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Comments:

The Southeast Alaska Land Trust has reviewed your letter of October 8, 2020 (File Code 1950; 2810), inviting input on your evaluation of Hecla Greens Creek Mining Company's proposed expansion of their Tailings Disposal Facility on Admiralty Island. We understand that the Forest Service will prepare a supplemental Environmental Impact Statement (SEIS) to analyze effects of the proposed action and various alternatives that would disturb between 19.4 and 33.7 acres, depending on the final selected design.

Your letter indicates that the U.S. Army Corps of Engineers (Corps) will be a cooperating agency due to the need for a permit, under Section 404 of the Clean Water Act, for impacts to waters of the U.S. We recognize that the Corps has responsibility and authority for determining what mitigation measures will be required for any permitted project.

Because the Corps may use the analyses in the SEIS during their evaluation of any permit application for this project, we recommend that the SEIS evaluate potential impacts to waters of the U.S., practicable avoidance and minimization efforts, and opportunities for compensatory mitigation for unavoidable impacts.

We specifically request that the SEIS acknowledge the availability of practicable options for compensatory mitigation in Southeast Alaska. There are four providers that offer mitigation credits for sale to permittees, to offset impacts to aquatic resources in the region.

The Southeast Alaska Land Trust and the Southeast Alaska Mitigation Fund both offer mitigation credits through their approved In-Lieu Fee programs. Trillium Mitigation Bank and Natuhini Bay Mitigation Bank offer credits through their mitigation banking programs. The proposed Tailings Disposal Facility expansion is within the service area for all four of these providers.

Thank you for the opportunity to provide these comments.