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First name: Aaron

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Organization:

Title:

Comments: Dear Regional Forester Janelle Crocker,

Please accept the attached objection to the Greens Creek Mine North Extension Project Draft Record of Decision.

Respectfully,

Aaron Brakel

Southeast Alaska Conservation Council

SEACC OBJECTION to the Greens Creek North Extension Project Supplemental Environmental Impact Statement Draft Record of Decision To: Regional Forester Janelle Crocker, Reviewing Officer March 18, 2024 USDA Forest Service, Alaska Region 709 W. 9th Street P.O. Box 21628 Juneau, AK 99802-1628 Submitted electronically to: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=57306> RE: Southeast Alaska Conservation Council Objection to the Draft Record of Decision on the Greens Creek Mine North Extension Project (NEP) dated February 2, 2024 and approved by Francis Sherman, Forest Supervisor, Tongass National Forest, as Responsible Official Dear Regional Forester Crocker, The Southeast Alaska Conservation Council offers this objection in good faith, appreciating the improvements that have been made in dealing with issues of metals-laden fugitive tailings dust at Greens Creek and in the spirit of public participation that leads to the improvement of environmental conditions. SEACC requests a meeting with the Reviewing Officer to discuss this objection and our suggestions for improvements to the proposed plan decision. SEACC submitted timely substantive comments during both the Scoping and Draft Supplemental Environmental Impact Statement comment opportunities on the NEP, and the concerns in our objection are linked to our previous formal timely comments except where new information and issues arose after the closure of opportunities for comment. Fugitive Dust SEACC's objection focuses on fugitive dust. The primary fugitive dust concern is metals-laden dust from the tailings. The tailings are composed of fine silty material with some sand-sized particles. The tailings include metals not removed in the milling and beneficiation process. This metal-laden dust, including lead, has been mobilized by wind and mechanical activity on the tailings pile during dry and windy periods and has been blowing off of open areas of the tailings pile for many years, polluting the surrounding environment. Knowable Weather Conditions Dry, cold, and desiccating periods are the primary weather conditions during which dust is generated. These conditions are understood by the mining company, the Forest Service, and others following the project, and are associated with short-term winter weather conditions. For this objection, we will refer to these conditions as dust-generating conditions. The decisions made and actions taken in preparing for, forecasting, and during these dust-generating conditions are understood to be key issues in preventing and minimizing fugitive metals-laden dust. SEACC's DSEIS comment raises and discusses seasonal predicted or observed wind and temperature conditions that create the highest mobilization of fugitive dust. Cessation of Operation The Western Regional Air Partnership's Fugitive Dust Handbook, 2006 (WRAP) was used in preparation of the Fugitive Dust Plan and is a source of fugitive dust information used in the

