

From: [James Kari](#)
To: [donlingoldeis_POA](#)
Subject: [EXTERNAL] Re: Donlin Gold Draft EIS comment
Date: Wednesday, May 18, 2016 9:50:59 AM
Attachments: [donlin-eisJK4.rtf](#)

Dear Sirs:

Please replace the file I sent you yesterday with this one.: donlin-eis-JK4.rtf. I made some important and I think constructive additions to it this morning. Please confirm this change.

James Kari

On Tue, May 17, 2016 at 8:33 PM, James Kari <jmkari@alaska.edu> wrote:
Please see attached comments

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May 18, 2016

Comments on Donlin Gold Project, Draft EIS, November 2015

James Kari, Professor Emeritus
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US Army Corps of Engineers. 2015. *Donlin Gold Project, Draft Environmental Impact Statement*. Anchorage: CEPOA-RD. JBER, AK, November. www.donlingoldeis.com/EISDocuments.aspx

In February of 2016, I downloaded all of the files for the Donlin Gold Project that have been submitted to the US Army Corps of Engineers. I am an expert on Alaska social sciences and especially Athabascan anthropology and linguistics. I maintain primary language data on three Western Alaska Athabascan languages that are in the area of the proposed Donlin Gold Mine and its proposed pipeline route (Dena'ina, Upper Kuskokwim, and Deg Hit'an).

I have spot-checked various sections of the EIS for which we have expertise. In particular, we have paid attention to these files:

- filename: 8 Environmental Analysis Social.pdf (668 pages)
- filename: 12 Chapter 6 Consultation.pdf
- filename: 13 List of Preparers.pdf
- filename: 15 Chapter 9 References.pdf
- filename: ScopingPoster3PipelineRoute.pdf

Throughout these chapters there is inadequate information on the ethnographic context of the Athabascan groups that have occupied the areas of the Donlin Gold Pipeline route. For example, the most comprehensive and well known source for the Dena'ina Cook Inlet Basin, Kari and Fall 2003 is not cited. Also the 2004 National Park Service report on the Upper Kuskokwim by Raymond Collins is not cited. I could elaborate upon what was *not* cited, but the ethnographic context in the Donlin EIS documents would not pass the standards expected in a graduate student's comp exam question for a literature survey on the ethnographic sources for the area of the proposed mine and its pipeline route.

The subsistence discussions make general statements such as on p.3.15-30:

Existing land use within southwest Alaska is largely limited to residential and commercial facilities in the few permanent villages in this region, temporary encampments along the Kuskokwim River, and industrial activity at the small mines that are found throughout the region. Subsistence and recreational hunting and fishing occur widely, as discussed in Sections 3.16, Recreation and 3.21, Subsistence. Land use is generally limited by the small population of southwest Alaska (ARCADIS 2013a).

In this section it would have been appropriate to have listed the various documents from the ADFG Subsistence Division for the mine site area, the downstream areas along the Kuskokwim, and along the proposed Donlin Gold Pipeline route.

The archaeological surveys of the mine site and the proposed pipeline route that Donlin Gold sponsored between 2004 and 2014 were conducted by NLUR in Fairbanks. While these archaeological survey reports are cited, apparently those surveys did not make use of background documents that may have augmented their search for potential sites. These would include for example the first maps such as: Herron, 1900; Sleem, 1910; and Brooks, 1911, that show the major foot trails between Tyonek, the Skwentna River, Happy River, Rainy Pass, and the South Fork of the Kuskokwim.

I found this statement on Traditional Cultural Landscapes and Traditional Cultural Properties to be noteworthy: (8 Environmental Analysis Social.pdf; sec. 3.20.2.6.2, (Pp 298-299 of pdf, emphasis added):

Cultural uses of the natural environment, such as ceremonial or other religious use of places, plants, animals, and minerals. These types of resources can include Indian (in this case, Native Alaskan) sacred sites that may or may not be considered as Traditional Cultural Properties (TCPs), cultural landscapes, ethnographic landscapes, rural historic landscapes including trails and transportation routes, and historic mining landscapes, for example.

A Traditional Cultural property (TCP) is defined as a place that is “eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community” (Parker and King 1992). TCPs often represent the location where important traditional events, activities, or cultural observances have taken place in the past, yet remain active in the community’s or tribe’s cultural practices. An ethnographic study involving the affected tribes can assist in properly identifying and evaluating the significance of TCPs. Confidential results of the ethnographic study would then be shared with the lead agencies and may or may not be distributed as public information.

