

**BLM Comments on the Camera Ready Draft EIS
October 2015**

Section Number	Page	Original Language	Proposed Language or Comment	Disposition (CAs should leave blank)
CH 1 COMMNETS				
	Entire document	Word "granular"	Replace w/ "gravel" or "granular rock" to enable public understanding. See similar BLM comment Dec. 2013.	
1.10.01	1.10-26	This Draft EIS includes analysis of measures to avoid and minimize impacts to fish, wildlife, habitats, and other resources. The Final EIS will address compensatory mitigation for impacts which cannot be avoided or minimized. It must be demonstrated that these factors have been considered by decision makers prior to undertaking actions such as issuing permits.	Needs acknowledgment that BLM has authority to - and likely will - require compensatory mitigation.	
CH 2 COMMENTS				
2.3.2.1.1 0	2-38	Cyanide detoxification chemicals would be available.	Available where? This is unclear if is just at Angyaruaq (Jungjuk) Port. Recommend be available where or when ever cyanide is stored or transported.	
2.3.2.1.1 2	2-41	Mobile equipment and vehicles that cannot be reused would be buried in the WRF at closure.	Recommend salvage of all carbon based material to reduce the overall Donlin carbon foot print as part of this EIS. Even though ADEC monitors waste regulation permitting. Recommend identifying in this EIS that all mobile vehicles would be recycled. Reducing the impact and burial of waste on private lands.	
2.3.2.1.1 2	2-46	Although the grounding of a barge is unlikely,	We disagree with this statement see information below	

			<p>U.S Coast Guard News release dated June 28, 2010 identifies the opposite. "It is not unusual for barges to ground on the shifting bottom of the Yukon Kuskokwim region's rivers." http://www.uscgnews.com/go/doc/4007/1385339/Imagery-Available-Grounded-barge-on-Kuskokwim-refloated-Coast-Guard-monitors</p> <p>As identified this location is McDonald's Crossing upriver from Bethel and is within Donlin's identified barging corridor. The Coast Guard Captain of the Port for Western Alaska approved a lightering plan allowing for the removal of 30,000 gallons of aviation fuel from the grounded barge Napamute providing for a successful re-float of the barge on the Kuskokwim River Monday morning. Removing of fuel from grounded vessels will likely require Coast Guard approved lightering plan.</p> <p>Initial Notification: Crowley Barge 160-1 ran aground near Quinhagak, AK, just south of the mouth of the Kuskokwim River on Sept. 16, 2009 http://incidentnews.noaa.gov/incident/8097</p> <p>Grounded Fuel Barge Re-Floated and Bound for Bethel, Coast Guard Reports Staff Jun 8, 2015. The Coast Guard responded to the scene on Friday to evaluate the situation, and reported that they had found no hull damage.</p> <p>http://alaska-native-news.com/grounded-fuel-barge-re-floated-and-bound-for-bethel-coast-guard-reports-17713</p> <p>Coast Guard inspection i and lightering plan</p>	
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2.3.2.1.1 2	2-46	The steps that would be taken in the event of a stranding would be:	1. Notifying U.S. Coast Guard of grounding. Should be identified as one of the top priorities.	
2.3.2.1.1 2	2-46	4. In the event that river bed conditions and/or other factors preclude pulling the barge free, or the tug is unable to free the barge, the next step would be to bring an empty fuel barge (equipped with a pump for fuel transfer) or cargo barge (equipped with a crane or other equipment for transferring cargo), as appropriate, alongside the stranded barge and begin lightering fuel or cargo across to the empty barge until the stranded barge is refloated. All appropriate spill containment measures (booms, etc.) would be implemented prior to lightering any fuel.	U.S. Coast Guard lightering plan would be required for the removal of fuel from grounded barges as identified in this example. "The Coast Guard Captain of the Port for Western Alaska approved a lightering plan allowing for the removal of 30,000 gallons of aviation fuel from the grounded barge Napamute providing for a successful re-float of the barge on the Kuskokwim River Monday morning." http://www.uscgnews.com/go/doc/4007/1385339/Imagery-Available-Grounded-barge-on-Kuskokwim-refloated-Coast-Guard-monitors	
2.3.2.1.1 2	2-46	The steps that would be taken in the event of a stranding would be:	1. Notifying U.S. Coast Guard of grounding. Should be identified as one of the top priorities.	
2.3.2.1.1 2	2-48	5. Once enough cargo had been removed from the barge it would refloat. In extreme cases the empty barge could be pulled free using a tug. As these barges would be designed for storage on the river bank during the winter season when the river is frozen, the barges would be structurally strong enough to withstand being pulled free. Freed barges would	As previously identified in comments. A Coast Guard inspection of the vessel to safely put it back in service should be required for fuel barges as part of this EIS. Identified in this article fuel barge grounded in 2015 was inspected by USCG. "Grounded Fuel Barge Re-Floated and Bound for Bethel, Coast Guard Reports The Coast Guard responded to the scene on Friday to evaluate the situation, and reported that they had found no hull damage. A Coast Guard C-130 Hercules did an overflight of the area and reported no pollution."	

