

Southeast Alaska Conservation Council

2207 Jordan Ave Juneau, AK 99801 (907) 586-6942 www.seacc.org

March 27, 2023

Frank Sherman Forest Supervisor, Tongass National Forest 648 Mission Street, Suite 110 Federal Building Ketchikan, AK 99901-6591 *Submitted via email:* sm.fs.greenscreek@usda.gov; francis.sherman@usda.gov

RE: Request for 60-Day extension of comment period on Draft Supplemental Environmental Impact Statement for the Greens Creek Mine North Extension Project

Mr. Sherman,

Southeast Alaska Conservation Council (SEACC) requests a 60-day extension to the 45-day public comment period, which opened on March 24, 2023, on the draft supplemental environmental impact statement (SDEIS) for the Greens Creek Mine North extension project. This SDEIS is somewhat unique in terms of the fact that the Responsible Official has not identified a preferred alternative and is seeking public input before making that choice. If for no other reason, this circumstance indicates a need for the public to have ample time to carefully consider all the information relevant to all the alternatives, as well as examining the extensive project record back to 1983 and studying the changes that subsequent National Environmental Policy Act (NEPA) decisions have allowed through the life of the mine.

The 2023 DSEIS is, by itself, 556 pages long. Going back to the original 1983 Environmental Impact Statement (EIS) and adding up the other EIS documents (2003, 2013), and amendments to the General Plan of Operations (GPO) in 2020, these documents alone total almost 2,500 pages. The complete 2020 GPO is well over 2,000 pages. This doesn't include important supplemental reading about Hecla's compliance record through the Alaska Department of Environmental Conservation (ADEC) and the Alaska Pollutant Discharge Elimination System's (APDES) permitting documents, or waste management permit and annual reports, water quality monitoring reports or Best Management Practices (BMP) reports. The decision to allow Greens Creek mine to further expand its tailings disposal footprint in the Admiralty National Monument has been extraordinarily difficult for previous Forest leadership to make, as stated in the most recent EIS (2013). This decision should be made with all due caution and care, for the decision this time has the potential to create longer-lasting impacts to the Monument.

We respectfully request that you extend the comment period deadline by 60 days so that ample time can be allowed for study.



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Thank you.

Respectfully, Katie Rooks, M.S.

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Environmental Policy Analyst