

Bruce Baker

May 13, 2023

Tongass National Forest
Greens Creek NEP SEIS
8510 Mendenhall Loop Road
Juneau, AK 99801

Subject: Greens Creek North Extension Project #57306

Dear Forest Supervisor Sherman –

I am writing as a more than 50-year Juneau resident who regularly uses north Admiralty Island, and who has an interest in the mine being operated consistent with both federal and state laws and regulations.

The following are concerns which need to be adequately addressed before you approve the Greens Creek North Extension Project.

Fugitive Dust: For over 30 years, lead and other metals-contaminated mine tailings have been blowing off the Greens Creek Mine tailings pile and onto the Admiralty Island National Monument and into the marine waters of Hawk Inlet. This has raised concerns that terrestrial and marine organisms may be contaminated in violation of the Alaska National Interest Lands Conservation Act (ANILCA). Fugitive dust monitoring and control needs to be regulatory with effluent limits and compliance requirements. Leaving it up to Hecla and their non-standardized monitoring is insufficient.

Repeat the Baseline Studies: ANILCA allows Greens Creek to mine in the Monument as long as it does not cause “irreparable harm” to its fish, fish habitat, and the ecological resources. However, the baseline environmental studies from 1981 have never been repeated to determine whether harm is occurring, making the question of “irreparable” harm difficult to evaluate. It is inappropriate for the Forest Service to approve an expansion at the mine until the baseline studies have been replicated. Moreover, there are several recommendations in the most recent Greens Creek Mine audit document regarding the need for baseline data for elements such as geochemical data about tailings and additional parameters in the Fresh Water Monitoring Program (Greens Creek Mine Audit, 2018, pages 8 & 13).

End the Mixing Zone: It is unacceptable for the mine to be allowed a mixing zone in the vicinity of Hawk Inlet, an important subsistence wildlife area. The Environmental Protection Agency allows in-pipe mixing as a supplement to ensure adequate water treatment. Augmenting the

flow with seawater would result in the effluent meeting water quality standards in the pipe, and allow for elimination of the mixing zone in open water.

More on Monitoring: The Forest Service needs to stop deferring to the state on monitoring design. The state is not answerable to ANICLA. And as far as I can tell, the Alaska Department of Environmental Conservation (DEC) has never conducted an on-site inspection of the mine site. Moreover, the state's monitoring program is designed to monitor an outfall, not harm. Nor is DEC inclined to measure population and species diversity trends – essential information the Forest Service should acquire in order to make an informed decision on the proposed mine expansion.

And on the matter of periodic audits, I understand that there have been only two 5-year audits in 33 years, and results of the second audit are apparently not linked to those of the first. The audits looked at different areas, so for practical purposes, there has only been one in each independent area.

As for methods of sampling, the "model" or hypothesis that testing tissue of benthic worms and mussels is indicative of the overall health of Hawk Inlet has never been field verified. It remains a model and untested hypothesis. The testing of organism tissue gives no information as to the health of a population or the greater dynamics of an ecosystem. Tissue sampling can only determine the trends in the five metals they test for.

In Closing: There is simply insufficient information for the Forest Service to approve this tailings expansion project with confidence that terrestrial and marine organisms will be protected to the highest degree possible and in full compliance with the requirements of Admiralty Island's National Monument status.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bruce Baker". The signature is fluid and cursive, written in a professional style.