area mined in a previous year that has not yet been reclaimed.” As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. DNR determined that the financial assurance adequately funds any reclamation and closure costs that can reasonably be anticipated. No changes to the POOA or RPA resulted from this comment.

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7	<i>Finally, after reading the section on financial assurance I am concerned that there is insufficient contingency in the event the engineering, modeling, and predictions/assumptions made by FGMI and their consultants does not work out as anticipated. The State of Alaska should take another look to ensure the people of Alaska will not be on the hook for any cleanup liabilities.</i>	Alaska Statutes require financial assurance to be based upon “reasonable and probable” estimates of reclamation costs. It is the duty of DNR to determine the required reclamation bond using the guiding principle of a “reasonable and probable” analysis. If conditions change prior to the completion of reclamation, DNR may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC 97.415(b) “After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current calendar year, plus any area mined in a previous year that has not yet been reclaimed.” As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. Since the itemized indirect costs accounted for contingencies, including engineering, DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or WMP resulted from this comment.
8	<i>At the 2095 closure mark, it is anticipated responsibility for inspecting and maintaining the two dams (tailings and water storage) will be transferred to the State of Alaska (RCP page 95). I did not find anywhere in the reports where this decision factors in risks, over the long term, from seismic events, or climate change-driven extreme precipitation events. Those must be addressed.</i>	Alaska Statutes require financial assurance to be based upon “reasonable and probable” estimates of reclamation costs. It is the duty of DNR to determine the required reclamation bond using the guiding principle of a “reasonable and probable” analysis. If conditions change prior to the completion of reclamation, DNR may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC 97.415(b) “After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current

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		calendar year, plus any area mined in a previous year that has not yet been reclaimed.” As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. The dams are addressed under the DNR’s Dam Safety Program, AS 46.17 and 11 AAC 93.151-201. Since seismic activity has been factored into the design and construction of dams, including acceptable factors of safety, dam failure is neither reasonable nor probable. DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or WMP resulted from this comment.
9	<i>I do not find adequate documentation that FK's proposed addition of 1 million tons of new materials to Pit Lake annually will not result in dam failure.</i>	The pit lake (at the bottom of the main pit) is used to dispose of the Manh Choh tailings and is currently a separate system from the TSF and dam, in which the Fort Knox and Gil tailings are deposited. It is stated in the Fort Knox Reclamation Plan that, "once the pit lake has reached the final elevation of 1,430 ft-above mean sea level, water will flow through the fractured bedrock and under the TSF and through the alluvium near the surface.” (Pg. 72) It should be noted that under the 1,430 foot elevation is bedrock separating the main pit from the TSF. This connectivity of water will occur after reclamation has been completed for the TSF and dam, and after the main Fort Knox Pit has filled with ground and surface water. No changes to the POOA, RPA, or WMP resulted from this comment.

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10	<i>FK’s 2026 plan estimates that 254.8 million tons of ore remain to be disposed of through the end of leaching in 2042. It is clearly foreseeable that the addition of new waste-water and solids from Manh Choh, Gil, continued FK mining, not to mention potential additions from other satellite mines, will strain the dam’s capacity and increase the chances of a dam failure, especially given the nature of the dam raise utilized by FK some years ago. The so-called “upstream raise” construction used was the cheapest and most vulnerable construction technique available. The presence of faultlines near the mine are also of deep concern. Indeed, of all dangers to the public from Kinross’ operations, the danger of a dam failure is the most serious and of the greatest concern to the public. Images of the dam failure at the Mount Polly Mine in 2014 are devastating and cost the Imperial Metals Corporation \$70M and BC taxpayers another \$40M plus five years of clean up. In that event, 25 million cubic meters of wastewater containing arsenic, antimony and mercury were released impacting livelihoods and resulting in years of ongoing monitoring. Full recovery is estimated to require a century or longer. Such a disaster in the Fairbanks North Star Borough would be a life-changing event for every Borough resident. Long-term degradation of the Chena River would damage or destroy the second-largest producer of King Salmon on the American side of the Yukon River drainage and impacts—both personal and financial—to local residents’ water quality, recreational opportunities, quality of life and tourism would be incalculable.</i> <i>What happens if a large earthquake damages the dam holding back all that contaminated water and it flows into the Little Chena and on into the Chena River? The steps listed in the documents seem woefully inadequate for a major dam breach.</i>	The dams are addressed under the DNR’s Dam Safety Program, AS 46.17 and 11 AAC 93.151-201. Since seismic activity has been factored into the design and construction of dams, including acceptable factors of safety, dam failure is neither reasonable nor probable. Alaska Statutes require financial assurance to be based upon “reasonable and probable” estimates of reclamation costs. It is the duty of DNR to determine the required reclamation bond using the guiding principle of a “reasonable and probable” analysis. If conditions change prior to the completion of reclamation, DNR may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC 97.415(b) “After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current calendar year, plus any area mined in a previous year that has not yet been reclaimed.” As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or WMP resulted from this comment.