		be inspected by appropriate qualified personnel and repaired, as needed, before being placed back into service.	http://alaska-native-news.com/grounded-fuel-barge-re-floated-and-bound-for-bethel-coast-guard-reports-17713	
2.3.2.2.1	2-59	Donlin Gold has identified a construction planning corridor of 300 feet , within which they would apply for a permanent ROW (50 feet wide on ANCSA and State of Alaska lands and 51 feet, 2 inches on BLM-managed lands). The total nominal construction corridor would be 150 feet to install the pipeline and fiber optic cable. Figure 2.3-16 shows the planned evolution of the ROW. The 300-foot corridor would provide flexibility to adjust the pipeline alignment during construction to avoid sensitive resources, areas with steep slopes, marshes and bogs, river crossings, and permafrost terrain to the extent practicable. Estimated total acreage on federal, state, and ANCSA Corporation lands for the 300-foot planning corridor is 11,457 acres as shown in Table 2.3-14. Ancillary facilities such as airstrips, construction campsites, and storage yards for pipe and equipment would require 2,643 acres.	Disconnect in the description of the construction corridor in Ch 2 and Ch3. In ch.2 the construction corridor is 300 feet, while in ch 3 (3.15.2.1.3) it was identified as a 150 foot ROW. Please clarify.	
2.3.2.2.2	2-48	Donlin Gold does not propose the construction of additional capacity in Dutch Harbor. Donlin Gold has indicated they would likely use a third-party to transport fuel	This seems like project segmentation, which is not allowed under either NEPA or section 106. We cannot avoid analyzing effects by saying that a third party will figure out what is needed and apply for permits themselves. If	

		and other supplies to the project site. That party would determine what amount of additional fuel capacity, if any, would be required in Alaska to accommodate demand. That party would also be responsible for applying for and obtaining any permits that may be required for the expansion.	infrastructure is needed for Donlin in Dutch Harbor, we need to figure that out and analyze the potential impacts, here, now, in this document. Otherwise we are not looking at the complete project. If not for the mine, this facility would not be built. Therefore, it is part of the project and needs to be analyzed more thoroughly here.	
2.3.2.2.3	2-48	Donlin Gold has indicated that a third party would construct and operate the Bethel Cargo Terminal. That party would determine what amount of additional storage space and waterfront structures, if any, would be required to accommodate demand. That party would also likely be responsible for applying for and obtaining any permits that may be required for the expansion. Since this work by a third party would be a connected action for the proposed Donlin Gold Project, the environmental effects must be evaluated as indirect effects.	Same comments as above: If not for the mine, this facility would not be built. Therefore, it is part of the project and needs to be analyzed more thoroughly here.	
2.3.2.2.9	2-58	30-mile mine access road and airstrip would be maintained for delivery of WTP	After mine closure will the 30 miles of road from port to mine site be open to public use? Subsistence uses? Either option will have an impact to subsistence users as it will restrict or improve future access.	
2.3.2.3	2-58 to end of chapter	Many specific construction, erosion control, and reclamation details are not included in this chapter and instead are found in specific affected resource descriptions and impact analysis in Ch. 3, resulting in a fragmented or incomplete description of the proposed action.	Provide detailed proposed actions not described in Ch. 2 but later described in Ch. 3.	

