

**From:** [Matt Ellsworth](#)  
**To:** [donlingoldeis, POA](#)  
**Subject:** [EXTERNAL] Donlin Gold Project Environmental Impact Statement (EIS)  
**Date:** Tuesday, May 31, 2016 2:57:23 PM  
**Attachments:** [Donlin Gold EIS.pdf](#)

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Dear Mr. Gordon, please accept the attached comments **RE: Donlin Gold Project Environmental Impact Statement** (EIS) from the American Exploration & Mining Association.

**Matthew Ellsworth**  
Government Affairs Manager  
American Exploration & Mining Association  
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May 31, 2016

U.S. Army Corps of Engineers  
Alaska District  
CEPOA-RD-Gordon  
P.O. Box 6898  
JBER, AK 99506-0898

Submitted via EMAIL: [POA.donlingoldeis@usace.army.mil](mailto:POA.donlingoldeis@usace.army.mil)

**Re: Donlin Gold Project Environmental Impact Statement (EIS)**

Dear Mr. Gordon,

The American Exploration & Mining Association (“AEMA”) is pleased to provide these unique comments in support of Alternative 2 of the Donlin Gold Project Environmental Impact Statement (EIS) released for public review and comment.

After reviewing the EIS, AEMA believes this project has been thoroughly analyzed. The EIS recognizes the robust mitigation measures in place to ensure that the project will have a net positive effect on not only the watershed in which it is located, but others in Alaska as well. Donlin Gold is committed to developing a safe and environmentally and socially responsible project that provides jobs for families in the Yukon Kuskokwim region and the State. This project has been consistent in its transparent communications, respecting subsistence and cultural values and creating business opportunities that benefit the Calista and Kuskokwim Corporations and Alaska economy.

AEMA opposes Alternative 3B which would replace the proposed natural gas pipeline with a diesel pipeline. Alternative 3B would result in a more substantial permanent footprint including the need to maintain an access road and air strips during operations. Access roads and air strips for the natural gas pipeline are only needed on a temporary basis during construction. The presence of an access road has the potential to increase competition on subsistence resources in vicinity of pipeline. Also, the potential environmental consequences from a diesel spill are greater than from a natural gas leak, and an unnecessary risk. ***We ask you to reject Alternative 3B.***

AEMA also opposes Alternative 5A that would replace the proposed slurry tailings storage facility impoundment with a dry stack facility. A dry stack facility would increase fugitive dust emissions creating unnecessary and unavoidable hazards. Additionally, the feasibility of a dry stack approach is questionable due to its high costs and technical and operational challenges. A dry stack of this size is unproven in the sub-Arctic climate such as this site. The Army Corps of Engineers has an obligation to approve alternatives on ‘the best available science,’ none of which is conclusive to this proposed Alternative at this time. The closest example of current dry stack facilities in Alaska are 20 times smaller than a Donlin dry stack and in a much different climate and environment. This is an inappropriate comparison to the proposal. ***We ask you to reject Alternative 5A.***

American Exploration & Mining Association is a 121-year old, 2,100 member national association representing the minerals industry with members residing in 42 U.S. states (including Alaska, six Canadian provinces or territories, and 10 other countries). AEMA is the recognized national voice for exploration, the junior mining sector, and maintaining access to public lands, and represents the entire mining life cycle, from exploration to reclamation and closure. Our broad-based membership includes many small miners and exploration geologists as well as junior and large mining companies, engineering, equipment manufacturing, technical services, and sales of equipment and supplies. More than 80% of our members are small businesses or work for small businesses. Most of our members are individual citizens.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Laura Skaer". The signature is written in a cursive style with a large initial "L".

Laura Skaer  
Executive Director

LES/mge