August 11, 2026
COR-26-030
Submitted via Email

Carolyn Farmer
Department of the Army
Alaska District, U.S. Army Corps of Engineers – Regulatory Division
P.O. Box 6898
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RE: POA-1996-00211 - Response to Request for Additional Information Pogo Mine Wetlands Application

Dear Ms. Farmer,

Northern Star (Pogo) LLC appreciates the U.S. Army Corps of Engineers' review of the above-referenced wetlands application and your request for additional information. We understand the Corps has placed the application on hold pending clarification and supplemental materials regarding the proposed action, the alternatives considered, and the associated figures and exhibits. This letter is intended to respond directly to those items and to provide a clearer framework for the accompanying revised figures.

Northern Star wishes to clarify the scope of the current request. The proposed action at issue is the placement of portal-related non-mineralized rock in the identified preferred area and the associated discharge of fill material to waters of the United States as described in the application materials and supplemental submittals. The current request does not include unrelated mine-wide infrastructure changes, and it does not include a diversion, relocation, or channel modification of Liese Creek.

1. Figures and Exhibits

(1) In response to the Corps' request, Northern Star has provided a revised figure package intended to clearly depict the proposed action, the alternative locations considered, and the site constraints relevant to practicability (Attachment 1, Revised Figures). The figures submitted with this response replace figures submitted in the original CWA 404 Permit Application. The previously completed Supplemental Document has not been modified and is included. The Supplemental Document originally contained four sheets. The figures have been revised as described below.

1. An annotated aerial exhibit distinguishing existing site features, surface flow drainage directions/wetlands, and the currently proposed work area so the Corps can readily identify what is and is not part of the present request (Figure 1).
2. Cross section view of the project and impact areas to indicate the spatial relationship to the affected wetlands and offsite waters/wetlands (Figures 2 and 3).
3. A location/context figure identifying the preferred portal-adjacent non-mineralized rock storage area, the hillside north of Lower Camp, the Mill Bench Extension, the airstrip area, the Goodpaster River corridor, and surrounding wetland and upland context (Figure 4). Haulage routes for each alternative are included in the figure to compare haulage distances.
4. Figure 5 has been added to show aircraft approach zones. This activity is described in alternatives considered.

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5. Figure 5A has been included to show the location of the stilling basin and drainage ditch which are described in the supplemental document. This design feature manages runoff water.

(2) Liese Creek Clarification

There is no proposed diversion of Liese Creek associated with the project under review. No diversion, relocation, or channel modification of Liese Creek is proposed as part of this action).

The original Storm water Pollution and Prevention Plan (SWPPP) figure submitted as part of the project description was intended to provide stormwater planning context and were not provided to represent a proposed diversion of Liese Creek. To avoid further confusion, Northern Star (Pogo) LLC has revised the figure package so that existing drainage features, mapped water features, and proposed project elements are more clearly distinguished. Liese Creek does not directly discharge in the Goodpaster River but rather dissipates into a vegetative filter (Figure 1).

2. Additional Information Requested

a. Alternatives Considered

Northern Star considered whether portal-related non-mineralized rock could be placed in other upland areas rather than in the preferred location near the portal. That review included, at a minimum, the hillside north of Lower Camp and the Mill Bench Extension, as well as the broader surrounding upland setting near the portal and airstrip to determine whether other reasonably available and practicable upland locations existed. Please refer to Figure 4 for the alternative project locations considered.

The alternatives review was not based solely on whether a location could be characterized as upland. Rather, Northern Star evaluated practicability in the context of the operational and environmental realities of the site. In screening potential locations, Northern Star considered the following:

- haul distance and haul profile, including whether uphill haulage would be required (cost, safety);
- additional trucks, equipment time, and personnel needed to support a given option (logistics and cost);
- worker safety, including traffic conflicts and equipment interaction on grades and in proximity to active operations or non-mineralized rock dump areas (safety and logistics);
- diesel consumption and associated emissions (logistics, technology);
- stormwater management and sediment control (logistics, cost);
- compatibility with existing mine support laydowns, grubbing piles, material stockpiles and site operation traffic patterns (logistics, safety);
- relative proximity to the Goodpaster River corridor and wetland resources; and
- site-specific constraints that limit the actual availability of certain upland areas (logistics, safety, technology).

A summary of operational practicability, worker safety, and environmental considerations are provided in Table 1 as part of the alternatives review.

Table 1: Alternatives Comparison Summary

Evaluation Criteria	**Preferred location (Proposed 1380 Portal Expansion)**	**Mill Bench Extension Location**	**Hillside North of Lower Camp**
Traffic Interaction Risk	Lowest risk- proximity to portal	Highest risk-- near camp facilities and pedestrian crossings	Medium risk
Haulage Profile	Level	Uphill adverse haul	Uphill adverse haul
Haul Distance	Shortest	Longest	Medium
Slope Stability Engineering	Stable in location	Complex on hillside	Complex on hillside
Fuel usage and Air Emissions	Lowest	Highest	High
Proximity to Goodpaster River Wetlands	Preferred – Approximately 500 feet minimum buffer distance to Goodpaster River	Greatest distance from Goodpaster River	Closest distance - 200 feet of Goodpaster River buffer distance
Stormwater runoff management and sediment control	Straightforward grading, ditch development, and stilling basin construction	Feasible- with substantial earthwork required	Complex – with extensive earthwork required

Preferred Portal-Adjacent Location

The preferred alternative places non-mineralized rock next to the portal in engineered compacted lifts within an area that can be integrated with the existing mine support setting. This location reduces haul distance, avoids repeated uphill transport, limits truck traffic and associated conflicts, reduces diesel use (pollution emissions), and contains the activity to a controlled operational area. From an aquatic-resources standpoint, it also avoids wetland areas that are near the Goodpaster River, anadromous waters. The proposed disturbance would be an extension of the preciously disturbed mine area. The rating criteria are shown in Table 1 and displayed by location in Figure 4.

