

DONLIN GOLD PROPOSED MINE



2017

Project Overview & Permitting Process

The document will give an overview of the Proposed Gold Mine on the Kuskokwim River, the process of permitting and how Georgetown Tribal Council has been involved in this process. The purpose of this document is to serve as an educational guide and also to act as a reference point for future GTC actions.

Donlin Gold Proposed Mine

PROJECT OVERVIEW

Location

Donlin Gold LLC has applied for permits to develop an open pit, hardrock gold mine about 10 miles north of the community of Crooked Creek, in southwest Alaska. (277 miles west of Anchorage and 145 miles northeast of Bethel.) In addition to the mine site, the project has two other major components: transportation infrastructure and pipeline.

Overview

If built, the Donlin Gold project would produce gold from a major ore-body, through a subsurface lease with Calista Corporation, an Alaska Native regional corporation, and a surface use agreement with the Kuskokwim Corporation, a merged Alaska Native village corporation. Some components would be on State of Alaska and Bureau of Land Management (BLM) lands. On the Cook Inlet side of the pipeline, a small portion of CIRI Inc. land would be affected.

The proposed project would take about 3 to 4 years to construct, with a projected mine life of approximately 27½ years. It would produce approximately one million ounces of gold per year for 27½ years. About 59,000 tons of ore would be processed onsite each day.

The following excerpt is taken from the US Army Corps of Engineers Donlin Gold Project EIS website (donlingoldeis.com/ProjectOverview.aspx). It describes the 3 major components of the proposed mine.

Mine Site

The mine and facilities would have a total footprint of about 16,300 acres. There is currently no road or rail access to the site, nor an existing power supply. Components of the mine site include:

- *Excavated open pit, ultimately about 2.2 miles long, 1 mile wide, and 1,850 feet deep*
- *A waste treatment facility (tailings impoundment) about 1 mile long, ultimately covering 2,350 acres*
- *Waste rock facility covering approximately 2,300 acres*
- *Mill facility processing approximately 59,000 tons of ore per day*
- *Natural gas-fired power plant with a total connected load of 227 MW*

Transportation Infrastructure

A key piece of transportation infrastructure would be a proposed barge landing near Jungjuk Creek on the Kuskokwim River. The dock area would cover 5 acres. On the river, residents could expect to see 3 barge-trains pass each day the river is navigable. Transportation infrastructure would also include

- *30-mile road from the mine site to the new barge landing*
- *5,000-foot airstrip*

Pipeline

The proposed pipeline would be a 315-mile, small-diameter (14-inch) natural gas pipeline from the west side of Cook Inlet, across the Alaska Range, to the proposed power plant.

Timeline of the Donlin Gold Project

Time Frame	Action
1996-2012	Exploration & Studies took place including feasibility study on natural gas pipeline & environmental baseline
2012	Notice of Intent to prepare EIS takes place & Scoping Process Begins
2012-2018	EIS Process: Scoping, Draft EIS, Final EIS, Record of Decision <ul style="list-style-type: none"> - Scoping Report was released August 2013 - Draft EIS was released November 2015 - Final EIS not yet released, expected out in 2018
3-4 Years	Construction
27.5 Years	Operation
Following Operation	Mine closure, reclamation
Ongoing....	Ongoing Monitoring



Images Left to Right: Donlin Creek Site in 2014 with runway and camp (alaskapublic.org), Proposed Mine Site (Donlin Gold)

Donlin Gold Proposed Mine

THE PERMITTING PROCESS

2012-?

What Is an Environmental Impact Statement?

An Environmental Impact Statement (EIS) is a decision making process that allows for a full review of public concerns about a proposed project, such as the Donlin Gold project. A federal agency prepares an EIS so that decision-makers have a complete picture of the benefits and potential environmental risks before approving a project.

Just as important, the EIS provides opportunities for tribes and local communities to voice their concerns and to understand the potential effects of the proposed project.

The National Environmental Policy Act (NEPA) requires agencies to prepare an EIS when an action may affect the quality of the physical and human environment. The process begins when someone applies for a federal permit for any activity that can affect the environment, including land, air, water, animals, and communities.

