

2021-Jan-04

Coogan Construction Company



Earl Stewart, Forest Supervisor, US Forest Service
Matthew Reece, Project Manager
Juneau Ranger District
8510 Mendenhall Loop Road
Juneau, AK 99801
sm.fs.kensington@usda.gov

KENSINGTON POA-1 APPLICATION

This supplements my previous comment of 2020-12-09. I stated Kensington is a tightly-run operation. During the last 45-yrs I managed a family construction company in Juneau which completed over 500 projects with a collective value over \$500-million. I am keenly aware of the ramifications and importance of operating a safe and environmentally meticulous operation. During my tour of Kensington in 2019, I observed a commitment to such attention to detail from management all the way through to workers performing their duties.

I reviewed the Plan of Operations Amendment 1 (POA-1) and compared it to the other alternatives; I am convinced POA-1 is the best alternative for several reasons.

1. POA-1 is basically a continuation of wet tailings treatment that works successfully. The existing operations have been proven as environmentally responsible and safe.
2. Experience tells me it is imperative to review engineering plans and their constructability. The planned dam raise is engineered for downstream construction (more stable and resilient than centerline or upstream methods) which adheres to the highest standards and provides for a safe, geotechnically sound dam design. I reviewed past safety reports; I found Kensington conforms to recommendations of safety experts. The use of waste rock to construct the Stage 4 dam raise will exceed State Dam Safety Requirements for its intended use of impounding water.
3. POA-1 is based on the studies included in the original EIS for Kensington's 2005 Plan of Operations including using Lower Slate Lake for tailings storage. The EIS determined this wet tailing storage to be the best alternative environmentally; this is the same conclusion of the US Army Corps of Engineers which issued a key federal wetland permit for the mine's operations.
4. The Tailings Treatment Facility in POA-1 is the only practicable alternative. It is the best and safest operationally; it uses less energy the least emissions (less travel time and distance). I can only repeat that Kensington has shown an unwavering commitment to



maintaining a rigorous and comprehensive water quality monitoring program... which fully addresses concerns for fish, wildlife, and the surrounding ecosystem.

5. The estimated construction program would generate direct and indirect economic impacts over the two-year construction period that would hire local workers with millions of dollars in construction jobs. Coeur Alaska is a proven local hire, local purchase company that supports the Juneau economy by purchasing goods and services locally
6. The employment impacts to Juneau cannot be overstated. Creation of over 380 family-supporting mining jobs will further support property values, rentals, and the local tax base. It will basically be a key economic engine of our community. Working families are anxious to see POA-1 approved because they personally witness the facts I have outlined. They are confident in Kensington's commitment to safety and the environment. Moreover, they are personally involved that positive agenda.

For the above reasons, POA-1 is the most responsible and practicable alternative which meets and or exceeds standards consistent with the US Forest Service Tongass National Forest Management Plan. With few exceptions, it would be a significant disappointment to the entire community of Juneau if POA-1 were not approved. Hundreds of families are literally relying upon its approval for their continued existence in Juneau. I personally see this as an unusually easy approval inasmuch as POA-1 merely extends the life of an already proven system that provides so much benefit in such a safe and environmentally-conscious manner.

I encourage the US Forest Service to provide the Kensington Mine an additional 10 years of operation by choosing the company's Proposed Action outlined in POA-1.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wayne Coogan', with a long horizontal flourish extending to the right.

Wayne Coogan
Coogan Construction Company
PO 34499 Juneau, AK 99803