

From: [Rainy Diehl](#)
To: [donlingoldeis, POA](#)
Subject: [EXTERNAL] EIS comments in support of Alt 1
Date: Tuesday, May 31, 2016 11:57:37 AM
Attachments: [Alternative 1.docx](#)

To whom it may concern:
Attached are my comments re: Donlin Gold Mine.
Thank you,
Rainy Diehl

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

From:
Rainy Diehl
6305 Connors Trail Circle
Anchorage, AK 99502
rainydiehl@yahoo.com

Mr. Gordon:

I strongly encourage all permitting committees to consider Alternative 1-NO ACTION.

I was born and raised in Aniak, just down the Kuskokwim River from the proposed Donlin Creek gold mine. My non-Native Dad absorbed as much of the local culture from the elders as he could and with my mom, who is from Stony River, raised three of us primarily on a subsistence lifestyle. We fished year round, for salmon in the summer and for lush in the winter with a fishtrap under the ice. We even ice fished for eels in the winter. We ate moose meat and went on camping trips to pick berries in the early fall time. We lived off of the land and the river.

In my professional life, I went off to college and earned a BS in Biological Sciences from Western Washington University. I also took marine biology and environmental science courses. I worked for ADF&G, KNA, and AVCP in fisheries for 7 or 8 summers. I then went on to graduate school and earned a Doctor of Physical Therapy. I now practice in the field of physical therapy, while fighting to ensure my region is safe from environmental harm is my personal passion.

I give you the history of my childhood because that is how I want my son's childhood to be. My husband, also from Aniak, retires from the US Navy in September 2016 and has always planned to return home. He has a fishcamp, where he spent the majority of his upbringing, 6 miles downriver from Aniak, on the Kuskokwim River. We spend time there with our son every summer and winter.

This mine may be the deciding factor on whether or not we move back. I am scared to death of living downriver from potentially North America's largest open pit gold mine. I fear for the drinking water to become polluted with heavy metals, for mercury emissions to blow over towards Aniak and my family be stuck inhaling them, for one of many barges or transfer stations to have a massive diesel spill in the Kuskokwim, for the destruction of the salmon population, for birds to land in the tailings ponds and then be eaten, or for our river to dry up because this mine requires so much water.

Sadly, our own Native Corporations (Aniak Traditional Council, TKC and Calista) have been hugely supportive of it and do not seem to place the potential environmental destruction, health disparities, or

subsistence lifestyle over the financial benefit from this mine. They have not even advocated for stricter environmental protection aside from the tailings liner. Many of the people in the native corporations making these decisions do not even live on the Kuskokwim. They live in Anchorage, on the road system, where they can go to the grocery store to buy food. They do not need to hunt or fish, eat the local berries or worry about the repercussions of mercury emissions or heavy metal bioaccumulation in the moose and caribou and migratory birds. Yet they speak boldly in support of the mine and act as a voice for all of their shareholders. They have not asked for my opinion as a shareholder. *I want the permitting committees to know that the Aniak Traditional Council, TKC AKA The Kuskokwim Corporation and Calista do not represent my voice, my husband's voice, or my son's voice.*

I have not had a chance to read the full EIS. I have read the executive summary and skimmed the EIS but could not find the time to read the entire EIS.

My concerns:

Transportation:

Using the river as a transportation corridor is risky. The amount of barges going up and down the Kuskokwim River carrying supplies, and astronomical amounts of fuel and chemicals, is simply asking for an environmental disaster. As a child I remember often seeing diesel slicks on the river where barges parked. Over the years the river seems to be lower and lower, and the potential for grounding seems high. Not to mention, the mine itself will require significant amounts of water which I fear could decrease levels in the watershed, leaving the Kuskokwim even lower with more potential for barge grounding and spills. The prop wash from the barges is sure to affect salmon travelling up and salmon smolt travelling down the river, most notably the juvenile salmon. The fumes & pollution from that much barge traffic also cannot be good for the adult or juvenile salmon. Who will be testing these fish to monitor for bioaccumulation of heavy metals or chemicals? Will there be studies to determine if barges impact the smolt population from the get go? The Kuskokwim fishery is already drastically low with multiple restrictions set for subsistence users. Are there any plans to stop barge traffic if the fishery is significantly reduced after the introduction of heavy barge traffic? Who will monitor this and look for a correlation to halt barge traffic if the subsistence fishery is ruined? The heavy barge traffic comes at a time when the state is also trying to rebuild the salmon population. Salmon is, after all, the lifeblood of the Kuskokwim. *This all needs to be addressed.*

Tugs will be pushing multiple barges in a 2x2 formations, however, with low water levels they will need to decouple and move to single 1x2 formations. This will not be done in the middle of the river. Will these barges be allowed to tie off wherever they want to along the river to switch formations? There should be designated tie off locations with the amount of barge traffic there will be to minimize impact on the riverbanks along the river. There are no designated tie off stations in the EIS. I certainly would not want them tying off on the beach in Aniak or just upriver from our fishcamp where their downwash can erode the bank, as well as have diesel slicks floating downriver towards us. I would also not want to see them tying off right in the town of Aniak where prop wash can easily erode the existing beach

where villagers tie their boats off, have fish cutting tables, and float planes are tied down. The EIS should address designated tie off locations in areas that will not affect salmon spawning, beach erosion, village beaches, or fishcamp sites. *This needs to be addressed.*