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11	<i>The changing chemistry of this water due to the addition of the Manh Choh ore is a superfund site in the making. Associated is the inevitable containment membrane penetration that will allow cyanide heap leaching solutions to escape off Walter and Barnes Creek facilities into the area.</i>	Barnes Creek and Walter Creek Heap Leach facilities are upstream of the TSF. The TSF dam is equipped with an elaborate and extensive a seepage collection system that prevents the discharge of water not meeting water quality standards from leaving the facility footprint. The plans meet the performance standards of 11 AAC 97.230 for drawdown and rinsing of the heap leach facilities. As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or WMP resulted from this comment.
12	<i>Several people associated with the mine have spoken of the basic substances in the ore at Ft. Knox being able to “neutralize” the acid in the process. Any chemist knows that the neutralization reaction goes on only if the base and acid are in the same location and in amounts that are equal to complete the neutralization. The limiting factor applies here. How can that reaction be counted on at all?</i>	Manh Choh tailings are deposited into the eastern pit bottom. The Fort Knox Gold Mine Plan of Operations & Waste Management Permit Renewals, Updated April 2026 Figure 2-4 shows the planned final configuration of the deposited tails under the in-pit waste rock dump. Water is expected to cover both to provide an anoxic environment to prevent acid rock drainage. No changes to the POOA, RPA, or WMP resulted from this comment.
13	<i>Heap leach closure questions were not fully resolved.</i>	Heap Leach Facility Closure is addressed under the Fort Knox Reclamation Plan which states that they, “...are based on site specific conditions, facility design, available test data, and technical analyses conducted as part of the closure planning process.” (Pg. 74) Kinross has collected weather data for many years and has modeled climate, precipitation, temperatures, and evaporation as part of long-term drainage after closure. There has been testing on the cyanide solution which showed a rapid

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		decrease as seepage is drawn down. After draw-down the heap leach facility will be regraded to a 3:1 slope and covered with growth media and erosion control measures to be included as part of the closure design. DNR will only return the financial assurance amount after reclamation performance standards have been meet under regulatory requirements. No changes to the POOA, RPA, or WMP resulted from this comment.
14	<i>The addition of Manh Choh acid-generating ore introduces risks not covered by existing permits.</i> <i>A critical change since the last renewal cycle is the incorporation of Manh Choh ore into Fort Knox processing. The original Fort Knox environmental assessment was premised on the fact that Fort Knox ore does not generate acid mine drainage (AMD). That assumption no longer holds for the full operation. AMD can persist for centuries and requires perpetual mitigation to protect downstream water quality. The draft permits must explicitly address how acid-generating tailings from Manh Choh will be stored, monitored, and managed separately, and what long-term financial assurance exists to cover perpetual treatment costs. A permit renewal that does not squarely confront this changed risk profile is inadequate.</i>	The processing of Manh Choh ore was described in detail in the Fort Knox Mine Plan of Operations Amendment, Manh Choh Ore Processing (March 31, 2023). The Manh Choh ore storage area is shown on page 5 on the Ore Delivery Site Road General Arrangement. The Fort Knox Gold Mine Plan of Operations & Waste Management Permit Renewals, Updated April 2026, summarized these unchanged permitted activities. Manh Choh tailings are deposited into the eastern pit bottom. Fort Knox Gold Mine Plan of Operations & Waste Management Permit Renewals, Updated April 2026 Figure 2-4 shows the planned final configuration of the deposited tails under the in-pit waste rock dump. Water is expected to cover both to provide an anoxic environment to prevent acid rock drainage. Alaska Statutes require financial assurance to be based upon “reasonable and probable” estimates of reclamation costs. It is the duty of DNR to determine the required reclamation bond using the guiding principle of a “reasonable and probable” analysis. If conditions change prior to the completion of reclamation, DNR may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC 97.415(b) “After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current

