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March 28, 2013

Mr. Don Kuhle
Regulatory Division
US Army Corps of Engineers
PO Box 6898
Joint Base Elmendorf Richardson, AK
99506-0898



Re: Environmental Impact Study Scoping Comments for the Proposed Donlin Creek Mine and Gas Pipeline.

Dear Mr. Kuhle,

Please find the following comments regarding the proposed Donlin Creek Mine project (DCM) for inclusion within the EIS Scoping. Thank you and the Corps of Engineers for taking a leadership role within this important process.

The following comments are submitted by Taiga Resources Conservation for which I am the Chief Executive Officer. They are submitted with substantial background, knowledge and experience from a personal long history of avocation for and often leadership within Alaska's mineral, forestry, professional guide and general construction industries. This history includes serving a term as the membership elected statewide president of the Alaska Miners Association and a eleven year history as the Executive Director of the Alaska Professional Hunters Association.

I have and continue to serve at the appointments of three Alaska Governors on a Subsistence Resource Commission, have served on the McGrath Fish and Game Advisory Committee, and currently am serving a second term by joint appointments from the Secretaries of Interior and Agriculture on the esteemed Wildlife and Hunting Heritage Conservation Council.

I have respected relationships with individuals and general contractors who were substantially involved with development of the Trans-Alaska pipeline and are still currently involved with similar large scale arctic and northern latitude projects. Within my life I have also worked on some of the most remote mining projects in the world as well as several natural gas pipelines within Alaska, Texas and Oklahoma.

Many years of my life have been dedicated to the conservation of the wild things in the wild places and respectful stewardship of industry within them.

Since 1983, I have been involved as a professional guide, conducting some of North America's greatest hunting opportunities with long term multiple species safari style hunts. These family operated and conservation based hunts have been conducted within a small region of the western Alaska Range which the resources that we are dependent upon will be impacted by the DCM. My sons, and now their sons, have spent much of their growing up years living and working in this region close to the lands and resources. It is for theirs and many others to follow like them, that the following comments are submitted.

Proposed Donlin Creek Mine Gas Pipeline Concerns and Comments

1. For many years I have been and continue to be supportive of respectful conservation based development of the DCM.
2. The first thoroughly recorded crossing of the Alaska Range Mountains within the Denali region occurred in 1898 when USGS geologist J. E. Spurr and topographer W. S. Post led an expedition across Alaska's Susitna Basin and ascended and then descended the Alaska Range Mountains into the Upper Kuskokwim River region. Their discovery route through the Alaska Range is very comparable to the route chosen by DCM for the proposed gas pipeline. The first evidence of human activities that Spurr and his party found on the West side of the range were hunting camps on the South Fork of the Kuskokwim River.
3. Further down the South Fork they encountered local people which were led by a man named "Nikolai". These people were engaged in living their traditional subsistence lifestyle.
4. It is very important to note within the EIS scoping that the incredible and pristine wildlife habitats and much of the wilderness of this region existing in 1898, are still the great habitats and wilderness regions that they were then. The people Spurr encountered in this locale in 1898, still live on within this region in the families/descendants of the people his expedition encountered. They, like their forefathers, are very dependent upon the conservation and utilization of the natural resources of this incredible region. The DCM pipeline should not jeopardize nor take away from these people and/or Alaska, the culture that has and does exist here. The EIS needs to clearly address and form protections for continuation of this way of life without it being jeopardized by the DCM.
5. Having personally hosted many remote mineral exploration projects for my own and other companies, many of which were within the region which will be impacted by DCM, I bring forward the following observations that I believe are critical and must be addressed within this EIS scoping process.
6. Most mineral development and exploration companies and their projects are comprised of leadership that has tremendous knowledge of mineral exploration and development. Their per-

sonal interests and education have led them down the paths they have chosen. Their education, job responsibility and focus is on exploration and development. Because their projects often occur in remote regions where conservation of wild things, wild places and the related social and cultural atmospheres are important, they sometimes work hard to understand and conduct their work with respect to these considerations. However, their education, job responsibility and focus is about exploration and development. The EIS needs to address this basic understanding and misunderstanding.

