

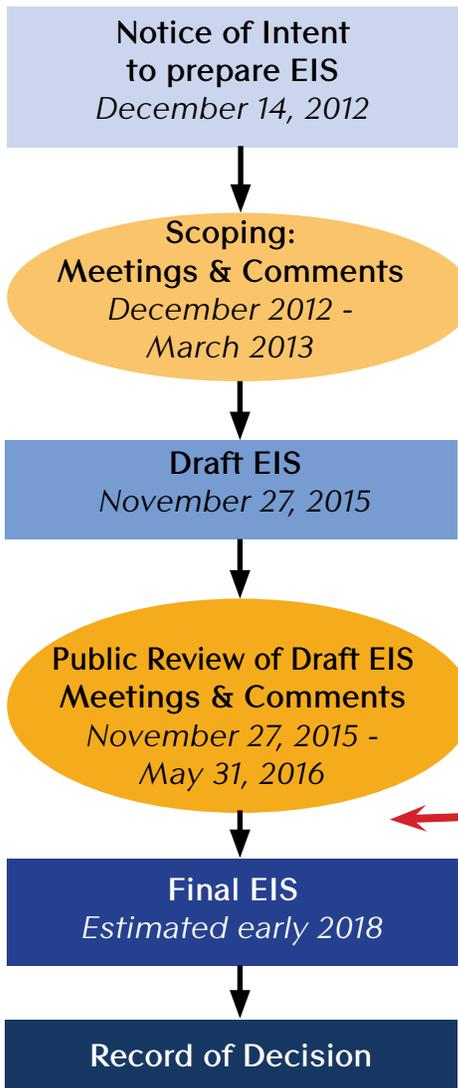


# US Army Corps of Engineers Donlin Gold Project EIS

Newsletter #6 • November 2016 • Public Comment Review

*This is the sixth in a series of U.S. Army Corps of Engineers newsletters about the Donlin Gold Project Environmental Impact Statement. Newsletters are mailed to federal, state, and local agencies; elected and appointed officials; Alaska Native tribes and corporations; other interested organizations; and individual citizens. For more information, visit the EIS website: [www.DonlinGoldEIS.com](http://www.DonlinGoldEIS.com)*

## Steps in EIS Process



## Public Comment Period Completed for the Draft Environmental Impact Statement (EIS)

The U.S. Army Corps of Engineers (Corps) prepared a Draft Environmental Impact Statement (EIS) to disclose impacts of the proposed Donlin Gold Project and offered the public and agencies opportunity to comment on the document. The public comment period began November 27, 2015 and remained open through May 31, 2016. During that period, the Corps conducted public meetings in 17 communities to discuss project impacts and gather comments. Since the close of the comment period, the Corps has been reviewing the public and agency comments that were submitted, and all comments will be addressed in the Final EIS. This newsletter provides a summary of the comments received and an update on the comment analysis process.



Photo credit AECOM



## Public Comment of the Draft EIS

During the public comment period, 17 public meetings were held to receive comments on the Draft EIS. These meetings were attended by a variety of stakeholders, including federal agencies, tribal governments, state agencies, local governments, Alaska Native organizations, businesses, non-governmental organizations, and individuals. Each of the public meetings consisted of a presentation by the Corps project manager, followed by a poster session, where attendees could speak with scientists and specialists about the proposed project and its potential environmental impacts. In each meeting there was opportunity for attendees to provide official comments on the Draft EIS. All spoken comments were transcribed by a court reporter to ensure they were accurately recorded. Transcripts of each public meeting are available on the Corps' project website [www.DonlinGoldEIS.com/BackgroundDocuments](http://www.DonlinGoldEIS.com/BackgroundDocuments).

The Corps also accepted comments via mail, email, and fax. The Corps is currently reviewing the comments to determine how each should be addressed, including consideration of the need for additional information and appropriate revisions to the EIS. The Final EIS will contain a summary of comments received and the Corps' responses to them in a Comment Analysis Report (CAR). The CAR will be included as a stand-alone appendix to the Final EIS.

