

**From:** [Craig, Bill](#)  
**To:** [Bellion, Tara](#); [Evans, Jessica](#); [Smith, Neal](#)  
**Subject:** FW: [EXTERNAL] Request to extend public comment period  
**Date:** Thursday, April 21, 2016 12:21:36 PM  
**Attachments:** [CSP2 comment period extension request.pdf](#)

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-----Original Message-----

From: Gordon, Keith POA [<mailto:Keith.Q.Gordon@usace.army.mil>]  
Sent: Thursday, April 21, 2016 12:19 PM  
To: Craig, Bill  
Cc: Newman, Sheila M POA  
Subject: FW: [EXTERNAL] Request to extend public comment period

-----Original Message-----

From: kzamzow@gmail.com [<mailto:kzamzow@gmail.com>] On Behalf Of Kendra Zamzow  
Sent: Thursday, April 21, 2016 12:10 PM  
To: Gordon, Keith POA <[Keith.Q.Gordon@usace.army.mil](mailto:Keith.Q.Gordon@usace.army.mil)>  
Cc: Dave Chambers <[dchambers@csp2.org](mailto:dchambers@csp2.org)>  
Subject: [EXTERNAL] Request to extend public comment period

Dear Keith:

CSP2 would like to submit the attached letter requesting an extension of the public comment period.

Thank you,

Kendra Zamzow, PhD  
Center for Science in Public Participation PO Box 1250 Chickaloon Alaska 99674  
907.354.3886 cell

# CENTER for SCIENCE in PUBLIC PARTICIPATION

PO Box 1250 Chickaloon, AK 99674

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“Technical Support for Grassroots Public Interest Groups”



April 21, 2016

Keith Gordon, Project Manager  
US Army Corps of Engineers, Alaska District  
CEPOA-RD-Gordon, PO Box 6898  
JBER, AK 99506-0898

Re: Comment period extension

Dear Mr. Gordon:

The Center for Science in Public Participation provides technical advice to public interest groups, nongovernmental organizations, and indigenous communities on the environmental impacts of mining. We have been involved with development of the Donlin draft EIS in the role of technical consultant to the Native Village of Chuathbaluk for over two years. However, our letter here is with regards to our role as a public entity commenting during the public comment period.

There are two documents that are not yet available which would serve the public well to review in conjunction with the draft EIS:

1. The BLM study on metal concentrations in fish within the Kuskokwim River drainage, including the George River, conducted as part of the Red Devil cleanup investigation.
2. The Alaska state Health Impact Assessment for the Donlin mine.

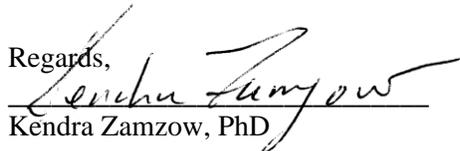
The BLM 810 Analysis included as Appendix N within the draft EIS highlights the extent to which different conclusions can be reached with regards to impacts on this very large project – which includes not only the mine footprint, but 200 river miles of the Kuskokwim River and 315 miles of pipeline.

It would be extremely relevant to have the above studies in hand while reviewing the Donlin draft EIS impact evaluation to determine potential discrepancies, which could then be addressed during the final EIS. While this evaluation could occur during the cooperating agency meetings, it would serve the public better if they were available during the public comment period.

Additionally, although the five month public comment period is generous, it does take considerable time to review the amount of material, particularly when also reviewing original documents DEIS statements are based upon, and the public must find time for the review in between the hours outside their regular work. Even organizations that have been involved as cooperators (Native Village of Chuathbaluk, Native Village of Napaimute, CSP2) have had to work in review time around several other ongoing projects and have found they need more time.

We would like to support the request of the Native Village of Chuathbaluk and other tribal and NGO groups to extend the public comment period. I can assure you that the time will be well-spent and will result in additional review and comments that we would be unable to make otherwise.

Regards,

  
Kendra Zamzow, PhD