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First name: JOHN

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Organization:

Title:

Comments: Objection to the Greens Creek North Extension Project #57306

Person Objecting: John Sisk

18175 Pt Stephens Rd

Juneau, AK 99801

Name of Project: Greens Creek North Extension Project #57306

Name and Title of the Responsible Individual and Administrative Unit: Francis Sherman, Forest Supervisor, Tongass National Forest, Alaska Region, USDA Forest Service

Reviewing Officer: Janelle Crocker, Regional Forester, Alaska Regional Office, PO Box 21628, 709 W. 9th Street, Juneau, AK 99802-1628, Fax: 907-586-7840, Phone: 907-586-8806

Date: March 18, 2024

Dear Ms. Crocker:

I am submitting this letter of objection to the Greens Creek North Extension Project #57306 because I think the Forest Service's record of decision has done an insufficient job in several very important areas that I identified in my scoping comments and my comments on the draft EIS. At the same time, I think there are things the Forest Service can and should do to remedy those deficiencies.

1. Strengthen significantly the Forest Service's government to government collaboration process with the Community of Angoon, through the Angoon Cooperative Association, and with an eye to a deeper and broader relationship with the community. The people of Angoon can best inform the Forest Service about how to do this.

2. Strengthen the control and remediation of lead pollution. The Forest Service, The Alaska Dept. of Fish & Game and Friends of Admiralty Island have documented that wind-blown fugitive dust (and perhaps other modes of transport) are spreading lead into the soils and fresh waters of the National Monument. This needs to be remediated as soon as possible through specific and enforceable, limits, standards and remediation techniques.

3. Take a more thoughtful look at the question of whether there is irreparable harm to the monument and, if so -- or if there is risk of such harm, how that might be remedied.

4. Commit to a collaborative Hawk Inlet-Admiralty Monument ecosystem monitoring program. Such a program is essential to understand how human activity has affected and is affecting the ecosystem(s). It will inform any necessary activities to clean up or otherwise remediate pollution. The Forest Service seems to seek to delegate this responsibility to the State of Alaska, through the pollution discharge permit (APDES) and other measures. Those permitting responsibilities are intended to ensure compliance with certain important laws, yet they do not address all the important ecosystem parameters that should be monitored. A strong program should be comprehensive and science-based. For example, it should look at biodiversity and marine and terrestrial species abundance over time, plus whether there is pollution accumulation and/or magnification in plant and animal species. It should include re-assessing existing baselines and other studies done in the past to learn what might already have changed. It should be designed to detect long-term, inter-related and potentially cumulative

changes and responses that might be warranted.

5. The Forest Service should reconsider its role and responsibility as the lead federal agency for this project and for management of Admiralty Island National Monument and the adjacent marine waters. The agency's responsibility is not simply ministerial or administrative. The Forest Service is responsible for the conservation and stewardship of Admiralty Island National Monument, it is responsible for leading respectful and successful government to government cooperation with tribal entities, and it has an implicit responsibility to initiate and coordinate an open scientific ecosystem monitoring program. With regard to the latter point, the Forest Service could recruit the federal science resources of NOAA, EPA and USGS, independent scientists, as well as the advice of Angoon, Hecla Mining Company, and concerned NGOs. Such a collaborative effort would be ideal. An effective record of decision could include a recommendation for federal funding for such a program. In that way the Forest Service would demonstrate that it is taking its responsibility seriously and is leading an effort to ensure healthy ecosystems in the mining area.

Thank you for your consideration of this letter of objection in which I try to present positive opportunities to contribute to a stronger record of decision. Sincerely,

John Sisk