



# International Union of Operating Engineers

**LOCAL 302 • Washington and Alaska • AFL-CIO**

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Keith Gordon, Project Manager  
U.S. Army Corps of Engineers, Alaska District  
CEPOA-RD-Gordon, P.O. Box 6898  
JBER, AK, 99506-0898



Dear Mr. Gordon,

Thank you for the opportunity to make public comment on the draft EIS for the Donlin Gold project. While I attended the function at the Egan Center on January 28, I was too far down the list to give public testimony that evening.

My name is Jason Alward and I am with the Operating Engineers, Local 302 and it is our pleasure to support this proposed project.

You may know that IUOE Contractors and Members in the U.S and Canada have built mines and pipelines in both countries and around the world. In Alaska our contractors built Fort Knox, Pogo, and Kensington mines to name a few. IUOE contractors and members built and maintain the Trans Alaska Pipeline as well as much of the infrastructure on the North Slope necessary to drill and produce oil. Our contractors are members of the Associated General Contractors of Alaska. They are Alaskan and many are native owned. Please know that much of the skilled labor necessary to build a gas pipeline and a world class mine in Alaska is here today and more importantly, a model to insure a skilled regional workforce is also here. For over 50 years our contractors have developed a skilled workforce in Alaska through registered apprenticeship. This model offers the best return on investment and is utilized in the U.S and Canada and should be utilized on this project.

It is imperative that the process for Donlin's project keeps moving forward, as the project is vital in supporting the communities of the YK region and also for the entire State during a much needed time of portfolio diversification. The state of Alaska cannot continue to be reliant on oil for 90% of its budget. In addition to a much needed economic boost, this project could help facilitate some basic infrastructure for other critical possibilities in the future. Some of these benefits could be energy relief costs to Western Alaska residents and roads to future resource extraction.

More specific to the draft EIS study, Alternative 1 should not even be considered when we have an excellent partner with an exceptional track record in mining willing to move this project forward. I feel

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**Sean Jeffries, President • Jason Alward, Vice President**

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confident that this project can be performed responsibly and the financial benefits to the people in the region and statewide economic benefits clearly outweigh the negatives. Alternative 3B should also not be an option, as a diesel pipeline with diesel fuel for powering the operation of the mine clearly entails more environmental risk. Additionally, there are clearly higher costs to build, operate, and maintain a diesel pipeline. To the contrary, LNG is clearly the superior option and with excess capacity, it can be used to potentially address the energy needs of the YK region. At this point and time, I don't believe Alternative 3A is the logical choice for LNG trucks if alternative 3B is approved. Typically speaking LNG trucks emit 20 percent less carbon dioxide than diesel trucks and generally cost about 30 percent less to operate. However, the LNG technology is only in the infancy stages. Currently there are only 3500 trucks in the U.S. running on LNG and Japan is building the first LNG marine vessel this year. As such, LNG trucks may be successful for highway trucks in middle America, but how about in the middle of an Alaskan winter at 30-40 below zero? The uncertainties of increased costs, logistics, and technology should clearly be a reason not to support Alternative 3A. As far as Alternative 4A and 6A are concerned, I do not have enough knowledge of the surrounding areas to comment, assist, predict, or speculate about the route selection of the pipeline. The locals in the region should have the largest input on these decisions, as long as costs to do so are not outrageous and the integrity of the pipeline is not compromised as a result of the new location. Lastly, I will defer any comments regarding Alternative mine stacking methods (5A) and leave that up to the Corp of Engineers and Donlin Engineers to figure out when the project gets started.

In closing, for all the above stated reasons I strongly encourage continued support for this project and that we also make sure this project is done with Alaskan's and Alaska Contractors.

Sincerely,



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