

MEMORANDUM

State of Alaska

Department of Fish and Game
Habitat Section

TO: Kate Kanouse
Southeast Regional Supervisor

DATE: November 20, 2020

SUBJECT: Kensington Gold Mine
POA 1 PDSEIS Investigations –
Amendment 1^a

FROM: Bill Kane *BK*
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In May 2020, the U.S. Forest Service released for cooperating agency review the Preliminary Draft Supplemental Environmental Impact Statement (PDSEIS) for Coeur Alaska, Inc.'s Kensington Gold Mine Plan of Operations Amendment 1 (POA 1). Stream courses adjacent to the Comet and Jualin Areas were inaccurately depicted and expansion activities within the proposed action appeared to potentially intersect streams documented as providing habitat for resident fish.

On August 25 and 26, Habitat Biologists Dylan Krull and Jesse Lindgren, Fish and Wildlife Technician Nicole Legere, and I visited the Kensington Gold Mine to verify stream courses adjacent to proposed expansion activities near Ophir Creek South Tributary and Upper Johnson Creek. This work was conducted to further inform decisions regarding the proposed locations of the Comet Growth Media Stockpile and the Comet and Kensington Waste Rock Stockpiles outlined in POA 1. Our investigations confirmed stream courses and Dolly Varden char use of the Ophir Creek South Tributary and Upper Johnson Creek, as previously documented (Tetra Tech, Inc. et al. 2004a).

In transit to Ophir Creek, we incidentally discovered Dolly Varden char in the drainage adjacent and upgradient from the current Comet Beach Road corridor (Figures 1–3). Downstream, a culvert along this section of the road is perched, impeding fish passage (Figure 4). Proposed expansion activities associated with the Comet Waste Rock Stockpile would fill an undetermined amount of resident fish habitat (Figure 5).

The location of the Comet Growth Media Stockpile as proposed would not intersect Ophir Creek South Tributary (Figure 5).

^a The original memorandum presented inaccurate boundaries from the PDSEIS for proposed expansion activities; this amendment incorporates verified boundaries outlined in POA 1 and information on a previously undocumented resident fish stream within the proposed Comet Waste Rock Stockpile footprint.

Northeast of the Jualin Area, Upper Johnson Creek comprises several active braided channels; the Kensington Waste Rock Stockpile as proposed would fill at least 30 meters of one of these channel braids (Figures 6, 7).



Figure 1.–Drainage upstream and adjacent to Comet Beach Road.



Figure 2.–Drainage downstream and adjacent to Comet Beach Road.



Figure 3.–Dolly Varden char captured in the drainage upstream and adjacent to Comet Beach Road.



Figure 4.–Perched culvert downstream of fish capture locations.

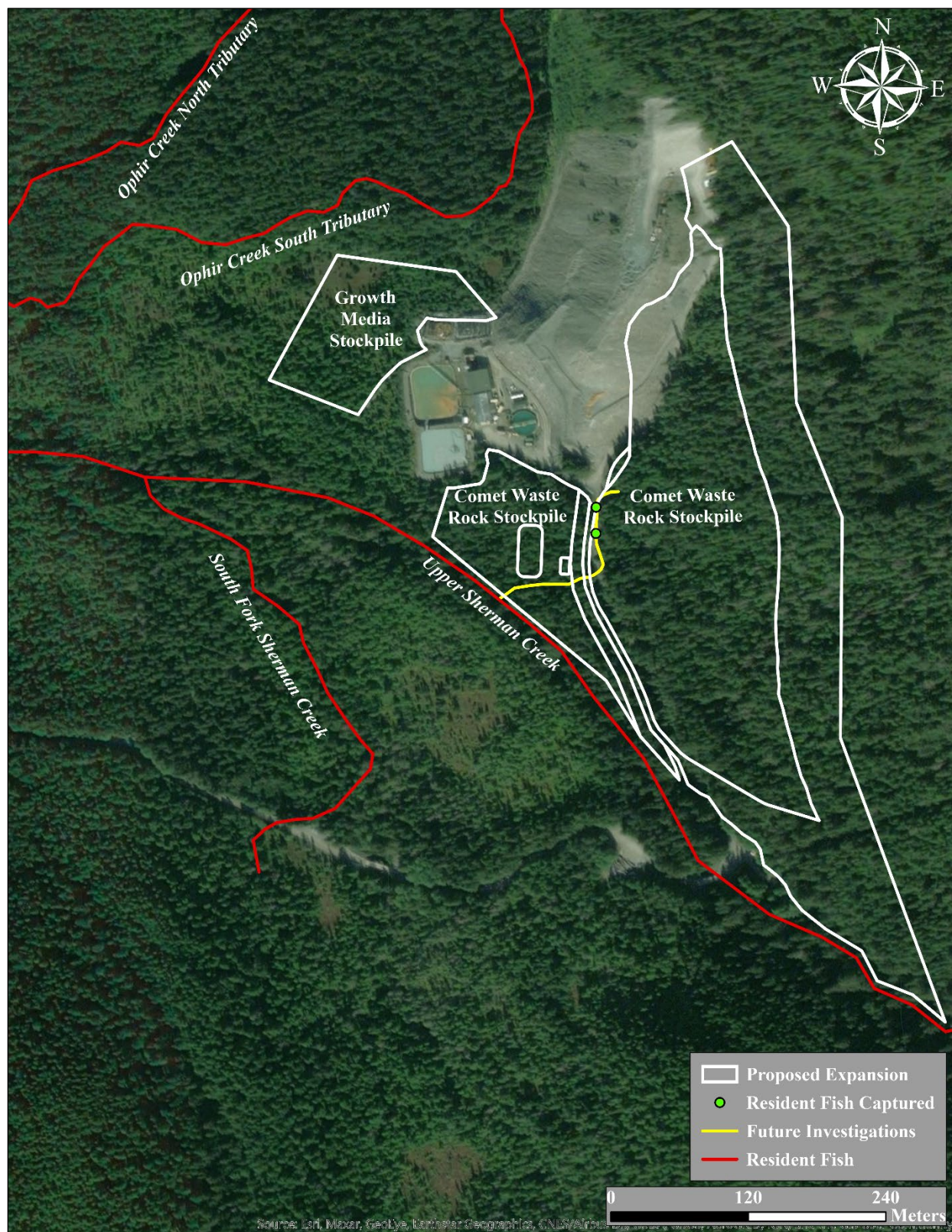


Figure 5.—Comet Area proposed action.



Figure 6.–Jualin Area proposed action.



Figure 7.—Active braided stream channel of Upper Johnson Creek within the proposed Kensington Waste Rock Stockpile site.

Recommendations

The drainage adjacent to Comet Beach Road requires further surveying to determine the extent of resident fish use. Since the contour of the proposed Comet Waste Rock Stockpile toe runs parallel to Upper Sherman Creek, further surveying is required to accurately document the stream course and upper extent of fish use.

Upper Johnson Creek requires further surveying to accurately document braided stream channels northeast of the Jualin Area.

Should the Comet and Kensington Waste Rock Stockpile footprints be approved as currently proposed, fish habitat permits will be required per AS 16.05.841; in which case, I will work with agencies and Coeur to develop mitigation strategies for fish passage, such as channel relocation.

Reference Cited

Tetra Tech, Inc., Tongass National Forest (Alaska), U.S. Environmental Protection Agency Region X, U.S. Army Corps of Engineers Alaska District, Alaska Department of Natural Resources. 2004a. Kensington Gold Project: final supplemental environmental impact statement Volume 1. U.S. Department of Agriculture Forest Service, Tongass National Forest, Juneau, AK.

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