Congress enacted NEPA to make sure that federal agencies take a careful look at a proposed activity, including:

- **The ideas and concerns of the public**, as stated during Scoping meetings and in review comments on draft documents
- **A range of alternatives**, including not allowing the proposed activity (no action)
- **A thorough scientific study** of current conditions and potential effects

Steps in the EIS Process

- Notice of Intent to Prepare EIS
- Scoping Meetings & Comments
- Draft EIS is Written
- Public Review of Draft EIS including Meetings & Comments
- Final EIS
- Record of Decision

Parties Involved in the EIS Process

- Throughout the process, any individual or group of individuals can provide comments on this project.
- The USACE is the lead agency
- Nova Gold/ Donlin Gold, Inc. is the applicant

- There are a group of agencies/organizations that make up the “Cooperating Agencies” group. This group is most heavily involved in the day to day consulting about the process. They are listed below
 - Bureau of Land Management (BLM)
 - Environmental Protection Agency (EPA)
 - Pipeline & Hazardous Materials Safety Administration
 - US Fish & Wildlife Service (USFWS)
 - State of Alaska Office of Project Management & Permitting (OPMP)
 - Village of Crooked Creek
 - Native Village of Chuathbaluk
 - Knik Tribal Council
 - Native Village of Napaimute
 - Native Village of Aniak

Donlin Gold Proposed Mine

GEORGETOWN TRIBAL COUNCIL INVOLVEMENT & PUBLICATIONS

Timeline of Involvement & Publications

Throughout 2013 & 2014, the GTC Environmental Coordinator attended several informational calls for Tribes & also sat in on several Cooperating Agency meetings. The list below includes only meetings where conversations were documented publicly or articles were published/submitted formally.

2013

- ▶ GTC Meeting held with USACE regarding scoping process (Meeting notes attached)
- ▶ GTC Resolution 13-02 passes, and scoping comments are submitted (Resolution & Scoping Comments Attached)
- ▶ August 2013: Blog Article Published on the Annual Meeting and Summarizes Comments related to Donlin Gold

2014

- ▶ July 2014: Blog Article Published: Project Update on Donlin Gold Proposed Mine - EIS
- ▶ August 2014: GTC Annual Meeting Hosts USACE (Meeting Notes Attached)
- ▶ October 2014: SPCO Hosts Public Meeting Regarding Pipeline Right of Way Lease, GTC Environmental Coordinator attends & publishes blog article

2015

- ▶ No Known Correspondence/ Involvement

2016

- ▶ November 2016: Blog article published on the National Historic Preservation Act Section 106 Regarding Cultural Resources

Blog articles can be found at georgetowntc.wordpress.com

Donlin Gold Proposed Mine

GEORGETOWN TRIBAL COUNCIL CORRESPONDENCE & PUBLICATIONS

March 2013

U.S. Army Corps of Engineers, Alaska District

DRAFT NOTES: Meeting with Georgetown Tribal Council

March 4, 2013

This tribal coordination meeting was requested by Georgetown Tribal Council Chair and Tribal Administrator to continue the dialogue regarding the U.S. Army Corps of Engineers' preparation of an Environmental Impact Statement (EIS) for the proposed Donlin Gold Project. As the lead federal regulatory agency, the Corps of Engineers has the overall responsibility for the EIS process and government-to-government coordination with tribes that may be impacted by the proposed project. The Corps of Engineers is neither a proponent nor opponent of the project. Topics of discussion included the potential impacts to resources.

Attendees:

Georgetown Tribal Council Representatives: Chairman; Tribal Administrator; Council Member; and Environmental Coordinator

U.S. Army Corps of Engineers (USACE): Don Kuhle, Project Manager and Amanda Shearer, Tribal Liaison

Meeting Summary:

- ❖ The meeting was held at the Regulatory Anchorage Field Office and started at 2:30 pm with introductions.
- ❖ Don explained the role of USACE in the permitting process under Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. While explaining, he stated the importance of differentiating to tribes between Donlin and USACE. He reiterated that this is not the Corps' project, they are only in charge of making sure the EIS is complete. Don stated that the EIS is an evaluation under the National Environmental Policy Act (NEPA). The Corps evaluates projects under NEPA, the CWA Section 404(b)(1) Guidelines, and a public interest review. The 404 (b)(1) evaluation requires that the Least Environmentally Damaging Practicable Alternative (LEDPA) be chosen. The LEDPA is not a NEPA requirement. Also, if there is an unacceptable impact that can't be avoided, minimized, or mitigated, then USACE can't issue a permit (Review Note: The 404(b)(1) Guidelines specify that "no discharge of dredge or fill material shall be permitted which will cause or contribute to significant degradation of the waters of the United States.") GTC asked if the EIS guarantees a permit. Don stated no, that NEPA is a disclosure process to help a decision maker become well informed. Each agency involved with permitting prepares their own decision document. The record of decision (ROD) will include a 404(b)(1) determination. The Corps Section 10/404 permit is just one of a number of permits that need to be gotten for this proposed project to happen. There are a number of Cooperating Agencies participating in this process that also have permitting authority. The release of the Draft EIS is currently slated for August 2014 (subject to schedule changes).

