

From: [Isaacs, Jon](#)
To: [DonlinEISAR](#)
Cc: [Bellion, Tara](#)
Subject: FW: [EXTERNAL] Kuskokwim River Watershed Council Comments For The Proposed Donlin Gold Mine
Date: Friday, May 27, 2016 9:51:46 AM
Attachments: [KRWCEISCommentsSubmitted5_26.pdf](#)

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

From: Gordon, Keith POA [<mailto:Keith.Q.Gordon@usace.army.mil>]
Sent: Thursday, May 26, 2016 5:22 PM
To: Isaacs, Jon; Bellion, Tara
Cc: Dave Cannon
Subject: FW: [EXTERNAL] Kuskokwim River Watershed Council Comments For The Proposed Donlin Gold Mine

Dave,

Ok. Tahnks

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

From: Dave Cannon [<mailto:krwcsolidwaste@kuskokwimcouncil.org>]
Sent: Thursday, May 26, 2016 6:15 PM
To: Gordon, Keith POA <Keith.Q.Gordon@usace.army.mil>; abittner@blm.gov
Cc: Adrian Boelens <aboelens@kuskokwimcouncil.org>; krwcsolidwaste@kuskokwimcouncil.org
Subject: [EXTERNAL] Kuskokwim River Watershed Council Comments For The Proposed Donlin Gold Mine

Hello Keith and Alan,

Please find attached the Kuskokwim River Watershed Council's comments on the Donlin Gold DEIS.

We would like our comments to be entered into both public records - that is, the Corps of Engineers' as well as for BLM's 810 Determination.

Sincerely,

Dave Cannon
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May 26, 2016

Mr. Keith Gordon

Project Manager

U.S. Army Corps of Engineers

Mr. Gordon,

The following are the Kuskokwim River Watershed Council's comments on the Donlin Gold Draft Environmental Impact Statement.

The word ensure appears over 230 times in the draft document. Unfortunately, relatively few things on a project such as this can be assured. Here are just several sections where the word ensure is inappropriate: Section 3.10-58, Section 3.10-47, and Page 44 in Volume 19 of the hard copy.

To be 100% certain that those things above will or won't happen is impossible. Specifically, things like mitigation measures, over extended periods of time, often become lax due to time constraints or cost overruns, or fall victim to implementation error and human error.

Consequently, the Kuskokwim River Watershed Council (KRWC) believes that the document is overly optimistic in its overall assessment that several impacts will be inconsequential or that mitigation will circumvent any impacts.

The strongest example of that is in the assessment of impacts to rainbow smelt. Page 143 of Section 3.13 states: *To minimize potential impacts of bed scour, barge traffic would be tracked using GPS and real-time river stage and depth monitoring systems to ensure vessel passages are conducted through the deeper portions of the channel, especially in confined and shallow segments of the river.*

The use of the word **ensure** is inappropriate because there are no assurances that the tugs and barges will not deviate from the deepest sections...and the possibility exists that developing eggs would be in close proximity to the deepest section (i.e., thalweg), and that the water depth in the deepest section would be inadequate to protect the eggs from harmful prop turbulence.

The DEIS even states in Section 3.13 that impacts, at least in 2015, would have been unavoidable - ***During the 2015 rainbow smelt spawning survey, spawning occurred as shallow as 8.7 feet along a relatively confined channel segment. In such locations, a medium to high level of injury or mortality to incubating eggs could have resulted from the propeller scour of passing tug traffic, depending on the tug's horsepower rating and engine speed. Because of the narrow width and relatively shallow depth across this particular channel segment, it is unlikely that impacts to incubating rainbow smelt eggs could have been avoided by altering the line of travel of barge traffic.***

The only way to ensure that smelt or their eggs would not be impacted in any way by the proposed activity as stated in Alternative 2, would be to cease baring operations in the vicinity of Lower and Upper Kalskag during the period when the smelt are about to spawn and for roughly twenty-one days afterward while the eggs are developing

The concern with the smelt is that for all practical intents and purposes, it is a single population that enters the mouth of the Kuskokwim all at the same time as opposed to a long protracted run for chums, kings and other salmon species. They then travel in a group upstream to their relatively limited area or areas to spawn. At this time no one knows just how many smelt return each year to spawn. If something were to happen that would reduce the spawning and egg development success for any given year, a significant proportion of the population could be in jeopardy.

