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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

January 4, 2021

Matthew Reece
POA1 SEIS Project Manager, Juneau Ranger District
8510 Mendenhall Loop Road
Juneau, AK 99801

Submitted via: <https://www.fs.usda.gov/project/?project=55533>

Dear Mr. Reece:

The Resource Development Council for Alaska, Inc. (RDC) is writing to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Kensington Mine Plan of Operations Amendment 1 (POA 1) submitted by Coeur Alaska, Inc. (Coeur).

RDC is a statewide trade association comprised of individuals and companies from Alaska's fishing, forestry, mining, oil and gas, and tourism industries. RDC's membership includes Alaska Native corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC urges the U.S. Forest Service (USFS) to move swiftly to finalize the SEIS and reach a Record of Decision that approves the Proposed Action. The Kensington Mine began operating in 2010 and has continued to prove it can do so in a responsible manner.

Our specific comments on the DSEIS are as follows:

Chapter 2.4.2 TTF with Reduced Water Closure Alternative

The Tailings Treatment Facility (TTF) Closure with Reduced Water Alternative does not include POA 1's fish habitat improvements and would greatly reduce the amount of aquatic habitat after closure. Following mine closure, the resulting waterbody would be small, shallow, and is unlikely to function as a healthy lake (DSEIS pg. 3-65). It would not provide Dolly Varden spawning habitat. The existing graphitic phyllite (GP) near the dam may not be sufficiently contained and additional GP may be exposed to obtain additional growth media at the nearby borrow site. During closure and reclamation there are also major concerns regarding the ability to safely operate heavy machinery on deposited tailings. Due to the lack of environmental benefits, risks surrounding managing a current source of GP as well as a new source of GP, and for safety reasons, create overriding concerns with this alternative and the USFS should not select it for approval.



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Chapter 2.5 Alternatives Considered by Eliminated from Detailed Study

RDC believes the analysis conducted by the U.S. Forest Service (USFS) and the Cooperative Agencies on this set of alternatives is reasonable, represents a logical thought process and reaches justifiable conclusions. RDC is supportive of the USFS and Cooperating Agencies eliminating the No TTF Lake at Closure (2.5.1.1) and the Mill Processing Rate Partially Based on Volume of Tailings Backfilled the Prior Month (2.5.2.2) Alternative.

Chapter 3 Affected Environment and Environmental Consequences

On November 7, 2019, we responded to your request for Scoping Comments by encouraging the USFS to only focus on significant impacts in the SEIS for POA 1. Given Coeur's model operational history and POA 1's design, siting, and mitigation measures, it was not unexpected at the end of the Scoping process, the USFS did not identify any significant impacts on the human environment. Now, RDC encourages the USFS and the Cooperating Agencies to complete and publish the Final SEIS with urgency given the fact that the USFS has not found POA 1 to contain any significant impacts on the human environment in the DSEIS. The USFS's Record of Decision should select the POA 1, the Proposed Action, without delay.

3.3.2.1 Water Quality and Monitoring.

It unnecessary for the DSEIS to contain a listing of water quality exceedance and it should be removed in the Final SEIS. The listing can then be replaced with a brief summary such as was done in the same section of the SDEIS for chemical and fuels spills that were reported to the Alaska Department of Environmental Conservation (DEC). Both data sets have been publicly available and the nearly three pages dedicated to the topic of water quality exceedances does little to inform the public or improve the quality of the document, particularly since the environmental consequences were minimal and adjustments have been made that resolved the issues.

For over ten years Coeur has shown that they can operate the Kensington Mine in an environmentally responsible way. Coeur's current plan to use existing infrastructure to expand the current tailings treatment facility and waste rock storage sites and adding only one more waste rock site will have the least impact on the environment. With these features come numerous best practices to protect the environmental qualities of the area, not the least of which is water quality. Coeur has incorporated the highest level of technology in terms of advanced water treatment and waste management and will continue to protect water quality, in partnership with the USFS and the DEC.

Chapter 3.4 Wetlands and Riparian Management

The DSEIS documents potential impacts to wetlands and other waters of the U.S. (WOTUS) that could result from POA 1 (Section 3.4). Most impacts would be to low or moderate functioning wetlands (pg. 3-37). Furthermore, as described in Coeur's Department of the Army permit application, POA 1 would require long term placement of fill in just 27.2 acres of WOTUS and 26.4 acres of upland habitat would be converted to WOTUS at the TTF at closure. Thus, the project overall will have just a 0.8-acre net decrease in WOTUS. Based on this data, we support a conclusion that POA 1 would not result in significant impacts to aquatic resources or aquatic resource functions within the affected watersheds.

Coeur's proposed POA 1 complies with the Environmental Protection Agency's 404(b)(1) Guidelines found in 40 CFR 230. POA 1 represents the least environmentally impacting practicable alternative when effects to aquatic resources during construction, operations and following reclamation are considered. The Final SEIS should provide similar analyses for other action alternatives to allow side-by-side comparison.

POA 1 would also minimize impacts to fish and fish habitat. POA 1, as proposed, would also provide long-term, reliable mitigation (avoidance) of impacts to fish from the accidental release of acid rock drainage, a benefit over other alternatives evaluated. Finally, POA 1 includes fish habitat enhancements in Upper Slate Creek and South Creek and, at closure, would restore downstream fish passage into and through Lower Slate Lake to East Fork Slate Creek

Economic Impacts of Kensington Mine

The Kensington Mine is the second largest employer and property taxpayer in Juneau, spending over \$55 million in wages in 2019. The mine also paid \$2.3 million in local sales and property taxes in 2019, while making community donations of over \$143,000. It is clearly an economic engine for Southeast Alaska with a strong commitment to protect the environment.

Conclusion

RDC urges the USFS to move swiftly to finalize the SEIS and reach a Record of Decision that approves the Proposed Action. Acting in this matter is supported by the Draft SEIS's analysis of the Proposed Action which clearly and reasonably demonstrates Coeur's Life of Mine Extension will not have significant adverse effects on the human environment. Furthermore, the Draft SEIS analysis also demonstrates that POA 1 is consistent with the Tongass National Forest's Forest Plan. For these reasons, POA 1 should be approved by the USFS.

Thank you for the opportunity to comment on this important project.

Sincerely,



Marleanna Hall
Executive Director