

LAW OFFICES

**BIRCH HORTON BITTNER & CHEROT**

1155 CONNECTICUT AVENUE, N.W. • SUITE 1200 • WASHINGTON, D.C. 20036 • TELEPHONE (202) 659-5800 • FACSIMILE (202) 659-1027

A PROFESSIONAL CORPORATION

HAL R. HORTON (1944 - 1998)

JENNIFER C. ALEXANDER  
RONALD G. BIRCH\*\*  
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CARISSA D. SIEBENECK\*  
AARON D. SPERBECK  
HOLLY C. WELLS

OF COUNSEL:  
WILLIAM P. HORN\*  
TIMOTHY J. PETUMENOS

1127 WEST SEVENTH AVENUE  
ANCHORAGE, ALASKA 99501-3399  
(907) 276-1550  
FACSIMILE (907) 276-3680

\*\* D.C. AND ALASKA BAR  
† MARYLAND BAR  
◊ VIRGINIA BAR  
\* D.C. BAR  
ALL OTHERS ALASKA BAR

March 29, 2013

Mr. Don P. Kuhle  
Project Manager, Alaska District  
Regulatory Division  
U.S. Army Corps of Engineers  
P.O. Box 6898  
Joint Base Elmendorf Richardson, AK 99506-0898



RE: EIS Scoping Comments on Donlin Creek Gold Project

Dear Mr. Kuhle:

The following proposed Environmental Impact Statement (EIS) scoping comments regarding the Donlin Creek LLC mining project are submitted on behalf of the Alaska Professional Hunters Association (APHA). APHA supports conservation of Alaska's fish and wildlife resources and opportunities to engage in guided fishing and hunting consistent with fair chase standards. APHA wants to ensure that the project EIS properly considers the wide array of fish and wildlife, and related habitat, issues that will be impacted by construction and operation of the mining project.

**Natural Gas Pipeline Route**

APHA is primarily concerned about the routing of the proposed gas pipeline from miles 120 to 194. This area, on the west slope of the Alaska Range dropping to the Kuskokwim River has outstanding wildlife habitat, populations, and hunting opportunities. A number of APHA member guides provide high quality hunts throughout the area which will be impacted by this pipeline route as well as construction and operation of the line. The Alaska Department of Fish and Game classifies the area as Game Management Unit 19C and the agency manages the Unit's wildlife for highest quality trophy hunting. The EIS must examine carefully the impacts of the gas line on this important area including construction and operation (and associated access) of the line. Well managed guided sport hunting has provided sustainable, renewable economic benefits in this area for over 40 years and can continue to do so. Improper placement of the gas line and associated facilities (camps, gravel pits, airstrips, etc.) – to serve a mine with a 27 year projected life span – could terminate the sustainable benefits provided by the wildlife and hunting. That would be an unacceptable tradeoff.

Consultation with local guides and the people of Nikolai indicates that the proposed gas line route should be moved some miles to the west to avoid important tundra flats and upland

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habitats used by area wildlife and local subsistence users. In addition, a route closer to Nikolai, and McGrath, should make it easier for the villages to tap into the gas and reduce dependence on very expensive diesel fuel. This specific alternative alignment must be evaluated within the EIS for both environmental and potential village benefit reasons.

Realignment is also likely to minimize impacts on at least three guide camps. The Silvertip Camp which has operated along Khuchaynik Creek near the Windy Fork of the Kuskokwim for over thirty years. The Camp provides hunting guide and other visitor services as well as offering employment to local residents of nearby Nikolai. The present proposed route is proximate to the Camp and will have adverse visual effects on Camp visitors and clients. Beyond these visual effects, the proximity of the gas line and related activities will no doubt drive the wildlife out of the immediate area adversely impacting Silvertip's long established operation.

Another long established guide camp is near milepost 123 of the proposed pipeline. At this location, project documents indicate there will be a field camp, pipe storage yard, quarry, and water extraction site. Activity of this level near the guide camp will have serious adverse impacts on the guide operations and services.

