

Wetzel, Kimberly

From: John and Marty Runkle <runkleinak@hotmail.com>
Sent: Friday, April 05, 2013 6:48 PM
To: roger.seavoy@alaska.gov; joshua pierce; Sharon Runkle; jacque ESAI; Gloria Janis; KERRY ALLES; City of Nikolai; kimball9999@yahoo.com; shane spearman; windyfork@hotmail.com; Kuhle, Don P POA; Dave Mushovi; MARK NORDMAN; BILL MERCHANT; bobbyfithian@gmail.com; Tom Shankster; teresa_lowrey@yahoo.com; Brooke adkinson; beverly.gregory@tananachiefs.org; NESTORNAOMI; rayc@mcgrathalaska.net; amy_craver@nps.gov; NICK Alexia; Kevin Whitworth; MTNT; andy coulter; andrew; Bob Kepp; william.mckinley@alaska.gov; allen_wink@hotmail.com; dan.winkelman@gmail.com; winkelman777@yahoo.com; BRETT; Kevin Keeler; Iron Dog; mayorlyman@gmail.com; daniel_esai@yahoo.com; dagregoire@windstream.net; dusty parker; Donald Petruska; DNR- guide; Brandon Esai; @alaska.gov; douglastony555@yahoo.com
Subject: FW: Donlin Creek Scoping EIS Needed Comments
Attachments: DSC02953_sm.jpg; Donlin Creek Mine Concerns.docx; Pretty Rock and the lakes.jpg

for those of you that were not on the first emailings. some of you already received. sorry for the duplicate.

Date: Sat, 23 Mar 2013 12:15:58 -0800
Subject: Donlin Creek Scoping EIS Needed Comments
From: bobbyfithian@gmail.com
To: mayorlyman@gmail.com; anselment@mcgrathalaska.net; runkleinak@hotmail.com; kimball9999@yahoo.com; kwhitworth@mtnt.net

Dear Respected Upper Kuskokwim Leaders,

Please recognize that an important scoping Environmental Impact Study regarding the proposed Donlin Creek Mine and Pipeline requires **comments due by Thursday March 28th**. After careful review, I feel that there are very important reasons to request within this scoping EIS that the proposed footprint of the pipeline be moved.

Attached please find a word document document that has some talking points for you to consider and use in your own words if you desire to comment My recommended change to the proposed gas line begins on item 14. page 3. I have also attached two pictures for those of you who may need to see a visual of the habitats I am concerned with. In both photos, the pipeline would lay in the fold of the country below where the pictures were taken from. There are fairly large gravel pits planned for all of the river and stream crossings. It appears that the one below Philip and Dora's Silvertip camp is about 3.8 hectares. Within the furthest spruce line in the photos is where I feel the pipeline would be much better laid that within the foothills.

Here is a link to the EIS:

<http://www.donlingoldeis.com/>

The second link below gives a basic proposed pipeline map overview. My concerns lie with the proposed gasline route along the front of the West side of the range which I feel would be better for its overall affects if it was stepped out two and one/half miles or more towards McGrath and Nikolai between mile posts 150 and 194. This would ease the impact on the

important critical wildlife habitats along the transition zone between the spruce and the uplands and put the pipeline that much closer to McGrath and Nikolai. It also would relieve the added pressure on the uplands/front-range/west side mountain regions and the struggling wildlife populations there by the impact of the pipeline.

<http://www.donlingoldeis.com/Documents/ScopingPoster3Pipeline11x17.pdf>

There is not a mail to address within the EIS link, but there is an electronic submittal page. The address to send hard copy comments to is:

Don Kuhle
Regulatory Division
US Army Corps of Engineers
PO Box 6898
Joint Base Elmendorf Richardson, AK
99506

Please do all you can to generate comments from your communities if you feel this concern is important to you and the people of the Upper Kuskokwim. If I can be of any help please let me know. The jobs and economy and potential natural gas are very important to your communities but we need to make sure on the front end that things are done respectful and right. There are other concerns within the proposed plan that i have not shared because of time and space but can if you contact me.

Kevin, if you could, please forward this note and attachments to the MTNT Board of Directors, it would be much appreciated.

