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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

May 23, 2023

Submitted via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=57306>

Attn. Matthew Reece

U.S. Forest Service

8510 Mendenhall Loop Road

Juneau, AK 99801

Re: Greens Creek Mine North Extension Project DSEIS

Dear Mr. Reece:

The Resource Development Council for Alaska (RDC) writes to express support for the Hecla Greens Creek Mining Company's (operator) request to expand their Tailings Disposal Facility (TDF) and related infrastructure as described in their North Extension Project (NEP). RDC encourages the U.S. Forest Service (USFS) to adopt Alternative D of the Draft Supplemental Environmental Impact Statement (DSEIS) as this alternative minimizes new disturbance in the Admiralty Island National Monument, avoids direct disturbance to sensitive habitat, and provides for a long mine life ensuring the proven socioeconomic benefits that the mine provides continue well into the future.

For more than 48 years, RDC has advocated for a strong, diversified private sector in Alaska and to expand the state's economic base through the responsible development of our natural resources. RDC is a statewide nonprofit association comprised of individuals and companies from Alaska's fishing, tourism forestry, mining, and oil and gas industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

The Greens Creek Mine has been in operation for over 30 years. At the time of its opening, it was estimated to have proven reserves of 10 years. Since that time, significant new reserves have been discovered, and metal prices have steadily increased, both of which have greatly prolonged the life of the mine. To allow for continued operation, additional tailings storage will be required beyond what was originally permitted and constructed. The initial tailings facility at Greens Creek is a "dry stack" disposal was permitted as recently in 2003 and expanded in 2012. At Greens Creek, the dry stack technique is considered to allow for less disturbance than alternative methods. RDC supported the previous approved expansion in 2012 because of these low environmental impacts. Once again, expansion is necessary to accommodate additional tailings with an estimated mine life of 2040. Expansion of the dry stack tailings method has proved to be successful in minimizing the surface footprint, eliminating the need for a separate new facility, and eliminates the need for a dam.

The Greens Creek Mine operator has a proven track record of operating the mine for decades while complying with and often exceeding state and federal environmental requirements. Unfortunately, there is serious misinformation included in public comments and discussion of this project from those that oppose the mine. There have been allegations of lead contamination in Hawk Inlet that improperly accuse the operator of causing environmental harm to the area. RDC asks the USFS to disregard these comments as untrue. The State of Alaska issued a statement regarding this matter as incorrect and not supported by the data. RDC further asks that USFS incorporate the State of Alaska's press release on this issue directly



refuting these allegations. That release can be found at: <https://dec.alaska.gov/commish/press-releases/23-05-friends-of-admiralty-study-is-misleading/>.

The Greens Creek Mine is the largest private sector employer in Southeast Alaska, providing nearly 500 jobs and over \$76 million in wages and benefits. The mine is a significant state and local taxpayer and facilitates workforce development partnerships, as well as contributes to area charities and nonprofits. Greens Creek Mine is good for the community and state it operates in. Because of this as well as Green Creek Mine's positive environmental track record, including being an early adapter of dry stack tailings technology that supported previous expansion approvals, RDC expresses significant concern regarding the length and delay of this permit application that began in 2020. The original EIS and ROD took more than three years and was 514 pages in length. The process for the SEIS is no longer than the original EIS both in time and length. This fails to adhere to the process stipulated in the National Environmental Policy Act (NEPA), which states that EIS documents should be between 150-300 pages and should be conducted within a two year time frame. Such delay is not supported by the well-established record the Greens Creek Mine for responsibly developing a critical resource and mineral as essential as silver during a time when our domestic production and security are more important than ever.

Therefore, RDC once again endorses the expansion of the dry stack tailings facility at the Greens Creek Mine and encourages the USFS to adopt Alternative D for the reasons above. Thank you for the opportunity to comment on this important issue.

Sincerely,



Leila Kimbrell
Executive Director