

Brelsford, Taylor

From: Kuhle, Don P POA <Don.P.Kuhle@usace.army.mil>
Sent: Monday, April 01, 2013 2:51 PM
To: Brelsford, Taylor
Subject: FW: Knik Tribal Council Comments to Donlin Gold Natural Gas Pipeline Plan of Development (POD) (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

-----Original Message-----

From: Richard Porter [mailto:RPorter@kniktribe.org]
Sent: Friday, March 29, 2013 2:43 PM
To: Kuhle, Don P POA
Cc: Bob Charles; Bruce Wright; dcall@tyonek.com
Subject: Knik Tribal Council Comments to Donlin Gold Natural Gas Pipeline Plan of Development (POD)

Don,

Thank you for the opportunity and the time and work that you have dedicated in the EIS process. Please except the following comments.

Knik Tribal Council (tribe) Comments to Donlin Gold Natural Gas Pipeline Plan of Development (POD)

The aforementioned POD has identified possible areas of environmental impacts of concern to the tribe should the pipeline be approved and constructed. These areas include impacts to subsistence resources, air quality, biological resources (including wetlands, vegetation, wildlife and aquatic resources, and threatened and endangered species), cultural resources, geology, soils and other mineral resources, historical and archeological sites, paleontologic resources (including geology and soils, mineral resources, paleontologic resources), hazards and hazardous materials, hydrology and water quality, (including groundwater and surface water), land use and planning, noise, recreation, aesthetics, socioeconomics (including population and housing, public services, utilities and services systems), transportation, cumulative impacts including associated mine development impacts, and environmental justice impacts. These areas of possible impacts as well as any other impacts deemed important need to be further addressed in the resulting EIS.

The project description describes some possible environmental impacts. These include impacts from construction vehicles; potential risks from release of natural gas; disturbance of habitat and special status plant and animal species; disturbance of possible archaeological sites; possible disturbance of unknown paleontological resources; possible exposure of construction crews and public to hazardous materials used in construction; short term effects on

subsistence resources; possible impacts to water bodies crossed by the pipeline; temporary noise and or ground vibration that may exceed ambient noise levels; and possible impacts to watershed environment caused by trenching.

The tribe is also concerned with potential natural habitat loss and fragmentation, changes in species movement, sedimentation, and air emissions.

Rights-of-way for the pipeline are expected to be cleared up to a width of 100 feet, and possibly more in certain areas such as camp sites, water collecting sites, storage areas, equipment mobilization areas, material borrow sites. After construction is completed, it is expected the right-of-way may be allowed to re-vegetate to native vegetation, trees and shrubs. It is understood that that most of the right-of-way is to be generally kept open, though vegetated with grass and other local organic material to minimize erosion and to facilitate monitoring, maintenance and repairs of the pipeline. These areas represent a long-term loss of the cleared habitat. In forest areas, the pipeline corridor would fragment large patches of forest. The new open corridor may inhibit the movement of some species, such as forest interior mammals, which may be reluctant to cross openings where they are more exposed to predators. The right of way corridor however, may also facilitate the movement of other species, both native and invasive.

The large amount of soil disturbance involved in laying the pipeline also poses erosion and sedimentation risks, particularly in steeper areas, near water bodies, and during heavy rain events. The tribe is concerned for potentially extensive failures to erosion and sediment controls on the pipeline. Stream and wetland crossings may create erosion and sedimentation problems, as well, especially with an “open cut” process, and there is a risk of stream bed collapse with crossing techniques if poorly designed or executed. The “open cut” process uses a trench dug across the stream channel with water temporarily diverted around the trench, while the HDD or “bore crossing” technique uses a drill or hydraulic ram to create a bore for the pipeline under the stream. Stream, river and other water-body crossings would need to have specific requirements to minimize erosion and sedimentation during and following construction.

Air emissions from the pipeline and compressor stations are another concern, and may include methane, ethane, benzene, toluene, xylene, carbon monoxide, ozone and other pollutants. Air emissions can also affect forest health. The tribe would want to see that the EIS consider habitat impacts from air emissions from the natural gas pipeline.

The impacts from developments in and near the Beluga point of beginning of the pipeline need to be given special consideration in the EIS. These impacts include impacts to the aquatic resources, subsistence resources in the Cook Inlet of importance to the tribe.

Overall, the Knik Tribal Council is in favor of and supports development of its resources and improvements in infrastructure to support economic development, but it desires and demands that the impacts to the natural environment be determined in the EIS process. The tribe desires to be fully engaged in the EIS process and including the development and long term operations and management so that it can assist in the environmental stewardship of the project. The tribe seeks to be provided an appropriate level of authority and resources as a government agency to ensure ecological and natural resource information is used to review siting and construction of the pipeline in order to avoid or minimize habitat impacts.

Richard Porter

Executive Director

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Caveats: NONE