- ❖ Don explained the relationship between USACE, URS, and Donlin. URS is preparing the EIS for USACE. URS is paid by Donlin but reports to USACE. URS does not work directly with Donlin. GTC asked if Donlin would do their own EIS if the project wasn't so big? Don said no, the applicant can't write their own EIS. Currently we are in the scoping process, in which we are taking comments. We are also currently reviewing baseline studies. URS is identifying data gaps. They will review comments received during public scoping, plus the information that Donlin originally submitted, and request any additional information needed. Donlin is responsible to provide information or additional studies to fill data gaps. After the Draft EIS is released there will be another round of public meetings. Everyone will be able to see how all the comments were addressed in the Draft EIS and provide additional comments. This information will then be used to prepare the Final EIS. The current timeline shows the Final EIS being published in October 2015, which may change depending on schedule changes.
- ❖ GTC asked if Don has worked with URS on other large projects. Don said no, but that URS has experts in Alaska and the Lower 48 with expertise in aspects of mining and in environmental areas, such as wetlands, etc. Don said he's been trying to make it clear that there are different entities involved in this process, but it is Donlin Gold's project, and there is only one project.
- ❖ Don referred to the list of issues that Georgetown provided prior to the meeting and asked for their specific concerns. GTC asked if the proposals go into fine detail of the barge sizes. Don stated the cargo barges would be 550 tons and the fuel barges would be double hulled with 173,000 gallon capacity. Each barge tug would push 4 barges and there would be 3 barge tugs per day. GTC asked how they predict barge traffic erosion impacts? Don stated that is the purpose of the EIS (to predict impacts). If it became necessary, USACE could request expertise within USACE to resolve any unanswered questions or discrepancies about the information/predictions.
- ❖ GTC asked, if Donlin gets the permit, then what is the relationship with USACE and Donlin after that point? Don stated that USACE would follow-up on the permit terms and conditions, such as doing compliance inspections to ensure Donlin is only filling the wetlands that they are permitted/allowed to fill. There would likely be a lot of conditions on the permit, such as those to avoid impacts to water quality, which USACE can also enforce. USACE has jurisdiction over waters of the U.S. GTC asked if Donlin will have to report to the State of Alaska. Don stated that once the EIS is complete and the permits are issued, then it is up to each agency to enforce their permits. GTC asked what happens if there are significant changes to the project after the EIS, such as Donlin wanting 5 tows per day instead of 3? Don stated that USACE could withdraw their permit if Donlin Gold did not properly describe the project in their application and the EIS process. USACE could also modify their permit. (Review Note: The review process for modification would depend on the extent of the changes. If changes were significant, a supplemental EIS could be required.) Don stated it would be good for Georgetown to submit comments on this. GTC asked if there are changes to a project, then a permit can be modified? Don stated yes. Not much can be done about secondary impacts once the permits are issued. Secondary impacts will be addressed in the EIS. If the EIS is inadequate, it could be subject to legal action.
- ❖ GTC asked if the EIS says how many dump trucks will be used, etc. Don said yes, the EIS will have that level of detail and that information is also on the website.
- ❖ GTC asked about different scenarios, such as issues due to low water in the river. Don stated that Donlin submitted a transportation plan, which might go over that information, but he hasn't looked at it yet. Some days they won't be able to operate due to low water.

