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Craig Litteken
Deputy Director of Infrastructure Portfolio Management
Permitting Council
Submitted via

Reference: FAST-41 Initiation Notice (FIN) for Red Dog Mine Life Extension Project

Dear Mr. Litteken,

For your consideration and coordination, please find below Teck American Inc.'s responses to the FAST-41 Initiation Notice (FIN) for the Red Dog Mine Life Extension (RDMLE) Project. I submitted these same responses through the on-line form. However, I'm duplicating them and attaching this letter to ensure the formatting comes across accurately. Please contact me if you have any questions or to discuss our project in more detail.

Project Purpose

Please provide a concise overview of the purpose and objective of the proposed project.

The purpose of the RDMLE Project is to extend operations at Red Dog Mine (RDM) for approximately 14 years¹ by developing the Aktigiruk and Anarraaq ore deposits through underground long-hole stoping mining methods while maximizing the use of existing and permitted infrastructure within the Project Area.

The Aktigiruk and Anarraaq deposits contain zinc, lead, silver, and germanium, which the Secretary of the Interior, acting through the Director of the U.S. Geological Survey, included on the 2025 Final List of Critical Minerals (90 Fed. Reg. 50494). Therefore, the Proposed Action meets applicable definitions of 30 U.S.C. 1606 (a)(3) and directly aligns with Executive Order 14156 *Declaring a National Energy Emergency*.

Project Description

Please provide a concise description, including the general location of the proposed project and a summary of geospatial information, if available, illustrating the project area and the locations, if any, of environmental, cultural, and historic resources.

RDM is located in northwest Alaska, approximately 90 miles north of Kotzebue and 55 miles inland from the Chukchi Sea. It lies within the DeLong Mountains of the western Brooks Range in the Northwest Arctic Borough. The nearest communities are the Inupiat communities of

¹ Based on indicated and inferred resources

Noatak, located approximately 50 miles south of RDM, and Kivalina, approximately 60 miles to the southwest.

The Project Area includes RDM, the DMTS (Port and Port Road) and the Extension Area (Project Description, Figure 1.2-1). The Port Road is a 52-mile gravel road between RDM and the Port, located on the Chukchi Sea coast to the southwest. The AKT and ANQ deposits are located 9 miles (15 kilometers) and 7 miles (11 kilometers) northwest of RDM, respectively. The AKT deposit is situated at an average depth of 2,500 feet (800 meters) and the ANQ deposit sits at an average depth of 2,000 feet (640 meters). Support infrastructure in the Extension Area is located on NANA Regional Corporation and State lands.

The Proposed Action relies heavily on existing infrastructure including RDM processing facilities and water management facilities, the DeLong Mountain Transportation System (DMTS) transportation corridor from RDM to the coast, and the DMTS port. Concurrent reclamation of facilities not needed for RDMLE operations would be implemented. Underground mining activities will take place in the Extension Area. TAI is currently constructing approved Exploration Phase infrastructure to support surface and underground exploration activities within the Extension Area, as approved by a United States Army Corps of Engineers (USACE) Clean Water Act (CWA) Section 404 Permit (POA-2018-00075).

Utilizing previously developed areas reduces the need for additional surface disturbance and supports the avoidance and minimization of impacts to water of the United States (WOTUS) consistent with the requirements of Section 404 of the CWA, the National Environmental Policy Act (NEPA), and associated federal and state permitted processes (Tables 1 and 2). This approach is also consistent with agency and local government priorities to limit the expansion of disturbance footprints and make efficient use of previously authorized infrastructure, including considerations identified by the USACE, Environmental Protection Agency (EPA), Alaska Department of Environmental Conservation (ADEC), Alaska Department of Natural Resources (ADNR), and local and regional governments, including the Northwest Arctic Borough (NAB) and community entities.

Table 1. WOTUS Impacts Summary for Extension Area and RDM

WOTUS Type	Impacts	Type	Fill
Wetlands	16.44 acres	Clean Fill	54,000 cubic yards
Perennial Stream	0.45 acres	Clean Fill	2,100 cubic yards
Perennial Stream	498 linear feet	Clean Fill, Culvert	100 cubic yards

Table 2. WOTUS Impacts Summary for DMTS Port

Wetland Impacts (acres)	Stream Filled (Acres)	Stream Culverted (Linear Feet)
1.8	0	0

By maintaining an anticipated ore production rate of approximately 10,000 metric tons per day, the RDMLE Project would sustain operations through 2046. In addition to securing critical mineral supplies, the project would preserve substantial socioeconomic benefits, including employment for Alaskan residents including Alaska Natives, continued revenue for NANA, and major fiscal support for the Northwest Arctic Borough and the State of Alaska.

The No Action Alternative would result in mine closure by the end of 2031, with significant economic and social impacts to the region. The Proposed Action mitigates these impacts while integrating responsible mineral development, water management, phased construction, and progressive reclamation consistent with existing regulatory approvals.

Technical and Financial Ability

Please provide a description regarding the technical and financial ability of the project sponsor to construct the proposed project

Teck American Inc. (TAI), a subsidiary of Teck Resources Limited, has the technical expertise and financial capacity required to successfully construct and deliver the proposed project. Teck Resources Limited is a leading Canadian resource company with decades of experience in the development, construction, and operation of large-scale mining and infrastructure projects across North and South America, including more than three decades of experience operating in northwestern Alaska.