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		calendar year, plus any area mined in a previous year that has not yet been reclaimed.” DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or WMP resulted from this comment.
15	<i>This permit barely mentions the Manh Choh ore, which is acid-producing and mineral-leaching. Since the Manh Choh ore is only processed for one month, four times per year, it must be stored at Fort Knox as it accumulates, for two-thirds of the year. Where is this temporary storage and what safeguards are in place to prevent it from contaminating this and other areas? See, also other questions raised on the second attachment which I incorporate into my comments by this reference. What reclamation is planned for the Manh Choh tailings and waste rock stored or permanently dumped at Fort Knox? What reclamation is planned for tailings and ore brought to Fort Knox from other sites?</i> <i>The Operational Plan, at pp. 7-8, states the Manh Choh ore is processed by using the same mill and tanks as ore from other sites. What measures are taken to avoid cross-contamination of the other material processed at the site? The Manh Choh tailings will be placed in the Pit Lake. However, the “Pit Lake” is designed for future use, according to the plan, and does not currently exist. Currently, there is on-going mining occurring in the pit, and the plan is for it to continue until sometime in 2028.</i> <i>Where are the tailings stored until the Pit Lake is available?</i>	The approved amendments for construction of mill beneficiation equipment, stockpiling of Manh Choh ore on the TSF and the deposition of its tailings were authorized on April 24, 2023 under approvals F20209852RPA.2 and F20209852POOA.2. The Fort Knox Mine Plan of Operations Amendment for Manh Choh Satellite Mine Ore Processing has been available to the public since the spring of 2023 via DNR’s Large Mine Permitting website for Fort Knox. Manh Choh tailings are deposited into the eastern pit bottom. Fort Knox Gold Mine Plan of Operations & Waste Management Permit Renewals, Updated April 2026 Figure 2-4 shows the planned final configuration of the deposited tails under the in-pit waste rock dump. Water is expected to cover both to provide an anoxic environment to prevent acid rock drainage. No changes to the POOA, RPA, or WMP resulted from this comment.

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16	<i>How can we be sure that the addition of so much potentially acid generating rock into the pit is not going to result in contamination of the water table?</i>	Manh Choh tailings are deposited into the eastern pit bottom. Fort Knox Gold Mine Plan of Operations & Waste Management Permit Renewals, Updated April 2026 Figure 2-4 shows the planned final configuration of the deposited tails under the in-pit waste rock dump. Water is expected to cover both to provide an anoxic environment to prevent acid rock drainage. No changes to the POOA, RPA, or WMP resulted from this comment.
17	<i>Fish and habitat protections need to be enforceable. The public needs the full pit lake record.</i>	DNR inspections are conducted to document all disturbance, reclamation, and surface use of the mine site to make sure that the operation is following all approved activities on the surface estate and that they are following the stipulated conditions outlined in their POOA and RPA. The pit lake record is incomplete as indicated by condition 2.1.6.3 of the WMP which requires FGMI to, “At a minimum, the department-approved long-term pit lake water quality model shall include those parameters evaluated in the <i>Fort Knox Pit Lake Evaluation, 2025 Update</i>. The pit lake water quality model shall be updated annually according to section 2.4.4.3.” No changes to the POOA, RPA, or WMP resulted from this comment.
18	<i>What happens to the Manh Choh waste rock? Which waste rock dump or tailing dump is used for it? What precautions are taken to prevent acid-generating or mineral-leaching rock from being released or mixed with the other waste rock from other areas?</i>	Waste rock from Manh Choh Mine is not transported to Fort Knox Mine. The pit lake (at the bottom of the main pit) is used to dispose of the Manh Choh tailings and is currently a separate system from the TSF and dam, in which the Fort Knox and Gil tailings are deposited. Water is expected to cover both to provide an anoxic environment to prevent acid rock drainage. No changes to the POOA, RPA, or WMP resulted from this comment.

