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Tongass National Forest
Kensington Mine POA 1 SEIS
U.S. Forest Service
8510 Mendenhall Loop Road
Juneau, Alaska 99801

Electronic Submission: <https://www.fs.usda.gov/project/?project=55533>

Dear Mr. Reece:

Thank you for the opportunity to provide scoping comments to assist in the U.S. Forest Service's preparation of the Supplemental Environmental Impact Statement (SEIS) for Coeur Alaska, Inc.'s (Coeur) proposed life of mine extension for its Kensington Mine as described in December 2018 Coeur's Plan of Operation Amendment 1 (POA 1).

The Kensington mine is an important asset in the Juneau community. It is the second largest private employer in Southeast Alaska in terms of payroll. It is the second largest payer of property tax in the City and Borough of Juneau. Loss of this critical economic driver would be devastating to the citizens of Southeast Alaska. POA 1 construction program would add an estimated 65 workers and about \$6.8 million in additional wages each year.

The mine employs over 380 individuals. Many of these are residents of Juneau and Southeast Alaska. These individuals and their families add to the quality of life in our communities. They coach many of our youth athletic teams. They are active leaders in many community activities that could not occur without their involvement, thus degrading our community's quality of life.

The mine adds children to our school system. Without these students our schools would lose significant state funding, reducing the ability to offer quality education to the remainder of our student population.

There are two specific issues we wish to address.

First Things First Alaska Foundation (FTFAF) is dedicated to preserving the economic viability and future of Alaska through education. There is a clear need to educate the public on the benefits of responsible economic development and natural resource management.

No Action Alternative

The USFS's Notice of Intent to prepare a SEIS for POA 1 explains the No Action alternative that will be analyzed in the SEIS is the USFS approved 2005 Plan of Operations for the Kensington Mine. While we do not want the USFS to adopt it as the preferred alternative, we agree with the USFS's viewpoint that it is the natural No Action alternative for this SEIS because if Coeur had not submitted POA 1, the 2005 Plan of Operations would have been carried forward by Coeur to its conclusion which, of course, includes reclamation activities. Fortunately, Coeur's 2005 Plan of Operations has been previously fully analyzed by the USFS so this new effort should not be extensive. However, in this new SEIS, the USFS's analysis of the No Action Alternative must acknowledge the detrimental socioeconomic impacts on Juneau and Southeast Alaska. It's important to acknowledge that these detrimental socioeconomic impacts do not need to occur and are mitigated by POA 1. With Coeur's submittal of POA 1, it is clear that the No Action Alternative is essentially an alternative that calls for the early closure of an operating mine. The detrimental economic and social impacts associated with the potential selection of the No Action Alternative is a unique circumstance among any of the reasonable alternatives the USFS will analyze in this SEIS. In this light, the No Action Alternative would prematurely end payments of local property taxes by Coeur, the second largest private employer in Southeast Alaska, to the City and Borough of Juneau, and this funding would create a gap in the City and Borough's funding of public services and improvements contributing to residents' quality of life.

Key Considerations of POA 1

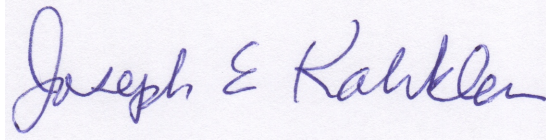
We believe the SEIS should fully acknowledge the beneficial impacts associated with POA 1 which include:

1. Maintaining the level of existing high paying jobs in this area. POA 1 will also bring new construction jobs for work such as the Stage 4 dam raise. Both types of jobs are important to the local economy. Failure to extend the mine life would result in an increase in the local unemployment rate.
2. The mine's tailings dam is designed for the intended use: to impound tailings and water. It has also been designed, constructed, and operated to the State of Alaska's highest Class I standard even though the state, based on its criteria, determined Coeur would have needed a Class II dam. The USFS must not allow itself to get distracted by comments that infer all tailings dams are alike. The SEIS should avoid conflating impacts associated with other types of tailings dams (such as a dry stack tailings dam) that are designed for different purposes with the tailing dam raise proposed as part of POA 1. Rather, the USFS should rely upon and defer to the expertise contained within the State of Alaska's Department of Natural Resources Dam Safety Program.
3. The SEIS should document POA 1's beneficial environmental impacts. Key among these include:

- a. At closure, over 25 acres of land at the Tailings Treatment Facility (TTF) will be converted into aquatic habitat which will provide additional habitat diversity on a landscape which is dominated by previously harvested forest.
- b. POA 1's fish habitat mitigation projects will increase the amount of spawning areas for Dolly Varden and improve fish passage by improving culverted crossings of streams. These projects will help maintain and improve fish populations.
- c. First Things First Alaska Foundation understands that acid rock drainage (ARD) material was encountered in the construction of the tailings treatment facility dam. Completion of the Stage 4 dam raise as proposed by Coeur Alaska in POA 1 would create a self-sustaining and effective long-term solution to the issue of ARD. Upon closure the TTF's water level will be allowed to rise and cover the graphitic phyllite (GP) located at the TTF's dam. The water cover will prevent the GP from oxidizing and creating ARD and thus eliminate any issues with ARD.

First Things First Alaska Foundation encourages United States Forest Service be mindful of the importance of the Kensington Mine to the economic, environment and social well-being of Southeast Alaska.

Thank you for your consideration.



Joseph E. Kahklen
Board President