

U.S. Army Corps of Engineers – Alaska District
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Mr. Keith Gordon and USACOE;

I am writing to comment on the Draft EIS developed by the Corps to “analyze the impacts of issuing permits for an open pit, hardrock gold mine” north of Crooked Creek on the Kuskokwim River, in southwest Alaska.

In order to be brief and succinct, I am providing my thoughts on the key elements of this project in bulleted form below, so that my understanding and informed approval of the many positive aspects of this proposed project, i.e. **Alternative 2** of the Donlin Gold Project is apparent.

- The mining company, Donlin Gold, has endeavored faithfully for over 2 decades to work out a successful and highly detailed mine approach, and preliminary mining plan of operations, that maintains worker safety, tight environmental standards, and incorporates various specific details that meet the desires and preferences of the landowners, The Kuskokwim Corporation (TKC) and Calista.
- The jobs generated by both the multi-year construction project and then long-term (> 25 years) operation of this mine will provide a substantial benefit to the residents of the entire Kuskokwim region, as well as virtually all of the other Alaskan Natives because of the distribution of funds through the ANSCA 7 (i) and 7 (j) revenue sharing program.
- Choosing to construct the 315-mile LNG pipeline from Cook Inlet to the mine site is a very good energy AND environmental choice, both because of the reduced level of particulates released to the atmosphere in order to provide the electricity and heat needed to run the mine, and also the resulting possibility that one or more villages in the regions near the alignment of the gasline may choose to tap into the line and use (thrifty and clean!) natural gas for their energy needs.
- It is clearly assured that a number of the Kuskokwim regions’ residents will be able to get jobs either directly with Donlin Gold, or with the many companies that will contract with them to meet their needs for supplying and operating the mine. As with Teck at Red Dog, this is a major boon for the economics of this rural area of Alaska. Donlin has a sterling reputation for “hiring local” to date, which will be firmly required to continue by the shareholders of TKC and Calista.

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- The new port at Angyaruaq (Jungjuk) and the improvements/expansion at Bethel and Dutch Harbor ports will be a long-term benefit to the mine's neighbors, as well as residents and businesses at each of these more distant, existing port towns.
- With regard to supplying the mine with "new"/more barges traversing the Kuskokwim River, and the Alternative 2 selection of access road siting (instead of Alternative 4; the Birch Tree Crossing Port idea), I agree with the maritime evaluation that favors this arrangement over the longer access road. The increased barge frequency (only one more barge/day, on average) is unlikely to cause subsistence problems any more than the previous decades of river traffic did. "Good practice" on how to move up and down the river has already been defined.
- Separately, I also feel that the choice to limit the use of Iditarod alignment by avoiding the riskier Dalzell Gorge route (Alt. 6A) is again well evaluated, and a proper choice. (much less colocation with the Iditarod route, with Alter. 2)
- Using the dry stack tailings plan (Alternative 5A) throughout the mine life is neither necessary nor preferable for these circumstances. Releasing the tailings dam at the time of closure is good, and an appropriate choice for long-term stability once the mine's life has been completed, and the tailings will be covered with vegetation.
- The benefits of this mine will extend beyond the local region, and yield some net positives to every single Alaskan resident and taxpayer.
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In closing I will again note that I favor the selection of Alternative 2 as the Corps moves through its review of the proposed mine program and comments received, and then develops the Final EIS for this project. The Donlin Gold plan has been well thought out and based on solid research and environmental baseline data since 1996. Marvelous efforts toward impact avoidance, minimization and mitigation have been deliberated and adopted in developing the Alternative 2 mine plan, and the extensive public involvement by stakeholders at dozens of public hearings all over the region have been skillfully executed.

Good luck, and please move along promptly, because it is time to move ahead and reach a Record of Decision and start construction.

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