As discussed above, the history of the region is characterized by intensive use and occupation by the Dena’ina and Yup’ik peoples, including residential and camp locations, subsistence resources, origin locations, place names, and travel routes. **Data on these locations are contained in a variety of sources, including published and unpublished historic accounts, oral traditions, and recorded interviews, but have not been compiled into a comprehensive document as part of the current proposed undertaking. Further development of the PA and Section 106 consultations with affected tribes may result in additional documentation of TCPs in the future.**

This statement appears to have been added to the chapter as an afterthought. The statement acknowledges that many sources pertinent to the identification of TCPs in the project area have not been cited in the 2015 documents. However, the EIS does *not* include a list of these specific sources. Note that the reference to "use and occupation by the Dena'ina and Yupik peoples" is a misstatement that reflects the improper specification of the ethnolinguistic groups affected by the project: Dena'ina (the Inland and Upper Inlet dialect areas should be specified), Upper Kuskokwim, Deg Hit'an (Kuskokwim dialect), and Central Yupik (middle Kuskokwim dialect).

I recommend that the 2015 Donlin Gold EIS be expanded to include an adequate treatment of the relevant ethnographic, ethnohistoric, subsistence and language sources. Several of the preparers of the 2015 report are qualified to do this. Lacking such revisions, Chapter “8 Environmental

Analysis Social" does not meet the standards of other EIS statements for the several Cook Inlet mega-projects that I have seen such as the Point McKenzie Rail Extension, the PacRim Chuitna River Coal, the Susitna Hydroelectric Project the treatment, the Alaska LNG Project, and the Pebble Mine.

Moreover, if a future stage of work on cultural resources for the Donlin Gold project is to address the suggestions in the **paragraph cited above in boldface**--that is to assemble all of the relevant sources on place names, trails and land use patterns, and to evaluate Traditional Cultural Properties--then a subcontract with a well-qualified two-person team would need to be formed to do this, say in a one-year time frame.

I have review the current Donlin Gold website at <http://www.donlingold.com/>. Here I have noted the high quality video productions that introduce the Donlin Gold project in the context of the Yupik people of the region. As I linguist I am impressed by the effort here to portray Yupik cultural perspectives. The Yupik language captioning is excellent. I would like my comments on the shortcoming of the 2015 Donlin EIS to be constructive.

There are two very important archival collections that with proper editorial leadership could become highly important contributions to Alaska ethnography and linguistic documentation. Both of these collections contain primary materials about the ethnographic landscape of the Donlin Gold Pipeline route or the Donlin Gold Mine site area

1) The Upper Kuskokwim language audio collections at Alaska Native Language Center/Archive have grown dramatically in the past five years. In November of 2014 linguist and historian Ray Collins of McGrath has brought in his personal archive of papers, language field notes and over 40 audio recordings. Mr. Collins research on Upper Kuskokwim language and anthropology spans fifty years. Especially significant is a group of 31 recordings made by Chief Miska Deaphon (1903-1985) of Nikolai. In 1980–81, Deaphon self-recorded his own memoirs. These texts are monolingual, slowly paced, and feature detailed accounts about hunting, wildlife, places, trails, and handling of dogs throughout the UK language area. Furthermore, Ray Collins and Betty Petruska did drafts of many of Deaphon's texts during 1990-1992 when Ray Collins was at the UA Rural Center in McGrath. During 2015 and 2016 some work on the MD texts is being done under the sponsorship of Denali National Park and grants to the Native Village of Telida. This appears to be one of the most detailed and comprehensive set of place-intensive narratives ever recorded for any Alaska Native language.

Ray Collins and I are both interested in editing and publishing the Deaphon texts. This project is well suited to be advanced in phases of funding. Perhaps Donlin Gold and various federal agencies such as NPS and BLM could participate. We think that two to three years and at least \$100k of funding would allow us to prepare a book of land use narrative by Deaphon and a few other speakers from Nikolai or Telida.

2) The Nixe Mellick Collection is a group of about 70 audio recordings, maps and various notes. Nixe Mellick was a Yupik store-owner and pilot from Sleetmute. Mellick donated these materials to the Lake Clark National Park in 2004. For nearly thirty years Mellick interviewed

and recorded with many elders from the Middle and Upper Kuskokwim area. Mellick also collected artifacts and implements, and he was highly knowledgeable about traditional technology. The potential of the Mellick Collection is well known. With planning and editorial leadership, the audio recordings could be transcribed and annotated. These would be a major contribution to the ethnohistory and ethnogeography of the Middle Kuskokwim area.

To summarize, in topic areas in which I have expertise, the 2015 EIS documents should be expanded and improved. At a minimum, the most important sources on ethnography, subsistence and language should be cited and summarized. This is important to have good bibliographic coverage for the three Athabascan languages and for Middle Kuskokwim Yupik.

If the Donlin EIS process is expanded to do a thorough job on the ethnographic landscape of the mine site area and the proposed pipeline route, a two-person team of qualified researchers is required. If the Donlin Gold group wishes to partner with agencies (perhaps NPS and BLM), there are two valuable projects that have great potential for the advancement of primary documentation on the Native traditions for the Middle and Upper Kuskokwim River areas.