

## Smith, Neal

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**From:** Joshua Peirce <peirceak@gci.net>  
**Sent:** Tuesday, April 26, 2016 10:16 PM  
**To:** donlingoldeis, POA  
**Subject:** [EXTERNAL] Donlin Gold Draft EIS comment  
**Attachments:** Draft Donlin Gold EIS comments.docx

Hello,

Attached is a word document containing draft EIS comments for Donlin Gold proposed mine, etc.

Kellie

PO Box 64  
McGrath, AK  
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April 26, 2016

US Army Corp of Engineers  
Draft EIS-Donlin Gold

Dear US Army Corp of Engineers,

I am writing regarding the proposed Donlin Gold Mine and would like my comments entered into the record for the draft EIS related to the proposed mine.

My bio includes: a Master of Science degree in Wildlife Biology, Bachelor of Science degree in Terrestrial Ecology, commercial pilot, landowner in the Farewell region, resident of McGrath, small business owner, subsistence user, hunter, trapper, wildlife photographer, recreational user, mother, wife, and gardener. Formerly held positions include but are not limited to Land Condition Trend Analysis Coordinator for the US Army Alaska, biologist in Alaska for the National Park Service, US Forest Service and Alaska Department of Fish and Game, private consultant to the federal government related to wildlife and natural resources management, grant writer for the McGrath Tribe, and data analyst for the Iditarod Area School District.

My comments focus on the proposed pipeline and some are specific to the section of line routing through the Farewell area. The potential impacts from this project are many. Below details an overview which is not all encompassing.

- permanent loss of wilderness value of the land
- permanent loss of scenic value of the landscape
- threats to wildlife
- diminished human experience
- increased human use
- increased competition for limited resources
- destruction of pristine landscape
- contaminants to water systems
- invasive species introduction
- replacement of native species with allegedly native species- but those that do not currently exist in the habitat (reseeding of runways)
- noise pollution
- disturbance/negative influences on critical fish spawning habitat in the upper reaches of the drainages that exist on the north side of the Alaska Range in the proposed development area
- erosion issues

- fault zone issues
- negative consequences to cultural entities that value wildness
- threats to subsistence lifestyles
- threats to the overall ecology of the region (plants, animals, birds, wetland habitats, soils, hydrology, mountain ecosystems, some mentioned above)
- impacts to recreational users, subsistence users, commercial guide operators, hunters, trappers, and residents that use the area
- disturbance within ecological transitional zone habitats, rich in biodiversity, the current proposed routing runs right through this unique area

I will expand upon some of these concerns in the below comments.

Alaska is a wild place. That is what draws people from all over the world here. The human psyche yearns for wildness, peace, solitude and an existence more primitive than what we have become. People pay large sums of money to have a chance to spend time in the wilderness, and that is why many people, of all user groups, come to Alaska and the Alaska Range. Some come to recreate, some come to be alone, some come to bag the big bear, moose or Dall's sheep, while others come to pick berries or hunt or trap for subsistence.

There is a thorough and ample supply of research and data that have been collected on the negative consequences of trails, roads and development built into wilderness areas. Our lower 48 neighbors know all too well what carving up wilderness does to a landscape- it no longer is wilderness. This pipeline, if allowed to be put through, will obliterate the scenic value of the Farewell area and the Alaska Range. People the world over seek out this beautiful region because of its wildness, and to destroy it with a large pipeline and permanent swath running through the landscape is a sad and disappointing proposal indeed. We have people that travel all the way from Norway, Sweden, Germany, Italy, Spain and other European countries to use the Farewell area, the region surrounding the proposed development and the Iditarod Trail that have long since lost most if not all of their true wild areas in their homelands. I have talked and visited with many of these people who are astounded at the awesome resource of wilderness Alaska still holds on to. This pipeline will ruin that wilderness value. The scenic value will be destroyed as well, as who thinks an area is wild when there is a 315 mile long piece of man-made piping in the ground and a permanent swath of man-made, cleared, land to maintain the pipeline right of way? Many guides are not in support of the pipeline either, their clients come from all over the world as well and seek out a true nature experience. Many are hunters seeking game, but most desire the wild experience of being in an untouched land, not altered and manipulated by people to the degree that this proposed pipeline will. TV reality shows abound on Alaska, most focusing on the wild aspects of our great state. There is a reason. People are intrigued about Alaska, her remote areas, breathtaking scenery and undeveloped landscapes.

I have grave concerns about increased numbers of people who will definitely come when the proposed trails, roads and airstrips are developed by Donlin Gold. The people of McGrath, myself, as well as our neighboring communities, live here because it is wild. We subsist off the

land and hunting and gathering from the land is our lifestyle. Farewell and the Alaska Range is our backyard. Many residents here do not want the pipeline and are very concerned about the impacts to the land. The Farewell area is increasingly getting more and more pressure from hunters every year. But this use is limited by the difficulty in accessing the region. Once roads and trails are cut, people will come, crowding the area, putting increased pressure on resources and game populations.

