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First name: Douglas

Last name: Mertz

Organization:

Title:

Comments: See attached letter.

Douglas K. Mertz

March 15, 2024

VIA FOREST SERVICE OBJECTION PORTAL

Janelle Crocker, Regional Forester

U.S. Forest Service, Alaska Region

709 W. 9th Street

P.O. Box 21628

Juneau, AK 99802-1628

Re: Objection to the Greens Creek Mine North Extension Project Final Environmental Impact Statement and Draft Record of Decision

Dear Regional Forester Crocker:

I wish to formally object to the Final Supplemental Environmental Impact Statement (2024 FSEIS) and Draft Record of Decision (Draft ROD) for the Greens Creek Mine North Extension. As noted in my original comment on the extension, I believe the USFS has not adequately addressed the impacts of the extension on water quality in the adjacent Hawk Inlet.

We know from the studies conducted by Friends of Admiralty that the USFS has relied on old studies without any new baseline information, even though toxic levels of contaminants have been identified in Hawk Inlet. It is not possible for the agency to establish the extent of either past or future contamination without a new and thorough baseline study and regular followup testing. When I pointed out in my comments that the USFS needed to

require, in any future action, a regular and rigorous baseline with regular testing to update it, the USFS merely responded that it lacks the authority to impose such a requirement.

This is flat wrong. The USFS has not so far imposed the requirement of a baseline study with periodic rigorous updating and testing, but that is not the equivalent of a finding of lack of authority. In fact the USFS has both the ability and duty to condition an extension of the permit on whatever means are needed for a regular assessment; if it cannot impose such a requirement, its only alternative is to deny the permit due to inability to protect the monument from the effects of mining and dumping of mined materials.

I urge you to either incorporate such a requirement into any permit, or issue a denial of the permit.

Sincerely,

Douglas K. Mertz