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19	<i>When will reclamation begin and end at Fort Knox? What will the reclaimed land look like? Will there be open ponds and lakes so contaminated that birds landing on or drinking the water will die? What steps will be taken to either fill in and eliminate dangerous waters, or keep birds from being poisoned by those waters?</i>	Site reclamation is explained as per the Fort Knox Mine Reclamation and Closure Plan (April 2026) Section 5.1. The schedule is further detailed in Table 5-1. Physical reclamation is scheduled to end in 2042. Figure 5-4 (page 55) shows the planned configuration with storm water surface drainage designed to provide a stable configuration for reclamation and closure. Monitoring will continue until dam seepage meets water quality standards. No changes to the POOA, RPA, or WMP resulted from this comment.
20	<i>Post-closure monitoring timelines are insufficient.</i> <i>Prior Fort Knox permitting has included post-closure water quality monitoring requirements of approximately five years. For a mine operating in the Fish Creek drainage, with a tailings storage facility of this scale, five years of post-closure monitoring is wholly inadequate. Groundwater contamination and tailings seepage can emerge on timelines of decades. I urge DNR and DEC to require monitoring commitments commensurate with the actual duration of risk and to ensure that financial assurance instruments are structured to cover those longer timelines, not just the period immediately following closure.</i>	Site monitoring is addressed in Section 7 of the Fort Knox Mine Reclamation and Closure Plan (April 2026, pages 71-92). The plan addresses the requirement under 11 AAC 97.240 to prevent the generation of acid rock drainage or prevent the offsite discharge of acid rock drainage. As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or WMP resulted from this comment.
21	After reviewing the documents behind the draft approvals, there are several issues that still need attention. Earlier SRK work (2019) suggested that while surface reclamation plans were solid, long-term water treatment needs might be underestimated. The updated RCP addresses some of this but leaves important gaps.	Site monitoring is addressed in Section 7 of the Fort Knox Mine Reclamation and Closure Plan (April 2026, pages 71-92). The plan addresses the requirement under 11 AAC 97.240 to prevent the generation of acid rock drainage or prevent the offsite discharge of acid rock drainage. The plan may be amended if conditions change.

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	The pit lake evaluation shows multiple contaminants are expected, yet the RCP assumes they will meet Alaska water quality standards once the pit is full. It also expects reverse-osmosis treatment to end by 2039 but does not describe what happens if treatment is still needed. Pump-back of tailings seepage is assumed to continue until at least 2074. Although many contaminants will be monitored, the plan lacks strong, specific requirements detailing what actions must occur if water quality standards are not met—especially given the addition of acid-generating and metal-leaching Manh Choh tailings, and uncertainties about potential acid rock drainage from the Gil Project. I am also concerned about possible downstream impacts on Fish Creek and the Chena River. Long-term monitoring of water quality and fish health should continue well past closure, as contamination at other mines has appeared decades later. The RCP suggests downstream dilution will make water meet standards, but relying on dilution is not sufficient protection. Future permits should require strong, long-term monitoring and clear responses if standards are exceeded, to protect Alaskans and the Chena River watershed.	As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. Closure cost estimation is an inexact exercise. However, the financial assurance that was calculated for these permits imposes conservative assumptions to protect the State’s interest. For example, total direct costs were increased by 37% to account for indirect costs, and the grand total resulted in these permit renewals increasing the financial assurance from \$100.6 million to \$218.3 million. DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or WMP resulted from this comment.
22	<i>Reclamation design has historically lacked enough detail. SRK’s 2019 audit specifically recommended that the Reclamation and Closure Plan (RCP) include a grading plan showing reclamation contours and drainages. The current 2026 Reclamation and Closure Plan (RCP) now includes figures for post-reclamation topography, drainage, and facility-specific reclamation, but the public should still ask whether the designs are specific enough for the expanded mine footprint, especially Pedro Creek, Roman Hill, Victoria Creek, and the Yellow Pup / Tailings Storage Facility (TSF) infill areas. This matters because reclamation is not just seeding disturbed ground. It requires</i>	Reclamation of the mine site has undergone numerous changes as the mine has continued development of the resource and has expanded operational needs since its inception. Each time there has been detailed documentation for the specific changes in the reclamation plan to encompass additional disturbance, structures, and requirements to meet reclamation performance standards and financial assurance. For example: the pit lake has always been part of the final reclamation of the main pit; however, to take advantage of a system that will become anoxic at water depth provides an ideal location for disposal of the Manh Choh tailings. The reclamation plans are part of the Fort Knox public record and

