



United States Department of the Interior

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In Reply Refer to:
FWS/R7/SAFWFO

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Subject: Hecla Greens Creek Mining Company Surface Exploration 2024-2028 project, Tongass National Forest (Consultation Number 2023-0062768)

Casey Loofbourrow:

Thank you for the opportunity to provide comments on Hecla Greens Creek Mining Company's (Hecla) proposed Surface Exploration Plan of Operations - 2024 through 2028 (Plan). Hecla proposes to conduct mineral exploration activities adjacent to their operating Greens Creek Mine within the Greens Creek Land Exchange and on their Federal lode mining claims located on Admiralty Island, Alaska. The exploration plan will explore over the next 5 years for mineral deposits, including, silver, zinc, lead and gold rich volcanogenic massive sulfide mineralization as is present at the Greens Creek Mine.

We appreciate the U.S. Forest Service's (USFS) coordination with the U.S. Fish and Wildlife Service (Service). The Service has reviewed Hecla's Plan and identified a number of conservation measures for which consideration would be appreciated. Our specific recommendations are provided below.

Topsoil Restoration, Revegetation, and Erosion Control

Restoration of the topsoil layer is an important factor in maintaining native habitat. Sites with little to no native topsoil will be vulnerable to invasive weeds and subject to decades of seral stages of succession until a stable plant community is restored, thus reducing ecosystem value for fish and wildlife. The Service encourages Hecla and the USFS to avoid and minimize impacts to habitat by using the following conservation measures to restore topsoil:

- Salvage the maximum amount of organic material and topsoil practicable and store separately (e.g., away from other overburden) for use during reclamation. At sites where the organic and topsoil layers are hard to distinguish or are very limited, we recommend salvaging the uppermost 6 inches of the soil profile (https://dnr.alaska.gov/mlw/mining/coal/pdf/coalreg_apr09.pdf).
- If topsoil is stored for more than one growing season, where practicable, use topsoil for interim reclamation by spreading it over cut and fill areas, around outer boundaries of

facilities, embankments, and drainage ditches.

- Stockpiled materials that will not be used within the first year should be placed on a stable area, labeled as topsoil, left undisturbed and protected from the elements by seeding it with an interim seeding mix (DOT&PF 2016; http://www.dot.alaska.gov/stwddes/desenviron/assets/pdf/bmp/bmp_52_53_00.pdf).
- When spread, redistribute topsoil to a uniform and stable thickness and protect it from compaction and erosion from wind and water until vegetation is established.
- It was noted in the Plan that no planting has been previously required in exploration permits. However, the Service recommends that all disturbed areas be seeded or planted with native vegetation whenever possible.
- Vegetative cover should be capable of stabilizing the soil against erosion.
- Create surface roughness to help control surface water runoff and reduce sedimentation (DOT&PF 2016; http://www.dot.alaska.gov/stwddes/desenviron/assets/pdf/bmp/bmp_30_00.pdf).
- Use erosion control measures that have minimal additional habitat impacts (e.g., weed free gravel, weed free erosion control materials, and erosion control materials without plastic mesh netting on project sites). Plastic netting can entangle wildlife and degrades into small fragments which are blown or washed into waterways, creating a toxic ingestion hazard for aquatic wildlife for many years.

It was noted in the Plan (page 26) that upon completion of drilling activities, drilling platforms will be disassembled, with timbers lying either directly on the ground or resting two high. Please provide additional justification for not removing dimensional lumber from the site once exploration activities have concluded.

Additionally, the Plan did not discuss whether timber that is felled at drilling sites would be salvaged or left on-site. Please describe how felled trees will be managed at drilling sites.

Invasive Species

Invasive species are one of the greatest threats to native biodiversity and are a significant driver of native species loss worldwide. We appreciate the mitigation measures included in the Plan and recommend the following additional measures to prevent invasive species from becoming established in the project area:

- Equipment
 - Equipment should arrive and leave the project clean without visible soil clumps, plant, or animal material.
 - Do not clean equipment in or near waterways as it may promote the spread of invasive plant species downstream.
 - Conduct project operations in uninfested areas first to ensure that invasive species do not contaminate equipment and get moved to new areas.
 - Avoid infested areas to the extent possible. If not possible, consider the seasonality of the work to minimize the operations when invasive species seeds or would be viable and readily moved.