Residents in McGrath and downriver worry about leakage to the massively large and deep proposed tailings pond at the mine site. What will this do to the salmon? How will it impact the other critical fisheries resources people's lives so depend upon? What about the birds that stop over to rest on the pond? The draft EIS states that impacts will be minimum because bird exposure should be minimum. It goes without saying the chemicals used in mining are toxic and deadly. It will not take much exposure to be harmful. If a person were exposed only once to a heroin injection, that is only once and could be construed as minimum exposure, but is it serious? Yes! Furthermore, the track record is bleak for mines being able to successfully contain their waste. Lawsuit after lawsuit have been through the US courts over mine infrastructure failures, leaks, and subsequent spills that leach toxic chemicals, infiltrating water systems. I am not confident that our technology is good enough to prevent a leak. To me, it is not worth the potential damages that could happen.

The pipeline routing goes through extremely sensitive habitats, relatively untouched by humans to date. Physical disturbance of the delicate soils in the range is a concern. Vegetation is slow to regrow in the region, growing seasons are short, the climate is harsh, and the winds are fierce. In my former capacity as a LCTA Coordinator for the US Army, I collected and analyzed data on land disturbance and habitats on military lands in Alaska. It is very difficult to revegetate and repair Alaska landscapes once damaged. Alaska's environment is not like the fertile rich soil types and longer growing seasons of many regions in the USA. It is fragile and does not repair easily. Some areas, such as wetlands, do not recover from disturbance and what was once wet tundra can quickly become a permanent bog pond after just a single pass from heavy equipment.

The subsistence users use the Farewell area to hunt, trap, fish and collect culturally important berries and plants. Critical fish spawning habitat in the upper drainages of the rivers that flow out of the north side of the Range exist and could be negatively impacted by the proposed development.

The proposed routing of the pipeline through the region near Farewell is a terrible routing, ecologically speaking. This area has some of the richest species diversity within Alaska. The Farewell area encompasses burned spruce forest, wet and dry tundra, mountains, rivers and birch/spruce forests. It also includes the transitional zone- an ecologically rich and diverse area for plant species and animal species. The Farewell area is a critical area for wintering caribou as high winds throughout the winter blow snow off vegetation allowing herds to forage successfully. One of the few, free ranging herds of American Bison exist here year round. This herd is unusual because it is genetically a very "pure" bison herd. The majority of bison

remaining in America have mixed with cattle, so this herd represents the closest living relatives to our original plains bison that historically so prolifically roamed our great nation. I am concerned by the proposal to reseed “with native grass species” the airstrips and disturbed areas overlaying the pipeline. If this is done it will be a beacon for the bison, which may at first glance seem desirable. But if they concentrate in the seeded area, as they likely will since grass is a preferred food, they will likely become “sitting ducks” for the many predators in the area. The bison are a herd animal, but are dispersed and exist in small herds in the area. Putting in freshly seeded areas changes the dynamic and existing nature of their habitat. Seeded areas will be like a dinner bell to them, could increase likelihood of disease, crowding, overgrazing and increased predation. Salmon congregate in small streams to spawn and in bear country, they are heavily preyed upon. A similar scenario exists by reseeding areas with native grass species, if the bison congregate regularly due to new forage, they will be an attractive meal for wolves, bears and other predators.

For personal reasons I am concerned about the direct impact to landowners as a result of the proposed pipeline. The current pipeline routing essentially goes right through the front yard of my land in Farewell. I have saved my entire life, and worked hard to fulfil a dream I have- of one day building a small cabin in the wilderness. I have the land, and the flagging tape is in place to build my remote dream cabin, but if the pipeline goes through, this area will not hold the same value. The scenic value to me will be destroyed. My idea of being in my dream cabin has never included watching bulldozers plow a swath of destruction near my land as I rock on my rocking chair on my front porch. Other land owners have land in the Farewell area due to its wildness and great beauty. We desire to keep it that way.

The proposed Donlin Gold mine, pipeline and infrastructure are enormous in scope and potential impact. I stand confused, wondering why such massive money, resources and time have been spent on this project already. Yet money talks. The operational life span of the mine is incredibly short time wise, estimated at <30 years. Why such enormity of effort is being put forth to construct a lengthy pipeline, mine, camps, airstrips, and other infrastructure as well as incredible effort and money on the taxpayer for the federal government to review and conduct the EIS is astounding when the sole drive here is the acquisition of money for a mere handful of people. Again, money talks.

Could the Donlin Gold mine, pipeline and infrastructure be developed in a way that would not adversely impact the wildlife, subsistence, ecological entities and wildness of the areas involved, among others? That is the multi-billion dollar question at this point.

Is it worth it for a handful of people to gain great wealth at the expense of those people and the natural resources that will be impacted by the proposed project? No, it is not. Is it worth the cost to people’s livelihoods? Their way of life? No, it is not. This proposed project is short lived, benefits very few, and the impacts are extreme and numerous. The end result will be a permanent scar on the land, with potentially abundant long term consequences, simply so a relatively few people can profit economically. Yes some jobs will be created, for a little while, yet is that

enough of a bargaining chip to convince locals to look the other way? Let's keep the Farewell area beautiful. Let's keep our water clean. Let's think about our fisheries and the importance of cultural and subsistence ways. I was surprised to discover while talking with one of the mine owners at a recent meeting, that some involved in wanting to develop this project have never even been on the ground to see the great resource- the beauty of the land, the quiet stillness of a wild area, far from cities, masses of people and the rush of modern society. This discovery caused a sense of wonder within me, it made me even more grateful for the knowledge I have gleaned from Alaska's wilds, and hopeful those who have not learned her ways would come to know them.

Kellie Peirce