Council of Alaska Producers

Hecla Greens Creek Mine
North Extension Project

May 23, 2023

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

Matthew Reece
Tongass National Forest
Greens Creek Mine NEP SEIS
8510 Mendenhall Loop Road
Juneau, Alaska 99801

Dear Mr. Reece,

The Council of Alaska Producers (CAP) appreciates the opportunity to provide comments on the Hecla Greens Creek Mining Company's (HGCMC) request to expand their Tailings Disposal Facility (TDF) and related infrastructure as described in their North Extension Project (NEP).

We fully support Alternative D of the Draft Supplemental Environmental Impact Statement (DSEIS) as it minimizes new disturbance in the Admiralty Island National Monument, avoids direct disturbance to sensitive habitat, and ensures the mine can continue to provide its proven socioeconomic benefits well into the future.

Formed in 1992, CAP is a non-profit trade association that represents the interests of Alaska's five large metal mines and several advanced projects. CAP informs members on legislative and regulatory issues, supports and advances the mining industry, educates members, the media, and the general public on mining related issues, and promotes economic opportunity and environmentally sound mining practices. HGCMC is a long standing and greatly valued member of the Council.

The Greens Creek Mine has been an essential part of the fabric of Southeast Alaska for decades. To continue their environmentally responsible operations and provision of significant regional benefits, we urge the US Forest Service (USFS) to complete the Supplemental Environmental Impact Statement (SEIS) process expeditiously.

In addition to supporting Alternative D, we would like to provide the following specific comments on the DSEIS:

- HGCMC has proactively addressed the issue of fugitive dust from the TDF for many years and has gone to great lengths to quantify the issue. They have also implemented significant operational and administrative controls to minimize and mitigate fugitive dust from the facility. Unfortunately, the DSEIS recommends vague and potentially unattainable mitigation measures based on a model which the DSEIS admits has limitations and over predicts fugitive dust

impacts. In particular, we urge the removal of language that would require a plan for "near-zero" dust emissions for the facility as the language is overly vague and subject to interpretation. Rather than establishing a nearly impossible standard, the Forest Service should allow HGCMC to develop an adaptive management approach that allows HGCMC to implement various measures to control fugitive dust emissions from the TDF. If the USFS determines that a measurement threshold is needed to authorize expansion activities under any action alternative, then we request that the USFS provide a concise, quantitative value for clarity in addition to the scientific and regulatory basis for the threshold.

- The DSEIS erroneously assumes that the extended tailings stack would result in a greater exposed surface area which is not consistent with the dust model prepared in support of the project. Operational parameters, including exposed tailings, are consistent between all alternatives - including the No Action alternative. Please update this inconsistency across the entire DEIS.

- Given that the dust deposition modeling tool is admittedly limited, please remove the requirement to conduct a new deposition modeling analysis after collecting an additional 5-year meteorological data set as it will not resolve this issue. Furthermore, even if the new deposition model analysis could accurately characterize actual deposition rates at all model receptors, the analysis would be representative only of the five meteorological model years and any subsequent years with the exact same meteorological conditions. It is unreasonable to expect that deposition modeling can be tuned to accurately predict fugitive dust impacts because of the inherent complexities of the model, including the variable meteorological conditions that can occur from year to year. For these reasons, we support HGCMC's contention that the development of additional mitigation should be based on monitoring actual fugitive dust emissions, in lieu of attempting to develop a predictive model that is severely limited in its predictive capabilities.

- We are also concerned that the air quality modeled fugitive dust deposition amounts are based on an arbitrary low to high scale. For example, the figures and text that support the fugitive dust deposition (amount) impact noted in Table ES-2 contain two issues. First, the language in these discussions suggests that the deposition scale from "low" to "high" represents modeled deposition amounts that are normalized against a maximum modeled deposition amount. However, no scientific studies or regulatory standards are provided to explain why the USFS considers a given deposition amount "high," "medium," or "low." Second, the fugitive dust modeling results in Section 3.2.2 do not align with the referenced Fugitive Dust Deposition Modeling Report. The modeling analysis as described in the report was designed to evaluate potential particulate matter deposition impacts from the no-action alternative and the action alternative years when tailings construction and B-Road relocation activities would occur concurrently with operations. This modeling approach was reviewed and approved by the USFS for characterizing maximum annual and monthly impacts from all action alternatives for comparison to the no action alternative. The modeling analysis was not designed to provide multi-year cumulative impacts that would occur for the entire duration of each action alternative. For this reason, using the model results to calculate multi-year impacts for each action alternative greatly over-predicts the fugitive dust impacts for each action alternative, especially for Alternative D which provides for a longer mine life.

- In multiple places in the discussion on fugitive dust, the DSEIS presupposes that the dust is deposited in specific areas and then metal leaching and contamination occurs. This discussion, especially if it is around impacts that the model is predicting, should describe any impact as potential and not actual.

- The DSEIS recommends additional mitigation measures in the marine environment, yet for all alternatives the analysis stated that the risk of fugitive dust to the marine environment would be minimal because of the flushing due to tide cycles. Requiring a mitigation measure to address a non-issue is not appropriate and these mitigation measures should be removed. We would also note that this mitigation ignores the significant biomonitoring that already occurs as part of permit requirements from the Alaska Department of Environmental Conservation (ADEC) which have been recognized by all agencies as assuring the health of the inlet.

- HGCMC has submitted detailed comments for the record, many of which fix factual errors in the DSEIS, and we hereby incorporate and support their comments with ours.

In addition to our comments on the DSEIS, we would also like to address significant misinformation that has been incorporated into the comments and public discussion of those opposed to the mine. Allegations of lead contamination in Hawk Inlet published in a poorly conceived and executed study have unfortunately led some stakeholders to believe that HGCMC has caused harm to the area. This is simply not the case. We would point you to the ADEC press release https://dec.alaska.gov/commish/press-releases/23-05-friends-of-admiralty-study-is-misleading/ and webpage https://dec.alaska.gov/water/hawk-inlet that refutes these irresponsible allegations.

Thank you for considering our comments and we urge you to select Alternative D in your record of decision as soon as possible.

Sincerely,

Karen Matthias
Executive Director