- ❖ GTC asked if they could dredge their way to make a channel? Don stated that a Section 10 permit would be required for dredging. If dredging were to be necessary, it would hopefully be determined before any permit for the mine was issued.
- ❖ GTC asked where Donlin Gold plans to get their gravel? Don stated he thought they identified borrow areas along the proposed road.
- ❖ GTC asked if water quality monitoring will be done in the George River or other areas? Don stated he did not know.
- ❖ GTC asked about the proposed horizontal directional drilling for the natural gas pipeline. Don stated Donlin plans to drill under 8 major rivers, including the 3 forks of the George River and the Kuskokwim River. They will drill far enough down to avoid scouring of the pipeline by the river. There would be monitoring/testing of the Kuskokwim water, but Don was not exactly sure where. There will be monitoring of water at the mine site as well but Don was not sure of all the details.
- ❖ GTC asked about reclamation of the mine. Don stated that a design for closure is included and it would be monitored in perpetuity. A fund would be set up to do that.
- ❖ Don re-emphasized that the Tribe should get their comments in by March 29 to get addressed in the Draft EIS. He asked them to be as specific as possible. After the scoping period ends on March 29, 2013 then it might be a year and a half or so until the Draft EIS (subject to schedule changes) and then there will be a 90-day public comment period. Information from that comment period will then be used to prepare the Final EIS.
- ❖ GTC asked if USACE or URS takes into account other mines in the state or nation that might be similar to this proposed mine? Their setbacks, etc.? Don stated that it is the job of URS experts in mining. USACE is required to permit the LEDPA. All alternatives will be included in the EIS. For example, using a road from Bethel instead of the river for transport.
- ❖ Regarding Traditional Ecological Knowledge (TEK), Amanda reported that Donlin commissioned the State Alaska Department of Fish & Game (ADF&G) to do TEK subsistence surveys. The surveys will be done in three phase: 1) Central Kuskokwim; 2) Lower and Upper Kuskokwim; and, 3) Y-K Delta. The first phase is already done.
- ❖ There were questions about tapping into the gas pipeline. Don stated that the pipeline would be a common carrier; it would not be operated by Donlin. Somebody could tap into it, but they'd have to get their own utility to tap into it.
- ❖ GTC asked about electricity, will Donlin tear down the power plant when they are done with it? Don said he wasn't sure, but someone would have to run the power plant if it were to keep running after Donlin is finished with it.
- ❖ GTC asked what main issues have been brought up in scoping? Don stated further downstream people are concerned with navigation and impacts to the river. All along the river there are concerns about contaminants and air emissions. Closer to the mine are concerns about traditional use of lands and restrictions to land use. The pipeline won't be fenced. Don stated that the Kuskokwim Corporation is the surface owner (USACE doesn't have any jurisdiction over them) they may restrict access to the road from mine to the port. Some are concerned about the large number of workers coming into the area and their impact on communities. The Health Impact Assessment (HIA) will look at that. Don expects that workers will live in a camp at the mine site and fly in and out for their shifts. They won't necessarily live in local communities. There is concern about all the benefits going outside and locals being stuck with the mess. Other people have been concerned that if local people are hired then those people will leave the communities because they have money to leave; moving to another location and flying in and out to work.

- ❖ GTC asked if Donlin is the party that will be responsible for the maintenance of the 300+ foot pipeline?
Don stated he had heard Donlin would have check valves every 20 miles and they would run a pig down it every so often. Don was not sure if a common carrier would be responsible for maintenance or Donlin.
- ❖ The meeting ended at 4:07 pm.

Action Items:

- ❖ Georgetown to submit specific written comments before the end of the comment period.
- ❖ Amanda to type up meeting notes.

March 2013 – Scoping Comments & Resolution 13-02 follow on next page



RESOLUTION 13-02

A RESOLUTION SUPPORTING THE SUBMISSION OF SCOPING COMMENTS TO THE U.S. ARMY CORPS OF ENGINEERS REGARDING THE IMPLEMENTATION OF THE PROPOSED DONLIN GOLD PROJECT, WHICH WOULD BE AN OPEN PIT, HARDROCK GOLD MINE TO BE LOCATED APPROXIMATELY 15 MILES NORTHEAST OF GEORGETOWN, AK.

WHEREAS: The Georgetown Tribal Council is a federally recognized Tribal governing body for the Native Village of Georgetown; and

WHEREAS: Our Tribe works closely with Federal agencies, Tribes and Regional Native organizations in the Kuskokwim River region in an effort to protect our environment and human health; and

WHEREAS: New economic developments such as the Donlin Gold proposed gold mine are entering into the region and the NEPA process allows for public commenting prior to the issuance of the draft Environmental Impact Statement (EIS); and

WHEREAS: The members of the Native Village of Georgetown wish to ensure the continued health of the Kuskokwim River and responsible development in order to protect its subsistence resources and the environment of the Kuskokwim River watershed; and

WHEREAS: Georgetown Tribal Council deems it appropriate that our comments be addressed in the Draft EIS, which will aid in protecting Georgetown's Tribal members and their environment for current and future generations.

