



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Natural Resources**  
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

550 West 7<sup>th</sup> Avenue, Suite 1430  
Anchorage, AK 99501-3561  
Phone: 907-269-0880  
Email: [catherine.heroy@alaska.gov](mailto:catherine.heroy@alaska.gov)

November 23, 2020

M. Earl Stewart  
Forest Supervisor  
Tongass National Forest  
648 Mission Street  
Ketchikan, AK 99901  
Submitted to [sm.fs.greencreek@usda.gov](mailto:sm.fs.greencreek@usda.gov)

Re: Greens Creek Mine North Extension Project Scoping Comments

Mr. Stewart,

The Office of Project Management and Permitting (OPMP) coordinated with the Alaska Departments of Natural Resources (DNR), Environmental Conservation (ADEC), and Fish and Game (ADF&G) to review the scoping notice and Amendment to the General Plan of Operations, North Extension Project (NEP) dated June 2020 (updated October 13, 2020) for expansion of the Tailings Disposal Facility (TDF) at the Greens Creek Mine near Juneau and Angoon, Alaska. Please consider the following consolidated comments in your Supplemental Environmental Impact Statement (SEIS) scoping process and decision.

### **Applicant Proposed Action**

Hecla Greens Creek Mining Company's (Hecla) current and proposed operation is located on Admiralty Island in the Tongass National Forest adjacent to the south side of Hawk Inlet and in part within the Admiralty Island National Monument. The TDF is the permanent disposal site for tailings not placed as underground backfill. A truck wheel wash station, the Pond 7 and 10 system, Pond 9, and a water treatment plant are located at the TDF. In May 2020, Hecla submitted an amendment to their Plan of Operations to the Forest Service for the NEP, which would extend the TDF to accommodate mineral production beyond 2031.

The NEP proposes to extend the current TDF and relocate related infrastructure. The NEP proposes construction of water management ponds (or expansion of current systems), stormwater facilities, storage areas for peat, overburden, and growth media, realignment of a portion of the existing B-Road and powerline, relocation of the existing electrical substation, and relocation of the water collection system at Cannery Creek. To the extent practicable, these changes would be on or adjacent to lands previously disturbed, and largely within current lease boundaries.

### **Environmental Conservation**

The fugitive dust monitoring plan in Chapter 5 of Hecla's Integrated Monitoring Plan, Appendix 1 of their General Plan of Operations, outlines the atmospheric deposition monitoring study at

the TDF. The plan suggests real-time monitors will be added to the monitoring system. From an air quality perspective, the final Integrated Monitoring Plan could be improved by providing details on the type of real-time monitors envisioned for the purpose of tracking fugitive dust emissions and deposition. The draft plan does not contain details on the monitors or how the quality of the data will be assured. Adding such information would be beneficial for understanding how the monitoring will occur. Likewise, it would also enhance the final document to provide information on how the real-time monitoring will inform mitigation actions to reduce potential fugitive dust.

Please provide additional information on the control of fugitive dust in the SEIS so that potential environmental impacts can be addressed and mitigated.

### **Fish and Game**

Hecla contracts with the Habitat Section to complete the aquatic biomonitoring required by their ADEC Waste Management Permit 2020DB0001 and Plan of Operations; the 2019 annual report is available in Kane (2020).

In accordance with the Alaska National Interest Lands Conservation Act (ANILCA) and the Greens Creek Land Exchange Act of 1995 (Public Law 104-123), Hecla is authorized to conduct mining and related activities on lands within the Admiralty Island National Monument. Activities must be conducted in accordance with ANILCA, as amended, and the Forest Service's general mining regulations and mining regulations specific to Admiralty Island National Monument (36 CFR 228).

The SEIS should also recognize provisions in ANILCA that affirm the responsibility and authority of the State of Alaska to manage fish and wildlife and exercise its other responsibilities under applicable law (ANILCA Section 505), and the requirement to evaluate the project's effects on subsistence (ANILCA Section 810).

The previously approved<sup>1</sup> 8-acre peat and overburden storage area northwest of the A and B Road junction requires further surveying to determine presence of fish; in prior project reviews, the ponded area was inadvertently omitted from fish presence investigations. The peat and overburden storage alternatives C and F (NEP Section 3.4.2) require further surveying to determine presence of fish. In 2021, ADF&G Habitat staff will work with Hecla staff to complete fish surveys.

Please include an analysis in the SEIS of potential impacts to migrating waterfowl or shorebirds associated with the creation of new habitat (e.g. new water management ponds described in the NEP Section 5.6).

### **Natural Resources**

The NEP states, "The layout and disturbance area of the TDF will be designed with final outside slopes of 3H:1V (horizontal to vertical). However, as part of stability designs [Hecla] will assess the stability and safety of alternate slopes." DNR agrees the SEIS should evaluate geotechnical information for the existing TDF and proposed extension and describe the effects of slope angles at the current and proposed facility on capacity and geotechnical stability.

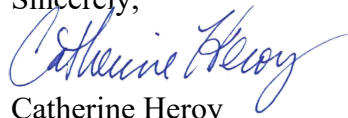
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<sup>1</sup> Per the 2013 Greens Creek Mine Tailings Disposal Facility Expansion Record of Decision.

**Administrative**

The SEIS should clarify if the Forest Service will follow the new Council on Environmental Quality implementing regulations for this National Environmental Policy Act (NEPA) review. Specifically, 40 CFR 1506.13 states, “The regulations in this subchapter apply to any NEPA process begun after September 14, 2020. An agency may apply the regulations in this subchapter to ongoing activities and environmental documents begun before September 14, 2020.”

Sincerely,



Catherine Heroy  
Large Project Coordinator

**Reference Cited**

Kane, W. J. 2020. Aquatic biomonitoring at Greens Creek Mine, 2019. Alaska Department of Fish and Game, Technical Report No. 20-05. Douglas, AK.

Cc: Basia Trout, Monument Ranger, Admiralty Island National Monument  
Matt Reece, Minerals Program Manager, Tongass National Forest  
State Large Mine Project Team (LMPT)