

Data Submitted (UTC 11): 5/19/2023 8:00:00 AM

First name: Cyril

Last name: Zuboff

Organization:

Title:

Comments: [External Email]Greens Creek North Extension Project Comment

[External Email]

If this message comes from an unexpected sender or references a vague/unexpected topic;

Use caution before clicking links or opening attachments.

Please send any concerns or suspicious messages to: [Spam.Abuse@usda.gov](mailto:Spam.Abuse@usda.gov)

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.

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:

- It is time to bring an end to the contaminated fugitive dust problem. Metals-laden contaminated tailings dust has been blowing from the tailings disposal area for over 30 years. Elevated metals levels have been found in waters near the tailings facility, including lead levels that caused Tributary Creek to recently be added to The Forest Service should require a fugitive dust ecological risk assessment similar to the one prepared in 2005 for the Red Dog Mine to clearly identify the risks from these contaminants, including lead, zinc, mercury, cadmium, and others, on environmental and human receptors, and implement a fugitive dust monitoring and mitigation plan that prevents the contaminated tailings from continuing to spread to the surrounding land and waters. The fugitive dust risk assessment and monitoring and mitigation plan should be developed with public input prior to allowing any expansion of the tailings facility.

- 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. In particular, the areas near to, and downwind of the tailings facility should be more thoroughly evaluated. However, given that nearly 75% of the tailings are in the PM10 size range, the longer-distance transport and fate of contaminants from the tailings dust needs to be understood - this may, for instance, be the source of the mine-related lead showing up in the butter clam shell study recently completed by Friends of Admiralty Island. 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.

- 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.

- 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. The responsibility to require modification of the mine's operating plan in order to eliminate activities that are harmful to fish and fish habitat under ANILCA is a separate responsibility falling on the Forest Service than that of the State Agencies who have the authority to permit a toxic mixing zone under the Clean Water Act. The Forest Service should require the fish habitat at the discharge point to be protected from mine effluent pollution that does not meet Alaska water quality standards. All essential fish habitat in Hawk Inlet should be protected from mine-related water pollution.

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,

Cyril Zuboff