

Please accept my comments on two issues related to the proposed extension/expansion of the Greens Creek mining operation in the Admiralty Island National Monument.

1. By law, continued operation and any expansion of the mining operations require that there be ongoing statistically valid environmental sampling to ensure that the mining operations are not causing irreparable harm to the National Monument. To date, this condition is not being met.

To meet this condition, the USFS and the Alaska Department of Environmental Conservation needs to repeat baseline studies conducted from 1979 to 1981.

If repeated sampling cannot be scheduled and performed in a statistically valid manner, the permit for expansion should be denied.

2. Greens Creek generates a significant proportion of the electrical energy it needs using diesel generators on site. As a consequence, there are sizeable emissions of greenhouse gases contributing to climate change impacts. This is despite having a federally funded undersea cable that allows it to buy electricity from AEL&P that is generated by renewable hydropower. Since 2009, the mine has been able to rely on AEL&P power for only 3 of the past 11 years.

As a condition of any new permit to expand and extend operations, it would be beneficial to stipulate that the mine's future electricity needs be met from renewable sources when those become available. This may involve a change of status to non-interruptible, coinciding with additional hydropower generating capacity coming online in the near future, such as from Sweetheart Creek. This would result in cost-savings for the mine and a win for the planet.

Thank you,

Doug Woodby
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