7. When a young man or women is raised within a wilderness region where their livelihoods and subsistence are dependent upon gathering, hunting and fishing of the wild things in the wild places, and the conservation of the same, or a person makes a decision to obtain an education and develop a career about how to understand and provide for conservation of the wild things in the wild places, their depth of understanding of a true conservation basis often differs from the conservation basis focus of a exploration geologist or a mine developer. The EIS needs to understand the differing level of conservation understanding and basis that different user groups have and strive to protect the people whose lifestyles and livelihoods are garnered from a “closer to the earth” basis of true conservation.
8. In the same thread of understanding, a keen and knowledgeable conservationist will often have a basic understanding of geology and mining, but will lack depth of understanding for geological structure, economic viability or development of the same.
9. From my family’s long history in hosting mineral exploration programs for numerous companies, we have found that it is rare to find exploration personnel or leadership that understand and respect a true close to the earth conservation basis to their impact on wildlife, wildlands and the people who are dependent upon this consideration. We have often had to work extra hard to try to educate and work with these companies to help them better understand what their impacts actually are to the regions they operate within. We have not always been successful in this effort and in several cases, when our recommendations and concerns relative to minimizing impacts and working together to do so have become burdensome; these companies have chosen to operate from different locations in future years where their activities do not have to conform to our level of requested respect. The EIS process therefore must not only expose the different views of conservation but must generate protection for the wildlife, wildlands and those who depend upon prudent stewardship of them.
10. Within the same thread as comment number 9, there have been several projects we have hosted within the region of the DCM where the leadership of the mineral exploration companies recognized our concerns relative to a true conservations basis and worked with us in whatever means necessary to reduce or eliminate potential disruption to the wild things and the wild places. These projects were not only successful for us in that regard, they also allowed for a growth and sharing of respect and understanding for each other. This type of success story should provide a model of how to do things right. The EIS should strive to force this same accomplishment.
11. With these comments being provided, we encourage the Corps of Engineers and affiliated reviewers involved within this EIS Scoping to build a deep baseline understanding of the true conservation impact that the DCM will have on the wildlands, wildlife and the people who are

dependent upon these considerations as you move into reviewing public input and making future recommendations. In fact, many of our livelihoods and lifeworks are dependent upon you being able to do so. This will be a critical aspect of the EIS as a whole.

12. As a recommendation, I would suggest that an actual tour of the whole of the impacted lands, waters and the people that live and/or operate businesses within them be conducted by the reviewers of the EIS to help with this needed deep understanding. A time spent with the people from Nikolai at the Silvertip camp for instance, would provide a great understanding of their lifestyles and how the DCM will impact them. This would be great help for the reviewers.
13. 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. It is not the people of Alaska's fault that this ore is of a complex nature and that the mine has such a tremendous energy requirement, or that the project is as large as it is and the projected life of the project is less than thirty years. The EIS must address the overall long term impact of the proposed benefit versus loss for Alaska.
14. 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. The EIS needs to clearly allow for Alaska residents to understand this energy requirement for DCM.
15. There is no way, without substantial new energy developments within Alaska, that DCM could utilize Alaska's existing energy production sources without raising the overall cost of living for most Alaskans. In no way should the people of Alaska have to compete with DCM for energy needs and costs. The EIS needs to provide the Alaska public with the facts about how this project as proposed can affect the majority of Alaska residents in increased or competitive energy costs.
16. Because of this, DCM has proposed installing a large natural gas pipeline and infrastructure that would allow for their required energy needs to be amassed near 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. The EIS has to carefully explore and define what the true conservation risks and cost will be to Alaska, what the potential benefit will be, and what losses Alaska and its residents stand to occur.
17. As proposed within the DCM plan, we can find no mention of where the natural gas for the pipeline and the mine will come from. The EIS should clearly define the following:
 - Where this gas will be produced from.
 - The overall environmental costs and risks affiliated with delivery, and storage.
 - Whether or not Alaskans will have to compete for the cost of the gas with DCM.

18. In today's world of in-demand natural resources such as wood, iron, coal, gas and oil which at today's premium cost inflict very challenging cost of living requirements for American and Alaskan citizens, there is a legitimate question about the development of a large gold mine within the central Kuskokwim region that will require such a tremendous amount of infrastructure and energy, and have such a large and breaching impact into the Kuskokwim region as a whole. The EIS needs to define how the creation of DCM will benefit Alaska and Alaskan's as a whole.
19. The EIS needs to clearly explore what alternative mine plans may exist relative to extending the mine life by reducing the 57,000 ton per day and extending the 27.5 year mine life. By careful review, it may be possible to reduce the energy demand to energy provisions that could be generated through more localized and less impacting delivery such as:
20. A fuel oil pipeline and or road development between the more bargeable Yukon River to the Kuskokwim River for the DCM.
21. Localized natural gas development from the Innoko River region.
22. Natural gas development from the Nenana Basin delivered to DCM.
23. Hydro energy.
24. Coal from known Western Alaska reserves delivered via a road system connecting the Yukon and Kuskokwim River and communities.
25. Biomass
26. Any combination of these alternative resources.
27. The EIS should explore each of these provided alternatives and each of their overall environmental, social, cultural and community benefits, risks and viability relative to the DCM.
28. Alaska as a whole should not trust that development of the proposed natural gas pipeline for energy delivery represents the only viable source. The EIS should fully explore this question and alternatives.
29. Often times the corporate drive for maximum return in as short of timeline as possible interferes with longer term and less overall environmental risk and impact. The EIS needs to carefully explore this equation.
30. Much of the benefit to the local communities by development of the DCM will be in the form of jobs and related local support economies. As we have seen throughout the world, technology improvements in machinery to larger equipment accomplishing larger workload accomplishment per person employed. This has eliminated many natural resource production related jobs. At the same time these mechanical improvements have increased jobs within the equipment development industry. Alaska has very little large equipment development industry but does have many people who need jobs and communities who need economy. Again, the EIS should