As always, Most Respectfully,
Bob Fithian

Robert R. Fithian
Chief Executive Officer

Taiga Resources Conservation

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Proposed Donlin Creek Mine Gas Pipeline Concerns

1. Many of us have been supportive of respectful; conservation based development of the Donlin Creek Mine for many years and continue to be.
2. The make-up of the ore relative to Donlin Creek Mine is classified metallurgically as a refractory type. This means that the ore has to undergo a type of processing which requires a tremendous amount of energy to facilitate extraction of the gold it contains. Therefore, the potential viability of the Donlin Creek Mine is dependent upon securing this needed energy requirement.
3. As a comparison for Alaska, as proposed, the required available and sustainable energy for the mine to operate once in production will be 227 megawatts. This is slightly greater than the current highest annual peak usage day (211.5 megawatts) of the whole of the Fairbanks, North Pole, Delta Junction, Nenana, Healy and Cantwell communities.
4. There is no way without substantial new energy developments within Alaska that Donlin Creek Mine could utilize Alaska's existing energy production sources without raising the overall cost of living for most Alaskans. Because of this, Donlin Creek mine has proposed installing a natural gas pipeline and infrastructure that would allow for import of their required energy needs to Alaska's Cook Inlet and delivery of that product to the proposed mine and power plant via a route through the Alaska Range and down the Kuskokwim Valley.
5. This development will represent the first major development of its kind within the Kuskokwim Region as a whole. As such it breaches the integrity of the wilderness barrier which has been in place forever previously.
6. It is therefore mandatory that very careful review and consideration be provided regarding this development. America and the world over is full of environmental, social, cultural and economical mistakes that have occurred whenever this same industrialization type of movement has taken place. These same mistakes if recognized, can help to provide for a true conservation, social and cultural basis for DCM to move forward within

7. There is a long history of the uncommon value relative to the outstanding wildland habitats and the incredible wildlife populations they have provided for which will be affected by the proposed gas pipeline.

8. These incredible wildlife populations and their given habitats have provided great benefit to subsistence hunters, resident hunters, professional guides, photographers, eco tourism and many related aspects of each to the local peoples and communities affected by this proposed development, not only in food but in important and sustainable economy as well.

9. The way of life that my family and I have enjoyed now for three generations and shared with people from all over the world is absolutely compromised by the proposed natural gas pipeline. This way of life has required a conservation basis for viability and sustainability which will be lost if the pipeline plan is developed as proposed.

10. The long history and the future sustainability of jobs, support services, affiliated local economy, sharing of food to the local communities and benefit to wildlife conservation and it's funding will also be affected in a negative way.

11. In short, a forfeiture of one sustainable industry which has a long and proven conservation basis for another which is non-sustainable and will provide at best, a questionable conservation basis of which the true long term impact and final reclamation result is questionable and unknown.

12. Additionally, with prudent wildlife and industry stewardship which are sustainable, the professional guide industry which has existed for over seventy years prior to this proposed development of DCM can easily be sustained for seventy years after the final ore is produces and reclamation completed at the DCM.

13. Therefore, it is very important to build the impact of the DCM to allow for both.

14. The compromise of our ways of life or industry for another does not need to happen for all to have the conservation basis needed for successful long term sustainability.

15. The requirement to have the sustainability for the whole, lies in the true level of respect given to each and the conservation basis that provides for the future of each and others as well.

16. <http://www.alaskaminers.org/2008SocialLicense.pdf> is a link to the Alaska Miners Association guidelines to social license to do business in Alaska. There are several very important aspect of these guidelines that the DCM project has not followed.

17. Donlin Creek Mine has not reached out to the overall professional guide industry service providers that will be impacted by the proposed pipeline in any respectful manner and asked what they might be able to do to work cooperatively for the best interest of the whole. Instead, they have come into the country with the attitude that we are going to be here, get used to it. We do not feel that we are going to put you out of business and if we do, too bad. Their historical willingness to respectfully address concerns has had to be forced.

18. It is very important therefore, for the EIS process to carefully, review, address and help mitigate conflicts and provide for a true conservation and respectful basis if possible, for the project to follow.

19. There are several aspects of the proposed project that provide serious potential problems and questions.

20. The unwillingness to work with or seek advice from long time local Alaskans who have lived or worked in this region for many years and who have a long history of being involved with construction project development throughout Alaska.

21. In my personal situation, we have traveled many times over the past thirty years the proposed pipeline route between mile posts 150 and 180 and know

intimately the conservation aspects of this route. Even with a known mining and construction history in Alaska, the request for sharing of thoughts or advice has never occurred.

22. After requesting and forcing several historic phone or in person meetings with DCM relative to the proposed pipeline development, my family nor our long term business was provided in any manner, notice of this EIS scoping before making a random call to the Alaska Department of Natural Resources in early March of 2013.

23. The well known and respected Alaska Professional Hunters Association which has a history of working closely with the Alaska Miners Association, and, has numerous professional members which will be affected the proposed DCM project, was not noticed of the scoping EIS.

