Data Submitted (UTC 11): 12/17/2020 9:00:00 AM
First name: Bonnie
Last name: Demerjian
Organization:
Title:
Comments: Dear Forest Supervisor Earl Stewart and Minerals Program Manager Matthew Reece,

Living as I do near the mouth of the Stikine River and the mines upriver and as one who depends on fish for sustenance, I am writing out of concern about the proposed expansion of Kensington Mine and the increased risk of dam failure it poses to Berners Bay. I ask that the Forest Service select the dry stack tailings alternative in the draft supplemental Environmental Impact Statement (EIS), which is the industry-recommended best practice and safest option. Living as I do near the mouth of the Stikine River and the mines upriver and as one who depends on fish for sustenance

Berners Bay, directly downstream from the mine, is heavily used by many Southeast Alaskans for recreation, sport and subsistence hunting and fishing, as well as cultural practices. It provides irreplaceable spawning and rearing grounds for herring and eulachon, feeding opportunities for marine mammals and migratory birds, and intact habitat for mountain goats, brown bear, and moose. Berners Bay was designated an Aquatic Resource of National Importance by the EPA in the 1990s because it is considered one of the most valuable public areas in the country. Any expansion, continued operation, and legacy of Kensington Mine will impact Alaskan communities and the Berners Bay ecosystem for many generations into the future.

Because of the immense importance of this special area and the increased threat from the proposed expansion, I urge the Forest Service to select the dry stack alternative and incorporate the most up-to-date knowledge on tailings storage technology and climate change. The current supplemental EIS for the Kensington Mine was conducted over 16 years ago and relies on field data collected prior to that. A great deal has changed about our understanding of tailings storage technologies and failures since then, as has our knowledge about climate change, which we now know has increased the risk of failure by modifying landscapes, increasing precipitation amounts, and altering water regimes throughout the Tongass National Forest and the world.

The proposed expansion adds the same amount of tailings authorized in 2004, doubling the amount dumped into Lower Slate Lake, now called a "tailings treatment facility." This expansion would require raising the tailings dam for a fourth time, bringing the new dam height to 124 feet [mdash] taller than Juneau's tallest building, the 9-story, 110-foot Federal Building. The dam technology used by the mine is similar to the tailings dam that failed at the Mt. Polley Mine in 2014, the worst mine disaster in Canadian history. After the Mt. Polley failure, the Canadian government convened an Expert Panel to avoid similar failures in the future. The Expert Panel concluded that submerged tailings technology needs to be discontinued because of the high potential for dam failures and to prioritize public safety over profit. Any approved expansion plan must anticipate tailings dam failures and require alternatives.

The draft supplemental EIS does not take into account any considerations for climate change. Successful long-term closure and the forever-maintenance of the site require accurate information to keep the water cover over the tailings and prevent uncontrolled releases or outright dam failure. Yet, it's clear that predictions are no longer reliable because of the increasing rate at which our climate is changing. This uncertainty requires us to use precaution when anticipating and planning for future climate scenarios. The Kensington mine plan must be re-evaluated in consideration of these many changes and employ the precautionary principle, in order to keep communities and ecosystems safe from adverse impacts.

The mission statement of the U.S. Forest Service is: "To sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations." I trust that you will take

action to live up to that mission and ensure that mining activities in the Tongass National Forest do not compromise the health of Berners Bay, in turn putting humans, the economy, and the environment at risk for gold.

Thank you for reviewing my concerns and considering my request for a dry stack alternative before approving any expansion proposal for the Kensington Mine.

Sincerely,
Bonnie Demerjian
t 99929