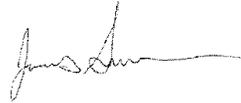
NOW, THEREFORE BE IT RESOLVED that the Georgetown Tribal Council hereby approves and supports these scoping comments for the proposed Donlin Gold project, for which a Notice of Intent was issued on December 14, 2012.

CERTIFICATION

The foregoing resolution was adopted by the Georgetown Tribal Council and passed this 29th day of March, 2013 by 5 in favor and 0 against and 0 absent.



President David Kutch Jr.



Council Vice Chairman Jonathan Samuelson

Georgetown Tribal Council
Native Village of Georgetown
5313 Arctic Blvd, Suite 104
Anchorage, AK 99518

RE: Scoping Comments - Donlin Gold Proposed Project

Lead Agency: USACE

These scoping comments are being submitted on behalf of the Native Village of Georgetown. The Native Village of Georgetown is situated in southwest Alaska in the valley of the middle Kuskokwim River amid the Kilbuck-Kuskokwim Mountains, just up river from the village of Crooked Creek. The village is approximately 15 miles southeast of the proposed Donlin Gold mine project location. The proposed route of the Natural Gas pipeline runs north of Georgetown, and it is our understanding that it would intersect with the George River in three locations. While the Georgetown Tribal Council (GTC) supports economic progress and development, we only do so as long as it is environmentally responsible.

It is our understanding from the Donlin Gold project plan that the implementation of this project would include infrastructure and activities including the following:

- two new ports on the Kuskokwim River, the Jungjuk barge landing location being approximately 25 miles downriver from Georgetown;
- a 313 mile natural gas pipeline from Cook Inlet to the mine location, crossing the George River in three locations;
- an increase in barge traffic on the river (up to 3 tows per day, each tug pushing 4 barges) at times carrying potentially hazardous materials (examples include cyanide and diesel).

Our comments are made with the consideration that upon implementation of such a large scale gold mine and its associated activities and infrastructure, it is imperative that the objectives of NEPA are being met, to ensure the protection and long term sustainability of our environment and its natural resources. There are four objectives of NEPA we would like to ensure are being met upon response to our comments (Section 101 of the National Environmental Policy Act of 1969, 42 U.S.C. §4331):

(b) 2 “assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings”

(b) 3 “attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences”

(b) 4 “preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice”

(b) 6 “enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources”

It is our intention to state clearly the comments we have in relationship to several areas of the proposed Donlin Gold project separately. Several comments are in question format, to merely suggest that additional thought and planning should be given to address these matters.

Proposed Ports at Bethel and Jungjuk locations on Kuskokwim River

(1) Construction of the two port locations on the Kuskokwim River will ultimately disturb fish and wildlife species, as well as their habitat in the immediate area of the project locations. There are many species of fish that are important to the subsistence way of life including but not limited to humpback and broad whitefish, salmon, sheefish, burbot, and pike. All of these species utilize the tributaries and mainstem Kuskokwim River throughout the year. Salmon are most notable utilizing the mainstem during the summer months as migrating adults; however the other species are resident in the Kuskokwim River drainage throughout the year and utilize the mainstem as a migration route to feeding and spawning areas. As it is impractical to avoid this time for construction, it is our recommendation that information be gathered for when peak times of migration occur at the proposed port locations for these species of fish, and avoid those time frames for construction. This would reduce the impacts such construction would have on a resource of significant importance to the subsistence way of life and the quality of the environment in general.

(2) Broad and humpback whitefish are important to subsistence users in the Kuskokwim area, where they constitute more than half of non salmon fish harvests. Subsistence fishermen have raised concerns over declining body size and abundance of these fish (Harper et al, 2012). Additional information regarding subsistence collection will be necessary to understand how and when this resource is harvested. For this reason, Traditional Ecological Knowledge (TEK) collection all along the Kuskokwim should be collected from each Native Village willing to participate. It is not enough to simply collect this information. After collection, it should be well documented how the information collected is impacting decision making (in this example, times of salmon or whitefish migration could be avoided for construction of ports).

(3) The possible change in hydrology due to such construction should also be taken into consideration. It is unclear if a significant change will take place as a result of this portion of the proposed project. It is also unknown how any changes will be monitored. GTC would like assurance that water quality monitoring will be conducted at each port location as well as up and downriver from each port location on a continual basis, throughout the entire life of the mine and its reclamation process.