explore carefully, the results of smaller annual production schedule, less energy needs, smaller equipment, more jobs and longer mine life.

31. Because Alaska has such incredible natural resources, and depends upon these resources for economics, and has constitutional mandates for maximum benefit for the people of the state from the extraction of natural resources, it is only respectful for this EIS process to provide to the people of Alaska and especially to the communities affected by the proposed DCM development, summaries of alternative longer term mine life relative to the following:
 - Smaller daily and annual production schedules which would result in more and longer term jobs and longer economic benefit for communities.
 - Less energy needs and the potential of being able to produce this energy from within interior or western Alaska.
32. Most corporate benefit from extraction of Alaska's natural resources is garnered by non Alaskan corporations. Relative to Comment 31, this aspect of the EIS scoping should explore the viability of securing maximum benefit for Alaska relative to DCM.
33. The development of Donlin Creek Mine 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 previously has been in place forever. The EIS must provide a complete understanding of how the DCM will change this region as a whole.
34. Most of the people who live in the Kuskokwim River communities live there because they enjoy life there. There is always the option of moving to the cities or to different parts of the world, but in general, these residents live in this region because they like to live there within the environment that exists. It is therefore mandatory that very careful EIS review and consideration be provided regarding this development and the long and short term impacts on these communities. 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, may help provide for a true conservation, social and cultural basis for DCM to move forward within.
35. There is a long history of the uncommon value relative to the outstanding wildland habitats, view-sheds and the incredible wildlife populations they have provided for which will be affected by the proposed gas pipeline. The DCM should not jeopardize these exceptional natural attributes and the EIS has to provide true base line protection for these outstanding natural characteristics.
36. These incredible wildlife populations and their given habitats have long provided great benefit to subsistence hunters, resident hunters, professional guides, photographers, eco-tourism and many related aspects of each to the local people and communities affected by this proposed development, not only in food but in important and sustainable economy as well. The DCM should not jeopardize these exceptional natural attributes. The EIS must therefore work to protect these ways of life.
37. The way of life that three generations of my family have shared with people from all over the

world will be absolutely compromised by the proposed natural gas pipeline. This way of life has required a deeply seated conservation basis for viability and sustainability which will be lost if the pipeline plan is developed as proposed. The EIS must work to truly protect these long term and sustainable businesses and the people who have had the entrepreneurship spirit to develop and manage them.

38. The long history and the future sustainability of jobs, support services, affiliated local economy, sharing of food to the local communities, benefit to wildlife conservation and its funding will also be affected in a negative way. The EIS must work to truly protect these long term and sustainable businesses and the people who have had the entrepreneurship spirit to develop and manage them.
39. In short, DCM as proposed, will force 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. The EIS process must clearly work to mitigate this potential impact by the DCM.
40. 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 produced and reclamation completed at the DCM. The EIS should work to protect this provision for Alaska and the people the world over who want to see, enjoy and experience a true wilderness hunting experience.
41. Therefore, it is very important to build the impact of the DCM to allow for both. In my opinion, the EIS scoping if truly done properly can provide for both.
42. The compromise of our way of life or industry for another does not need to happen for all to have the conservation basis needed for successful long term sustainability. The EIS process can help provide for both by carefully exploring the former comments and those that follow here.
43. The requirement to have the sustainability for the whole, lies in the true level of respect given to each and the environmental and conservation basis that provides for the future of each and others as well. The EIS should be able to define this basis if the scoping process is conducted with the same given charge of respect.
44. The following is a link to the Alaska Miners Association guidelines to social license to do business in Alaska. <http://www.alaskaminers.org/2008SocialLicense.pdf>
 - As one of the presenters at the social license conference which generated the linked document, I feel that the guidelines presented if truly respected and followed allow for proper social license development. There are several very important aspects of these guidelines that in my opinion, the DCM project has not followed as far as the proposed gas line development of which I am the most familiar. This may not be entirely a failure aspect on their part but rather a lack of understanding on their part of the true impacts that the project will have on the conservation aspects and those who are dependent upon protecting them.