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	<i>stable slopes, working drainage, erosion control, growth media, revegetation, and long-term monitoring.</i>	are available for review. These records demonstrate the historical changes that are, and have been, addressed to meet reclamation requirements. The plans meet the requirements under AS 38.05, AS 27.19, 11 AAC 86.800, and 11 AAC 97. If conditions change prior to the completion of reclamation, DNR may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC 97.415(b) “After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current calendar year, plus any area mined in a previous year that has not yet been reclaimed.” DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or WMP resulted from this comment
23	<i>PEDRO CREEK SHOULD NOT BE APPROVED ON INCOMPLETE ANALYSIS.</i> <i>Pedro Creek is one of the most important new facilities in the current renewal. The 2026 Reclamation and Closure Plan (RCP) identifies the Pedro Creek Waste Rock Dump (Pedro Creek WRD) as part of the reclamation package and shows a pending Pedro Dump land area of approximately 520 acres. Because Pedro Creek is a new waste rock facility and watershed disturbance, the public should ask whether the State has the complete technical record before approval.</i> <i>SRK Consulting’s 2080 “full revegetation” rendering shows how the proposed Pedro Creek Waste Rock Dump (PCWRD) is expected to appear decades after reclamation, with darker evergreen vegetation mixed into softer deciduous vegetation and a smoother visual blend with the surrounding hillsides.</i>	Pedro Creek is leased property from the Mental Health Trust who provided a separate public notice for the lease with stipulated conditions. DNR is only approving the reclamation of the proposed waste rock dump’s reclamation and the financial assurance amount to cover these activities. The reference to an “incomplete analysis” is unsubstantiated and needs context to specifically address. No changes to the POOA or RPA resulted from this comment

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	<i>However, the report notes that the landform may still be visible in winter until evergreen cover becomes more established.</i>	
24	<i>The dirt just from the yards and roads used by the trucks is splattered all over the public travelling in the vicinity of the trucks when roads are wet and dragged onto the hardtop access road to each location the trucks stop between the two mines. Since the roads used by Fort Knox to bring ore to its Fort Knox Mine are part of the Fort Knox mining activity, additional safeguards should be required for that location and the trucking activity. Trucks should be cleaned before entering public highways, by using water, air or other methods.</i>	FGMI employs and documents best management practices aimed at preventing and minimizing offsite sediment tracking from vehicles entering public roads according to the requirements of Multi-Sector General Permit.AKR060000. No changes to the POOA, RPA, or WMP resulted from this comment
25	<i>The State should connect all permits instead of reviewing them separately.</i>	Due to the complexity of a large project's design, waste management, habitat requirements, water, and land use of the site is not manageable by one entity to issue an independent permit/authorization. Specifically, each federal, municipal, and state agency specializes in specific statutory and regulatory authority in which they have jurisdiction and oversight. DNR and DEC combine their permitting cycle to help clarify to the public that the financial assurance that is regulated by each agency, and held by DNR, to meet 18 AAC and 11 AAC requirements. No changes to the POOA, RPA, or WMP resulted from this comment.

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26	<i>The State should require Fort Knox to fix the gaps identified in previous audits, inspections, water-quality reports, and fish studies before approving the next permit cycle. SRK found that reclamation cost estimates appeared adequate for surface reclamation, but that uncertainties surrounding long-term water quality and management, including treatment and pumping, were not clearly defined and may be underestimated. Contingencies for a dam failure were not addressed and bonding is not known to be adequate according to the SRK review. Moreover, the 2026 package still relies heavily on long-term predictions for pit lake chemistry, heap leach drain-down, Tailings Storage Facility (TSF) seepage, groundwater movement, and future water treatment. Given the misgivings of the third-party consultant who are experts in the mining industry, the public deserves assurances that state permits are equal to this next phase of mining and will protect the public and the fishery from degradation of water quality, the potential for dam failure and assurances that sufficient bonding is in place.</i>	The 2024 environmental audit replaced the 2019 document. Plans were updated based on the 2024 environmental audit. Proposed financial assurance has been updated with current information and costs. The dams are addressed under the DNR’s Dam Safety Program, AS 46.17 and 11 AAC 93.151-201. Since seismic activity has been factored into the design and construction of dams, including acceptable factors of safety, dam failure is neither reasonable nor probable. Alaska Statutes require financial assurance to be based upon “reasonable and probable” estimates of reclamation costs. Dam failure is neither reasonable nor probable. It is the duty of DNR to determine the required reclamation bond using the guiding principle of a “reasonable and probable” analysis. If conditions change prior to the completion of reclamation, DNR may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC 97.415(b) “After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current calendar year, plus any area mined in a previous year that has not yet been reclaimed.” As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or WMP resulted from this comment.