The 313 mile natural gas pipeline from Cook Inlet to the mine location

(4) The proposed route of the pipeline crosses the George River in 3 locations (the main stem, north fork and east fork) and is to be done with the use of horizontal directional drilling. After conducting some research, GTC has found that although popular, this technique lacks control of risks coming from underground. Some of the risks identified by Dr. Kruse in his paper given at the 4th Pipeline Technology Conference in 2009 include “1. High pulling forces or incomplete pull back caused by local bore hole instability, 2. High pulling forces or incomplete pull back caused by frictional forces in the borehole and 3. seepage through the borehole to the surface” (Kruse, 2009). Given these risks, we suggest Donlin Gold be required to perform a soil related risks analysis for the prevention of unwanted events during the drilling stages or after the installation prior to the issuance of any permits for this project.

(5)GTC would also like to see water quality sampling being conducted at each of the proposed points of where the pipeline will cross the George River, as well as a location downriver from these points, and at the mouth of the George, where it meets the Kuskokwim.

(6)The right of way for the pipeline is to be 200 ft during construction and 50 ft following construction, and to be brushed every 10 years. It is our concern that this area will be fenced, thus creating a barrier in areas where subsistence hunting takes place, and would be an impediment to animal migration. (7) It is also eliminating habitat for birds and other wildlife in that area - could brushing take place less often so as to eliminate the need for disturbance to these species?

(8)The proposed plan states that the pipeline is designed to last 30 years. What happens after those 30 years? Will the pipeline be removed or remain onsite? It should be clearly stated in the project plan and taken into consideration during the EIS process so that the impacts of this portion of the project are fully understood and considered prior to permit issuance.

(9)Who will be responsible for maintenance of the pipeline including monitoring for leaks? Will it be the Natural Gas Company or Donlin Gold? (10) If others are allowed to buy into the pipeline for personal use, will they be responsible for that portion alone or will Donlin or the Natural Gas company still cover maintenance and monitoring? It is important to be clear about this up front, to ensure proper monitoring and accountability.

(11)It is our understanding that recent court rulings classify greenhouse gas emissions as pollutants under the Clean Air Act, and thus could mean that a full analysis of the cumulative impacts of a natural gas pipeline should be required. Are the cumulative impacts of a natural gas pipeline being considered with the completion of this EIS?

Increased Barge Traffic on the Kuskokwim River

The increased barge traffic on the River causes several significant concerns, on which we would like to comment.

(12)With an increase of barge traffic on the river, disruptions to fish and wildlife species will occur. Increased erosion on the banks of the river could have negative effects on riparian areas that these species depend upon. (13) Juvenile salmon can often be found living in near shore habitats along the banks of the river, and the wakes from barges could push these fish up onto gravel bars, leaving them stranded. These impacts should be well understood and documented prior to construction.

(14)Again, the effect of an increase in barge traffic should be considered in relationship to the migration of salmon, sheefish, humpback whitefish, broad whitefish, bering cisco, least cisco and round whitefish. Adult salmon migration occurs in the main stem of the Kuskokwim River from late May through November, corresponding with the length of time the river is free flowing. Whitefish species migrate upriver from early May through September, and then down again following spawning periods (Harper et al, 2009). Sheefish will spend most of the summer at the mouth of main tributaries such as the George River and then migrate upriver to spawning grounds, occurring in late September and early October. They will then move back downriver fairly abruptly over a span of a week or two in late fall (Stubby, 2012). Because these migration times correspond with times when barges would be travelling up and down the river, it is necessary for the impacts of this increased traffic on these species of fish to be understood.

(15)The movement of the barges through the river could have significant impacts on hydrology. It could cause changes in dissolved oxygen, temperature, total suspended solids, total dissolved solids, and pH levels. These parameters are all of vital importance to aquatic life, and should be monitored all along the Kuskokwim and its tributaries for the life of the mine and reclamation process. GTC has been monitoring water quality for the past 6 years and has developed baseline data for the Georgetown area. It will be important to continue monitoring to ensure and verify the long term sustainability of our ecosystem health.