- I encourage the EIS reviewers to use the above link provided about social license and compare the overall recommendations within that document with the comments you receive within the EIS scoping. This will help you in defining and mitigating concerns brought to you through the EIS process.
45. DCM has not reached out to the overall professional guide industry service providers which will be impacted by DCM located between MP 150 and MP 188 of the proposed pipeline route in any respectful manner and asked what they might be able to do to work cooperatively for the best interest of the whole or asked what they could do to for their project to have minimal impact on these historic businesses. The EIS process has to work to mitigate this failure and protect the conservation basis and the entities that depend upon it within this region.
 46. 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. Their words have said one thing, and their actions another. 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.
 47. I was first made aware of the proposed pipeline project by a phone call from a DCM contractor in late February 2010. The call was made asking about submitting a hurried bid to provide camp support for a "confidential" project that would have three helicopters and twenty plus persons doing reconnaissance from May through September of that year right across the lands we have long conducted our guiding service within. The call was a result of conflict DCM had with another local lodge at Farewell Lake, and they needed last minute support for the project. We immediately made the contractor aware that we had clients booked as usual for our fall hunts and that we would look at what we could do to balance this thing out and work with them to get the job done. We then were to find out about the proposed pipeline and route and the base line data that DCM was in a hurry to develop.
 48. However, DCM chose a different camp for their project citing concerns with safety and fuel storage with ours. The location of the chosen provider required a one hundred mile round trip addition to each of many daily helicopter flights to and from the work location. Substantial fixed wing support would also have to occur to support the chosen camp. Most of these flights would be right over the important wildlife and wildlife habitats that we are dependent upon and we had to request and fight for special consideration for now not just the impact on the proposed pipeline right of way but also for all of the flight traffic which was to occur right over important habitats and the wildlife within them.
 49. After some struggle, we were able to achieve an assertion that DCM would complete the work in the sensitive areas we guide within during the summer months and would incorporate flight patterns to minimize impact on wildlife. Respectfully, this effort by DCM has been a failure.
 50. Struggle and disruption has occurred each year since with many instances of conflict, primarily with aircraft associated with DCM. We have had to make many calls to DCM, it's contractors, the Alaska Miners Association asking that someone help us with the negative impacts on our guided hunt activities by DCM affiliated helicopters. DCM may provide a different story but we

have numerous documented instances of this type of conflict. As our moose, Dall's sheep and caribou hunting seasons close on Sept. 20th, not only during our regular August and September hunts, but also on two different years on Sept. 21st or later we have been impacted by DCM affiliated helicopters returning to disruptive wildlife and quality of hunt experience with our grizzly hunters who we book for later September hunts.

51. This past fall, (2012) my wife Barb was guiding father and son hunters near and over the proposed pipeline footprint as this area provides some of our best moose habitat. For two days right in the heart of moose season she had low elevation DCM affiliated helicopter activity on the pipeline footprint acutely disrupting the hunt. Once again, we had to make all of the calls asking for help.
52. What this history shows, is a underlying lack of respect and understanding of how the DCM project will impact the lands, waters wildlife, wildland experience, and viewshed resources for those of us who depend upon conservation of and prudent stewardship of them. Therefore, this EIS scoping must develop mitigation to prohibit this type of behavior respectful of the whole.
53. After making calls in February of 2010 to the leaders of the Upper Kuskokwim communities about the "confidential" project and their subsequent inquiries about the project, DCM quickly developed several important stakeholder meetings in these communities. This is another instance that shows a lack of respect for the overall impact of the DCM. The EIS must work to help provide this respect.
54. There are several aspects of the proposed project that provide serious environmental, ecological, conservation, cultural, social and economic problems and questions. The EIS has to explore and provide answers to the following concerns.
55. I have traveled many times over the past thirty years the proposed pipeline route between MP150 and MP180 and intimately know the conservation and environmental aspects of this route. Even with a known and respected mining and construction history in Alaska, the request for sharing of thoughts or advice has never occurred. We understand that to a large corporation we are probably just local hillbillies, but true respect for those of us impacted by the DCM should have brought forward respectful communication. The EIS should work to allow our concerns and knowledge to be considered. We need the EIS to help protect what we cherish and to be able to provide it to future generations.
56. 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 operate from one end of the proposed pipeline to the other that will be affected the proposed DCM project, was not noticed of the scoping EIS.
57. After requesting and forcing several historic phone or face to face meetings with DCM relative to the proposed pipeline development, neither my family or our guiding business, which has long term DNR land use authorization in this region (Robert Fithian/DBA Alaskan Mountain Safaris; ADL 206060 which expires in 2042), and which has been easily seen on any general land status plat for many years is adjacent to and significantly impacted by the DCM project. Even with all of this history, we received no timely notice of this EIS.

