

January 4, 2020

Matthew Reece, Project Manager
Juneau Ranger District
8510 Mendenhall Loop Road
Juneau, AK 99801
sm.fs.kensington@usda.gov

RE: Coeur Alaska Kensington Mine Plan of Operations Amendment 1 (POA 1) #55533

Dear Mr. Reece,

I would like to submit the following comments on the proposed POA 1. As a previous commercial crabber that harvested Dungeness Crab in Berners Bay for many seasons, I would like to make comments regarding the tailings treatment facility and the proposed rock storage as the preferred alternative.

This natural ground rock from the Berners/Lace/Antler Rivers watershed is virtually identical to what is milled and currently deposited into Lower Slate Lake that is stored in a proven and effective tailings storage system under consideration for expansion in POA. From ADF&G harvest records and annual reports the fishery and shellfish stock in Berners Bay and Lynn Canal continue to be strong and stable after 10 years of mining production and successful tailings storage.

Further, POA 1 is the proposal that provides the best fish habitat among all the tailings storing alternatives by enhancing the Dolly Varden fishery upon reclamation and closure. Dolly Varden habitat would also be significantly enhanced by the construction of deltas and rerouting Fat Rat Creek into South Creek to improve fish habitat. Further, under Coeur Alaska's plan at the closure, the lake will be more productive and there is the creation of nearby wetlands providing 120 acres of productive fisheries and wildlife habitat thus providing an enhanced environmental gain. The US Forest Service would be hard-pressed to find EIS actions that rise above the traditional avoid, minimize, or mitigate impacts, with a plan that raises above this standard and enhances fish habitat in a simple, straightforward manner as found under POA 1.

Another reason that POA 1 is the preferred alternative is that it requires less use of diesel fuel for hauling waste rock and tailings compared to the other alternatives. Not only does POA 1 require less fuel storage and handling, but it also reduces emissions which is of growing importance in Juneau community values, corporate values, and elsewhere.

I appreciate the opportunity to provide helpful comments on your decision to select the best alternative-POA 1 for Coeur Alaska's continued operations.

Regards,

Duff Mitchell
3274 Pioneer Ave.
Juneau, AK 99801