(16)Another concern with barge traffic lies in what the barges are transporting: cyanide, fuel, and other hazardous chemicals. If and when an incident should occur that would cause a spill, the outcome could be disastrous for those living on the River, and even for far reaching communities that would be affected downstream. This bears a significant "risk to health and safety" for the fish and wildlife populations and village communities along the Kuskokwim River. The project plan states that there will be spill response equipment at Bethel and Jungjuk ports, but what about in between? A spill response plan should be developed for each village along the barge route to ensure the fastest and most effective response time possible.

(17)Barges have been getting stuck increasingly over the past few years, and this also poses a significant risk for potential leaks or spills into the river. There are several stretches of the Kuskokwim of notoriously shallow water, such as the stretch just downriver of the proposed Jungjuk port location, near the convergence with the Oskawalik River. These areas should be studied to be sure that barges of this size could pass through without delay or incident.

(18)Should an area of the river be too low for barges to pass through, would dredging be required? How often and where? With break up each year, gravel gets moved around and channels change so much, that there is concern there would be dredging required each year, and if this is the case, the impacts of this should be properly addressed in the EIS process.

(19)Birch Tree Crossing, just downriver from Aniak (GPS coordinates N 61 35' 15.03

W 159 50' 20.27), in the mainstem of the Kuskokwim River has been identified as a probable location for spawning of humpback whitefish. They were tracked migrating to this location during September and October and then began migration downriver shortly thereafter, an indication of spawning. The habitat is also similar to other known spawning grounds, again indicating a spawning area. However, additional studies during the spawning period are needed to confirm the presence of mature fish in spawning condition at this location (Harper et al, 2012).

(20)Broad whitefish primarily migrate in September to late October and humpback whitefish are already on the spawning grounds at this point. Both of these fish feed little during spawning migration, and thus depend on their stored energy to get them to reach their spawning grounds (Harper et al, 2012). Increased barge traffic could increase energy expenditure during migration of these fish, according to fisheries biologists in the area.

(21) For these reasons, it is GTC's suggestion that studies should be conducted regarding the effect of increased barge traffic on salmon, sheefish, humpback whitefish, broad whitefish, bering cisco, least cisco and round whitefish, . (22)In addition, spawning areas should be confirmed prior to allowing increased barge traffic along the migration routes of these fish and/or dredging in the area of Birch Tree Crossing.

(22)When fishermen use set nets, the waves from the barge wake could disrupt this method of fishing, causing problems for subsistence harvest. (23)Likewise, if commercial fishing were to take place on the Kuskokwim River, the amount of barge traffic on the river could cause significant disruptions for the fishermen. What plans are in place to mitigate these disruptions? (24)The many communities along the proposed route of barge traffic depend on the river for not only fishing, but transportation as well. Will the increase of barge traffic disrupt schedules, or cause harm to boaters?

General Comments

During our research of the proposed Donlin Gold mine, a few general questions were generated that we feel should be answered during the EIS process.

- (25)What plans are in place for dealing with earthquakes and other natural disasters?
 - How would the mine and tailings impound withstand such an occurrence?
- (26)What are the exact GPS coordinates for river crossings along the proposed pipeline route?
- (27)What are the plans for infrastructure once mine life is completed?
- (28)How long and wide is each of the four barges of each tow?
 - Will an additional tug be needed for each or any of the tows?

(29)Finally, it is our understanding that permitting decisions are made after the review of the final EIS and a record of decision is made. It is trusted that Donlin Gold will disclose all planned aspects of the project and associated activities and the EIS would consider all possible impacts of this proposed project. This way, when permits are issued, it is with an understanding of the least amount of risks possible and activities are being allowed in the most environmentally responsible way.

For some of these activities, a specific permit is required from a federal or state agency. After the EIS process is complete and the permit is issued, should there be any changes to the project or permitted activity, a modification to the permit would need to be requested by Donlin Gold, since it is not what the agency would have signed off on and permitted. However, there are some activities associated with the project that are not specifically permitted, but have impacts on the environment nonetheless. These secondary activities and impacts are analyzed and considered in the EIS process, which is used by the federal and state agencies to help make a permitting decision. But since they are not specifically issued a permit to take place, what happens if significant changes are made to these activities following the EIS process? There would be no process such as permit modification to address these changes.

For example, should unforeseen events take place following the NEPA process and permit issuance, and Donlin Gold decided they need to have 5 tows per day rather than the intended 3 tows per day, what would happen? The number of tows per day is not specifically permitted, but a specific number was allowable under the record of decision made on this project. To change the number would cause great implications to fish and wildlife populations, bank erosion, quality of habitat, and communities all along the river – and the premise for which permits were issued will have changed. Would this make all associated permits invalid and thus require a new EIS or would it be allowable since it is not specifically permitted?