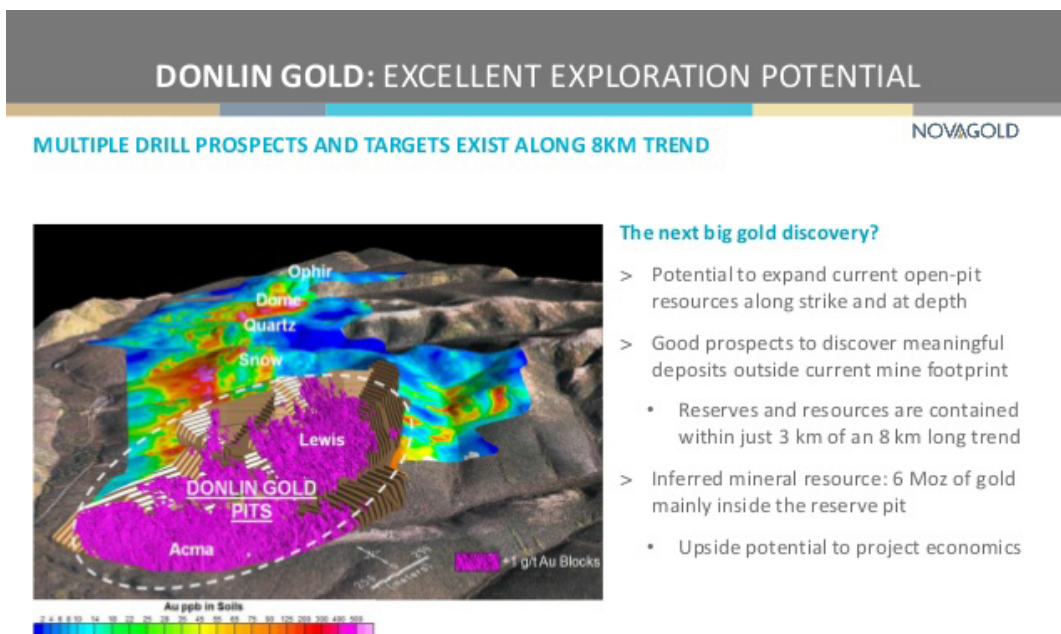
Cumulative Effects Analysis

Social Implications

Table 4.2-2 states that since there has not been a formal proposal to develop a borough anywhere within the Kuskokwim drainage, that such a formation would be considered an external action that does not qualify as being reasonably foreseeable.

However, there has been significant effort by people, local governments of the middle Kuskokwim Region and The Kuskokwim Corporation in the past four months looking into the possibility of creating a borough. The general consensus is that the formation of a borough is inevitable if the mine were to be built, while the formation of a borough would have major implications with how schools and local governments are funded.

If a borough were created, then there would be the need for a continued revenue stream upon closure of the proposed Donlin Gold mine. NovaGold, one of the partners in the Donlin Gold project shows potential for additional prospects in the vicinity of the project as shown in the photo below.



Section 4-33 states that impacts to groundwater quality “would range from low to high intensity, be temporary to permanent in duration, localized in extent, and affecting a common to important resources. Overall, the additive incremental impacts to groundwater quality attributable to Alternative 2 would be minor to moderate.”

Biological Implications

If further development were to proceed, that would, at a minimum, have additive impacts on soil disturbance, erosion, surface water and sediment quality, and groundwater quality; none of which are currently addressed in the DEIS.

The KRWC believes that such potential for development should be considered in a cumulative effects analysis, particularly since it would have a further reduction in the amount of water flowing in Crooked Creek. Depending on the implications for a high K factor shown in table 3.13-30, Crooked Creek eventually could lose 50% or more of the water that is critical for salmon and the other fish species that inhabit it.

Bethel Port Facility

An analysis for the need for an improved or expanded port facility in Bethel seems to be lacking in the DEIS. A poster provided by Donlin Gold on April of 2016 at a meeting in Aniak with a Calista/Lynden logo shows the construction of approximately 600 feet of riprap with a sheet pile bulkhead dock located at the Knik Construction. Such reinforcement of the bank will divert stream channel energy away from the newly constructed section downstream to unprotected banks possibly causing an unknown amount of unnatural erosion that could possibly have significant repercussions with villages like Oscarville...especially considering cumulative effects from further upriver already reinforced sections (i.e., the seawall protecting Bethel).

Such an impact should be addressed in the final EIS.

Sincerely,

/S/

Adrian Boelens

Executive Director

Kuskokwim River Watershed Council