FSEIS supporting documents, including in the calculation of particulate matter emission amounts due to wind erosion of open areas and as a source of commonly used effective fugitive dust mitigation measures. The WRAP is a key source of information about fugitive dust and was used in evaluating fugitive dust emissions (see FSEIS 3.2.2.1. Fugitive Dust Modeling, Emission Calculation Methodology). The WRAP is also cited in the FSEIS Fugitive Dust Mitigation and Monitoring Plan at 2.0 Mitigation Measures. SEACC included the WRAP in our comment on the DSEIS and specifically referred to [ldquo]cessation of operations[rdquo] as one of the mitigation measures identified in the WRAP. SEACC[rsquo]s DSEIS comment also identified, [ldquo]Temporary cessation of tailings deposition in periods known to contribute heavy dust loading,[rdquo] as a fugitive dust mitigation method. The key area for cessation of operations is the open acreage of the tailings pile. Section 1.3.2 of the WRAP, titled Wind Generated Dust, discusses important site characteristics of open dust sources, and includes the following key paragraph:Frequency of Mechanical Disturbance. Emissions generated by wind erosion are also dependent on the frequency of disturbance of the erodible surface. A disturbance is defined as an action that results in the exposure of fresh surface material. This would occur whenever a layer of aggregate material is either added to or removed from the surface. The disturbance of an exposed area may also result from the turning of surface material to a depth exceeding the size of the largest material present. Each time that a surface is disturbed, its erosion potential is increased by destroying the mitigative effects of crusts, vegetation, and friable nonerodible elements, and by exposing new surface fines. (WRAP p. 1-6, emphasis in original) SEACC is not the only commenter that referred to the need to cease surface operations on the tailings pile during key periods. Rivers Without Borders also noted the need to avoid activities on the tailings pile and provided the following comment:Avoid surface disposal during high dust weather events. From the Tailings reports it is clear that the majority of dusting events occur during set times of the year and under predictable short-term weather conditions. During these times, Hecla should avoid surface disposal and place tailings as underground backfill. (FSEIS Appendix C, Responses to Comments, Comment #329-5) SEACC objects to the failure of the FSEIS to disclose issues surrounding the use of temporary [ldquo]cessation of operations[rdquo] on the tailings pile during key weather conditions. The WRAP indicates that mechanical disturbance is a key consideration. Stopping mechanical operations on the open acreage of the tailings pile during knowable and identified dust-generating conditions should be implemented at Greens Creek. SEACC suggests that the Forest Service require cessation of all mechanical activity on the open acreage of the tailings during forecasted or identified dust-generating periods, except for activity that is specifically directed towards mitigating the generation of dust from the open acreage. Such activity might include watering, applying a crust-forming agent, or (potentially) covering the pile with a temporary cover. SEACC notes that cessation of operations on the open acreage of the tailings pile should not require cessation of operations at the mill or of other mining or surface activities. Greens Creek currently uses two backfill methods to place approximately 50% of the total volume of tailings generated underground, paste backfill, and jam backfill. Sequencing of underground operations in such a manner as to allow all of the tailings to be placed underground during brief periods of dry, cold, desiccated, windy weather is not unreasonable. The FSEIS should have fully disclosed all issues surrounding the temporary cessation of operations on the tailings pile, including the impacts to mill and underground operations. Failure to address and disclose impacts from the temporary cessation of operations on the tailings pile and placement of the tailings underground as backfill during the temporary cessation was an arbitrary decision to which SEACC objects. The Fugitive Dust Monitoring and Mitigation Plan was not available for public review and comment during any comment opportunity, and SEACC was thus unable to comment on the lack of disclosure of cessation of operations impacts. The failure to disclose temporary cessation of operations impacts on the project, including on mine sequencing and backfill operations is a new issue that arose with the publication of the the Fugitive Dust Mitigation and Monitoring Plan and the FSEIS. SEACC suggests that a path forward could be to disclose the impacts of cessation of operations and of placing all tailings underground during forecasted or identified dust-generating conditions in a draft Fugitive Dust Mitigation and Monitoring Plan that is released to the public for comment. Some of these impacts could include the need for different underground engineering and mine sequencing approaches, additional backfill cementation and transport capacity, etc. If a draft Fugitive Dust Mitigation and Monitoring Plan is not released to the public for comment, SEACC requests that a supplemental draft environmental impact statement be prepared and that the full range of impacts associated with cessation of operations during critical weather conditions be disclosed. We have confidence that if a best practice of cessation of surface activity on the open acreage of the tailings during