If the latter is the case, this causes great concern for the environment and communities all along the Kuskokwim. It should be clear what we are allowing to happen, and if changes are made that will alter the impacts made, whether they are specifically permitted for or not, Donlin Gold should be held accountable for these changes, and re-evaluation required for all activities associated with the mine. Each permit should cover all secondary issues, thus requiring a modification upon any changes, whether it is the primary activity or not.

Please see attached resolution of support for these comments.

Thank you for considering our comments, and we would appreciate a full analysis of each of these comments along with a copy of both the Draft and Final EIS.

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July 2014

Donlin Gold Project EIS

Georgetown Tribal Council Annual Meeting

Presentation regarding the Donlin Gold Project EIS

July 19, 2014

Project Team Attendees:

Don Kuhle, U.S. Army Corps of Engineers

Chelsey Beans-Polk, URS Intern

Taylor Brelsford, URS Environmental Scientist

Overview:

At the invitation of Council President, Don Kuhle presented an update on the Donlin Gold Project EIS at the annual meeting of the Georgetown Tribal Council on Saturday July 19, 2014. Georgetown Environmental Coordinator coordinated the Corps' participation. The presentation included a summary of the project

components, results from scoping, alternatives under analysis, workshops and studies to fill data gaps, and an overview of the EIS process. Mr. Kuhle and Taylor Brelsford answered questions during and after the presentation. Approximately 15 people attended.

Issues Raised:

1. How will the natural gas pipeline cross rivers, like the Kuskokwim River, without environmental damage?

Response: The pipeline will be installed below the Kuskokwim River using horizontal directional drilling. This avoids disturbance to the river during construction.

2. Will the EIS review an alternative with no pipeline?

Response: In an earlier design stage, Donlin Gold planned on using barges to transport all the fuel needed for electrical generation and transportation at the mine site. Because of concerns about barging 90 million gallons of diesel fuel each year. Donlin Gold modified the plan to rely on a natural gas pipeline to fuel the electrical plant and reduce fuel barging to 40 million gallons of diesel per year. There is currently no alternative under review that would eliminate the pipeline as part of the plan. However, one alternative would propose a diesel rather than natural gas pipeline in order to eliminate barging of diesel fuel. The EIS will compare the environmental risks and consequences of the pipeline alternatives.

3. Will the Corps hold additional teleconferences with the tribes as the EIS progresses?

Response: Yes, the Corps intends to hold tribal coordination teleconferences with the tribes on an ongoing basis throughout the EIS. Government to Government Consultation with the Alaska District Commander could also be held if warranted.

4. When there are alternatives for the road to the mine site, will the EIS examine all environmental consequences for each route?

Response: The alternative routes to the mine site will be from the up-river barge landing at Angyaruaq (Jungjuk) for the proposed action, or for an alternative site at Birch Tree Crossing. In both cases, a comparable level of environmental analysis is required.

5. How will the pipeline be maintained to insure it doesn't leak? *Response: In its permit application, Donlin Gold included detailed plans for ongoing monitoring and maintenance of the natural gas pipeline. The adequacy of these plans to prevent leaks will be evaluated in the EIS, and the permitting agencies will include binding permit conditions to insure this maintenance and monitoring work is done.*

6. Will meetings be held for public comments on the Draft EIS similar to the scoping meetings?

Response: Yes, public meetings will be held to review the Draft EIS, in the same subregions of the project area as during the Scoping meetings. These meetings are currently scheduled to take place in the fall of 2015.

7. Will the Draft EIS identify which alternative the Corps plans to permit?

Response: The Corps has a different regulatory process than some other agencies. The Corps is required to select the Least Environmentally Damaging Practicable Alternative (LEDPA) in their Record of Decision. A draft LEDPA may be included in the Final EIS. The Corps will not be identifying a preferred alternative in the Draft EIS.

8. What happens if the different agencies disagree on the best alternative for the Donlin Gold project?

Response: A great deal of effort goes into coordination among the cooperating agencies so that the EIS can serve their specific agency needs. The agencies meet once or twice per month to help develop the EIS analysis. It is rare that the agencies would not come to agreement on the best alternative for permitting. However, if that were to occur, we anticipate that there would be high-level discussion among the agencies to come to an agreement.