Another concern with large amounts of barge traffic is that the river is also a highway for the local people. A reality on the river is that not all local people drive boats sober or in daylight, nor do all local people have lighting on their boats. What are the plans to avoid barge/small boat collisions in the entirety of the Kuskokwim? Will there be an increase in public safety on the rivers to monitor and/or prevent these situations? Who will provide the public safety on the river? *This needs to be addressed.*

At the dock facilities in Bethel, I am concerned for fuel and chemical spills as barges from Dutch need to transfer large amounts of fuel, chemicals, and supplies at this port to barges heading up the Kusko. The same goes for the proposed dock at Jungjik. Potential for spills and leaks is just way too high. The current Bethel port also currently cannot handle the increase in mine operations and would have to be updated to accommodate the increase in mine traffic. *Enlarging the Bethel Port to accommodate mine traffic definitely needs to be addressed in the EIS.*

The 30 mile road from the mine site to the dock at Jungjik has potential to kick up significant dust, and with it chemicals and pollution from the large amount of heavy equipment moving back and forth. A few years back I recall reading a scientific article where the berries were tested along the road from Red Dog Mine and came back positive for carcinogens. How will the dust be kept down? Who will monitor the road to ensure diesel spills from the heavy equipment are monitored quickly?

This next concern falls in with the pipeline and barging. If the pipeline proves not feasible, will the EIS have in place a cap for the number of barges on the river at any given time? Preferably 3. As it stands, there is no cap on the number of barges on the river, and if the pipeline is not feasible, the mine can simply add more barges to haul more gas. *This needs to be addressed.*

Pipeline:

The natural gas pipeline will cross several waterways including the Kuskokwim River and its tributaries and the potential for leakage due to breaks is not worth it. Several years ago, when Donlin was in the initial stages of the mine, they told the villages they would build a gas pipeline to the mine and feed all of the villages to provide heating at significantly lower rates than what people pay now. That is obviously not part of the plan; it was simply a ploy to buy people's support.

Another concern I have heard from the river is the overpressure on hunting. When the influx of people to the region and the pipeline/road brings easier access to the mid Kuskokwim to hunt and fish out the resources, people on the Yukon have raised concerns that people on the Kuskokwim will begin to fish and hunt in their region. It would be an easy portage across the hills to the Yukon River. If Kuskokwim fisheries and hunting resources are depleted, can the Yukon River drainage support increased hunting and fishing pressure from all the villages along the Kusko? *This needs to be addressed.*

Mine Site:

The waste treatment facility will not be covered or fenced, leaving it open to animals and birds trying to land on it or drink it. The chemicals will either cause death or bioaccumulation of heavy metals and chemicals which will then be transferred to the locals who eat the meat. Why won't they treat the waste water immediately after closure of the mine? Why wait 50 years? Also, are there any clauses for Barrick or NovaGold to have a back up to monitor the water treatment after mine closure if they go bankrupt or fold?

Right now there is no plan for fencing around the tailings pond to ensure animals do not try to drink or approach this water. I strongly advocate for fencing around the pond, and some kind of cover so that birds cannot land on it. *This needs to be addressed.*

Mercury Emissions is a big one. There is the potential for volatile/airborne emissions, emissions into the water table, and bioaccumulation into our meat, fish and salmon. This ties into my below section on the local community. Have there been studies looking at the local population and current rates of neurological problems? There should be a baseline. To my knowledge, there are very few people with neurological conditions in the middle Kuskokwim. What happens if we start to see infants born with very clear neurological problems? Or adults starting to walk a little ataxic, starting to lose sensation in their hands and feet, and then be diagnosed with a neurologic condition? If there is not a significant concern now, then it could certainly be related to mercury emissions. *This needs to be addressed with baseline studies.*

Have cancer rates in the Kuskokwim been studied? If we see an increase in rates of cancer, there certainly could be a correlation. Open pit gold mines release loads of carcinogens and teratogens, too many to name. The people will be exposed similar to mercury-airborne, on the berries, in our meat, in our fish, and in our drinking water. *This needs to be addressed.*

Local Community:

Will the drinking water be closely monitored throughout the life of the mine, in all villages along the Kuskokwim River and after closure of the mine? What are the plans, if a disaster happens, to ensure clean drinking water? How do we know that our water tables will not be contaminated with carcinogens, neurotoxins, or teratogens? Along the same lines, will large mammals be tested regularly for carcinogens? Or bioaccumulation of heavy metals? What happens if the game starts to test positive for chemicals and recommendations are made not to eat the animals? Will Donlin be held accountable?

