



Southeast Alaska Conservation Council

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Kate Kanouse
Alaska Dept. of Fish and Game
PO Box 110024 Douglas, AK 99811

Sent via Email
February 4, 2014

Re: Follow up on Hawk Inlet Meeting

Kate,
Thank you for the opportunity to meet on Wednesday, January 29th. This is just a quick follow-up letter.

The reason for the meeting was to discuss conducting a contemporary bioassessment including a species diversity and population survey for Hawk Inlet and Youngs Bay. This data would be compared to the baseline survey conducted in 1981 prior to mining activities near the inlet.

The reasons given for the new assessment was to clearly assess whether the water quality standards for designated uses in Hawk Inlet, specifically aquatic life support, are met. It is SEACC's position that the current monitoring program, designed in conjunction with the waste water discharge permit first issued in 1988 and continued essentially unchanged to the present, is insufficient and unable to assure waterbody use attainment. We are asking that the monitoring program be augmented by conducting a contemporary bioassessment and comparing that assessment to the baseline study performed in 1981 in anticipation of mining activities.

I discussed some of our specific concerns with the monitoring program including issues with sample depth, location and timing and the lack of a broad-based, waterbody wide data set. The shortcomings of the monitoring program are apparent in the Department of Environmental Conservation's (DEC) dual characterization of Hawk Inlet. DEC assesses Hawk Inlet as a Category 3 water body- insufficient data to show the protection of existing uses-while at the same time assessing Hawk Inlet as a Tier 2 waterbody-water quality above the aquatic life criteria for purposes of the waste discharge permit.

I also shared the 2009 Environmental Audit of the Greens Creek Mine. One of the significant findings was that the monitoring program had never been evaluated for effectiveness.

A new bioassessment will answer the question of whether or not this project is in compliance with the Clean Water Act requirements to protect Hawk Inlet's existing uses.

Fish and Game commented that they are reviewing data I had provided on the issue. Fish and Game had talked to DEC about SEACC's concerns with the monitoring program and were somewhat confused by DEC's response. The main concern expressed with conducting a new bioassessment and

comparing it with the 1981 baseline was accounting for possible effects from the cannery that existed in Hawk Inlet prior to the original bioassessment. You asked for additional data, which I provide below.

The cannery burned down in May of 1976 and ceased operation. *See: Greens Creek Final Environmental Impact Statement, 1983 at 3-37.* The baseline assessment was published in October of 1981, so at least 4 years had passed.

The inlet was reviewed for essential fish habitat during the environmental impact study for the 2003 tailings dump expansion. *See: Review of Essential Fish Habitat in Hawk Inlet Subsequent to Mining Operations, Ridgway 2003.* The only affects from cannery operations described in Ridgway were the apparent abundance of halibut in Hawk inlet while the cannery operated. "Historical information indicates that occasional commercial halibut fishing in the area yielded some large catches during 1914 to 1976, when the cannery was open. *See: Ridgway page 20.* Ridgway further noted that zooplankton density tended to be highest at the head of the Inlet and opposite the cannery (near Outfall 001). Larval forms decreased from the head of the Inlet to the mouth (Andrews 1996). *See: Ridgway page 14.*

Ridgway concludes that Hawk Inlet biodiversity and populations were typical of southeast Alaska. "The abundance of seafloor organisms both subtidally and intertidal were considered very high. Although cannery impacts were not explicitly analyzed, Holland *et al* (1981) concluded that species composition and abundance suggested that the system had recovered or was not impaired by the cannery." *See Ridgway, page 38.* If the cannery did not affect the baseline data, the lack of a cannery should not affect a contemporary assessment.

I look forward to working to working with your agency to assure aquatic resources are protected. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Guy Archibald". The signature is fluid and cursive, with a large initial "G" and "A".

Guy Archibald
Mining and Clean Water Coordinator