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Mr. Keith Gordon, Project Manager
U.S. Army Corps of Engineers, Alaska District
CEPOA-RD Gordon, P. O. Box 6898
JBER, AK 99608-0898

SUBJECT: Donlin Mine Draft Environmental Impact Statement

Dear Mr. Gordon,

I am submitting the following comments pertaining to the Donlin Mine Draft Environmental Impact Statement:

NATURAL GAS SUPPLY

My understanding is the Operator will purchase its natural gas needs on the open market from Cook Inlet area suppliers. Such a large amount of gas will put pressure on Southcentral gas supplies and prices. It also would further put additional drilling pressure on Cook Inlet and the Kenai Peninsula that will have significant regional social, economic and environmental impacts. Given the State's budget crisis, there is no realistic prospect of stranded gas supplies being moved from the North Slope to alleviate shortages in the Railbelt Corridor.

RECLAMATION

The Operator's proposed 'reclamation' plan is highly speculative because such an effort involving a hard rock mine in Alaska has never been undertaken on such a large scale that I am aware of. The only major mining reclamation effort that comes to mind is the Usabelli Mine that is ongoing as the mining takes place. It is also a coal mine. For example, permafrost makes the likelihood of anchoring the tailings dam suspect. The prospect of the Operator monitoring and maintaining the mine site into perpetuity is absurd with no historical precedent. To rely on the State to ensure dam safety would be like asking the fox to watch the hen house given its aggressive approach to developing natural resources with little or no attention to the downsides.

PROJECT LIABILITY

Where do the legal responsibilities lay for injurious activities stemming from the project? Do they rest with the Operator and/or will it and the land owners be jointly and severally liable? The

costs of a catastrophe spill, long-term heavy metal contamination to mention a couple of possibilities would be enormous, and do the Operator and land owners have the financial resources to address them?

FINANCIAL

Barrick Gold operates at a continuing loss, has a declining Cash Flow, has negative Retained Earnings, and a Long-Term debt that is two-thirds of its Total Assets. NovaGold is essentially a penny stock. Both companies business models are solely dependent on a mercurial commodity. Both companies have had a rocky history partly having to do with each other. In my opinion, the partnership does not have the financial wherewithal to make good on potential huge claims. Barrick, being the much larger of the two with world-wide operations has a checkered environmental and human-rights history. The DEIS should flush this out.

MINING RECORD

The DEIS should look that the long history of the environmental impacts of hardrock mining both in Alaska and in the rest of the Unites States which is well-documented. Given the plethora of disasters and problems dating to the present, it is hard to accept that the proposed project will be any better than others have been.

MISCELLANEOUS ENVIRONMENTAL CONSIDERATIONS

Melting permafrost resulting in hydriodic erosion could become a major problem over time. This will be more than a site-specific issue extending to other places where there is infrastructure development. Again, a review of other regional open pit mines would be helpful to include the effectiveness of state and federal regulation. In view of the state fiscal crisis, the state will have diminishing resources to properly monitor the project.

The DEIS acknowledges that there will be unauthorized ORV access along the pipeline and access roads. This infers that they will be used to access adjacent state and BLM lands with no oversight resulting in significant impacts on terrain and wildlife. Unregulated ORV use is commonplace throughout most of Alaska with almost no oversight resulting in enormous environmental degradation and loss of wilderness values. The absence of road access is the only layer of protection outside of some conservation units.

The low-lying, permafrost, impregnated wetland nature of the surrounding area would make clean-up difficult in the event of a major breach or spill. Although the DEIS addresses the risks, it does not address what specific contingency plans and equipment will be put into place.

CUMULATIVE & OFFSITE IMPACTS

Although the DEIS obviously cannot speculate on the long-term fallout of the proposed project,

it is safe to presume that there will be additional projects large and small as the area is industrially developed and infrastructure put into place such as more mines, oil exploration and development, pipelines, and powerplants. The implication is that the wilderness and rural character of the region will be permanently lost. The DEIS should address the possible long-term scenarios.

What will be the interface between the gas line and the Chuitna Coal Project?

It is difficult to envision that the pertinent agencies will require pipeline, road, and airstrip removal. If anything, they will remain in place. The DEIS should examine the implications. Could the natural gas pipeline be extended to provide gas to local villages or for that matter other mine sites? Would the proposed power plant remain in place to provide power for area villages which would mean more roads and transmission lines, and who knows what else?

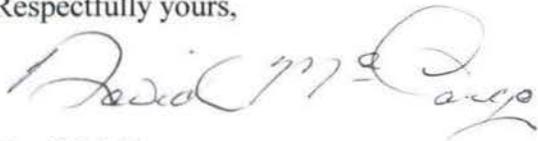
The DEIS does not speculate what the remedial costs that would be incurred by the public sector if there is a spill, groundwater contamination, loss of subsistence opportunities owing to wildlife and fisheries displacement.

COMMENT PERIOD

I only became aware that the DEIS had been issued when accidentally seeing a news item on KTUU about the Anchorage Hearing. While the Corps is not to be faulted, the proposed project has had relatively little public exposure especially when compared to others most notably Pebble. Even much smaller projects like Pogo and Fort Know have generating much more publicity. While there has been a five month comment period, it would not hurt in the public interest to extend it. This most importantly would give the rural communities that do not have the organizational and technical capabilities more time to digest the huge amount of information contained in the DEIS notwithstanding the horrendous implications of the project that they will have to live with.

In view of the enormity of the project, the huge potential risks, the innumerable offsite impacts, the many unanswered questions, and the lack of a genuine "Need", the No Action Alternative is more me the logical option.

Respectfully yours,

A handwritten signature in cursive script that reads "David McCargo". The signature is written in dark ink and is positioned above the printed name.

David McCargo

DMcC/dmcc

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