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Mr. Matthew Reece
Minerals Program Manager
Tongass National Forest
8510 Mendenhall Loop Rd
Juneau, AK 99801

Submitted electronically to U.S. Forest Service: <https://www.fs.usda.gov/project/?project=55533>

Subject: Draft SEIS for Kensington Mine Plan of Operation Amendment (POA 1)

Dear Mr. Reece,

The Alaska Miners Association (AMA) appreciates the opportunity to submit comments on the U.S. Forest Service's (USFS) Draft Supplemental Environmental Impact Statement (DSEIS) for the Kensington Mine Plan of Operations Amendment 1 (POA 1) submitted by Coeur Alaska, Inc. (Coeur Alaska).

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. We are composed of more than 1,400 members that come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Our members include individual prospectors, geologists, engineers, suction dredge miners, small family mines, junior mining companies, major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.

Our specific comments on the DSEIS are as follows:

Probability for Tailings Dam Failures

Presenting information of other tailings dams in the world in the DSEIS is not relevant to the proposed project. The proposed water dam at Kensington will be designed, constructed, and operated differently than several of the dams presented as examples in the DSEIS; subject to different regulatory requirements; and use modern techniques, best management practices, and engineering tools. Furthermore, the examples presented in the DSEIS are at various stages of facility life, constructed using different dam construction techniques, and/or are in areas with different climates. The Final SEIS's focus should be put on the fact that POA 1 Stage 4 dam will be designed, constructed, and operated in accordance with the most stringent U.S. regulations and international standards. Site-specific data will be used to assess the TTF dam stability supported by engineering studies such as a seismic analysis for the site.

Filter Tailing Facility (FTF) Alternative

This alternative would represent an operational change for Coeur Alaska that if selected by the USFS will result in additional costs, lower efficiency, and significant additional construction and operational

risk relative to the Proposed Action Alternative. Although an FTF has worked at Greens Creek, there are concerns about the feasibility and safety of this alternative at Kensington; primarily due to the higher levels of precipitation at Kensington. The FTF will likely also expose a known source of graphitic phyllite material, which produces acid rock drainage, increasing environmental risks and requiring additional measures to properly contain and store the GP material.

If the selection of this alternative is made by the USFS it will be contrary to a goal of the USFS's 2016 Forest Plan's Minerals Overlay Land Use Designation, which is to encourage mining and processing of locatable minerals in areas with the highest potential for minerals development.

TTF Closure with Reduced Water Alternative

The TTF Closure with Reduced Water Alternative should not be select because it lacks environmental benefits, there are concerns over worker safety during reclamation activities, and over to concerns with acid rock drainage.

With this alternative, at closure the amount of aquatic habitat would be greatly reduced compared to POA 1, and the resulting aquatic habitat would be small, shallow, and unlikely to function as a healthy lake. It will also not provide Dolly Varden spawning habitat. Additionally, POA 1's fish habitat improvements are not included in this option as the water levels will not be high enough to support these enhancement activities.

From a work safety standpoint, this alternative would require heavy equipment operators to travel over wetted tailings that could result in a unstable surface in order to conduct reclamation activities.

Finally, the existing graphitic phyllite near the dam will not be covered in water and create a long-term risk requiring active management. Additionally, this alternative will need a nearby borrow site to produce growth media and the nearby areas contain GP which will create a new situation where GP will need to be managed.

Johnson Creek Waste Rock Storage (WRS) Alternative

This alternative would be a new stand-alone WRS located almost entirely on National Forest Service land, requiring construction of an additional access road. Use of this proposed WRS site would present new and serious safety concerns related to increased traffic and haul distance required to access the site. The fact that the access road and a portion of the Johnson Creek WRS would be located within an active avalanche area raises additional safety concerns and may result in restricted access to the WRS during the winter and spring.

Chapter 2.5 Alternatives Considered by Eliminated from Detailed Study

The USFS and the Cooperative Agencies provide a logical and thoughtful approach in their consideration of the alternatives there were eliminated from detailed study. We support these conclusions and discourage the USFS and Cooperating Agencies from providing serious consideration to changing any these decisions.

Chapter 3.3.2.1 Water Quality and Monitoring

We question the need and the value for the extensive space the USFS dedicated to listing water quality exceedances. From a public disclosure standpoint, this information is already in the public sphere.

From an environmental consequence's standpoint, impacts were minimal and of a short duration as operational and water treatment remedies were made. From a consistency standpoint, we suggest the information be replaced with a summary just as the USFS accomplished, in the same section, with the descriptions of the chemical and fuels spills that had been reported to the Alaska Department of Environmental Conservation (ADEC).

Chapter 3.5 Fish and Fish Habitat; subsection 3.5.3 Environmental Consequences.

There is a substantial environmental benefit the Proposed Action (POA 1) has over the No Action Alternative and the two other tailings storage alternatives when it comes to long-term, reliable mitigation (avoidance) of impacts to fish from the accidental release of acid rock drainage (ARD). This important protective measure is POA 1's water level at the Stage 4 TTF which will cover the graphitic phyllite (GP) with water and prohibit the GP from oxidizing and by extension, not allow the formation of ARD. The Proposed Action's approach to GP management is the most effective way to protect fish and fish habitat. To account of this in the USFS's Final SEIS, additional discussion should be included that compares the environmental consequences to fish and fish habitat related to the GP that was exposed during early dam construction at the TTF.

Conclusion

The Draft SEIS's analysis of the Proposed Action clearly and reasonably demonstrates Coeur Alaska's Life of Mine Extension will not have significant adverse effects on the human environment. Additionally, the Draft SEIS makes clear the Proposed Action is consistent with the Tongass National Forest's Forest Plan. The lack of significant adverse effects and consistency with the Forest Plan are appropriate conclusions for the USFS to make based on the Coeur Alaska's successful and environmentally responsible operational history at the mine, the quality of the resources at the site, Juneau and Southeast Alaska's need to continue receiving the substantial positive economic impacts Coeur Alaska brings to the region, and the mitigation measures, those that will be on-going as well as the new fish habitat enhancements and long term inundation of graphitic phyllite at the Tailings Treatment Facility. For all these reasons, we urge the USFS to promptly finalize the SEIS and issue a Record of Decision for the Proposed Action.

Thank you for this opportunity to comment. If you have a need to discuss our comments with us, we will be happy to do so.

Sincerely,



Deantha Skibinski
Executive Director