Data Submitted (UTC 11): 11/23/2020 11:00:00 AM
First name: Margo
Last name: Waring
Organization: Renewable Juneau
Title: President
Comments: November 22, 2020
RE: Comments on Greens Creek North Extension Project #57306

Dear USFS,

Thank you for the opportunity to comment on the proposed Greens Creek mine tailings expansion. Renewable Juneau is a 501(c)(3) non-profit with a mission of information, education and advocacy for renewable energy to mitigate the impacts of climate change.

We have reviewed the materials inviting public comments on your assessment of
Hecla Greens Creek Mining Companys proposed expansion of their tailings disposal facility on Admiralty Island. We understand you will prepare a supplemental Environmental Impact Statement (SEIS) to analyze effects of the proposed action and various alternatives.

Renewable Juneau requests that the SEIS specifically address the effects of the proposed action and alternatives on greenhouse gas (ghg) emissions, climate change and ocean acidification. Among the significant effects that need to be addressed are the impacts of the proposed action and the related extension of the life of the mine, on ghg emissions and ocean acidification related to transportation of materials to and from the mine, to mining operations, and to on-site generation of electricity.

These are important issues to the residents of the City and Borough of Juneau, which has adopted goals of reducing ghg emissions by 25% by 2032 (Juneau Climate Action and Implementation Plan, 2010), and of moving toward 80% of the communitys energy coming from renewable sources by 2045 (Juneau Renewable Energy Strategy, 2018). According to these documents, Greens Creek produces about 5% of the total ghg emissions in the CBJ, and the importance of Greens Creek emissions in meeting community goals are noted throughout these documents.

Of particular interest is the opportunity to mitigate the increase in total ghg emissions that would result from extending the life of the mine by increasing the proportion of electricity derived from Juneaus abundant renewable sources. This would allow Greens Creek to reduce its use of diesel for electricity generation and to displace fossil fuels and reduce ghg emissions in its mining operations by electrifying more of its mining operations.

A federally funded $13 million transmission line provides Greens Creek with the option to conduct operations with hydroelectricity rather than generating its own electricity on site with diesel. This option acts to reduce ghg emissions and other environmental impacts, such as local air pollution and risks of fuel spills, while potentially lowering operational costs for the mine. And while it is possible that there are limitations of existing hydroelectric supplies at times, we raise these points with the understanding that other sources of hydropower generation could be made available.

Over the past decade, Greens Creek typically uses on the order of 75 million kWh of electricity annually. But, according to AEL&P tariff filings, since 2009 Greens Creek has only obtained their full electrical needs from hydropower in three of these past eleven years. These shortfalls have been made up by on-site diesel generation. If this pattern continues over an additional ten-year period, there will be significantly more ghg emissions, air pollution, and risk of fuel spills.

These effects of the proposal, and the opportunities for mitigation, should be identified and evaluated in the SEIS.

Sincerely,

Margo Waring,
President, Renewable Juneau