



March 11, 2021

Mr. Matthew Reece
Minerals Program Manager
Tongass National Forest
8510 Mendenhall Loop Rd
Juneau, AK 99801

Submitted electronically to: matthew.a.reece@usda.gov

Subject: Draft SEIS for Kensington Mine Plan of Operation Amendment (POA 1)

Dear Mr. Reece,

We inadvertently missed the formal comment period, but we would still like our voices to be heard. We have a strong opinion about the positive impact the Kensington Mine makes to our community, and we work daily with the mine to protect our environment, our land, and our people.

On behalf of Goldbelt, Incorporated (Goldbelt) please find the following comments on the U.S. Forest Service's (USFS) Draft Supplemental Environmental Impact Statement (DSEIS) for the Kensington Mine Plan of Operations Amendment 1 (POA 1) submitted by Coeur Alaska, Inc. (Coeur).

Goldbelt is the Alaska Native Corporation representing Juneau, Alaska. Our shareholders live in many communities in Southeast Alaska and benefit from local mining operations. Goldbelt has been a partner with Kensington Mine for many years supporting the mine with transportation and security services.

Our specific comments on the DSEIS are as follows:

Chapter 3 – Affected Environment and Environmental Consequences

While the DSEIS identifies a variety of significant issues, the USFS's analysis of the Proposed Action (POA 1) shows it will have no direct or indirect significant¹ impacts on the human environment. Overall, we support those findings and encourage the USFS to work expeditiously to finalize the SEIS and issue its Record of Decision in support of POA 1.

Chapter 3.5 Fish and Fish Habitat; subsection 3.5.3 Environmental Consequences

The USFS's Final SEIS should include a discussion on the environmental consequences to fish and fish habitat related to the graphitic phyllite (GP) that was exposed during early dam

¹ 40 CFR 1508.27

construction at the Tailings Treatment Facility. There is a key environmental benefit the Proposed Action has over the No Action, Filtered Tailings Facility and the Reduced Water Closure Alternatives when it comes to long-term, reliable mitigation (avoidance) of impacts to fish from the accidental release of acid rock drainage. At closure, the Proposed Action will cover the GP with water which will prevent the GP from being oxidized and by extension, prohibit the formation of ARD. The Proposed Action's approach to GP management is the most effective way to protect fish and fish habitat.

Chapter 3.7.2.2 Threatened and Endangered Species

As a corporation comprised of Alaska Natives and as the operator of the ferry transporting miners and other supporting staff, Goldbelt is in a unique position to lend our perspective on the seriousness Coeur applies to ensuring their operations coexist with area's threatened and endangered species. The mariners, which do include Goldbelt shareholders, that make up Goldbelt's ferry crews, work every spring with Coeur's marine mammal observers to spot marine mammals and take the necessary steps to avoid a "take" of threatened and endangered species. This is highly successful effort.

Chapter 3.9 Socioeconomics and Environmental Justice

Socioeconomics

It is one of Goldbelt's priorities to encourage economic development and job creation in Juneau, Alaska. Goldbelt believes that the Proposed Action (POA 1) in the DSEIS is an essential part of the Juneau and State economy. POA 1 will preserve 359 direct jobs and 321 indirect jobs in Juneau. An additional 180 indirect jobs will be retained elsewhere in Alaska. Many of these jobs will be in Southeast.

If the USFS selects the No Action Alternative, the mine will close, and workers will have trouble finding a comparable job. Mining is the highest paid industry in Juneau with average monthly wages being more than double the Juneau average. The importance of this fact is not stressed enough in the DSEIS. And while also important, the visitor industry is the largest private sector industry in Juneau but these jobs tend to be more seasonal with lower annual wages.

Environmental Justice

Overall Comment:

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires each federal agency to make the achievement of environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations. The Order further stipulates that the agencies conduct their programs and activities in a manner that does not have the effect of excluding persons from participating in, denying persons the

benefits of, or subjecting persons to discrimination under such programs, policies, and activities because of their race, color, or national origin.

