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November 29, 2025

United States Army Corps of Engineers  
Mr. Greg Mazer, Project Manager  
Submitted via email at [gregory.j.mazer@usace.army.mil](mailto:gregory.j.mazer@usace.army.mil)

RE: Comments of the Alaska Miners Association supporting Graphite Creek Project POA-2018-00210

Dear Mr. Mazer:

The Alaska Miners Association (AMA) writes to support the Clean Water Act Section 404 permit application and corresponding Environmental Assessment for the Graphite Creek Project.

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. We are composed of more than 1,400 members that come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Our members include individual prospectors, geologists, engineers, suction dredge miners, small family mines, junior mining companies, and major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.

AMA urges the approval of the of the permit application for Graphite Creek. The project applicant, Graphite One Resources, has spent more than a decade learning the local terrain and environment. It has incorporated that knowledge into their plan to develop the project with the smallest overall footprint possible, with the selection of the Mosquito Pass access route.

Graphite One has a strong foundation of environmental baseline work to understand and protect the area. The company has studied fish streams, wetlands, pre-mining water quality, air quality, invertebrate populations, wildlife habitat, and cultural resources. Graphite One's efforts to build this record have proven the project will be executed in a responsible manner, and that it will meet the rigorous permitting requirements to construct, operate, and reclaim the mine.

During its time in the region, Graphite One has been active in local communities, hiring local residents and incorporating local knowledge into the overall project plan wherever possible. The company has insisted upon incorporating public and tribal concerns in the design via public meetings and the project's Subsistence Advisory Committee.

Should the Graphite Creek project become an operating mine, 250 jobs will be created in rural Alaska. Careers in mining see an average wage of \$122,500, twice the state average for other economic sectors. These year-round, family-supporting jobs make a meaningful impact to over 80 communities in Alaska, over half of which are in rural areas of the state with limited other employment



opportunities. In addition, mines spur procurement opportunities from grocers, hardware stores, lodges, air taxis; nearly 500 Alaska based businesses see over \$1 Billion dollars annually in spending on the goods and services mining activity needs.

Finally, the advancement of Graphite Creek is the establishment of a domestic graphite supply chain that reduces our reliance on adversarial nations to procure critical supplies of the mineral.

The above-described efforts explain AMA's strong support for the 404 permit approval at Graphite Creek. Thank you for your consideration, and please do not hesitate to contact me with questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "DSK", is positioned above the printed name.

Deantha Skibinski  
Executive Director