

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

First name: WANDA

Last name: CULP

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 write here to oppose DEIS Alternatives C and D in the N. Greens Creek Extension Project, after realizing the unrealities of Alternative A, I offer cautious and conditional support for Alternative B. Yes, Greens Creek Mine is an important economic engine for Southeast Alaska, producing valuable silver, lead, and zinc, however, there are emerging conditions requiring transition out of mining on reserved and protected public lands.

Congress allows the mine to operate in Admiralty Island National Monument, national public lands, 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 U.S. Forest Service in turn is required to provide careful and objective regulatory oversight through approval protocols regarding how the mine is run, how pollution is to be monitored, how potential and actual environmental contamination events are appropriately evaluated and addressed.

I support Alternative B should the following conditions be met:

- End the contaminated fugitive dust problem from metals-laden contaminated tailings dust blowing from Greens Creek tailings disposal area for over 30 years past. Elevated metals levels have been found in waters near the facility, including lead levels at Tributary Creek that must require a fugitive dust ecological risk assessment similar to the one prepared in 2005 for the Red Dog Mine. Consistent assessments for risk factors from these contaminants must be data clarified and identified, including lead, zinc, mercury, cadmium, and all others. Risks to the environment, humans, migratory birds, all dependent on healthy ecosystems must weigh in during today's global illnesses on ground, air, and in the waters. Now is the time to seriously implement fugitive dust monitoring and mitigation plans that prevent the contaminated tailings from continuing its spread to the surrounding land and waters via the air. The fugitive dust risk assessment, monitoring and mitigation plan must provide public input prior to allowing any expansion to the tailings facility.

-Updated studies and monitoring of the plants, lichens, soils, sediment, water, and wildlife near the tailings facility in Hawk Inlet need to be a part of the plan, in particular, the areas near to, and downwind of the facility must be scientifically evaluated in order to be thorough. Nearly 75% of the tailings are in the PM10 size range, the longer-distance transport and fate of contaminants from such tailings dust must be publicly understood. The questionable source of mine-related lead showing up in the recent butter clam shell study completed by Friends of Admiralty Island must not be ignored and must include the original and purposeful 1981 environmental baseline studies. These studies characterized the pre-production (pre-mine) environment, including, sampling wildlife species population and the ecological diversity of 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 enabling changes in the environment at Hawk Inlet can be clearly understood.

- A mixing zone in Hawk Inlet is unnecessary. The mixing zone, with its zones of acute and chronic toxicity, is not a necessity 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 must require any mine effluent leaving a project on the U.S publicly owned Monument to meet federal EPA and 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, eliminate it, or require mitigation activities that will harm fish habitat, especially their birthing environments. Mining primacy is a state of Alaska priority on America's public lands under ANILCA across all of Alaska. A simple and inexpensive plan developed by using the abundant saltwater as an alternative resource would ensure that fish habitat at the exit end of the pipe is protected. The EPA laws hold overall federal agency authority in modification to the mine's operating plan, by requiring focus to eliminate activities that are harmful to fish habitat under ANILCA, a completely separate responsibility of the Forest Service. And certainly not of State Agencies who generate special permit authority for a toxic mixing zone under EPA's Clean Water Act. The Forest Service must require that the fish habitat at the discharge point be protected from mine effluent pollution that does not meet U.S. EPA Alaska water quality standards. All essential fish habitat in Hawk Inlet must be protected from mine-related water pollution during today's global warming crisis when habitat protection involves direct human action remedies over further pre-authorized exploitation. Making official space for incorporating local traditional ecological knowledge is a must to regaining and maintaining the balance of nature on public lands.

If these issues are addressed, Alternative B will indeed have the least negative impacts on the ecosystem and presents the lowest risks when compared to the other three action alternatives and is my preference.

Thank you for serious consideration of my comments.

Sincerely,

WANDA CULP