

From: [Greg Roczicka](#)
To: [donlingoldeis, POA](#)
Subject: [EXTERNAL] Donlin DEIS comments
Date: Tuesday, May 31, 2016 3:26:40 PM
Attachments: [Donlin comments - 5-27 ed-gr.doc](#)

See attached.



May 31, 2016

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

Re: Proposed Donlin Creek Mine, Draft EIS

Dear Sirs:

The ONC Executive Board would like to express its concerns and opposition to the proposed Donlin Creek mine as put forward through the Draft EIS that has been circulating over the past several months. These concerns include such major items as; 1) inadequate monitoring of mercury emissions and construction/maintenance of a containment dam in perpetuity; 2) unknown effects on out-migrating salmon smolt from increased barge traffic; 3) only brief “snapshot studies” involved in the DEIS determinations of “minimal” effect; and, 4) unaddressed oversight or practical enforcement of the Clean Water Act in bush Alaska such as requirements of bilge/ballast water dumping that could occur from the large increase of ocean going fuel and/or cargo barges associated with the project.

Along with the extreme threat over-all to maintaining the integrity of our subsistence fisheries and water quality in perpetuity that is shared by so many and to which ONC fully subscribes, and other entities with more technical expertise have expressed, this document leaves almost as many significant questions either unanswered, inadequately addressed as minimal impacts, or in some cases, essentially dismissed as “indirect effects”, as it attempts to adequately mitigate.

Most glaring in this last category is the “new” Port expansion being proposed at Bethel, whose huge potential impact is addressed only at the most superficial level. ONC raised these issues back when the idea was first presented to the Corps as an independent project back in February & March of 2014 for cargo and fuel storage expansion of the present day Knik Yard Dock. Our questions remained unanswered then, but we trusted, and were assured they would be, by having them included as part of this EIS process. The DEIS has failed to do this!

The navigable channel for large ocean-going freight or fuel barges at the site of this proposed construction is already fairly limited, and has become increasingly so in recent years from accretion that is occurring on the inside of the river bend. The assumption presented in the DEIS that there would be 925 feet of navigable water available from the face of proposed sheet pile bulkhead to the opposite (southerly) riverbank is simply a false one. The google picture in the Draft EIS appears to have been taken during a high water event. The existing and expanding sandbar at this location is not “navigable” by anything but small skiffs even during high water. This proposal in reality would allow approximately only 200 feet or less of navigable channel to

the existing docks that already serve as main ports for goods and services (including bulk fuel storage farms and small barge transfer delivery points) for villages throughout the Kuskokwim River drainage.

Regarding the impeded navigability issue mentioned above, a reverse concern must also be addressed. Should this project result in an accelerated accretion process, downstream access to the 2 existing docks could easily be eliminated for all but the corporate interests of this proposed project in that same 10-20 year time frame. Previous statements that the southerly channel could be used as an alternative access route to Bethel reflects little knowledge or understanding of the high accident potential and difficulty (if not impossibility) involved with docking a large ocean-going freight or fuel barge from an upstream approach in an extremely constricted maneuvering area. The statement is simply unrealistic from the standpoint of safe maritime practice.

Such speculation incorporated into the DEIS does not sit well for confidence levels of its process. And we should not expect or accept that those actually conducting these engineering reviews, study and analyses would have, or be subject to that level of naivety.

Of equal or greater consequence however, is the highly probable effect installation of this bulkhead would have for increasing and redirecting the river current velocity that would inevitably cause increased erosion to occur on the lower end of this river bend: While the DEIS shows and addresses only the immediate footprint of the proposed dock expansion - reflecting the misrepresentation/lack of adequate study mentioned in the previous paragraph. There is a large flood plain area there which encompasses a slough housing many fish camps of our tribal membership (along with several other area villages), and where - at the lower end - resides the community of Oscarville. This slough is relatively protected at present, and accessible at the upstream entrance only during high tide or seasonal high water events.

The change in existing channel velocity and erosion patterns which are highly probable from this project would result in this slough evolving into a much higher stream flow channel through Oscarville Slough, that would subsequently erode these fish camps away along with the entire village of Oscarville in the next 10-20 years. In the past thousands of years of historical use, people could and did simply move their fish camps or entire villages in response to, or avoidance of, naturally occurring erosion. With the advent of new societal land ownership practices over just the last 60 years however, this is no longer available as a realistic option. In addition to Bethel residents, we are aware of at least the village of Oscarville, Kasigluk & perhaps Nunapitchuk, that have maintained historical fish camp sites in the slough that is at risk of becoming a river channel as a long term environmental impact result of this proposed project.

The high potential and probability for loss of an entire village, as well as seasonal fish camps for many others, in the next 10-20 years cannot justifiably be ignored, dismissed or in any other way acceptable to being categorized as an "indirect effect" by the Donlin Gold Project DEIS. The proposed project should not go forward with such matters left unresolved.

In too many respects, the DEIS offers only a cursory review of the impact on the entire river ecosystem as this proposed cargo/fuel handling facility in Bethel exemplifies. And significantly represents a fatal flaw in the DEIS that reflects poorly on the US-Corps of Engineers management of the process. The lack of focus on navigational impacts as they relate to increased erosion, re-channelization and the region's subsistence economy here is more disappointing in light of the Corp's national responsibilities in the management of navigable waters.

Sincerely,

Walter Jim, President