forecasted or known dust-generating conditions is adopted, Hecla Greens Creek Mining Company possesses the technical and workforce capability to develop methods of placing all of the tailings underground for these brief periods. December 1 to March 1The FSEIS uses December 1 to March 1 to describe historical high dust deposition periods (see 4.1 Open Acreage Effects on Deposition and 5.1.1 Operational Planning). SEACC included this comment on the DSEIS, [ldquo]On a single day, November 15, 2016, a single ADP dust collector recorded 54% (65,155 of 120,617 [mu]g/m3) of the total lead loading recorded for the entire 2016 year.[rdquo] Our comment draws attention to lead loading events outside the December 1-March 1 period and refers to episodic events identified in our analysis of the Waste Management Plan annual reports. Our concern here is substantively linked to our DSEIS comment and thus to the reports of lead loading by period. ADC collection records in those annual reports show significant lead loading outside the December 1 to March 1 period, including November 14, 2011, November 28, 2011, March 18, 2014, March 9, 2017, November 8, 2017, November 22, 2017, and March 12, 2018. The Forest Service should take those ADC collection reports into consideration and should have disclosed why December 1 to March 1 was appropriate instead of a larger date range. The high lead loading from these ADC collection periods indicates that significant dust events also happen regularly in November and March. SEACC objects to the use of December 1 to March 1 and we suggest that November 1 to April 1 should be used instead and the open acreage of the tailings be limited to 3 acres during that period.We also note the occurrence of high ADC lead loading collections in those periodic reports on June 24, 2014, June 7, 2016, July 7, 2016, and September 5, 2018. While the lead loading on these non-winter dates is not as extreme as some of the winter periods, it points to lead-laden dust generation outside of the winter months. This is a particular concern when construction is taking place in which tailings or the rock cover is being moved during tailings facility expansion activities, and the open acreage of the tailings is larger. The Fugitive Dust Mitigation and Monitoring Plan should require the minimization of the open acreage year-round, and develop operational and monitoring approaches to minimize the risk of generating dust during non-winter months and, in particular, for construction on the pile or while moving tailings during construction. Having adequate watering truck capacity, for instance, could be quite important if very dry conditions occur during construction.Request for Public Comment Opportunity on the Fugitive Dust Mitigation and Monitoring PlanThe Tailings Disposal Facility Fugitive Dust Mitigation and Monitoring Plan dated October 2023 and prepared for Hecla Greens Creek Mining Company by Boreal Environmental Services is new information arising after designated comment opportunities, contains issues or approaches that arose after comment opportunities closed, and was unavailable to the public prior to the publication of the FSEIS in February 2024 or during designated comment opportunities. This objection period is therefore the first opportunity to comment on the Fugitive Dust Mitigation and Monitoring Plan.Numerous public comments on the DSEIS raised concerns about fugitive dust, and the Forest Service acknowledged publicly that the creation of a fugitive dust plan is at the heart of public concerns about the project. In a story airing on KTOO FM on February 1, 2024, Forest Service project manager Matt Reece stated, [ldquo]We heard pretty loud and clear from the public during that process that they would like to see that plan.[rdquo] We agree, and we believe that the public should not only see but also have an opportunity to comment on the fugitive dust plan. The Fugitive Dust Mitigation and Monitoring Plan has not been available for the public to review and comment on. SEACC[rsquo]s comment on the DSEIS pointed out that key documents related to fugitive dust were [ldquo]not readily available for public review [and] causes us serious concern about the ability of the public to understand the DSEIS and effectively comment on fugitive dust concerns.[rdquo] Our comment requested, [ldquo]public input through a public comment process as part of the development of a fugitive dust mitigation and monitoring plan.[rdquo] With substantive issues such as temporary cessation of operations and temporary placement of all tailings underground during key periods having arbitrarily been ignored and impacts not disclosed in the FSEIS or the Fugitive Dust Mitigation and Monitoring Plan, SEACC objects to the lack of a public comment period on the Fugitive Dust Mitigation and Monitoring Plan. SEACC suggests that the Fugitive Dust Mitigation and Monitoring plan be re-released in draft form for public comment. We appreciate the opportunity to participate in public processes that disclose impacts from projects and offer citizens the opportunity to understand, identify, and comment on key environmental concerns, and to have those concerns addressed. Thank you for giving our objection careful consideration, and we look forward to meeting to discuss and potentially resolve the concerns we have raised in this objection.Respectfully, Aaron Brakel (907) 586-6942 aaron@seacc.org