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May 23, 2023

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

Re: Greens Creek Mine North Extension Project

Dear Mr. Reece:

The Alaska Miners Association (AMA) thanks you for the opportunity to comment on 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 wholeheartedly 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 provides for a long mine life ensuring the proven socioeconomic benefits that the mine provides continue well into the future.

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. We are composed of more than 1,400 members that come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Our members include individual prospectors, geologists, engineers, suction dredge miners, small family mines, junior mining companies, and major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.

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

1. **Permitting timeline.** AMA is concerned that the DSEIS has been significantly delayed since it was initiated in 2020. The original EIS for the mine, and the Record of Decision (ROD) took just over three years and was 514 pages in length. We are now almost three years into the SEIS process and the DSEIS is 556 pages in length. NEPA guidelines for an EIS stipulate a length of between 150 and 300 pages and a two-year timeframe.

Permitting delays are not only harmful to the mine, its employees and contractors, and the benefits provided to the community, but also to overall investment in domestic mining projects. Worse, delays negatively impact members of the public seeking to engage in mining proposals. A nearly 600 page DSEIS is insurmountable for the average citizen to review and evaluate.

We urge you to simplify and complete the process in an expeditious manner.

2. **Current and accurate socioeconomic data.** Given the long delays in the SEIS process, the socioeconomic numbers should have been updated to reflect the significant positive impacts that HGCMC has on the regional economy. In 2022, HGCMC was the largest private-sector employer and taxpayer in Juneau, with a direct economic impact in local communities of more than \$219 million, including approximately \$77 million in wages, \$29 million in taxes and fees, and \$112 million in purchases from vendors. Hecla's purchase of surplus hydropower has helped provide Juneau residents with over \$80 million in reduced electricity rates since 2009. HGCMC is also the largest single provider of student aid at the University of Alaska Southeast (UAS). This data must be considered when evaluating all "impacts" from the mine extension.
3. **Air quality and fugitive dust.** HGCMC has proactively addressed the issue of fugitive dust from the Tailings Disposal Facility (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. It is everyone's best interest that a plan actually works, and the mine should have the flexibility to make adjustments along the way to achieve the greatest efficacy.

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 belief 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.

4. **Statement of purpose and need.** The statement of purpose and need is incomplete and fails to recognize the role that HGCMC plays in supplying both critical and essential metals. Greens Creek is the third largest producer in the United States of the USGS designated critical mineral zinc and it is the largest producer of silver, a mineral essential to the construction of solar cells and the expansion of renewable energy in our country. Allowing for extended mineral production at Greens Creek is a national imperative, and the DSEIS should have noted this.
5. **Company response to DSEIS errors.** 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.

Conclusion

With the facts outlined above, AMA believes it is clear that Alternative D is the right path forward for the Greens Creek Mine North Extension Project. It minimizes new disturbance in the 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.



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 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> published by ADEC that refutes these irresponsible allegations.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Skibinski".

Deantha Skibinski
Executive Director