

From: [Jack Bynum](#)
To: [donlingoldeis, POA](#)
Subject: [EXTERNAL] Donlon Gold EIS Comments
Date: Saturday, April 30, 2016 1:25:11 PM
Attachments: [Donlon Gold Project EIS Review.pdf](#)

Dear Army Corps of Engineers and those overseeing this project,

Below you will find attached a small number of my comments about the project. I am pleased to see you have extended the comment window into the end of May as that was my first point of someone. I strongly believe that Donjon and the companies that own Donlon have showed a long history of failures, spills, and mal practice and because of this the NO ACTION alternative should be chosen.

Please feel to contact me via email or phone (845-661-3008) if you have any questions.

Sincerely Yours,
Jack Bynum

Jack Bynum, Alaska Resident
107 N. Harbour Drive
Valdez, AK
jbynum22@gmail.com
April 21, 2016

Dear U.S Army Corps of Engineers,

As a resident of Valdez, Alaska, a U.S Citizen and long time user of Alaskan Land and waterways, a fisherman and someone who makes a living off the Alaskan Land, I am writing to ask you to deny permitting to the Donlin Gold Project by choosing the **No Action Alternative**. Additionally, given the highly limited publicity of the project and the massive length of the EIS, I believe a 6 month minimum increase in the commenting period is required. For a project of this size, 169 unique submissions for initial scoping clearly evidences an inadequate outreach and scoping procedure. According to Table 1 of the Final Scoping Report from 2013, many of the town meeting times/dates work work days and therefore limited participation. This is especially true in light of Donlin Gold's use of gag orders in the Iditarod Trail case. The reasons for my rejection or request of restricted and cautious progress of the project are as follows:

1) Acid Mine Drainage (AMD), Arsenic, Cadmium, Lead, Cyanide, and Mercury off gassing emissions.

While Donlin Gold maintains that they will both work to capture off-gassing and fully line their waste rock pit, there are still significant risks associated with the quantity of acid rock waste. The main concern is the proximity Kuskokwim River, and more minutely any leaching into ground water. While the liner is certainly beneficial, it does not account for the 1) the high seismic activity of the area, 2) inevitable off-gassing from diffuse rather than point sources, 3) Animal encounters and transfer of acid rock deposits proliferating local and global bioaccumulation and biomagnification 4) Life span of the liner after the predicted 27 1/2 year life span of the mine and resulting cleanup. Mercury is a well-studied neurotoxin. A recent paper by Mathieu Miller and released by the Air and Waste Management Association indicated that non-point sources at open pit gold mines can be between 14- 56 percent of the total mercury emissions from a mine. The EPA need to monitor and regulate non-point source emissions. While it is true that the Kuskokwim River has had an historic exposure to Mercury due to past mining and that the people of the area have unusually high levels of Mercury, this should be in no way an excuse for slack regulations. Mercury's effects compound over time both in bodies and in ecologies. If a spill were to happen, that is 413 million cubic meters of mill tailing, decant water and storm water into the waterways of the Alaskan Coast and its fisheries. Barrick Gold Corp. and NovaGold Resources, the two companies running the Donlin project, have awful track records when it comes to spills of all sorts. The Rock Creek Mine in Nome, Alaska shut down and two employee deaths and an (at least)15,000 liter cyanide leak at Barrick's Veladero mine in Argentina in which five rivers were contaminated both come to mind as examples of the company's poor track record. The massive spill and damn break of the Mount Polley Mine in B.C ought to serve as yet another warning of the inevitability of leak under companies poor provision and supervision.

2) Dredging and High Spill Potential for the Barging on the Kuskokwim River

Given the high value of the Kuskokwim both as a cultural symbol and as a rich locale for salmon and other biodiversity, there is a great risk in increasing a barging network (through CWA 404). Over the span of 30 years, the likelihood of a spill of the some 37.5 million gallons of fuel per year to be transported is high. At present, Donlin has yet to provide a convincing solution to this high-risk problem. Alaska has had repeated accidents with Barge groundings and spills. While in parts of Alaska, such as Valdez there are 24 hour cleanup crews at the ready, this is not a proposal made by the Donlin group.

3) 313 Mile Pipeline Crossing the Alaska Range and threatening Iditarod Trail Cultural Significance

According to a report put together for the U.S Dept. of Energy, all gas lines have at least a small amount of leak. This leak is both affecting air quality, and potentially impacting streams of the Alaska Range and affecting water quality. The Alaska Range is already crossed by one pipeline, the TAPS, and does not need a second. Moreover, it would be more sensible to piggyback this pipeline on the TAPS instead of making a new corridor and re-routing gas into Port Valdez instead of Cook Inlet. Additionally, the destruction of 58 miles of the Iditarod trail should be avoided for cultural significance.

