

THE PERRINS' RAINY PASS LODGE, LLC

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907-248-7599 907-733-2714 lodge

Donlin Gold Project EIS

January 22, 2013

Attention: Don Kuhle

I am the owner of The Perrins' Rainy Pass Lodge, The oldest hunting lodge in Alaska located on Puntilla Lake that celebrated its 75th year in business in 2012, and was commemorated by the Alaska Legislature. Our business is a family business as all 5 of our sons and their families are involved in some way.

The Donlin Gold pipeline project as designed would change our business forever, and most likely have the potential to put us out of business.

I am not anti-mining and realize development is always ongoing. We have told the Donlin folks our concerns and they don't seem to make the needed alterations or concessions to help us get behind the project. We have asked them to consider three items from day one as they may concern us. I will outline those below later. The number one issue we currently have is that they plan to develop a 5000 foot runway in the worst place possible for our business. The plan is to put a runway and 200 man camp in the main valley (Ptarmigan) across Indian Creek from our lodge. This runway and camp would be between our lodge and our first camp 1/2 way lake. 1/2 way lake has been a camp for as long as I have been in the Rainy Pass Lodge area 1977 and was a camp for as long as the lodge has been a hunting lodge. This I can document, but it also carries a state LAS permit. The runway being in the main valley could never be put back to "as is" and would open this country to big planes and 4 wheeler activity as did the Farewell Bend lake strip. DC 3's access that strip and bring in as many as a dozen 4 wheelers and have done serious damage to the moose hunting there and as importantly the prior guiding business as well. Currently terrain and the lack of a large strip protect our business from this kind of impact. We have a 2000 to 2500 foot strip at Rainy Pass lodge and it is not conducive to 4 wheeler activity as it is still in timber line area and the Happy River and Indian Creek keep that kind of travel from moving up the valleys where we operate.

There is a mining camp strip that has been newly developed in the past few years, just 8 miles from us on the Skwentna river. It is operated by Kiska Metals, and is approximately

3500 feet long with design to be extended to 5000 feet. This strip could easily be extended to 5000 feet and it has been proposed by kiska and myself to do this to protect our business.

All the equipment is currently on site to do the work. This may not be the most desirable to Donlin creek, but it is a very viable option, and should be on the top of their list to accomodate and help us get on board with their project. A primary reason Kiska built this strip and moved their camp off our strip (Puntilla airport strip) is to keep our business intact, as they knew we did not want a 5000 foot strip at our lodge site.

We currently hold firm to not wanting a 5000 foot strip at the current puntilla strip. This would impact us considerably as well; However it would be hugely more desirable than any strip in the main ptarmigan valley. The proposed Donlin strip site is in open country above timberline and would never allow for the strip or scarring of the topography to be put back natural.

Wildlife and Habitat: The construction of a 5000 foot airstrip and a 200 man camp in the ptarmigan valley would create some serious impact on our wildlife habitat and most likely change their patterns and behavior for many years to come. We saw evidence of changes to bear patterns with just a 50 man camp at the Puntilla strip during the Kennicott and Kiska camp days. This is an area that encompasses moose/caribou/brown-grizzly bear/black bear wolf and wolverine as well as sheep habitat on the mountains on both sides and evidence of sheep crossing the valley in this area. You cannot build a strip and do the project in one or two years. There would be winter activity that disturbs the caribou in the valley floor. There would be a fall mobilization of equipment, a spring summer build and a fall set up, a build and then a next season break down of the camp and then re-furbish attempt. I see this as a 3-4 year impact. With a population and activity in this area we would have potential long term detriment to our wildlife movement and habitat. Our Caribou are just now coming back in this area and the lichen is a main food source for them on the valley floor. Our hunters and summer tourist count on this to book a wilderness adventure with us.

We told the Donlin creek folks that we had three major considerations if the project as originally proposed (completely underground pipeline) was to go through our area.

1. We must be advised well in advance as to a schedule, as we normally are booked with our hunters and summer tourist two years in advance. The project would not allow for hunting and tourism at the time they were doing summer/fall construction. Winter construction could be done with minimum adverse effect to our income. **If they were to build during our tourism and hunting season, we would expect to be compensated for the loss, and notified in time to differ that season(s).** We now believe that the summer/fall project build

may effect us for three seasons. As of late Donlin creek cannot promise anything as the project is not sanctioned by the parent company yet?? Therefore no discussions can be made. It is imperative that our business be protected in this.

2. **We would request the option of housing the workers at our lodge or in the vicinity, to eliminate a camp from being constructed elsewhere and further impacting us in a negative way.** For example a camp up the valley would take time to construct and de-mobe, therefore being an obstruction to business for a longer period of time in an area we hunt. At the lodge or existing strip at Puntilla, it would be less of an impact as it keeps all development in one basic area. This may also help with income to the lodge to defer our losses from normal business. AS our business is 85% repeat and referral, a loss of business for 2-3 years would most likely send our guests elsewhere and we would need to re-build that clientele. Our hunters don't just stop hunting because we can't accommodate them.
3. **We have also asked that they stage their needed valve stations strategically that they are not an additional eye sore to our wilderness guests.** This has been voiced numerous times, and the current plan shows one on the west side of Indian creek as opposed to near the lodge where there is other structures, including a web cam that was not desired. **We also requested the option to have natural gas to the lodge facility.** Kiska metals is also interested in natural gas, and agreed that a valve station near the lodge would be advantageous to them and us as the distance to them would be about the same. If the valve station was near our lodge it makes it possible to service us and the kiska proposed mine site, for natural gas, which could be a big advantage to us in future energy savings. Donlin seems to be discouraging this by telling us the cost would be huge for us to bleed down the line size etc.

We recently were contacted by Donlin and told there is a new route being considered that would eliminate the Rainy Pass creek and pass it self, and would go up three mile creek, and over a pass there. I have not seen that new proposed map yet, but either way it impacts our camps and traditional hunting grounds. We have several camps that will be impacted in the map we are familiar with. (Rainy pass lodge/1/2 way lake cabin/sheep lake camp and Rainy Pass Lake cabin. ? Moose creek cabin?) All of these camps are LAS permitted.

I realize the need for corporate secrecy, and as we have had many discussions with planners of the pipeline, the general feeling with all those I have talked with is that we are not getting the whole story. This causes distrust and concern as to how our businesses and family livelihood will survive. This concern may seem to be unfounded in the early development stages, but never the less it is real. I am emailing you from 30,000 feet as we

are currently traveling to shows and visiting clientele as this is the season for our bookings. Therefore we cannot attend the meeting in Anchorage today.

I would ask that this be read as a public concern during your public testimony tonight, and ask that it be officially entered into the EIS comments. I also would ask that we be kept informed by mail and email as all times. As we live at our lodge for 6 months or more of the year, email is always the best way to connect to us.

Thank-You

Sincerely,

Steve & Denise Perrins

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