Data Submitted (UTC 11): 12/28/2020 9:00:00 AM
First name: Iris
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Organization:
Title:
Comments: Dear Forest Supervisor Earl Stewart and Minerals Program Manager Matthew Reece,

I am a longtime Juneau resident. I am privileged and honored to live and work in Southeast Alaska, the ancestral and current homeland of the Tlingit, Haida, and Tsimshian peoples.

I am writing out of concern about the proposed expansion of Kensington Mine and the risks[mdash]chronic and catastrophic[mdash]that it poses to Berners Bay. I ask that the Forest Service not approve the mine expansion but instead seek to close and clean up the mine, with the goal permanently removing the risks that the current mine poses to Berners Bay. In the alternative, I ask the Forest Service to include and thoroughly consider a dry stack tailings alternative in the draft supplemental EIS. The dry stack tailings alternative is the only responsible and safe option to continue mine operations, and it is also the industry-recommended best practice. If the proponent deemed the dry stack alternative economically unfeasible, then the mine as a whole should not be considered feasible. Any consideration of the expansion needs to re-analyze the mine's current and future safety in light of most current information about wet tailings dams. Any approval of continued operation should require assurances that mine proponent is able, financially and in practice, to clean-up a worst case scenario tailings dam failure with no net loss in ecological function or values of Berners Bay.

Berners Bay is culturally significant and heavily used by many Southeast Alaskans for recreation, hunting and fishing, and cultural practices. I have personally treasured Berners Bay annually since 1990. My family uses Berners Bay several times a year for kayaking, camping, photographing, birding, wildlife viewing, wild food harvesting, and solitude. This year alone, we made three trips to the bay. We value Berners Bay most for its immense and irreplaceable cultural and ecological values, including spawning and rearing grounds for salmon, herring, and eulachon, feeding areas for marine mammals and resident and migratory birds, and intact habitats for mountain goats, brown bear, wolves, and moose.

With current declines in Southeast Alaska's salmon, eulachon, and herring runs, it is inconceivable to me that we have allowed the Kensington Mine to risk the productive aquatic habitats of Berners Bay. The 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 threaten the region's people and the Berners Bay ecosystem now and forever into the future.

Because of the immense importance of this area and the increased threat from the proposed expansion, I urge the Forest Service to re-evaluate the mine's ability to operate in an environmentally safe manner. The current 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 increase the risk of dam failure by modifying landscapes, increasing precipitation, and altering water regimes.

The proposed expansion adds the same amount of tailings that was authorized in 2004, doubling the amount of tailings dumped into the Lower Slate Lake, previously a fish-bearing lake that is 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. Would we have ever approved this mine if the initial proposal was for a mine this big? How is such a dam going to withstand a big earthquake or the stresses of time?

The dam technology used by the mine is similar to the tailings dam that failed down the coast 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. Catastrophic dam failure is an unacceptable risk anywhere, let alone in an ecologically rich place like Berners Bay.

The draft supplemental EIS does not consider climate change impacts on mine safety, including tailings dam integrity, over time. 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 an 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.

It is unacceptable to let the mine expand its already forever-toxic legacy in Berners Bay. When gold is gone and company left, what are the assurances that water quality in Berners Bay will not be affected, either from chronic or catastrophic events? Who will foot the bill, including for lost ecological services, cultural values, and recreational opportunities, if tailings dam bursts and reaches Berners Bay? What assurances do we have from Coeur Alaska that it will be around to maintain facilities, stop chronic leakage, or to clean up a dam failure 50 or 100 years from today? How about 200?

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 and any other ecologically and culturally significant watersheds. You should not be in the business of putting humans, the economy, and the environment at risk for gold. Berners Bay's salmon, hooligan, and the ecosystems and people they support are the perpetual gold mine that you, we all, should support and protect.

It is time to start prioritizing ecological and public safety over short-term private profits. It is time to say no to a business model that allows mining companies to externalize environmental and social costs. It is time to stop authorizing mining projects until they can be done without serious risks to the lands and waters that support us all. It is time to stop approving mine "creep" and incremental mine approvals. It is time to say no mines that will require perpetual water treatment, that is, treatment for all time. Mining, including approving Kensington's extension, should not be permitted if the true costs are passed onto future generations (of fish, birds, marine mammals, and people).

In summary, the current mine threatens my interests in Berners Bay and any expansion of the wet tailings storage and dam there poses an additional unacceptable risk to the Berners Bay ecosystem and users like me. In light of Mt Polley and the changing climate, I urge you to consider and thoroughly analyze alternatives that permanently eliminate the risks that submerged tailings technology poses on the ecological, cultural, and recreational values of Berners Bay.

Thank you for reviewing my comments.

Sincerely,

Iris Korhonen-Penn
Juneau, AK