Hecla Greens Creek Tailings North Expansion

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This is my personal response. In 1997 I was one of the founding members of Friends of Admiralty Island and I wholeheartedly support the details of their response to this DEIS.

I, in my response, want to shed some light on the history of the intent of the pre-mining efforts and the lost opportunities that continue to this day.

I was the Admiralty Island National Monument Manager (Ranger) in 1978-1982. I was responsible for the development of the Draft EIS, working with Noranda Corporation, State and Federal agencies, Angoon, Juneau citizens, and other organizations.

Noranda was committed to a process that was transparent and science driven. Noranda had made a public pledge that the public would be consulted before significant decisions were made. The Juneau Noranda managers breached that trust by quietly applying for an Army Corp of Engineer Permit with design details. This came as a surprise to the Forest Service and other agencies – as well as the public. There was a serious backlash by the public. Noranda responded by replacing their Juneau Management Team and withdrew their application to the Corp. They admitted publicly that this was a breach of trust and was not the transparency they had promised.

The point is that the agencies and Noranda were very open about the process and kept the public engaged. There was a genuine effort to design and operate this mine in compliance with maintaining healthy ecosystems, especially since this mine was in and adjacent to a newly proclaimed National Monument.

In this spirit there was unanimous support for a premining scientific baseline that would serve as the foundation for monitoring the health of Hawk Inlet’s ecosystems and determining mine caused changes in those systems. This study was designed to establish the species diversity and population numbers in the intertidal and freshwater aquatic areas. It was agreed that this strategy was the most accurate way to measure health and changes in that ecosystem.

An important component was the selection of Youngs Bay as a control area. This adjacent bay marine ecosystem is fed by highly mineralized watersheds (as is Hawk Inlet), but not directly affected by an active mine.

The stated intention was to replicate this baseline every 10 years, or sooner if some dramatic incident occurred, such as an ore spill or infrastructure failure either on land or in the water.

This baseline was published in 1981 and all agreed this was to be the cornerstone of the monitoring system.

In 1980 Congress passed the Alaska National Interest Lands Conservation Act (ANILCA), moving Admiralty Island from a Presidential proclaimed National Monument to a Congressionally proclaimed National Monument. The ANILCA language that allowed the Greens Creek mine was very specific and set the mine’s performance bar very high. Congress specified that the mine could operate until 2095, under the condition that the operation was not to cause irreparable harm to National Monument values. This direction was a perfect fit with the strategy of the 1981 pre-mining baseline.

I retired from the Forest Service in 1982 before the Draft EIS was published.

To date the pre-mining baseline has never been replicated.

How did things go so wrong?

Please refer to Friends of Admiralty Island’s detailed response to this proposed tailings expansion of the failures of mine monitoring to understand the magnitude of lost opportunities.

Abandoning the Pre-mining baseline and failure of the Forest Service to assure that the mine was in compliance with ANILCA standards is a complete failure of agency trust and responsibility.

In 2013, the previous tailings expansion decision maker Forest Service Supervisor Forrest Cole recognized the lack of reliable information he had available to approve a 30–50-year tailings expansion. He stated in his Record of Decision that he would only approve a 10-year expansion and asked the stakeholders to help fill in the missing data, so that the next decision maker (which is now) is not faced with the dilemma that he faced with.

Friends of Admiralty rose to that challenge and recognized the lack of scientific data of the health of the ecosystems so undertook a study to determine if the 1981 Pre-mining baseline could be replicated. We determined that yes the original sample sites can be identified and it can be replicated.

Forrest Cole also requested an analysis of ANILCA direction and standards relating to the Congressional intent of allowing Greens Creek mine to operate. In 2012 the Forest Service circulated a draft policy that suggested Congress intended to be more lenient than a strict reading of ANILCA language would require. That draft was challenged and the Forest Service rescinded it. To date there has been no Forest Service public effort to help clarify how the Forest Service interprets their responsibilities to ANILCA direction.

Hecla mine is doing what the permitting agencies have required. The problem is that those requirements do not satisfy the intent of Congress.

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