

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

First name: Vicky

Last name: Hoover

Organization:

Title:

Comments: Dear Forest Supervisor Sherman,

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. I have visited Admiralty Island and the village of Angoon; I have heard the concerns expressed by Angoon villagers about how the mine waste is befouling their environment and how they do not want to keep on giving in to the mine's never-ending demands for more space, more storage, space, more tailings space. Greens Creek never seems to stop wanting MORE. I oppose giving the mine ANY more expansion of tailings space, although I could support Alternative B if certain conditions are met -- FIRST -- fugitive dust from contaminated mine tailings has been a big issue and problem for a long time, and compliance with the Forest Service's near-zero fugitive dust detection requirement must be assured AND a long-term ongoing dust-monitoring plan must be in place. SECOND --the ANILCA requirement of "no irreparable" harm is difficult to evaluate. and no expansion at the mine should be approved until there are comprehensive, adequate new baseline studies.

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.

[mdash] The mixing zone in Hawk Inlet has caused many water quality problems and is basically 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. Changes in the environment at Hawk Inlet need to be better understood.

I support Alternative B if and only if the above conditions are met:.

Also note, 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 I can support it -- although no expansion would be my preference.

Thank you for your consideration of my comments.

Sincerely,

Vicky Hoover