Another APHA member maintains a long established camp on the Middle Fork River near Big River. Near this camp, the project proposes another construction camp, numerous pipe storage yards, large airstrip, and numerous gravel pits. This existing sustainable business is likely to suffer irreversible harm if the gas line project proceeds as presently proposed. APHA insists that these kinds of impacts must be assessed thoroughly in the EIS and pipeline modifications, and other mitigation measures, be specifically considered.

The proposed pipeline route also goes through Rainy Pass the site of still another hunting lodge operation. There the project proposes an airstrip and camp too. The proximity of this activity during an actual 3 to 4 year construction period would devastate the Rainy Pass Lodge business. The EIS should specifically consider alternative routes that bypass Rainy Pass and consider use of an existing airstrip built by Kiska Metals near the Skwentna River instead of the facilities slated for Rainy Pass.

Time restrictions on construction activities are a mitigation measure that must also be examined in the EIS. It will be impossible to offer a quality hunt to a client if during the limited hunting season construction is in full swing. The helicopter flights, machine noise, and related commotion will not only drive away the game species but audibly and visually intrude on the hunters. If Donlin Creek persists on routing the gas line through this important wildlife area, mitigation measures, such as a cessation of construction during the hunting season, to minimize impacts on the guide operations (and subsistence users) who have used this area for year must be part of the mix.

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On a related note, construction and operation of the pipeline may facilitate greatly overland access with ATV's bringing more people into the area with concomitant impacts on wildlife and habitats. The combination of more airstrips in the area – needed to service the gas line – and a maintained right-of-way useable by ATV's will fundamentally alter the character of this area. These alterations include adverse impacts on wildlife populations, visual impacts, and changes on the historic, traditional lifestyles of local residents. These consequences of facilitating access to this region between miles 120 and 194 must be carefully scrutinized in the EIS.

### **Other Issues**

The EIS needs to address other issues at the minesite, the region around Donlin Creek, and along the 313 mile pipeline route.

Water is crucial concern. Where will the water used at the minesite come from? How much water will be necessary and what impact will diversion and use of this water have on local hydrology, stream flows, etc.? It is evident too that there will substantial volumes of wastewater produced by the mine. How will that water be handled and treated to ensure that it does not contaminate fish producing streams or nearby wetlands? What steps will be taken to ensure that contaminated waters will be properly treated and stored to prevent acid mine drainage and leaching of toxic heavy metals into nearby streams and rivers? And what are the risks to the areas fish and wildlife values if water treatment measures fail or simply don't work? All of these specific issues must be thoroughly examined in the EIS.

The cumulative impacts section of the EIS must also consider the development of additional reserves and other mineral deposits proximate to Donlin Creek. We know that construction and operation of the Trans-Alaska Pipeline and production facilities for the Prudhoe Bay oil field put in place infrastructure that spurred development of nearby oil fields that were not large enough by themselves to fund the infrastructure needed for production and delivery to market. The same phenomenon will likely occur here. If Donlin Creek is up and running, the presence of the in place infrastructure it paid for will likely make nearby smaller mineral deposits economically viable to develop. Development of a bona fide mining district, with multiple mines, in this now remote area must be reviewed and cumulative impacts assessed.

The 313 mile gas line features multiple stream crossings as well as the development and maintenance of multiple gravel pits along the route. Each crossing creates risks of significant impacts on fisheries including salmon and these impacts must be assessed. APHA is persuaded a sound assessment will be difficult because for many of these remote streams and rivers, there is no good data regarding flood events especially 100 year flood flows. To ensure that the crossings are properly engineered, and the risks to fisheries (and public safety) correctly assessed, this kind of flood data needs to be developed promptly.

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Multiple gravel pits proximate to streams and rivers are another concern. Pits situated hard on streams or in flood plains can wreak havoc on local hydrology. This in turn can adversely impact valuable fisheries. The necessity and specific location of each proposed gravel pit must be scrutinized within the EIS.

Thank you for the opportunity to provide these scoping comments on the proposed EIS for the proposed Donlin Creek mine project. Development of sound data and information regarding these issues, and careful examination of these impacts, is necessary to fulfill the requirements of the National Environmental Policy Act and provide to the public a factually and legally sufficient EIS.

Sincerely,



William P. Horn  
Counsel for Alaska Professional Hunters  
Association

cc: Sam Rohrer  
Joe Klutsch  
Bobby Fithian