Local Population:

Western Alaska and Native people already struggle with drug and alcohol abuse. An unfortunate reality is, sometimes when Native people come into large amounts of money i.e. from shareholder dividends and/or paychecks from the mine, we will very likely see an increase in substance use/abuse. The shift work that Donlin offers will allow 2 weeks off, and even in the early stages of the mine we saw locals use their paycheck to fly to Anchorage or place an alcohol order and literally drink their paycheck away. In rural Alaska we are not raised to put money away for 401Ks; when you have money you spend it. What are the plans to mitigate an increase in substance abuse amongst employees, families, and TKC/Calista

shareholders? Will there be a substance abuse facility in Western Alaska? With substance abuse also comes an increase in crime. Where will funding come from to increase public safety in these villages? Substance abuse also brings with it negative health ramifications. Where will the increase in funding be for health care? Will Donlin pay for this? *This needs to be addressed.*

On a similar note, will there be financial management classes for the employees at Donlin?

Who will monitor the local population for health disparities? Who will monitor rates of cancer from the heavy metals on the land and in the food sources, from the barge pollution, from mercury emissions, or from the drinking water being contaminated? Who will monitor communities for an uptick in substance abuse? Who will monitor rates of obesity? Once people have to switch from a subsistence lifestyle to that of predominantly store bought food source, obesity rates are likely to increase. Along with obesity you may see an increase in obesity related health disparities including diabetes, hypertension, joint problems, just to name a few.

If there are health disparities related to the mine; i.e. increase rates of cancer from the carcinogens, neurological problems from the mercury, increases in substance abuse, increases in obesity, etc who will pay for the healthcare? Will Donlin pay for the healthcare? I highly doubt it. Most rural Alaskans do not carry private health insurance as the majority of qualify for Medicare (elderly), Medicaid (low income), or Indian Health Service (Native people). If there are health disparities related to the mine, it will mostly be covered by the federal government. *Can we afford it? Can this be addressed?*

Hazardous Spill Response:

Diesel slicks and spills from barge traffic is very likely. Growing up on the river, pretty much any barge that docked in Aniak had a diesel slick flowing downriver behind it. The increase in barge traffic on the river stands to increase the amount of diesel in the river considerably. Currently, the nearest response team is in Anchorage. If weather is down, they will not be able to respond immediately. Will there be a local presence of DEC, EPA, or Coast Guard at the mine site and/or in one of the hub communities along the Kuskokwim River to immediately respond should spills occur on the river, on the land, and to hold Donlin accountable? Is there a plan in place should diesel spills or chemical spills occur in the river? Is there a plan in place should a tailings pond breach occur? *This needs to be addressed.*

Wood Bison:

Wood Bison were released into the same vicinity as the Donlin Gold mine in May 2015 and have recently reproduced, making them a wild bison population in the middle Kuskokwim/middle Yukon. They have been sighted on the banks of the Kuskokwim in the past year. They will be sharing the land with the mine, the heavy equipment, breathing the air, drinking the river water. Bison/equipment collisions are a possibility. When the pipeline is built, it will bring more traffic to the area, making bison exploitation, poaching, and hunting a more likely possibility. The National Bison Legacy Act was signed into law in May 2016, making this the national mammal of the US. Does this animal receive special protection now? As does the bald eagle? It now reproducing in western Alaska, afterall, and was not covered in the threatened/endangered animal section of the EIS.

In summary, I do not believe the mine can operate without significant environmental and human impacts. In reading the EIS I couldn't help but think how many other mines and environments are being destroyed for this SINGLE mine. All the diesel that has to be used, all the natural gas that will come out of Cook Inlet, all the metal that will be needed for the pipeline and minesite-that all comes from somewhere. When does it end? Why can't we push for recycling gold and metals instead of destroying people's homes, culture, lifestyles? I strongly recommend alternative 1-NO ACTION.

Sadly, I feel like a needle in a haystack and that my meager opinion won't hold much weight regarding Alternative 1 when I am competing with two of my native corporations and a multinational corporate mine. If the mine does go through, I would strongly recommend a combination of three other alternatives.

1. I support alternative 3A over alternative 2. Use the LNG powered Haul Trucks to minimize emissions and minimize barge traffic on the river which is less risk of spills, less impact to the salmon habitat. The gold is not going anywhere so they can wait until the technology is available. Nowhere in the world is climate change more evident than rural Alaska; minimizing emissions is absolutely essential if this mine is to go forward.
2. I support Alternative 4 over alternative 2-Birch Tree Crossing. Minimize barge traffic on the river, lower risk for spills, less impact to the salmon. Keep the road closed to the public.
3. I support Dry Stack Tailings with a liner. Less risk for tailings breach. Not the greatest option but better than a tailings breach.

Army Corp, please, please, please think about the children on the river and the people who live there. People's lives are literally in your hands. The mine has the potential to destroy everything. I want to see people in the workforce as much as anyone else, but this mine is simply not worth 27 years of economic stimulation.

Sincerely,

Rainy Diehl and my 3 year old son, Hunter