

Data Submitted (UTC 11): 5/4/2023 8:00:00 AM

First name: John

Last name: Gebhards

Organization:

Title:

Comments: Dear Forest Supervisor Sherman,

I have a degree in Chemical Engineering from the Missouri School of Mines and Metallurgy and have traveled and paddled in SE Alaska. I am writing to oppose Alternatives C and D in the Greens Creek North Extension Project Draft Supplemental Environmental Impact Statement, and offer conditional support for Alternative B, the proposed Alternative. Greens Creek Mine is an important economic engine for Southeast Alaska, producing valuable silver, lead, and zinc. Congress has allowed the mine to operate in Admiralty Island National Monument under the specific condition that it does not cause irreparable harm.

The burden of proof in demonstrating that the Greens Creek Mine is not causing irreparable ecological harm is on the mining company itself; the Forest Service in turn is required to provide careful and objective regulatory oversight and, if appropriate, approval, regarding how the mine is run, how pollution is monitored, and how potential environmental contamination events are evaluated and addressed.

I support Alternative B if the following conditions are met:

[mdash] Metals-laden contaminated tailings dust has been blowing from the tailings disposal area for over 30 years. Mitigation to minimize air borne dust containing heavy metals should be applied to avoid this toxic material from spreading into Green Creek and others waters. The Forest Service should require a fugitive dust ecological risk assessment to clearly identify the impacts of these contaminants, including lead, zinc, mercury, cadmium, and others, on the environment, and implement a fugitive dust monitoring and mitigation plan that prevents the contaminated tailings from continuing to spread to the surrounding land and waters.

[mdash] As part of the environmental risk assessment, additional studies and monitoring of the plants, lichens, soils, sediment, water, and wildlife near the tailings facility and in Hawk Inlet need to be implemented. The original 1981 environmental baseline studies should also be replicated. These studies characterized the pre-production (pre-mine) environment, including, among other things, sampling species population and diversity in Hawk Inlet. While some methodologies and detection limits may have changed since the baseline studies were conducted, every effort should still be made to replicate those studies so that changes in the environment at Hawk Inlet can be better understood.

[mdash] A mixing zone in Hawk Inlet is unnecessary. The mixing zone, with its zones of acute and chronic toxicity, is not necessary to mine operations. The Environmental Protection Agency should not promote "dilution as the solution" via "flow augmentation," or addition of water prior to discharge, as a supplement to treatment. The Forest Service should require any mine effluent leaving a project on the Monument to meet Alaska Water Quality Standards.

[mdash] Section 505(4)(B) of the Alaska National Interest Lands Conservation Act requires the Forest Service to modify any mining plan to eliminate or mitigate activities harmful to fish habitat. A simple and inexpensive plan to add salt water can be developed that would ensure that fish habitat at the end of the pipe is protected.

Until these issues are addressed, expansion of the tailings facility is not appropriate. If these issues are addressed, Alternative B has the least negative impact on the environment and presents the lowest risk of the action alternatives, and as such is my preference.

Thank you for your consideration of my comments.

Sincerely,

John Gebhards