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

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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. 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 mine has stated they will do what is regulatorily required but they have not taken additional essential steps to protect the Monument. The Forest Service must provide careful and objective regulatory oversight and increase the environmental protections of the Monument and the aquatic waters of this region.

I can 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. Implement a fugitive dust monitoring and mitigation plan that prevents the contaminated tailings from continuing to spread to the surrounding land and waters. A fugitive dust risk assessment and monitoring and mitigation plan should be developed with public input prior to allowing any expansion of the tailings facility.

- 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. Longer-distance transport and fate of contaminants from the tailings dust needs to be understood.

- 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 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 prior to discharge can be developed that would ensure that fish habitat at the end of the pipe is protected. 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.

Sincerely,

Jim Rehfeldt