58. Neither my family nor any of our historic businesses had any idea of this EIS scoping before I made a random call to the Alaska Department of Natural Resources during the first week of March of 2013. We have struggled since that time, to come up to speed with the EIS and make timely comments regarding the proposed DCM pipeline. We certainly feel we should have been given the courtesy of being noticed. The EIS should consider that not just ourselves as stakeholders in this process, but many others, were not informed or notified. There are many parts of the project that will impact us that we are daily discovering and we do not at this stage in the process have the time to adequately address. Again the EIS should take into consideration that important and well known stakeholders were left out of the EIS notification process.
59. We should not have had to be on the end of this fight for notification, 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 input on important concerns we have. Instead, we feel we have had to force these considerations. The EIS needs to help mitigate this situation.
60. Over the past thirty plus years that I have conducted guided hunting activity in this region, just about one half of our historical harvest of moose, grizzly and black bear has occurred on and adjacent to the proposed pipeline footprint. Approximately one quarter of the harvest of caribou has occurred to the west of the proposed pipeline footprint. The short and long term impact by DCM on these wildlands and subsequently the wildlife, will substantially negate or eliminate our viable and sustainable future. To put it bluntly, we will be out of business. We are dependent upon this EIS process to protect us and the other commercial operators like us within the proposed DCM pipeline area.
61. The proposed DCM impact to the ecological setting will negatively upset our long time businesses viability. The ecological setting is dependent upon this EIS process to protect it.
62. The proposed DCM impact to the wilderness setting will negatively upset our long time business' viability. Please understand that, at the end of each year of guiding we have to look back at the success of our hunts and how we can count on that success to help provide clientele in the future. A successful hunt does not always include harvest of wildlife but harvest success does play a key factor. Almost as important is the quality of the hunt and the quality of the wilderness experience. Without question, when potential clients are sincerely interested in our service, they ask for client references from the previous year and years. As we limit our clientele annually and strive to provide high end, long term, quality of wilderness experience hunts, please recognize what it means to our ability to secure clients when the previous year's clients are contacted and their response is:
63. "Well we had a pretty good hunt but those helicopters sure played hell on us during some of the better weather days. If they are moving forward with that pipeline project you better check with Bob and ask him what you are to expect. Most of the best moose and bear habitat is right where that pipeline is going and you do not want to be spending a bunch of money hunting there on a once in a lifetime hunt if there is work going on that pipeline. You might want to look somewhere else." The EIS process needs to understand these types of impacts on our business, how they impact us, and help us work to eliminate them.

64. Hunters do not travel from all over the world to hunt at a location in the wilderness of Alaska where the view-shed which they glass over and hunt daily is impacted by a 200' wide pipeline right-of-way dissecting it. We are dependent upon this EIS process to protect the view sheds and our livelihood.
65. Hunters do not travel from all over the world to hunt at a location in Alaska where the stream and river crossings used daily have gravel pits and pipeline development scars. We are dependent upon this EIS process to protect the stream and river crossings from scarring as well as our livelihoods.
66. The region to the west of Rainy Pass within the proposed pipeline footprint is classified by the Alaska Department of Fish and Game (ADF&G) as Game Management Unit (GMU) 19. There are four subunits within GMU 19 which are described as 19 A, B, C and D. According to long time ADF&G development and management goals, this GMU can be conveniently divided into two regions that have distinct differences in habitat, user access, and hunting practices.
- Units 19A and 19D are generally lower elevation areas accessible by boat. Hunters within 19A and D generally have been local residents living and hunting for food.
 - Units 19B and 19C are generally higher elevation areas where access is largely restricted to aircraft. Few people live in these areas, and those traveling there to hunt have been mainly hunting for quality of wilderness experience, trophy quality and acquisition of meat factors.
67. The EIS needs to acknowledge this past management history and work to protect those guidelines.
68. GMU 19C has historically been managed by ADF&G primarily for non subsistence and non-local hunters. As such, this region has provided for the development of many historical professional guide businesses. Combining the incredible quality of the wilderness and the management for trophy quality game in this region has provided a direct link to Alaska's Constitutional mandate of maximum benefit for the conservation of our natural resources. The DCM as proposed eliminates this way of life and the constitutional mandates which they provide for from this region. The DCM should not impact this sustainable future in any way. The EIS needs to help protect this history and sustainable future.
69. There has been little consideration provided by DCM for the true impact which will occur to the long term businesses and their employees and families whose livelihoods are dependent on minimal adverse impact on the wildlife, wildlands, viewshed and quality of wilderness experience of this area. The EIS need to define what the long term loss of these businesses will mean to these peoples and the local economies.
70. What this history shows, is an unwillingness of DCM 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.
71. The wildland habitats between proposed MP150 and MP194 of the pipeline route are within the

