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**Cc:** [BLM AK Donlin Admin Record](#); [Newman, Sheila M POA](#)  
**Subject:** [EXTERNAL] Donlin Gold DEIS Comments  
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**Attachments:** [Donlin Gold Draft EIS - May 27, 2016 NOC Maxwell.docx](#)

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These comments are from the BLM Air Quality, Meteorology/Climate, Climate Change, & Noise subject matter experts, for consideration with the Donlin Gold DEIS.

*~ Thanks ~*

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**Comments on the Draft Donlin Gold Mine Pipeline EIS for:  
Air Quality, Meteorology/Climate, Climate Change, & Noise**

<b>Reviewer Name</b>	<b>Section Number</b>	<b>Page</b>	<b>Subject/Original Language</b>	<b>Proposed Language or Comment</b>	<b>Disposition (CAs should leave blank)</b>
Dave Maxwell	Appendix	Acronyms & Symbols	$\mu\text{g}/\text{m}^2$ = Micrograms per Square Meter	$\mu\text{g}/\text{m}^3$ = Micrograms per Cubic Meter. This is an important air quality unit of measure.	
Dave Maxwell	Appendix	Acronyms & Symbols	$\mu\text{m}$ = Micrometer	$\mu\text{m}$ = Micrometer ( $1 \times 10^{-6}$ meter). This explains the unit more precisely.	
Dave Maxwell	Appendix	Acronyms & Symbols	Degrees Celsius not listed. Degrees Fahrenheit was listed.	$^{\circ}\text{C}$ = Degrees Celsius.	
Dave Maxwell	Section 3.8 Air Quality	Entire Section	A reference to an appendix or location where input and output data for air modeling was not provided.	Identify where the input and output data used for the air modeling analysis is contained. It should be included in an appendix. Appendix I (Air Quality) did not contain this information.	
Tom Coulter	Section 3.8 Air Quality	Page 3-8.46, Para. 4	CALPUFF modeling was used for determining mercury deposition impacts.	Why was CALPUFF model run to determine mercury deposition impacts? The AERMOD model can also determine wet and dry deposition mercury impacts. The AERMOD model was used everywhere else for air modeling. An explanation would clarify the question.	
Dave Maxwell	3.26 Climate Change	Table 3.26-2, page 3-26-8	Annual Reported Greenhouse Gas (GHG) Emissions by $\text{CO}_2$ eq ( $\text{CO}_2$ equivalent).	The other GHGs should be included in this table such as carbon dioxide ( $\text{CO}_2$ ), Methane ( $\text{CH}_4$ ), and nitrous oxide ( $\text{N}_2\text{O}$ ). the sum of these 3 GHGs should add up to the $\text{CO}_2$ eq total.	
Dave Maxwell	Section 3.8 Air Quality	Page 3.8-14	Regional Haze Rule (RHR)	What is the current status of the RHR in Alaska? The Donlin Gold Project would be subject to RHR requirements. What are these requirements?	
Dave Maxwell	3.26 Climate Change	Section 3.26.4 - Table 3.26-8	GHG Assessment Criteria for the Donlin Gold Project	Where are the calculations that show that project related emissions are less than 1% of the total annual GHG emissions for the State of Alaska?	

Dave Maxwell	3.26 Climate Change	Page 3.26-2, Para. 1	Direct GHG emissions from project activities at the mine site would range from 1% to 10% of Alaska annual GHG emissions.	Where is the reference and/or supporting documentation (e.g., calculations) for this statement?	
Dave Maxwell	3.26 Climate Change	Page 3.26-1, Para. 4	No references provided for quantitative statements made in the last paragraph.	GHG emissions statements are made for three mines without a reference to where these numbers originated. Section 3.26.3.1 (Atmosphere) is generally light on providing information on trends in GHGs in the Donlin Gold Project planning area.	
Dave Maxwell	3.26 Climate Change	Page 3.26-26, Para. 1	Since the Donlin Gold Project exceeds 25,000 MT (metric tons) of GHGs/year (the CEQ, 2014 threshold), the project warrants a discussion of climate change in the NEPA process.	Where is the discussion of climate change in the NEPA process within the draft EIS? The reader should be directed to where this discussion occurs in the draft EIS.	
Dave Maxwell	Section 3.8 Air Quality	Entire Section	A trend analysis of the Affected Environment was lacking.	Is the Air Quality trend getting better, worse, or remaining about the same for criteria pollutants, GHGs, hazardous air pollutants (HAPs), and volatile organic compounds (VOCs) within the planning area? See the Checklist I sent in the fall of 2014 (Air Resources Checklist for RMP's/EISs – Affected Environment). This shows where trends analyses are applicable.	

Dave Maxwell

Air Resource Specialist – National Operations Center

May 27, 2016