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To: [Gordon, Keith POA](#); [Newman, Sheila M POA](#); [Brewer, Jason D POA](#)
Cc: Council@cityofbethel.net; [Andre Achee](#); [Bill Howell](#); [Peter Williams](#); [Ted Meyer](#); [Muzaffar Lakhani](#); [Hansel Mathlaw](#)
Subject: [EXTERNAL] Donlin Gold Mine Project Comments
Date: Monday, May 30, 2016 9:51:27 PM
Attachments: [DonlinGoldMineEISCommentsSubmissionAKC05.30.2016.pdf](#)

Keith

Attached are official comments on the Proposed EIS for Donlin Gold Mine Project.

This is in substitution to any previous comments that were previously made.

Please note that the attached comments were reviewed and approved by Bethel City Council

These comments are not in support or opposition of this project.

Ann

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May 26, 2016

U.S. Army Corps of Engineers
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RE: Public Comment for Donlin Gold Project EIS

Mr. Gordon, while this letter does not cite specific section of the EIS, this letter does address the overriding concerns for the City of Bethel that the “Donlin Gold Project” EIS does not include consultation or input from the Department of Homeland Security. DHS oversees and administers emergency management services and thus should have been identified by the lead agency, US Army Corps of Engineers, as one of the essential agencies to be consulted. Moreover, this EIS lacks any input from the State of Alaska or any local emergency service management providers on how the “project” would address catastrophic events which will affect residents along the water transportation routes and land based routes. Specifically, in the City of Bethel where Donlin Gold has partnered with Lynden Cargo Transport and Knik properties for the transport and storage of cyanide, mercury and high caliber explosives.

By this letter, the City of Bethel does not indicate support or opposition for this project, however as the City Manager and the City’s designated Civil Defense Incident Commander with full support of Bethel City Council; I have the following comments and observations on the Donlin Gold Mine project:

Sec. I

The premise of “de-coupling” the transportation and storage of cyanide, mercury and high explosives

While it is the position of Donlin Gold Project that the Bethel operation has been subcontracted to a separate operator, the US Army Corps of Engineers should apply the standard of measurement that

“but for the Donlin Gold Projects” Lynden Cargo Transportation and Knik properties would not operate a massive storage yard in City of Bethel and barge highly toxic chemicals and explosives on the Kuskokwim River.

- (a) Transportation and storage of toxic chemicals necessary for the operation of this project must be part of the EIS.
- (b) Department of Homeland Security should be an official federal/state agency to comment on any and all emergency management plans for the safety or evacuation of residents along the Kuskokwim River and the entire “Project’s” natural gas pipeline route.

Sec. II

The security of the proposed dock and storage yards in Bethel should be a required component of this project

Proposed Bethel storage yard adjacent to the Bethel dockyard does not include any security measures for the safety of Bethel residents or the safety of the employees at the storage yard. This project needs to include basic security fencing around the perimeter of the proposed storage yard and an emergency access route to the dock and the storage yard. This EIS is not specify if the chemical shipments of cyanide, mercury and high explosives will be off-loaded from the sea barge directly to the river barges or will this material be off-loaded from the sea barge to the dock and stored in the yard and then loaded on to the smaller river vessels.

For this reason alone, the proposed project must obtain mandatory comments from Homeland Security and the Local Emergency Planning Committee/City of Bethel Emergency Incident Commander. The City of Bethel first responder teams for safety, security and medical treatment of injuries to human beings and wildlife must be provided with the resources and training to handle any environmental spills, and injuries from cyanide, mercury and high explosives.

- (a) Safety and emergency response plan at the Bethel storage and dock yard must be included as approved by Department of Homeland Security and City of Bethel first responder agencies.
- (b) Donlin Gold Project must provide the necessary resources including but not limited to financial security bonds for the development of emergency response plan at the Bethel dock and storage yard.
- (c) This emergency response plan must address the location and security of the proposed storage and the dock yard, that currently plans to store high explosives within several hundred yards of the largest regional fuel storage containers.
- (d) Storage of these high explosives next to the storage of fuel tanks is a disaster awaiting the residents of Bethel.

Sec. III

Piped water is not currently available for fire suppression for the dock yard or the storage yard located next to the fuel tanks

City of Bethel does not have sufficient water and sewer infrastructure to provide the necessary water pressure for fire suppression, waste water and toxic solid waste disposal. The issue of water pressure availability for fire suppression is significant for the protection of life and property in the proposed Bethel dock and storage yard.

City of Bethel has trucked water. The ability to draw water from the river, in the event of a chemical spill, an explosion on a sea barge, or during winter months when the river is frozen is impossible and/or would pose an enormous risk to all first responders. Accordingly, the City of Bethel lacks a viable means to adequately fight a fire in this area.

- (a) Bethel dock and storage yard facility must build an extension from the planned water and sewer pipeline main institutional corridor to the Donlin Gold Project associated storage and dock yard facilities.
- (b) Bethel dock and storage yard must provide a plan for disposition of its waste water and solid waste including but not limited to used oil and associated toxic chemical products.

Sec. IV

Geographic isolation of the area

City of Bethel and the villages that dot the landscape along the Kuskokwim River are located on what is commonly referred to as “off the road transportation system”. There are no traditional “roads” leading to and from Bethel or planned project’s geographical region. There is no “mutual aid” from anywhere in the United States that can arrive to assist Bethel’s first responders for at least the first 6 hours of a catastrophic event. The nearest US Coast Guard is located in Kodiak, AK. Bethel dock and storage yard operating as a subcontractor for Donlin Gold Project must provide sufficient physical and financial emergency transportation resources to the City of Bethel and the region’s villages along Kuskokwim River.

- (a) Bethel dock and storage yard must provide initial resources and create a 5-year plan to assist local area emergency first responders with evacuation and transportation of area residents.
- (b) Provide for emergency housing facilities if village residents along the “Project’s” planned transportation routes must be evacuated.

Sec. V

Local governance capacity along the Kuskokwim River and the “Donlin Gold Project” region

The City of Bethel has the largest developed local governance capacity along the Kuskokwim River at the present time. However, Donlin Gold Project will affect all the small villages along with a large swath of land related to this project. Small villages have very few resources or governance capacity to organize and address environmental or human disasters. Such emergencies would have to be addressed by the State of Alaska with assistance from first responders in Bethel.

Issue of governance capacity is somewhat loosely referred to in the current EIS study. However, this study fails to address or recommend a remediation plan on how the lack governance capacity will affect the isolated population. How will these small village and tribal governments recognize, communicate and articulate their concerns on the matters of safety and security of their communities?

- (a) Donlin Gold Projects and the permitting Agency must address the issue of governance capacity by set aside of financial resources to aid the affected communities to build governance organization(s). These organization will then enable affected communities to develop a common voice and a financial instruments that will compensate the affected communities in their ability to develop a “metropolitan planning organization-like” governance structures which will address the ongoing environmental and human impacts to this area for the 30 years of proposed operation of the mine and the 100-year life cycle of the mining operation’s impact on this region.

With Bethel City Council,

Respectfully,



Ann K. Capela
City Manager

cc: Bethel City Council
Alaska Governor, Bill Walker
Claude Denver, State of Alaska Office of Homeland Security