

**From:** [Glenn Ruckhaus](#)  
**To:** [donlingoldeis, POA](#)  
**Subject:** [EXTERNAL] Donlin Gold Draft EIS comment  
**Date:** Monday, May 23, 2016 4:55:00 PM  
**Attachments:** [DEIS comment letter.pdf](#)

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May 26, 2016

Don P. Kuhle  
U.S. Army Corps of Engineers  
CEPOA-RD  
P.O. Box 6898  
JBER, AK 99506-0898

Dear Mr. Kuhle:

We have reviewed the Draft Environmental Impact Statement (DEIS) for the Donlin Gold Project. Overall, the DEIS appears to document a thorough evaluation of the potential effects of the various project alternatives. We strongly support this project as Donlin Gold has provide detailed science for the evaluation of environmental impacts and demonstrated its commitment to the local communities of the Yukon-Kuskokwim area through its hiring practices and ongoing education and engagement. Approval of this project as proposed will enable continued improvement to local economy that will enable the communities to continue to live the subsistence lifestyles they enjoy. The most productive subsistence lifestyles in Alaska are those that are combined with a strong local economy. In addition to the broad comment of support for the project we offer the specific comments below for your consideration.

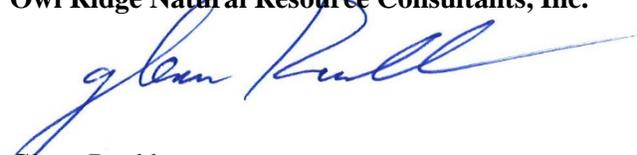
1. On pages 3.18-36 and 3.18-39, the discussion notes Donlin Gold has expressed a commitment to hiring qualified Y-K region residents during construction (operation) of the mine and other project components. It is important that these discussions disclose that Donlin Gold not just expressed a commitment to hiring qualified Y-K regional residents; rather Donlin Gold has demonstrated a commitment to hiring qualified Y-K residents. Donlin Gold filled many of the jobs available during exploratory and resource data collection efforts with Y-K residents and there is ample data to support this. We feel it is important in the evaluation that readers should understand that Donlin Gold has done more than just “express a commitment to hire qualified Y-K region residents.”
2. The discussion of energy effects under Effects on Supply of Public Goods and Services on pages 3.18-47 to 3.18-48 appears to trivialize the Donlin Gold decision to oversize the natural gas pipeline to provide an opportunity for other entities to use the excess capacity that would exist. With an expected 30-year life of mine project, the excess capacity in the pipeline provides a real opportunity for Y-K residents to take advantage of the proximity and availability of natural gas.
3. Section 3.13.3.2. 5, Summary of Impacts for Alternative 2 that starts on page 3.13-165 identifies a number of moderate and major effects to Fish and Aquatic Resources that are not supported by the detailed discussion presented earlier in Section 3.13.3.2. In particular, the summary identifies various impacts to salmon from loss of habitat and barging as moderate or high. The specific discussions earlier in Section 3.13.3.2 identify effects mostly in the range of negligible to minor. How do the effects increase to moderate or high in a summary section when they are not supported by the detailed scientific discussion?

4. The discussion at the top of page 3.13-129 lists approaches that were incorporated to reduce potential impacts of vessel traffic and fuel or chemical spills on the Kuskokwim River. A primary factor not mentioned here is the natural gas pipeline. Donlin Gold's decision to add the pipeline to the mine project substantially reduced the amount of fuel that Donlin Gold would have to barge up the Kuskokwim River, which effectively minimizes the effects of barging on fish and people that rely on the River. The connection between the natural gas pipeline and minimization of barge traffic on the River should be made clear to the reader. This connection is important to a full understanding of the extent of efforts that Donlin Gold made to minimize barge traffic and associated adverse effects. This perspective is especially needed in light of the medium- to high-level of intensity impacts identified for barging in the effects summary.

We appreciate the opportunity to review the DEIS and look forward to your responses to these comments.

Regards,

**Owl Ridge Natural Resource Consultants, Inc.**



Glenn Ruckhaus  
President