transitional phase of spruce forest to uplands on the western slope of the Alaska Range. As such, this first and second generation habitat is considered critical and very important to wildlife for a number of ecologically enhancing reasons and should be avoided by the pipeline development. The EIS needs to work to protect this critical wildlife habitat.

72. This region lies almost due parallel with the major Denali fault zone which extends nearly the length of the western Alaska Range. The DCM does not in my opinion provide enough security to a breach of pipe during a substantial plate tectonic movement of this fault. The EIS needs to explore the proposed engineering of the two pipeline intersecting major fault zones.
73. As one of the largest fault zones in North America, the Denali Fault as it is called in this region, has numerous crosscutting dikes and smaller fault zones. These cross cutting dikes and fault zones often carry mineral to affiliated surface exposures which are important to wildlife. There is a dominant cross cutting fault that branches from the Denali Fault in this region which for the purpose of these comments I will call the Middle Fork fault. This fault zone intercepts and outcrops in the very first small up thrust of the mountains just to the south of the Middle Fork River. One of these most utilized mineral sources is located within a short distance from the DCM proposed pipeline. Two similar mineral bearing zones also surface at two additional points to the northwest where impact by the DCM activities will have a restrictive and possibly damaging impact on the wildlife of the region as a whole. These three points are historic mineral sources for all ungulate wildlife species of the region and predators as well. All three licks are used consistently. The DCM pipeline will impact these important wildlife mineral sources. The EIS needs to consider the impacts on wildlife by affecting wildlife access to these mineral sources.
74. I do not believe that the DCM impact on this region will be brief. I believe it will be problematic and ongoing and that these great wildlife habitats should not be compromised. The EIS needs to consider the impacts on wildlife by affecting wildlife access to these mineral sources over the long term.
75. On any given winter when the western Alaska Range mountains between MP 150 and MP 185 of the proposed pipeline receive heavy snowfall, the Dalls sheep of the region migrate out to the western flanks of the range where wind generally exposes winter feed. There are several small outlays of hills from the range which during these times of deep snow and nutritional stress, the sheep populations also use these exposed low elevation hills for food. As proposed, any winter or late spring DCM pipeline surveillance and or construction has the potential to negatively impact wildlife utilization of these important and critical habitats. Any additional stress can provide substantial mortality results during these weather events. The EIS needs to consider the impacts on wildlife by affecting wildlife access and comfort in these locations during high nutritional and weather stress periods.
76. On any given winter when the western Alaska Range mountains and outlying tundra uplands between MP 150 and MP 194 of the proposed pipeline receive heavy snowfall, the tundra uplands with their related first and second generation habitats provide critical browse for the moose populations of this region. As proposed, any winter or late spring DCM pipeline surveillance and/or construction has the potential to negatively impact wildlife utilization of these important and critical habitats. The EIS needs to consider the impacts on wildlife by affecting

wildlife access and comfort in these locations during high nutritional and weather stress periods.