Alternatives considered:

Hillside North of Lower Camp:

Northern Star considered the Hillside North of Lower Camp as an upland alternative. However, this option was not identified as the preferred alternative because it would require uphill haulage to a higher-elevation location, increasing truck travel, fuel use, and operating complexity. It would also introduce additional worker-safety concerns associated with haul-road grades, increased traffic interaction, and operation in less efficient relation to active mine support functions. This location was not considered the least damaging practicable alternative when considering operational and environmental factors (Figure 4).

Mill Bench Extension:

Northern Star also considered the Mill Bench Extension as an upland alternative. This location similarly

presented practicability concerns, including increased haul distance, increased risk of surface traffic collision, increased risk of vehicle-pedestrian interaction, and additional operational inefficiencies relative to the preferred portal-adjacent location. This location was not identified as preferable when the project's full site constraints and practicability were considered (Figure 4).

Additional Potential Upland Areas:

Northern Star reviewed the surrounding upland setting near the mine portals and airstrip to determine whether other upland areas were reasonably available and practicable for storage use. The review determined that other upland areas were either constrained by operational limitations, safety considerations, incompatibility with existing site features, or were not meaningfully more environmentally preferable than the proposed location (Figure 4).

Airstrip End

The ends of the Airstrip were evaluated as part of the review. Although portions of the areas are within uplands, it is not freely available for new project use. Existing grubbing piles are retained in that vicinity as closure material, as well as aggregate stockpiles (clean gravel, sand, and rock used for civil works) and their size and height must remain limited so as not to interfere with aircraft operations. As a result, that area does not represent a practicable alternative for the proposed action (Figure 5).

Pre-existing Laydown Areas

Pre-existing laydowns and infrastructure, as noted in Figure 1 south of the Airstrip, are not available for use. This area is used for underground construction materials, equipment, and core box storage. Relocating these laydown and infrastructure areas would require additional wetland disturbance exceeding the currently proposed fill area.

Preferred Project Area

The proposed project area is an extension of an existing disturbed and permitted area. It is the least damaging practicable alternative considering costs, logistics, and available technology to safely extend the life of the underground mine operation. For these reasons, Northern Star concluded that the preferred portal-adjacent configuration represents the least damaging practicable alternative among the available locations available for the proposed non-mineralized rock placement and storage.

b. Proposed Schedule for project

Project Component	Anticipated Commencement
Vegetation clearing	2026 through Spring 2027
Fill placement	Spring 2027 through Winter 2028
Non-mineralized rock placement/ benching	Beginning Spring 2028
Final design bench and height configuration	End 2037

c. Wetland Delineation Method

The delineation of the affected wetlands submitted with the project application was determined by 2024 field work and analysis completed by Stantec. Field data collection and mapping wetland was conducted using the US Army Corps of Engineers Wetlands Delineation Manual (1987), Regional Supplement to the Corps of Engineers Wetland Delineation Manual Version 2.0 (2007), and the USACE

2022 National Wetland Plant List (2023). The 2026 Preliminary Jurisdictional Determination Report is enclosed as Attachment 2.

d. CWA 401 Pre-filing meeting request

The CWA 401 Certification prefiling meeting request was submitted to the Alaska Department of Environmental Conservation (ADEC) through the Environmental Data Management System (EDMS) on March 25, 2026. The ADEC Prefile Receipt is Attachment 3. The CWA 401 prefile will be updated with this additional information. Northern Star (Pogo) LLC will complete the CWA 401 certification process when notified by ADEC.

e. Vegetation Cover/Land Use

Please refer to Section 3.2.1 in Attachment 2, Preliminary Jurisdictional Determination Report, for a description of vegetation cover types within the proposed project area. Infrastructure near the project area includes pre-existing laydown yards with equipment and material storage, 1380 portal pad, and site access roads.

I authorize Victor Ross, Stantec Consulting Services, Inc to submit this letter, Attachment 1 - Supplement with New Figures; Attachment 2 - Pogo Mine Portal Facility Expansion Preliminary Jurisdictional Determination Report, dated May 4, 2026; Attachment 3 – ADEC Receipt, in response to your Request for information. No changes to fill acreage, volume, location, permits, and addresses found in Engineer Form 4345 have been made by this submission.

Sincerely,

Russell Gossett
Agent, Environmental Manager
Northern Star (Pogo) LLC

Encls:
Attachment 1 – Supplemental Document with Revised Project Figures
Attachment 2 – 2026 Preliminary Jurisdictional Determination Report
Attachment 3 – ADEC EDMS Prefile Receipt

cc: Michael Eckert (NSR)