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Matthew Reece

Juneau Ranger District

Attention: Greens Creek North Extension Project #57306

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Deer Mr. Reece:

First, I'm writing to voice my strong opposition to Alternatives C and D.

After attending the USFS in-person Hawk Inlet Open House, I am concerned with the Forest Service's policy enforcing section 503(i) of the Alaska National Interest Lands Conservation Act (ANILCA). I also encourage Forest Service staff to be better prepared to speak with the public about Region 10's interpretation of this policy. More can be found here: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3809319.pdf and in the Forest Service Manual: 2800 - minerals and geology: R-10 2800-2003-1. These resources could have been made available at that meeting.

In a region where community members depend heavily on a healthy environment for traditional foods to sustain their traditional way of life, I'm greatly concerned that the USFS has catered so heavily to mining interests in their interpretations of the policy.

This is why I'd like to request the Forest Service extend the public comment period for Greens Creek North Extension Project #57306 DSEIS and hold public meetings to clarify Region 10's interpretation of ANILCA 503(i) and how that relates to this project, specifically. This would also open public and legal input/feedback into the Forest Service's current policy, which was established nearly 20 years ago.

Recognizing the economic importance of The Greens Creek Mine and the least negative impact on the environment, Alternative B presents the lowest risk of the action alternatives. If Alternative B were to be selected, I'd like to see some improvements:

- I was disappointed with the complete dismissal of Friends of Admiralty's research by the State of Alaska, The USFS, and Mine. Before making a decision on the Greens Creek North Extension Project #57306, the Forest Service, Mine, and/or State needs to replicate the Hawk Inlet Study and incorporate those findings into the DSEIS analysis and process. Additionally, this would provide more time for the environmental risk assessment to include additional studies and monitoring of the plants, lichens, soils, sediment, water, and wildlife near the tailings facility and in Hawk Inlet that need to be implemented and analyzed.

- Considering recent impacts to Tributary Creek and the Fugitive Dust project analysis (performed by ICF) and presented at the USFS in-person Hawk Inlet Open House. 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.

- Section 505(4)(B) of the ANILCA 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 to ensure that the fish habitat at the end of the pipe is protected.

- 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 allows "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.

- The USFS needs to stop dragging its feet, It's been 42 years, and it's time for the 1981 environmental baseline studies to 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.

Greens Creek's recent impacts on Tributary Creek concern me, as the creek falls within the boundaries of the National Monument. As I understand it, these impacts are potentially related to fugitive dust and the approved tailings expansion permit from 2013. The mine clearly hasn't shown its due diligence to mitigate impacts from the last extension project. Therefore, the USFS should proceed cautiously and require more vigorous mitigation efforts BEFORE approving yet another extension project.

If the Forest Service fails to deliver more time for public input and research, again, Alternative B has the least negative impact on the environment and presents the lowest risk of the action alternatives, and reluctantly would be my preference.

Thank you for your time and consideration,

Dan Cannon
Juneau, AK