77. As proposed, the DCM will develop at least one and possibly two, three hundred person man-camps between proposed MP 150 and 194 of the pipeline (Big River and Farewell). It is unclear within the information provided to the public whether either of these camps will be utilized year around but the probability of both is high. This would be almost identical in human impact to taking the whole human population of McGrath times two and putting half in Farewell and half at Big River. Year around or not, this level of human impact on the lands and resources will be very high and devastating to my way of life there . As proposed, this large amount of personnel will not be allowed to hunt within the pipeline corridor which is 200' wide and takes the average human about thirty seconds to walk across. Even with heavy work schedules these employees will have opportunity to go and play. As proposed, all of the pipeline development between MP 150 and 194 is located in what is considered critical and important summer and winter wildlife habitat.
78. Therefore, the EIS needs to clearly address the following: The negative impact of many hundreds of employees, employee housing, equipment shops, fuel transport, storage and risk, tremendous amount of large equipment, pipeline storage yards storing five miles of fourteen inch steel pipe every five miles, large gravel pits, water extraction, fuel spills, the overall large scope of work and the R&R activities of these employees on the critical summer and winter wildlife habitats and the wildlife itself.
79. The proposed field camp, gravel pits and new airfield at Big River, for instance, will be readily visible to all of my hunting clients during many days of their hunts. Ordinarily, the first view they have of this country is breathtaking and the resulting photos are always cherished with memories of what an incredible wilderness region they were able to be part of. The DCM pipeline as proposed takes this future away from them. I believe that the project will be more complicated, problematic and continuously more ongoing than DCM projects, at the risk of serious impact to the lands and resources and to my and many others sustainable futures as professional guides. The EIS needs to address the removal of quality wilderness viewsheds and replacing it with man camps, gravel pits, storage yards and large airfields.
80. The re-routing of the pipeline footprint at least two and one half miles further west toward Nikolai and McGrath from MP 150 to MP 194 or beyond alleviates impact on these important wildlife habitats.
81. DCM maintains that the route chosen between MP 150 and 194 was done so to limit the potential impact of the pipeline on environmental factors such as wetlands. I strongly disagree with this assertion and "suggest that a rerouting of the pipeline a distance at least two and one half miles further west not only protects critical wildlife habitat but also provides a better environmental overall footprint for the pipeline". This suggested re-route would establish the pipeline within habitats and regions much less critical to wildlife and human use. I would hope that the EIS process would also find and recommend this needed change for the best interest of the whole.
82. There are many thousands of miles of buried pipeline in similar or identical habitats within

each of the drainages that outflow to the west from the mountains between MP 155 and 180 of the proposed DCM pipeline. Now, due to continual warming, many of these drainages are completely void of any glacial ice or historic snowpack. This is an indication of continual warming in this region which will, in my opinion, jeopardizes the integrity of the DCM pipeline as proposed. The EIS should define this potential and suggest alternatives.

90. There are numerous noticeable glacier retreat age rings as seen by infrared aerial photos lying within twenty miles of each of the major drainages to the west of the mountains between MP155 and 180 of the DCM pipeline. Earth scientists maintain that the overall age of this defined ice age may be less than six thousand years. Each of these retreat rings indicate cooling trends which stalled the overall warming retreat cycles. During eight of the past ten years, the previous winter snow pack has melted completely and substantially diminished reserve snow and ice pack. Once again, I use this knowledge to help you understand that the DCM pipeline as proposed should not be placed within the tundra upland warming habitats. The EIS should define this potential and suggest alternatives.
91. As proposed, nearly the whole of the route between MP 150 and 194 are fully exposed to solar thaw.
92. The wildland habitat at least 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.
93. Global temperature change has to be considered when looking at the potential thaw and resulting long term impact on the proposed gas-line trench. This consideration should be an important aspect of the EIS scoping.
94. As proposed, many of the tributary crossings between MP 150 and 194 have much longer and steeper entry and exit grades than are found at least two and one-half miles further west. The EIS should work to define the benefit of alternative pipeline routing.
95. After having contended with flood events in many parts of the world and thirty-years in the Western Alaska Range during flood season, I have seen and dealt with three flood events that were significant. I have no way of knowing if any of these events approached a "one hundred year" flood event but I am concerned with the lack of historical hydrology studies and whether the one being used by DCM relative to the proposed river and stream pipeline crossings is adequate to address channel erosion during a one hundred year flood event. The EIS should carefully review the design engineering of these crossings relative to major flood events and lateral and horizontal erosion.
96. There is a proven history of wildlife conservation failure related to the Farewell airstrip providing unlimited access to hunters. Important wildlife populations of Dalls sheep, moose and caribou located within the west side of the Alaska Range within GMU 19C are currently in low but stable densities. This is a factor that has occurred primarily due to predation on these species. As such, any increase in hunting that results from the DCM development will directly affect the allocation and opportunity for future hunters. As this occurs, it will take away the existing viability of many long established businesses within this region and will put the opportunity to

hunt these resources into drawing permit hunt programs that further restrict all resident Alaska hunters. The EIS should define these facts.

97. It will be very important to wildlife conservation, subsistence, local resident hunters and professional guides within this region that DCM follows through with the removal of all of the access corridors and provisions needed for development of the proposed gas line. This is a very important aspect of the EIS.
98. This is especially important relative to the large airfield developments contained within the DCM. These airfields if left available for utilization will quickly attract additional hunters which the wildlife populations cannot support. For my family's long term business viability, the proposed airfield at Big River alone will eliminate the future of our business if it is built and not completely removed as provided in the DCM plan.
99. Subsequently, the DCM will destroy a sustainable industry to develop another which is not sustainable. This should not be allowed to happen and we sincerely hope that the EIS will help to protect us.
100. The re-routing of the pipeline at least two and one half miles further west between MP 150 and 184 will substantially relieve significant negative ecological, social, cultural and economic effects on the local people, communities and dependent businesses.
101. We very much want to see a successful development of the Donlin Creek Mine but request that true respect for the conservation, social, cultural and economic atmosphere of our lives, communities and region will not be jeopardized by that development.