Public meetings were held in:

- Aniak
- Crooked Creek
- Anchorage
- Bethel
- Akiak
- Quinhagak
- Kipnuk
- McGrath
- St. Mary's
- Emmonak
- Toksook Bay
- Hooper Bay
- Nunapitchuk
- Tyonek
- Lower Kalskag
- Holy Cross
- Chuathbaluk



## Analysis of Comments

The number of comments that the Corps received during the public comment period was larger than expected, with 526 unique submissions and transcripts. Comments made on the Bureau of Land Management's ANILCA Section 810 Analysis of Subsistence Impacts were also reviewed by the Corps. Signatures were submitted on two petitions opposing the proposed project. Comments were received from federal and state agencies, local and tribal governments, Alaska Native organizations, businesses, special interest groups/non-governmental organizations, and individuals. All comments received are available on the Corps' project website [www.DonlinGoldEIS.com/PublicComment](http://www.DonlinGoldEIS.com/PublicComment).

All submissions on the Draft EIS were read, reviewed, and dissected into discrete comments which were entered into a Comment Analysis System database, where reviewers sorted substantive comments into specific categories (e.g., Groundwater Impacts, Subsistence, Mitigation Measures). Substantive comments included requests for clarification, new information, criticisms of analysis methods and conclusions, and suggested improvements for the Final EIS.

Many of the comments within each category made similar points. Reviewers grouped like-comments and synthesized them into Statements of Concern (SOCs) that summarized each group of comments. For example, 24 SOCs were written to summarize the 255 comments within the Subsistence category. This process ensures that every substantive comment is summarized by an SOC and is filed appropriately in the database.

During the comment analysis phase, over 5,000 substantive comments were assigned to one of approximately 600 SOCs. Examples of comments received are provided on the next page.



Photos credit AECOM



# What did people say?

**Barge Issues.** Commenters suggested that the frequency and volume of proposed barge traffic on the Kuskokwim should be more clearly stated. There is concern about riverbank erosion, disturbance to fish and other boats on the river, and navigational hazards. Some noted that the impacts of Bethel dock improvements should be analyzed more fully.

“Donlin Gold...will provide much needed infusion of cash economy to individuals, villages, the Y/K region, as well as the State of Alaska.”

**Fisheries.** Comments expressed that impacts to fish resources should be described in greater detail. This would include changes in habitat and behavior from barge disturbances, stream drawdowns, contaminants, and pipeline and road crossings.

**Subsistence.** Residents felt that the Corps should be aware of the importance of subsistence and consider impacts to subsistence resources when making decisions. Some comments asserted that impacts would be more severe at the mine site and as a result of barge traffic. There is concern that the pipeline right-of-way could create access for subsistence competition. Other comments supported the conclusions in the Draft EIS.

“The pipeline and ... airstrips will cause improved access to the area by both subsistence and non-subsistence users”

**Socioeconomics.** Many commenters were weighing the economic benefits of the project (employment, purchases of supplies and equipment, and tax revenues) against the potential negative environmental impacts, including risk of spills and potential for outmigration from the smaller communities.

**Iditarod Trail.** Some comments expressed concern that the pipeline route would negatively impact recreation and the historical quality of the trail. Others asserted that there would be no adverse impacts to trail users.

**Water Flow.** Commenters suggested potential stream flow impacts should be discussed in greater detail. For other impacts like ice breakup and small boat traffic, commenters felt the context should be more fully explained.

**Air and Water Quality.** Some commenters felt that the Corps should more carefully consider the effects of air emissions and water discharges, particularly of fugitive dust and mercury. Additionally, more information would be needed on how project components would impact the quality of groundwater and surface water.

**Spills and Hazardous Materials.** Many commenters suggested that more information should be added on the transportation of hazardous materials and the potential for spills and the Corps should analyze and compare different tailings dam failure scenarios.

**Alternatives.** Additional alternatives were suggested, including variations on the proposed pipeline route. Commenters noted that there should be enough information under each alternative to properly compare effects between them, and the No Action alternative should be more thoroughly analyzed across all resources.

**Mitigation and Monitoring.** Some commenters felt that more mitigation measures should be implemented and long-term monitoring should be required to ensure that project activities will not harm fish, wildlife, and communities.

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## What Happens Next?

The Corps is reviewing comments and will begin to respond to SOCs. Specialists are incorporating suggested changes into the Final EIS document. A Comment Analysis Report will be produced to summarize all comments received, include a response to each SOC, and describe how comments were incorporated into the Final EIS. The Comment Analysis Report will accompany the Final EIS as an appendix and will also be available for download on the project website with the Final EIS.

[www.DonlinGoldEIS.com](http://www.DonlinGoldEIS.com)

*The next newsletter, planned for late 2017, will provide information on the development of the Final EIS.*

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US Army Corps of Engineers  
Donlin Gold Project EIS



## Contact the Corps

*Please don't hesitate to contact us at any time during preparation of this EIS.*

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