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27	The mine originally planned to create wetlands below the TSF and establish a future public grayling fishery in the Water Supply Reservoir (WSR—both positive environmental goals noted in earlier documents. Wetland construction for grayling spawning began in the 1990s, and their use as habitat has been well documented by ADF&G. Reverse-osmosis (RO) discharge into these wetlands started in 2016. In 2024, juvenile grayling from the wetlands were tested for several metals and compared with 1993 baseline data collected before the wetlands existed. This is useful, but it does not address contaminant buildup in older, larger fish—the types eaten by predators like eagles and ospreys, or by people. Testing multiple age classes of grayling and burbot in both the wetlands and WSR would better identify potential risks to wildlife and human consumption before opening the WSR to public fishing. The Fort Knox Monitoring Plan (2026) notes that larger fish often accumulate more contaminants and recommends sampling fish of different sizes, including species eaten by birds and mammals. Burbot prey on grayling and are likely to be part of a future public fishery. Past reports also recognized that grayling leaving the WSR could migrate into Fish Creek and eventually reach the Chena River, where fishing is allowed. Some grayling may move even farther downstream to overwinter. A major gap in all documents is the lack of assessment for mercury methylation in the wetlands below the TSF. Mercury methylation is known to occur in boreal wetlands and can increase mercury levels in fish. This concern is especially relevant because earlier recommendations encouraged building more wetlands, including passive-treatment systems. Yet mercury is not included in the list of contaminants planned for	It is the duty of DNR to determine the required reclamation bond using the guiding principle of a “reasonable and probable” analysis. If conditions change prior to the completion of reclamation, DNR may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC 97.415(b) “After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current calendar year, plus any area mined in a previous year that has not yet been reclaimed.” As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. No changes to the POOA, RPA, or WMP resulted from this comment.

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	monitoring during closure, except for limited groundwater testing.	
28	Fort Knox sits upstream from the Chena River, which is part of the Waters of the United States and supplies drinking water for Fairbanks and likely Fort Wainwright. The Chena River is also an important chinook salmon spawning tributary, at a time when Yukon River salmon populations are already facing major declines. Protecting water quality in this watershed is therefore critical. The TSF is roughly 42 miles upstream from Fairbanks and much closer to the Little Chena and Chena Rivers. For any contaminant exceedances in surface or groundwater, modeling how effluent mixes and dilutes downstream would help assess risk. Older dam-failure analyses show that solids could reach the Little Chena and Chena Rivers, raising broader questions about how contaminants would behave in rare failure scenarios—or if routine exceedances extend beyond what the mine can treat onsite. I have not found any analysis from FGMI or its contractors showing how contaminants would dilute downstream if statistically significant exceedances continue to appear inside the mine footprint, especially near full closure after decades of operation. Modeling dilution at various downstream distances would help the public understand potential long-term water quality risks.	The dams are addressed under the DNR’s Dam Safety Program, AS 46.17 and 11 AAC 93.151-201. Since seismic activity has been factored into the design and construction of dams, including acceptable factors of safety, dam failure is neither reasonable nor probable. Alaska Statutes require financial assurance to be based upon “reasonable and probable” estimates of reclamation costs. Dam failure is neither reasonable nor probable. It is the duty of DNR to determine the required reclamation bond using the guiding principle of a “reasonable and probable” analysis. If conditions change prior to the completion of reclamation, DNR may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC 97.415(b) “After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current calendar year, plus any area mined in a previous year that has not yet been reclaimed.” As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met.