2.3.2.3.2	2-64	Fiber Optic Cable section	Describe whether or not the fiber optic cable would be installed within proposed construction and ops ROW, or an additional separate ROW would be needed, and quantify / detail width of additional ROW.	
2.3.2.3.2	2-64	Donlin Gold is currently evaluating options for where the fiber optic cable would originate, including installation of a microwave tower, running a cable along existing power line routes from Anchorage, or from existing infrastructure at Beluga.	Identify which routes would be used.	
2.3.2.3.2	2-64	Details regarding installation of the fiber optic cable would be completed during final design.	This should be discussed as part of the NEPA process.	
2.3.2.3.3	2-67	Figure 2.3-18	This map is incomplete. It shows the Farewell airstrip, and it shows the pig station, but it doesn't show how one will get from A to B – will there be a road between the two? If not, are you using a river or winter overland travel only?	
2.3.2.3.3	2-66	Metering stations would be located at the pipeline tie-in (MP 0) and at the terminus (MP 315). The station at the mine site would include limited above-ground piping and a module that would house the metering equipment as shown in Figure 2.3-20. The pipeline terminus pad would be 100 feet by 100 feet and would have locking man-doors. The tie-in location at MP 0 would be 120 feet by 53 feet, fenced, with a sliding gate and lock.	It would helpful to describe what a metering station is and why it is needed. There are very detailed descriptions relating to operations at the mine site but not as many details for the operation of the proposed natural gas pipeline.	

2.3.2.3.3	2-69	<p>MLVs would be placed at intervals of no more than 20 miles along the length of the pipeline. A total of 20 MLVs would be installed at locations identified in Table 2.3-15. Four of the valves would be located with other facilities: the Beluga Pipeline (BPL) tie-in, the compressor station, the Farewell pig launcher/receiver site, and the pipeline terminus at the mine site. Three of these, located at the Beluga Pipeline (BPL) tie-in, the compressor station, and the pipeline terminus, would function as emergency shutdown (ESD) valves, and would be able to be remotely and/or automatically operated by a Supervisory Control and Data Acquisition (SCADA) system. These ESD valves could also be manually operated by the activation of an ESD switch at any of the three sites by an on-site operator if necessary. Figure 2.3-21 shows a typical MLV assembly.</p>	<p>It would be helpful to include more information about the operation of the mainline valves. The diagram is excellent but does not explain the functionality of the valves.</p>	
2.3.2.3.4	2-70	<p>Donlin Gold would clear temporary extra workspace as required outside of the authorized 150-foot construction corridor. Temporary extra workspaces would be required at: ☐ stream and river crossings, and high banks at ravines where earth cuts are required;</p>	<p>Section 2.3.2.3 does include footprint of ancillary facilities and campsites on BLM land but not specific location to determine impact to the site for a sufficient NEPA analysis.</p>	

	<p> areas where pipe is being installed using HDD methods, to accommodate extra equipment; </p> <p> sidebends; </p> <p> the beginning and end of each construction spread for spread mobilization and demobilization; </p> <p> stringing truck turnaround areas; </p> <p> other areas where extra space for spoil storage and construction activities are necessary; </p> <p> areas of sideslopes where grade cuts are required to create a level work surface across the width of the ROW (the extra width needed for the cuts and/or the fills) as shown in Figure 2.3-22; </p> <p> areas where a high water table would undermine trench walls, creating an extra-wide trench and larger spoil piles (for instance, in a gravel floodplain); </p> <p> on steep grades or for shoofly (temporary) access roads around such grades; and </p> <p> pipe laydown areas. </p> <p> During pipeline and transmission line construction, additional areas for construction camps, pipeline and construction material storage yards, material source sites and airstrips would also be required. These facilities requiring upgrading or new construction would be constructed </p>		
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		<p>before initiation of pipeline construction. Ancillary facilities that are currently being used or planned for use by Donlin Gold and others would require negotiations and leases or use agreements. These facilities are included in the estimates of area to be cleared and the acreage totals shown in Table 2.3-14 above.</p>		
2.3.2.3.4	2-76	<p>Temporary site access and shoofly roads would be required for airstrips, borrow material sites, water withdrawal sites, and other authorized temporary use areas such as pipeline storage yards. A shoofly road is defined as an access road to the pipeline construction ROW or along the ROW to provide continuous access where the ROW is too steep for pipe stringing trucks and personnel carriers. Temporary gravel access roads would be a maximum of 24 feet wide, with culverts installed as necessary to facilitate surface water flow. Road shoulders surrounding culverts would be lined with rip-rap (or equivalent per the erosion and sediment control plan). Table 2.3-20 identifies planned temporary access roads and the corresponding pipeline MP. The temporary roads would total about 156 miles in length and would encompass just under 49 acres. In addition to</p>	<p>BLM requires the location, size, and structure of temporary roads on BLM land for a sufficient NEPA analysis of impacts. Otherwise NEPA does not meet BLM standards.</p>	