24. I (Robert Fithian DBA Alaskan Mountain Safaris) have held commercial land use authorization from the State of Alaska which is easily seen on any general land status plat for many years that is adjacent to and significantly impacted by the DCM project. (ADL 206060 which expires in 2042.) Even so, we received no notice of this EIS. Any historic written notices received by us from DCM (which we record as one in 2010) were prompted by sharing our concerns about the proposed project to other local businesses, service providers and communities.

25. We should not have had to be on the end of this fight for information and understanding of this proposed project. Instead, DCM should have had the respect to reach out prior with respectful notification and let us know what their plans and goals are and seek counsel on important concerns we have. Instead, we have had to force these considerations.

26. What this history shows, is a unwillingness to respect other ways of life that will be impacted by the proposed DCM project without forcing DCM to do so. Once again, this brings forward the importance of the integrity of the scoping EIS to recognize and help mediate conflicts.

27. The wildland habitats between proposed MP150 and 194 of the pipeline route are within the transitional phase of spruce forest to uplands on the Western Slope of the Alaska Range.

28. As such, this habitat is considered critical and very important to wildlife for a number of ecologically enhancing reasons and should be avoided by the pipeline development.

29. The rerouting of the pipeline footprint two and one-half miles further west towards Nikolai and McGrath from Mile 150 and 194 alleviates impact on these important wildlife habitats.

30. DCM maintains that the route chosen between miles 150 and 194 was done so to limit the potential impact of the pipeline on environmental factors such as wetlands.

31. I strongly disagree with this concept and suggest that a rerouting of the footprint two miles further west not only protects critical wildlife habitat but also provides a better overall footprint for the pipeline.

32. There are many thousands of miles of buried pipeline within similar or identical habitats within Alaska and Canada that have been successfully established that support this recommendation.

33. Additionally, much of the proposed footprint of the DCM pipeline outside of MP 150 -194 lies right through comparable habitat to this rerouting recommendation.

34. It is neither right nor respectful to impact sensitive and critical habitats that wildlife and humans depend upon when viable alternatives exist.

35. Much of the proposed routing between Mile 150 and 190 lies in close proximity to or over an existing trail historically established by cinnabar miner Robert Lyman. Mr. Lyman developed this winter trail to bring equipment to his White Mountain mine site from 1963 through 1974.

<http://alaskamininghalloffame.org/inductees/lyman.php>

36. I have traveled this trail on many occasions over the past thirty years and can clearly state that even the historical and minimal winter only impact on the frozen surface caused considerable eventual thaw to numerous locations resulting in sloughing and erosion. These impacts were enhanced as well by solar thaw in this primarily open habitat. Some of the resulting holes would swallow a large piece of heavy machinery today. This route represents in many areas a jumble of big holes and uneven landscape. Again, the rerouting of the pipeline two miles to the west alleviates the future solar thaw aspects and provides a better overall footprint.

37. DCM maintains that they will construct this portion of the pipeline in one winter and be gone with no noticeable disturbance to the wilderness environment. Alaska has a long history of taking assumptions identical to this and proving them wrong.

38. I have a very strong concern that the overall environmental impact of the pipeline as proposed in this region will not be minimal but will be problematic and continuously ongoing.

39. The relative warm permafrost temperatures in this region make the permafrost very susceptible to solar thaw. Minimal surface vegetation and ground disturbance even in winter can and will substantially enhance thawing, troughing and erosion.

40. As proposed, nearly the whole of the route between MP 150 and 194 are fully exposed to solar thaw.

41. The wildland habitat two and one-half miles west of MP 150 and 194 is much more spruce covered with the accompanying ground insulating mat which maintains the permafrost at lower temperatures.

42. Global temperature change has to be considered when looking at the potential thaw and resulting long term impact on the proposed gasline trench.

43. As proposed, many of the tributary crossings between MP 150 and 194 have much longer and steeper entry and exit grades than are found two and one-half miles further west.

44. There is a proven history of wildlife conservation failure related to the Farewell airstrip providing unlimited access to hunters.

45. It will be very important to wildlife conservation, subsistence, local resident hunters and professional guides within this region that DCM follows through with the mitigation and removal of all of the access corridors needed for development of the proposed gasline.

46. The re-routing of the pipeline two and one half miles further west between MP 150 and 184 will substantially relieve significant negative ecological, social, cultural and economical effects on the local peoples, communities and dependant businesses.

47. We very much want to see a successful development of the Donlin Creek Mine but request that respect for the conservation, social, cultural and economical atmospheres of our lives, communities and region will not be jeopardized by that development.