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	These three issues—post-closure water treatment costs, contamination risks to wetlands and fisheries, and the absence of dilution modeling—should be directly addressed in the 2026–2031 permits. Although earlier documents suggested mine shutdown by 2028 or 2031, the newest Reclamation and Closure Plan extends operations substantially. Milling and mining activities are now projected through 2038, and heap leaching through 2041–2042. This pushes the 65-year monitoring period out to about 2107, followed by another century of TSF dam maintenance.	DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or WMP resulted from this comment.
29	<i>What would be the potential mitigation strategy or water treatment if groundwater contaminant exceedances were detected downstream of interception wells below the TSF dam, or statistically significant exceedances were detected in the surface water outflows, in the created wetlands below the dam, or in the downstream WSR? (permit section 2.1.6.5, section 2.2.1.6, and section 2.5).</i> <i>In the event that contaminant exceedances continue as the date of complete closure arrives, what entity would be paying for water treatment, from what bond/fund source, and for what duration of responsibility as long as exceedances may exist (in perpetuity)? (permit section 2.7.3 and section 4.1.4)</i>	It is the duty of DNR to determine the required reclamation bond using the guiding principle of a “reasonable and probable” analysis. If conditions change prior to the completion of reclamation, DNR may require the company to amend the plan, update the cost estimate, and update the financial assurance under 11 AAC 97.415(b) “After a multi-year reclamation plan goes into effect, the miner shall ensure that the bond amount is sufficient at all times to cover any area to be mined during the current calendar year, plus any area mined in a previous year that has not yet been reclaimed.” As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. No changes to the POOA, RPA, or WMP resulted from this comment.
30	<i>Should not a memorandum of understanding specify, among other topics, the conditions of investment assumptions for a long-term monitoring endowment and conditions for release of operator bonds post-closure? (permit section 4.1.2)</i>	As per 11 AAC 97.435, financial assurance will not be released until reclamation performance standards under 11 AAC 97.200 and the approved reclamation plan have been met. No changes to the POOA, RPA, or WMP resulted from this comment.

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31	<i>Has the State required Fort Knox to fix the gaps identified in previous audits, inspections, water-quality reports, and fish studies before approving the next permit cycle?</i>	The plans meet the requirements under AS 38.05, AS 27.19, 11 AAC 86.800, and 11 AAC 97. No changes to the POOA, RPA, or WMP resulted from this comment.
32	STORMWATER AND ROAD-SEDIMENT CONTROLS NEED STRONGER CONDITIONS <i>The 2022 Alaska Department of Fish and Game (ADF&G) spring sampling report documented visible turbidity from runoff entering Fish Creek and North Fork Fish Creek after road improvements. Fort Knox staff improved stormwater diversion measures, but that example shows why stormwater controls need enforceable conditions, especially for Pedro Creek, Roman Hill, Gil, Victoria Creek, haul roads, growth media stockpiles, and reclaimed areas.</i>	The plans meet the requirements under AS 38.05, AS 27.19, 11 AAC 86.800, and 11 AAC 97. Not substantive FGMI employs and documents best management practices aimed at preventing and minimizing offsite sediment tracking from vehicles entering public roads according to the requirements of Multi-Sector General Permit.AKR060000. No changes to the POOA, RPA, or WMP resulted from this comment.
33	Long-term water quality and treatment were identified as uncertain years ago.	Continued, ongoing water quality monitoring required by the WMP serves to reduce uncertainties and improve water quality understanding, projection, and treatment. DNR and the DEC determined that the financial assurance adequately funds any reclamation and closure, monitoring, and water treatment costs that can reasonably be anticipated. No changes to the POOA, RPA, or WMP resulted from this comment.

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34	<i>Mercury is missing from the list of contaminants to be monitored during mine closure in the Monitoring Plan (FMGI 2026b, pages 39-41). Mercury is listed to be monitored only in the underdrain system (ground water) on a semi-annual basis in the Reclamation and Closure Plan (FGMI 2026a, page 90).</i>	Mercury is not considered to be a constituent of concern for a few reasons. First, geochemistry of the drainage indicates undetectably low concentrations throughout all rock formations. Second, all water quality data indicates mercury concentrations below the most stringent level of concern. Finally, as a safeguard, mercury is monitored in the underdrain. That is because the entire area naturally lacks mercury, and if the only point where mercury could access the aquatic system is monitored (the underdrain) and found to be safe, then areas downstream are protected. No changes to the POOA, RPA, or WMP resulted from this comment.