End of Taiga Resources Conservation DCM EIS Scoping Comments.

The previous comments respectfully submitted by



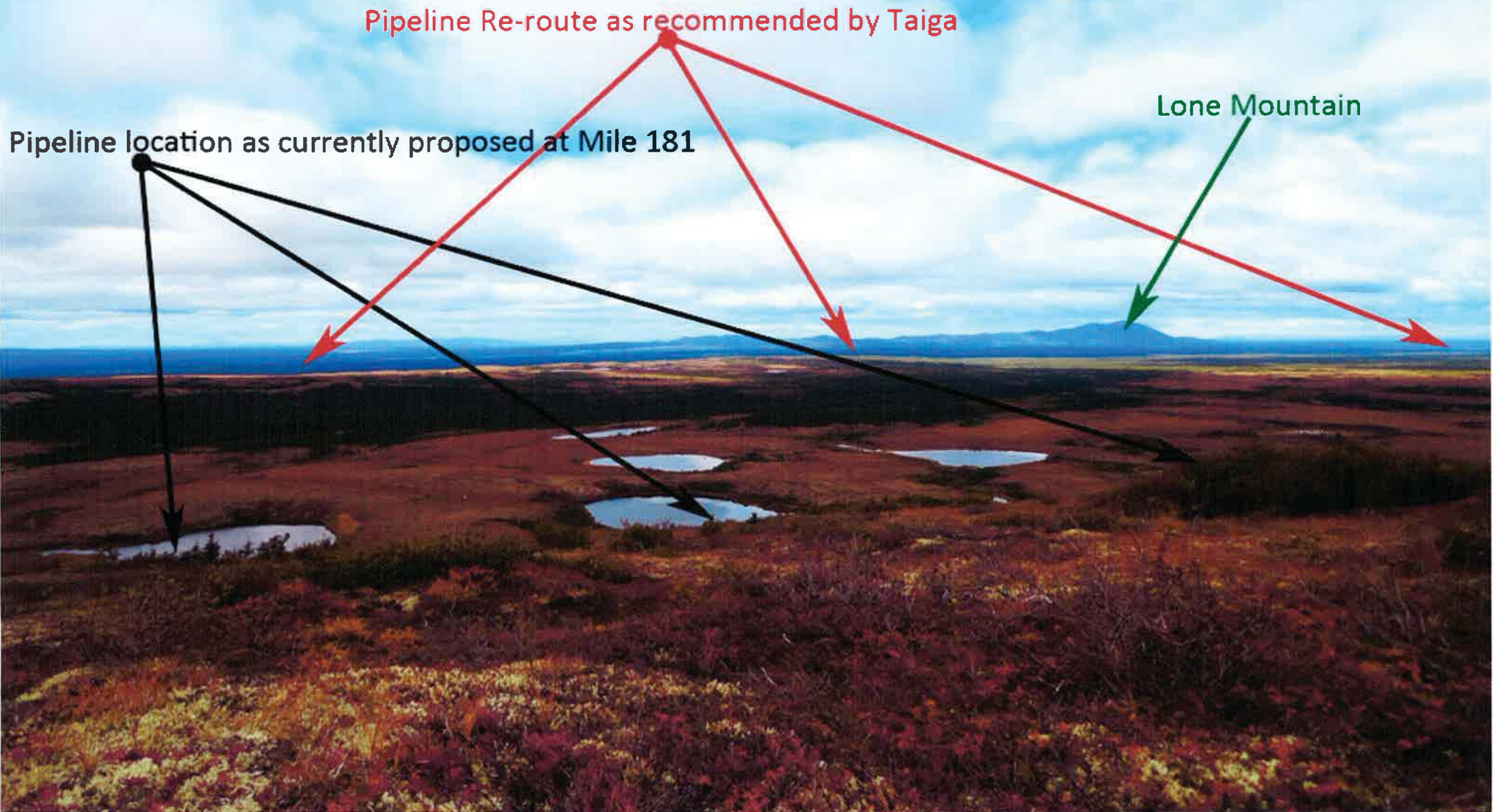
Robert Fithian

Enclosures:

TRC Photo 1

TRC Photo 2

Taiga Resources Critical Transition Zone Habitat
Photo #1, Location: Proposed MP 181



Taiga Resources Critical Transition Zone Habitat
Photo #2 , Location: Proposed MP 184

Proposed pipeline at base of uplands.

Taiga Resources recommended re-route

