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First name: Sam

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Organization:

Title:

Comments: To: USFS

RE: Hecla Greens Creek Mining Company Surface Exploration 2024-2028 #64682

Public Comment Submission

October 4, 2023

I am a fly fishing and wildlife viewing guide that operates tours throughout the Tongass National Forest for Bear Creek Outfitters (BCO). The tours I guide, are operated under a special use permit with the USFS. I access our tour locations exclusively via floatplane.

The lower stretches of Greens Creek (approximately the last mile), the estuary, and salt water adjacent to the mouth of the creek provide an important destination for my tours due to the protection of hawk inlet from most marine winds (for aviation safety), and the valuable wilderness experience the creek provides to our guests. As such, the activity of the Greens Creek Mine has an impact on the wilderness experience I seek to provide to my guests.

I have reviewed the the Plan of Operations dated March 13, 2023 and have the following comments:

1) There is no mention of salmon anywhere in the plan. While section 5.6 addresses aquatic resources, there is no mention on how the increased drilling activity and locations could impact important salmon habitat. Any development plans involving salmon habitat needs to address how the specific plan could impact the fish, and what specific mitigation plans are in place.

2) There are insufficient limitations on helicopter activity. As the plan states, no new roads will be built as part of the increased development. Instead the work will be supported by helicopters to transport both personnel and equipment. While aircraft activity is very common in the area, helicopters were frequently observed flying directly over the creek at low elevations, impacting wildlife and the overall wilderness experience. As a result, a standard flight path, and minimum elevations should be established to limit the impact of helicopter operation in the wilderness area.