

From: [Kerry Adler](#)
To: [donlingoldeis, POA](#)
Subject: [EXTERNAL] Donlin Gold Draft EIS Comments
Date: Tuesday, May 31, 2016 4:48:43 PM
Attachments: [Donlin_DraftEIS_commentsKerryAdler_2016.docx](#)

Dear Mr. Gordon,

Please find attached comments related to the Donlin Gold Draft EIS.

Thank You,

Kerry Adler

7060 Cheryl Street
Anchorage, Alaska 99518

Mr. Kieth Gordon, Project Manager
U.S. Army Corps. Of Engineers, Alaska District
CEPOA-RD-Gordon, P.O. Box 6898
JBER, AK 99506-0898

Dear Mr. Gordon,

The following are my comments related to the Draft Donlin Gold Environmental Impact Statement:

Having reviewed the six alternatives proposed for the Donlin Gold Draft Environmental Impact Statement, Alternative #2 best meets the regulatory and operating parameters for this project to advance to the final draft and permitting phase. This Draft EIS is very thorough and provides the necessary details to advance this project. This extremely important project offers economic opportunity through an established culture of safety, respect for the community, environmental concern, and traditional values. Advancement will provide numerous benefits to the people and communities of this region and greater Alaska.

I was invited to join the Donlin Gold field team from 2006-2012 with the objective of delineating the prefeasibility mineral reserve to a feasible reserve status. My duties encompassed a wide range of responsibilities, including oversight of the field drilling, geologic data collection, and sample processing program, as well as coordinated support of safety, logistics, supplies, engineering studies, field communication, baseline studies, training programs, camp operations, and personnel management as needed. Contributions to the effort were made by a wide range of specialists from every field. Central to the effort was a diversely talented team comprised dominantly of citizens from the Kuskokwim and Yukon Region. I have worked in Alaska's minerals exploration and mining community throughout Alaska for over 30 years through my family services company. I am honored to have had the opportunity to make a positive contribution to this project and learn more about the community values, traditions, and priorities from co-workers residing in this region of Alaska.

It is important to contemplate that the alternatives set forth in the Donlin Gold Draft EIS are the feasible possibilities derived from exhaustive investigations, including those listed in chapter 2.4 (Alternatives Considered But Eliminated From Detailed Analysis). The outcome stems from extensive investigations and innovative studies limited by remote access, limited logistics, variable terrane, hydrologic and climatic conditions, local cultural considerations, and environmental concerns. A viable mine in this part of Alaska with no appreciable infrastructure requires a deposit of unusual size and grade. Deposits of this nature are rare and are not necessarily conveniently located. Had this deposit been in an area nearer a road system, or reliable power, or fuel, there may possibly have been other alternatives and efficiencies to consider such as decreased annual throughput, extended operating mine life, reduced potential fuel storage risks, reduced river traffic and reduced potential impacts to subsistence users. Remote site constraints limit a project to rigid planning conditions. The fact that this project has reached this level of consideration is a credit to the concern, dedication, ingenuity and contribution by those involved in the project, and by the careful review from citizens from the community.

Subsistence

Regional subsistence resource use is well addressed in section 3.21 and paints an interesting picture of community based harvest patterns. The information included in the Draft EIS conforms well to the area

proximal to the proposed mine area when compared to information relayed through visits with coworkers during the mineral resource evaluation.

This project will offer several personal alternatives and choices to subsistence harvesting activities for one who benefits from employed at this project. The more obvious opportunity is the ability to invest in equipment and fuel to access harvest areas that otherwise might otherwise be financially limited. The benefits and impacts of such investment is entirely dependent on an individual's harvesting means, enthusiasm, and preferred harvest method. Harvesting may be dependent on employment scheduling and scheduling. In the event subsistence harvest limits are imposed due to low fish and game populations, reliable income becomes an important alternative until such limits or restrictions are lifted. This offers a benefit for local fish and game management as well as the employee.

Barge Traffic

Barge traffic and the associated infrastructure is well addressed and Alternative #2 best meets the projects needs by reducing overland impacts through reduced road construction and maintenance. I am not familiar of tangible interference or impacts to fisheries from previous barge traffic. There have been instances of barges stuck on river bars and local traffic and safety concerns by derelict craft, however barge construction and traffic procedures proposed in this Draft EIS would implement safeguards to potential hull breaches, improve river navigation, communication, and encourage safe travel habits to the public.

Gas Line

Fuel is a critical component to the advancement of the project. I recently had the opportunity to pass through South Fork of the Kuskokwim River and Farewell area. Over the years of incidental travel, I have noticed numerous trail additions, hunting platforms, camps and airstrips. The ATV trail system is fairly extensive and in some places the ruts are quite notable. The gas line as described in Alternative 2A takes into account detailed soils conditions and engineering practices that will minimize potential degradation to intermittent frozen areas. While this may offer another pathway for cross country travel, it may also provide soil stabilization in areas of uncontrolled public access thus reducing impacts by the public across wet or frozen areas. The addition of the gas pipeline access will not inhibit or detour access for the type of vehicles presently used to access this area.

Planning and Permitting

While the process of evaluating and determining the impacts from a project such as that proposed by the Donlin Gold Project are and important, the process itself has become cumbersome. Delays, policies, and inevitable litigation have inevitably crept into the process of mine construction and operation. This impacts the continuity, viability, and certainty of such projects. These projects take substantial time and capital to evaluate before they ever reach the stage for permitting. This project has taken nearly 30 years to assess potential viability. It may take ten or more years to complete the permitting and litigation process, and if successful, there is another 4-5 of construction before gold production begins. In the mean time, the work force that was established during the exploration and assessment phase of the project is now dispersed to other areas where their training at least may provide employment. I

would not expect most of this work force to be available if and when the mine reaches construction or mining phases. It is discouraging to see an economic bust in a reliable work force due to uncertainties related to permit acquisition. It would take a stream of several ongoing, overlapping projects to fill the employment gap created in the regulatory and permitting process. Unfortunately, with Alaska's infrastructure limitations and the scale of projects necessary to meet these criteria, this is not a practical solution.

This project continues to be, transparent in the way they operate and have always been receptive to the needs and concerns of their community. This philosophy of community and personal investment encourages substantive communication to gather information, assess potential impacts, address concerns, and provides ideas for future project guidelines. Alternative #2 best meets the regulatory and operating parameters for this project, and should be the primary consideration to advance this project to the Final EIS and permitting phase.

Sincerely,

Kerry Adler

7060 Cheryl Street
Anchorage Alaska
99516