



Southeast Alaska Conservation Council

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Ranger Chad VanOrmer
Admiralty Island National Monument
Tongass National Forest
8510 Mendenhall Loop Road
Juneau, AK 99801

Re: new alternative related to proposed expansion of the Greens Creek Mine's tailings dump

Recently SEACC learned that the current treatment technology applied at the Hecla Greens Creek Mine (HGCM), with the associated discharge of toxic pollutants into a mixing zone into Hawk Inlet, which is directly adjacent to Admiralty Island National Monument, may be unnecessary. Given our understanding that a Draft EIS for the proposed dump expansion is planned early next year, we realized how important it was to notify you about this alternative as quickly as we could. Careful investigation of this alternative will assist the Forest Service in meeting its responsibility to ensure that mineral development at HGCM is compatible with the purposes for which Admiralty Island National Monument was established and the long-term protection of Hawk Inlet's incredible resource values.

According to the attached letter from Dr David M. Chambers of the Center for Science in Public Participation (CSP²),¹ the mixing of pollutants from the Greens Creek Mine into Hawk Inlet is unnecessary because demonstrated treatment alternatives exist to direct discharges from underground gold mines into Alaska waters. Investigating the approach identified by Dr. Chambers, and previously approved by ADEC and EPA for the Pogo Mine in 2011 to discharges from the Greens Creek Mine makes sense now, given the proposed expansion and roughly 82 years remaining in HGCM's 99-year term to conduct mineral exploration, development, and production on the subject properties under the Greens Creek Land Exchange Agreement of 1995. *See* Letter from SEACC to VanOrmer (July 29, 2011)(advising of need to include a life-of-the-mine analysis sufficient to encompass the remainder of Hecla's 99-year term interest in the subject properties).²

EPA authorized the off-river treatment works option for the Pogo Mine following the disclosure and analysis of an application for a National Pollutant Discharge Elimination System (NPDES) permit in the 2003 Final EIS for the Pogo Gold Mine. On March 10, 2011, the Alaska Department of Environmental Conservation issued an Alaska Pollutant Discharge Elimination System (APDES) permit using this demonstrated flow augmentation technology. As noted by Dr. Chambers:

¹ Letter from Dr. Chambers, CSP² to SEACC (Nov. 18, 2011)(hereinafter CSP² Review).

²Greens Creek Land Exchange Agreement of 1995, Pub. L. No. 104-123, 110 Stat. 879-80 (1996); *see also* 141 Cong. Rec. H 4919, 4921-22 (daily ed. May 15, 1995).

Flow augmentation essentially involves “pre-mixing” effluent and receiving waters before the mixture enters the receiving water itself. This means no mixing zone is required – the effluent is diluted before entering the receiving water. Flow augmentation removes a great deal of regulatory uncertainty, including that of modeling (no mixing zone modeling is required), and in the measurement/monitoring of the effluent discharge in the receiving water. This is a significant issue in Hawk Inlet where collecting a water quality sample at the edge of the mixing zone is virtually impossible.

CSP² Review at 3.

Links to the 2003 FEIS for the Pogo Gold Mine, and relevant permits and authorizations, are provided at <http://dnr.alaska.gov/mlw/mining/largemine/pogo/index.htm> (last reviewed December 8, 2011).

We also wish to supplement our earlier scoping comments relating to the information and analysis the upcoming DEIS should include relating to the effectiveness, costs, environmental impacts, as well as technical and economic feasibility of treatment alternatives, with our comments on the draft APDES permit reissuance for the HGCM, our Informal Request for Review of APDES AK0043206 and Statement in Support, the Director’s response to our request, and our recent follow up with DEC requesting its consideration of the Pogo treatment approach at the HGCM. A PDF Portfolio of these documents is attached to this letter. Please incorporate all this material into the administrative planning record for the proposed dump expansion.

Thank you in advance for your attention to this important matter. We look forward to collaborating with you, your NEPA contractor, the Alaska Department of Environmental Conservation, HGCM, and others on this exciting opportunity to design a wastewater discharge treatment system for the HGCM that will prevent the risk of significant adverse environmental impacts to Hawk Inlet fisheries resources and habitat from mining activities and ensure that mining activities conducted at HGCM are consistent to the maximum extent feasible with the purposes for which the Admiralty Island National Monument was established.

Best Regards,



Buck Lindekugel
Grassroots Attorney