



Council of
Alaska Producers

Scoping comments on the Hecla Greens Creek Mine North Extension Project

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Submitted electronically via

<https://cara.ecosystem-management.org/Public//CommentInput?Project=57306>

Attn. Matthew Reece
Tongass National Forest
Greens Creek Mine NEP SEIS
8510 Mendenhall Loop Road
Juneau, Alaska 99801

Dear Mr. Reece,

The Council of Alaska Producers (CAP) appreciates the opportunity to provide scoping comments for the Hecla Greens Creek Mining Company's (HGCMC) request to amend the 2013 Greens Creek Mine Plan of Operations. This request would expand their Tailings Disposal Facility (TDF) and related infrastructure as described in their North Extension Project (NEP).

Formed in 1992, CAP is a non-profit trade association that represents the interests of Alaska's five large metal mines and several advanced projects. CAP informs members on legislative and regulatory issues, supports and advances the mining industry, educates members, the media, and the general public on mining related issues, and promotes economic opportunity and environmentally sound mining practices.

The Greens Creek Mine has been an essential part of the fabric of Southeast Alaska for decades. From original discovery in the early 1970's to commencement of operations in 1989 through its continued operations today, Greens Creek is renowned for its safe and responsible production of silver, gold, lead and zinc. The operation currently employs about 440 people, most of whom are Alaskan, and is a cornerstone of the regional economy.

To continue their environmentally responsible operations and provision of significant regional benefits, it is important that the USFS complete the Supplemental Environmental Impact Statement (SEIS) process for HGCMC's requested TDF extension in an efficient and timely manner. CAP respectfully submits the following scoping comments to aid in that effort:

- Given that this facility has already undergone three separate Environmental Impact Statements (EIS) and one Environmental Assessment, CAP applauds the USFS for determining that the SEIS is the appropriate National Environmental Policy Act (NEPA) permitting pathway.
- In the SEIS, the USFS should rely on, and tier from, the 2013 EIS for analysis of significant issues and not introduce new analyses of issues previously identified.

- The Council for Environmental Quality (CEQ) recently adopted significant reforms to the NEPA process. We strongly recommend that the USFS recognize the intent of these rules in this process by:
 - Efficiently making use of previous NEPA reviews to significantly reduce redundant and duplicative agency review.
 - Working with the cooperating agencies (e.g., US Army Corps of Engineers) to produce a single decision document (i.e., Record of Decision).
 - Expediting the NEPA process to be completed within a 2-year timeframe and limit the SEIS document to 150 pages.
 - Evaluating only new alternatives that have not been previously analyzed or reviewed in prior NEPA documents.
 - Evaluating only alternatives that meet the goal of HGCMC and considering both economic and technical feasibility by HGCMC.
 - Allow greater participation during the NEPA process by HGCMC.

- In the 2013 EIS, the Record of Decision (ROD) recommended various steps including additional feasibility analyses and updates to Forest Service Manual (FSM) 2800, Mining in Admiralty Island and Misty Fiords National Monuments, to be completed if further TDF expansions were requested in the Admiralty Monument. HGCMC's proposal will not result in new surface disturbance outside the USFS-approved HGCMC Lease Boundary, and the tailing stack would not extend into the Tributary Creek Watershed, thus these requirements are not needed.

- The existing monitoring requirements in and around Hawk Inlet under current permits are comprehensive and accurately characterize the biological integrity of Hawk Inlet over time and there is no need to recreate historical baseline studies. HGCMC has been actively monitoring, sampling and reporting per its required permits for over forty years in Hawk Inlet and the surrounding area. This has created a substantial database of aquatic and biological data since the original baseline studies and this data has been deemed sufficient by multiple permitting agencies to ascertain the impacts of mining activities. This is supported by the determinations made by Alaska permitting agencies in recently issued permits.

Finally, CAP would like to emphasize that the proposed areas for extension have been studied extensively in prior NEPA analyses and HGCMC is not proposing any material changes in how it operates the TDF. There is simply no need to unduly delay the SEIS process by re-opening analysis of areas that have already been studied and the SEIS should tier back to the 2013 EIS wherever possible.

Thank you for consideration of our comments.

Sincerely,



Karen Matthias
Executive Director
Council of Alaska Producers