

From: [Craig, Bill](#)
To: [Bellion, Tara](#); [Evans, Jessica](#)
Subject: FW: [EXTERNAL] RE: Donlin Gold Draft EIS comment revised 1.1
Date: Thursday, March 31, 2016 10:19:03 AM
Attachments: [Donlin EIS Comment 1.1.docx](#)

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

From: donlingoldeis, POA [<mailto:POA.donlingoldeis@usace.army.mil>]
Sent: Thursday, March 31, 2016 10:13 AM
To: Craig, Bill
Subject: FW: [EXTERNAL] RE: Donlin Gold Draft EIS comment revised 1.1

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

From: Bruce Jaffa [<mailto:bruce@jaffaconstruction.com>]
Sent: Thursday, March 31, 2016 7:45 AM
To: donlingoldeis, POA <POA.donlingoldeis@usace.army.mil>
Cc: dbseavey@gmail.com; 'Keeler, Kevin' <kkeeler@blm.gov>
Subject: [EXTERNAL] RE: Donlin Gold Draft EIS comment revised 1.1

From: Bruce Jaffa [<mailto:bruce@jaffaconstruction.com>]
Sent: Thursday, March 31, 2016 7:40 AM
To: 'POA.donlingoldeis@usace.army.mil' <POA.donlingoldeis@usace.army.mil>
Cc: 'dbseavey@gmail.com' <dbseavey@gmail.com>; 'Keeler, Kevin' <kkeeler@blm.gov>
Subject: RE: Donlin Gold Draft EIS comment revised 1.1

Mr. Gordon,

For the record, Please replace my earlier letter (comment) with this revised letter 1.1 with corrected INHT description and acronym.

Bruce Jaffa

From: Bruce Jaffa [<mailto:bruce@jaffaconstruction.com>]
Sent: Wednesday, March 30, 2016 10:24 PM
To: POA.donlingoldeis@usace.army.mil <<mailto:POA.donlingoldeis@usace.army.mil>>
Cc: carole@jaffaconstruction.com <<mailto:carole@jaffaconstruction.com>>; jake@jaffaconstruction.com <<mailto:jake@jaffaconstruction.com>>; dbseavey@gmail.com <<mailto:dbseavey@gmail.com>>; 'Keeler, Kevin' <kkeeler@blm.gov <<mailto:kkeeler@blm.gov>>>
Subject: Donlin Gold Draft EIS comment

Please See the attached comment letter

Keith Gordon, Project Manager
USACOE, Alaska District
CEPOA-RD-Gordon
POB 6898
JBER, AK 99506-0896
March 30th 2016

Dear Mr. Gordon,

I am a 40 year Alaska resident/ pilot and property owner. My family and I own several parcels of remote property in the Talachulitna /Quartz Creek area near the project path. I have flown and snow machined in around and through Rainy and other Alaska Range Passes many times and am very familiar with the area for the proposed pipe line routes. I have reviewed the Executive summary and EIS documents. I am in support of the concept to deliver natural gas to the Donlin Project.

As a strong supporter of the project I think it becomes essential to “get it right” and not create unnecessary harm in the process. The EIS offers opportunity to consider all aspects to allow reasonable development. My comments are specific to the route Skwentna to Farewell. I am opposed to disturbing the current route of the Iditarod National Historical Trail (INHT) or of any wild river such as Happy River. I believe that the INHT Trail system, as all National trails envision both winter and summer use. Terrain scars are long healing and very visible at seasonal transition periods. The altered view-scape of the clearing, construction and rehabilitation should be considered from the aspect of the transition season that highlights any anomaly in terrain and vegetation and not just a view during Summer/Winter.

If there is an example of “pristine”, then the bubbly, churning, white water canyon of the Happy River is it. The SOA in 1987 agreed to maintain the INHT (Chapter 3 pg 3.15-12) in a manner that protects historic values. The definition of this value is the responsibility of the SOA ADNR to provide. I think most users of the trail and vicinity believe view scape is a historic value. Further this stretch from Shell lakes to the mountains is one of the few relatively natural, undeveloped landscapes along the INHT. Highways, roadways, powerlines and other signs of man dot the ROW from Seward to Nome. It is correct for the EIS to value this scenic factor.

The project is correct in selecting Alternate 2 as preferred. Clearly Alt. 6A is aligned through difficult and unstable terrain for pipeline construction. From Finger Lake to Farewell the straightest route is not through via Alt 6A. Alternate 2 recognizes a route that is superior.

I do not understand why an Alternate routing for the pipeine and access roads further away from the IDHT corridor through the upper Skwentna and Happy River drainages was not selected for study. It should have been. This single IDHT area will be greatly impacted by excessive criss-crossing and an actual 4.5 mile over lay of the pipeline, construction access. It would appear from maps in the EIS that the river gains more consideration than the Trail.

Moving the development away from the IDHT may require choosing the 2nd best routing in some cases. In this area that should not be difficult to do. Keeping the construction activity, road and any maintenance access, clear of this trail corridor from MP 91 to MP 106 should be possible if the route selected for the service road were moved to the South of Indian Creek or to the North side of the valley, both these areas appear by map and overflight review to have reasonable ground slope and gravel. There appears to be plenty of distance from any slide chutes or swampy ground, really nothing that could not be simply dealt with.

Simulation photos, of possible low impact restoration, after construction, cannot be relied on without undue faith being placed in the management and engineering of unknown conditions that will be discovered during this construction project. Scars from historic activity remain visible to a great extent throughout the region of Cook Inlet and the Rainy Pass traverse.

Summary:

I would have little objection to a pipeline corridor that was kept away from rivers and the INHT except in an occasional tangential crossing. The base of the mountains in the Upper Skwetna area would be suitable for construction and the pipeline could use that area without significant impact. I generally support Alternate 2 with the above described objections and absolutely oppose Alternate 6A routing through Dalzell gorge.

Respectfully,
Bruce Jaffa
PO Box 107
Moose Pass Alaska 99631