Specific Comment:

Goldbelt agrees with the USFS statements in the DSEIS that Kensington Mine's Plan of Operations Amendment 1 does not negatively impact minority or low-income populations and should be approved as soon as possible. The USFS's conclusion in this matter is based more on the population in the Juneau area not meeting the definitions of a "minority population" and "low-income population." This analysis notwithstanding, the USFS should still acknowledge the positive economic and social aspects Coeur has had and continues to have on the minority and low-income populations. Case in point are the relationships that exist between Coeur and Goldbelt. Goldbelt shareholders are employed, directly and indirectly, at the Kensington Mine and these job opportunities provide our shareholders a living wage in a region with extraordinarily high living expenses. In addition to job opportunities, Goldbelt's shareholders benefit from Goldbelt's business relationship with Coeur. Goldbelt provides security and transportation services to Coeur. Revenue from these operations is shared through dividends paid to Goldbelt's shareholders.

Chapter 3.9.3.2 No Action Alternative

The DSEIS makes factual mention of lost jobs and income not having a disproportionate effect on minority or low-income population. While not inaccurate given the USFS determined the Juneau area does not meet the definitions of a "minority population" and "low-income population," the DSEIS fails to recognize the substantial negative affects the selection of the No Action Alternatives will still, nonetheless inflict upon minority populations, which Goldbelt shareholders represent. The final SEIS should include information and conclusory statements that substantial negative impacts will occur on minority and low-income populations under the No Action Alternative. Furthermore, this must be given serious weight when developing the Record of Decision. The No Action Alternative must not be selected by the USFS.

Chapter 3.9.3.3 Proposed Action and Action Alternatives

Again, in the DSEIS, the USFS makes factual mention of lost jobs and income not having a disproportionate effect on minority or low-income population. While not inaccurate given the USFS determined the Juneau area does not meet the definitions of a "minority population" and "low-income population," the DSEIS fails to recognize the substantial negative affects the selection of the No Action Alternatives will still nonetheless inflict upon minority populations, which Goldbelt shareholders represent.

Chapter 3.11 Scenery

Again, as providers of water-borne transportation services to Coeur, Goldbelt offers our perspective on this section of the DSEIS and requests the USFS to revise its Analysis Methods with an acknowledgment towards the area's climatic conditions and the seasonal nature of vessel

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traffic on Lynn Canal and Berner's Bay and by extension the environmental consequences, which are currently overstated for the Proposed Action.

The USFS analysis should account for the degree to which viewing opportunities are available. Clearly the climatic conditions of a temperate rainforest do substantially limit viewing opportunities in that low hanging clouds, fog, rain, and/or snow frequently hamper visibility of the landscape. The same is true for low light conditions, which is present when most cruise ships pass through Lynn Canal. Furthermore, the USFS analysis should acknowledge the frequency of the traveling public. For many months of the year, there are no cruise ship passengers, and the current level of ferry traffic is lower than has been in the past. By not acknowledging these factors, the USFS overstates the impacts of POA 1, specifically the facilities on the Comet side of the mine and the Pipeline Road WRS.

In Closing

Coeur's successful and environmentally responsible operational history at the mine, and Juneau and Southeast Alaska's need to continue receiving the substantial positive economic impacts Coeur brings to the region, and mitigation measures (those that will be ongoing as well as the new fish habitat enhancements and long-term inundation of graphitic phyllite at the Tailings Treatment Facility) all contribute to the merits of the Proposed Action and the fact that the Draft SEIS's analysis of the Proposed Action has not identified any significant adverse effects on the human environment nor incompatibility with the Tongass National Forest's Forest Plan. The lack of significant adverse effects and consistency with the Forest Plan are appropriate conclusions and we encourage the USFS to work with urgency to promptly finalize the SEIS and issue a ROD for the Proposed Action.

Thank you for this opportunity to comment. We would be happy to virtually meet with the USACE to discuss these comments and provide further detail if so needed. Please contact me at McHugh.Pierre@Goldbelt.com or 907) 321-2179.

Sincerely,



McHugh Pierre
President & CEO
Goldbelt, Incorporated