4) Both Barrick Gold Corp. and NovaGold Resources are Canadian Corporations with a Track Record of Environmental abuse and Regulation Violations.

Within this comment is no anti-Canadian sentiment. Rather, what the comment pertains to is the fact that 70% of the worlds mining industry is headquartered in Canada for a reason: because Canada has a history of sheltering Mining companies from legal disputes and contract fall outs. The concern is that, barring a massive catastrophe earlier, after 27.5 years of mining, when the gold deposit runs out, the companies will simply leave without spending the money to truly clean the area. If they were American companies they would in theory be held more accountable by the U.S government and EPA. If this were to happen, then the 1400 jobs that had been provided by Dunlin Gold will likely be cut with those remaining shifting over to clean-up efforts possibly paid for by the U.S govt. This is all speculation of course, but time an again this has happened across the U.S and by Barrick and NovaGold. A CorpsWatch Report published in May 2007 outlines many of the regulations broken by Barrick in it's global mining projects of that year. The list is extensive. On the NovaGold side: in 2007 the Galore Creek copper-gold mine came to an abrupt halt after the companies projected a 3 billion dollar cost overrun. If a similar thing were to happen at Donlin, any infrastructure, expense, and landscape destruction endured by the natives there would be without financial return. It make more sense from socio-economic perspective to have an American company mine the gold.

5) Inadequate Study and Address of Habitat Loss Specifically Pertaining to Endangered Species.

Endangered Species present in Alaska in the area effected by the Donlin Gold Mine are: Short-Tailed Albatross, Eskimo Curlew, Blue Whale, Humpback Whale, Right Whale. All of these species have a high potential to be affected by the project either because of continual emissions and ground water leaks, or because of a spill. The population of Eskimo Curlew in the area has not been adequately assessed. Given he current

superfund sight already leaching into the Crooked Creek area, baseline testing needs to be done on the fish and wildlife of the area. Most importantly, said testing ought to be done on the resident whale populations so levels of mercury and arsenic can be monitored throughout the duration of the project and their origins traced. IF this monitoring were to show any increase in levels as a result of the Donlin Project, a cease and desist would be in order. All alternatives in the Donlin project suggest no impact to endangered or threatened species, but this is based off a narrow definition of threat.

6) Provision of funds for future long-term decommissioning costs and impacts.

Given the immensity of this project, research at comparable mines for a total 200 year long cost of cleanup and monitoring should be compiled. This amount must then be put in an escrow account between Donlin Gold and U.S Bureau Reclamations for use in decommissioning, cleanup, or cleanup of unforeseen spills. This escrow account must be put in place before any development permit are registered.

7) Need automatic and publicly accessible air quality, water quality data collection

These stations need to be immediately on sight for point sources and in the surrounding areas for diffuse emissions.

Consideration of Alternatives:

With these concerns, and many more in mind, I strongly advocate for the **NO ACTION** Alternative. At the least, an extension in the comment period is required. If No Action is not endorsed, I provide a critique of a few of the alternatives mentioned in the DEIS.

Alternative 3A

2.3.3 — while using LNG powered trucks does reduce the diesel barging up the Kusoskwim, it increases the flow thru the pipeline and makes said pipeline all the more necessary and increases likelihood of leaks. An impact statement should be prepared comparing the relative impacts of a pipeline as compared to barging. Additionally, while LNG burns much cleaner than diesel, the overall emissions impact is comparable.

Alternative 4

2.3.5.2 — Reducing Barge Traffic by increasing the length of the access road from 30 to 76 miles is a poor plan. While Barge traffic has the significant risk of leaks and congesting the waterway, the increase in road length would spell a massive increase in dust production and a decrease in air quality. A simple calculation would suggest that by increasing the road by 153% you also increase the dust produced by road traffic by 153%. This would be offset by a minuscule reduction in emissions from barge traffic.

Proposed Alternative Amendment: including alternative 2.3.5.2 while paving the entire length of the 76 mile road would reduce barge traffic and decrease fugitive dust emissions.

Notable Alternatives Left Out of Proposal for Reconsideration:

MS-88 Decommission and remove all mine infrastructure at closure

MS-107 Remote-sensing monitoring

TI-55 Use “Hi-Float” or “Chip Seal” on the road to the mine site from Angyaruaq (Jungjuk) Port.

TI-62 Reclaim the mine site airstrip after operation was complete.

TI-79 Combining two or more of options TI-69 through TI-78 (energy alternatives)

PL-47 Installing slope breakers and trench breakers at wetland boundaries to prevent trenches from draining wetlands.

PL-67 Option for HDD at all fish-bearing streams.