From a technical standpoint, TAI leverages Teck's established in-house engineering, project management, environmental, and operational teams, all of which have demonstrated success in executing complex projects in challenging environments. This includes proven capabilities in feasibility assessment, detailed engineering design, procurement, construction management, and commissioning. TAI also works with reputable engineering, procurement, and construction contractors and maintains rigorous project governance frameworks to ensure adherence to safety, environmental, schedule, and cost objectives.

Financially, Teck Resources Limited maintains a strong balance sheet, diverse revenue streams, and access to capital markets, enabling it to fund and deliver capital-intensive projects. The company has a track record of disciplined capital allocation and prudent financial management, supported by investment-grade credit metrics and established banking relationships. TAI benefits directly from this financial strength and corporate support.

Together, these technical and financial capabilities position TAI as a highly qualified and reliable project sponsor, capable of executing the proposed project in a safe, efficient, and responsible manner.

Summary of Financing, Reviews and Authorizations

Please provide a description of any Federal financing, environmental reviews, and authorizations to be required to complete the proposed project. Summary of Financing, Reviews and Authorizations

TAI has completed initial stages of a funding opportunity through the Department of War (DoW). TAI has not received any federal funds for RDMLE, and no decision has been made by the

DoW. TAI remains open to evaluating potential federal funding opportunities appropriate for the advancement and completion of RDMLE.

TAI has identified the following federal regulatory authorizations and/or reviews applicable to RDMLE:

- Department of Army Permit (Clean Water Act, Section 404)
- Clean Water Act (CWA), Section 401 Certification (State of Alaska)
- National Environmental Policy Act (NEPA) Record of Decision
- Consultation and coordination with State Historic Preservation Officer (SHPO) and federally recognized Alaska Native Tribes (National Historic Preservation Act, section 106)
- Informal consultation under the Endangered Species Act (ESA), Section 7
- Essential Fish Habitat consultation (Magnuson-Stevens Act, Fish and Wildlife Coordination Act)
- Migratory Bird Treaty Act / Bald and Golden Eagle Protection Act coordination/consultation
 - TAI applied for a Federal Fish and Wildlife Permit Application Form (3-200-91) Eagle Disturbance Take on July 22, 2026. This application is under review by the U.S. Fish and Wildlife Service.
- Marine Mammal Protection Act coordination/consultation
- Coordination/consultation with National Park Service regarding continued use of Port Road through Cape Krusenstern National Monument. No new disturbance is proposed on lands managed by the National Park Service.

Project Assessment

Assessment that the project meets the definition of a covered project as defined in [42 U.S.C. §4370m\(6\)\(A\)](#) of the FAST Act and a statement of reasons supporting the assessment.

The Red Dog Mine Life Extension Project (Project) is appropriately considered a “covered project” under 42 U.S.C. § 4370m(6)(A) (FAST-41), based on the statutory criteria and the Project’s characteristics.

Under §4370m(6)(A), a covered project is an activity requiring federal authorization or environmental review that involves infrastructure construction in an eligible sector (including mining) and meets specified thresholds or complexity criteria.

- Eligible Sector (Mining / Infrastructure Development)
The RDMLE Project involves continued development and expansion of an existing large-scale zinc mining operation (including new underground components, associated facilities, and supporting infrastructure). Mining is an expressly eligible FAST-41 sector.
- Subject to NEPA and Federal Authorizations
The RDMLE Project requires federal approvals (e.g., Clean Water Act Section 404 authorization by the USACE), which constitute “federal actions” triggering NEPA review. This satisfies the requirement that the project be “subject to NEPA.”

- TAI requests that the USACE complete an Environmental Impact Statement (EIS), with a detailed scoping plan followed by a thorough evaluation of potential environmental and socioeconomic impacts, assessment of reasonable alternatives, and opportunities for meaningful public and agency participation, and tribal consultation in the decision-making process. Potential impacts from RDMLE are likely to be found significant, as the Proposed Action would cause significant beneficial socioeconomic impacts, and the No Action alternative would cause significant adverse socioeconomic impacts.
 - TAI further recommends that the USACE considers allowing an applicant-prepared EIS (33 C.F.R. § 333.51), which would increase efficiency and better support the review schedule under FAST-41. Under this approach, TAI would direct its qualified contractor to prepare the EIS and the USACE would supervise the work, including required revisions, and independently evaluate the analyses. The USACE would retain responsibility for the final decision document.
 - An EIS will fully inform the USACE (as Lead Federal Agency), State of Alaska, NAB, and interested tribal entities of the change in mining method and location associated with developing the AKT and ANQ deposits. Stakeholder, community, and tribal engagement will be enhanced by a transparent and legally defensible permitting process administered by the USACE and coordinated through FAST-41.
 - TAI request that the USACE, in coordination with the Federal Permitting Council, seek direct consultations with the NANA Regional Corporation, Native Village of Noatak, and Native Village of Kivalina during the NEPA review process for the RDMLE Project.
- Capital Investment Threshold
Given the scale of the existing RDM and the scope of the proposed RDMLE Project (including new underground mining areas, infrastructure, and supporting facilities), the Project exceeds the \$200 million investment threshold specified in the statute.
 - Non-Abbreviated Review / Multi-Agency Involvement
The Project requires multiple federal reviews and consultations (e.g., USACE permitting, ESA consultation, NHPA Section 106, etc.), and is not eligible for abbreviated permitting processes, further aligning with the standard pathway criteria.

Sincerely,

Kyle Moselle
Manager, Social, Environmental, & Regulatory Approvals
Red Dog Mine Life Extension Project
Teck