- Consider tracking pads as a means to remove soil from equipment. If tracking pads are used, they must be cleaned after each use in a specific area.
- Reclamation and Reporting
 - Re-vegetate bare soils as soon as feasible to minimize the possible establishment of invasive plant species.
 - Stabilize disturbed soils using appropriate erosion and sediment control procedures as soon as possible. Use certified invasive-free materials.
 - Record and report locations of invasive plants that are new to a particular area. Visit: <https://accs.uaa.alaska.edu/invasive-species/submit-data-to-akepic/> to record and report your finding.

Spill Mitigation

- Containers with an aggregate storage capacity of greater than 55 gallons that contain fuel or hazardous substances should not be stored within 100 feet of a waterbody or within 1,500 feet of a current surface drinking water source.
- During equipment storage or maintenance, ensure the site is protected from leaking or dripping fuel and hazardous substances by placing drip pans or other surface liners designed to catch and hold fluids under the equipment, or by creating an area for storage or maintenance using an impermeable liner or other suitable containment mechanism.
- During fuel or hazardous substance transfer, ensure a secondary containment or a surface liner is placed under all container or vehicle fuel tank inlet and outlet points, hose connections, and hose ends. Appropriate spill response equipment, sufficient to respond to a spill of up to 5 gallons, should be on hand during any transfer or handling of fuel or hazardous substances.

Migratory Birds and Eagles

The Service recommends the following conservation measures to reduce adverse impacts to migratory birds and their habitat. These conservation measures are intended to avoid, minimize, and mitigate impacts to migratory birds under the Migratory Bird Treaty Act and eagles under the Bald and Golden Eagle Protection Act (BGEPA).

- Schedule vegetation removal and other disturbances outside of the peak breeding season to the extent practicable. For the most recent timing guidance, visit: <https://www.fws.gov/alaska-bird-nesting-season>.
- Prevent increases in lighting of native habitats during the bird breeding season.
- To the maximum extent practicable, limit construction activities to the time between dawn and dusk to avoid the illumination of adjacent habitat areas.
- If construction activity time restrictions are not possible, use down shielding or directional lighting to avoid light trespass into bird habitat. To the maximum extent practicable, low intensity energy saving lighting should be used.
- Install anti-perching devices on facilities and equipment where birds may commonly nest or perch.
- Cover or enclose all potential nesting surfaces on the structure with mesh netting, chicken wire fencing, or other suitable exclusion material prior to the nesting season to prevent

birds from establishing new nests. The netting, fencing, or other material should have no opening or mesh size greater than 0.75 inch and should be maintained until the structure is removed.

- Cap pipes and cover or seal all small dark spaces where birds may enter and become trapped.

Among other protections, BGEPA prevents take of eagles and their nests either directly (such as by removing a nest) or indirectly (such as by disturbance of nesting eagles without a permit). The BGEPA applies to any nest in the area, regardless of whether it is currently documented in the eagle nest catalogue or whether the nest is currently active or inactive.

- The Service recommends activities involving ground disturbance and short-term, obtrusive noise take place outside the peak nesting period (March 1 to August 31) to the extent practicable. For additional information on bald eagle nesting and sensitivity to human activity, please visit: <https://www.fws.gov/Alaska-eagle-nesting>.
- Prior to drilling, nest surveys should be used to confirm presence or absence of historical nests, and to determine the exact location and status of all current nests within the potential zone of impact for your project.
- Establish and maintain a landscape buffer for each eagle nest site (including in-use nests and any alternate nests). At a minimum, a landscape buffer should provide 660 feet of natural, forested vegetation or other shielding, topographic features between the project activity and any eagle nest site.
- Maintain the landscape buffer. Do not clear or construct within this buffer and minimize other activities that could cause habitat degradation within it, regardless of whether eagles are present at the time of the activity.

If you are unable to conduct your work outside the peak eagle nesting season or implement the recommended spatial buffers around eagle nests, or if you become aware of a roosting or foraging site that may be affected by your project, you may need an incidental eagle take permit, pursuant to the BGEPA. Please visit our eagle permits page for more information: <https://www.fws.gov/story/do-i-need-eagle-take-permit>.

Thank you for the opportunity to comment. For questions regarding these recommendations, please contact Sarah Markegard at 907-231-5850 or sarah_markegard@fws.gov and refer to Service Consultation Number 2023-0062768.

Sincerely,

Douglass M. Cooper
Ecological Services Branch Chief