		these roads, 75 shoofly roads ranging from 0.09 miles to 6.91 miles in length and totaling about 77 miles would be needed. Reclamation of these roads is described in Section 2.3.2.3.6.		
	2-74	Clearing along the route chosen would begin in the winter prior to pipeline construction as soon as the ground becomes sufficiently frozen to support the weight of equipment. Clearing would be done such that the ground would not be damaged and erosion or long-term vegetation loss would not occur. Maintenance of the winter access ROW would occur only during the winter months by packing, watering, and grading the snow and ice surface.	Explain how the ground will not be damaged after clearing? Also describe how long term vegetation loss would not occur. What are the methods of clearing?	
	Figure 2.3-34		Please use more colors and/or other symbols to display the permafrost distribution. This figure is not clear.	
2.3.2.3.4	2-88	The main campsites would consist of cleared gravel pads with self-contained, soft- or hardsided structures	BLM would need more information about the construction camp layout for a sufficient NEPA analysis of impacts. Otherwise NEPA does not meet BLM standards.	
2.3.2.3.4	2-95	The location and number of material sites that may require a processing plant/crusher would be determined during final design. Material sites would be located during final design and sized to avoid mapped sensitive areas such as wetlands, cultural sites, sensitive	BLM would need to review the analysis on the material sites for impacts. proponent needs to propose specific locations so impacts can be analyzed and available for public review	

		species habitat, and other environmentally sensitive areas.		
2.3.2.3.4	2-97&98	Table 2.3-27: Potential Mineral Sites	Lists 22 Borrow Mineral Sites on Federal (BLM) Land. Seven of those sites list “gravel” as the material type that will be utilized. This material is a salable Mineral under the Materials Act (1947) and disposal activity requires a BLM permit.	
2.3.2.3.4	Whole section	Whole section	The description of these “ancillary facilities” for the pipeline is inadequate for BLM analysis. It does not provide the same level of detail that is shown in the mine site description, plus it is spread over 300 miles. It says on page 2-70 that these locations are still being negotiated, so we don’t even know where many of them will be yet. There is no way we can do the same level of analysis on the pipeline and ancillary facilities with the level of detail provided here. I also think the intro to this section should give some totals: total miles of roads, total number of/ acres of materials sites, number of wells, etc.	
2.3.2.3.4	2-74	Winter Access Corridor, also see p. 2-122, para. 5, 2 nd and 3 rd sentences.	If Southcentral Alaska experiences further low snow, high temperature winters such as experienced in 2013-14 and 2014-15, this proposed action will be infeasible (along with the proposed winter construction techniques describe for the pipeline). What are the alternatives if this is not a feasible option during the years which the proponent intends to construct the pipeline?	
2.3.2.3.4	2-74 and beyond	General	Document should provide tables and specific total mileage of all types of construction ROW surface preparation, such as ‘ice/snow pad, frost packed winter ROW, graded ROW, and summer wetlands’. (Repeat of Dec. 2013 BLM comment.)	
2.3.2.3.4	2-70	Bullet list	Inadequate information for BLM analysis. This bullet list needs to be expanded into a more detailed description. How many locations will	

			have these shoofly roads around steep-grade areas? How many pipe laydown areas and truck turnaround areas will there be? How big of a footprint is needed in HDD areas?	
2.3.2.3.4	2-83	Table 2.3-21	Table is underestimating the footprint of all these roads. It think this should include the full disturbance footprint from building the roads, because that is what we will look at in terms of impacts to cultural, vegetation, etc. the full disturbance area may be greater than the final length of the road, with no staging areas, buffer, etc.	
2.3.2.3.4	2-86	The main campsites would be supplemented by fly-in camps without temporary road access along the ROW, to reduce travel time and commute distance.	Inadequate information for BLM analysis. What is a “fly-in camp”? What would the footprint of one be? How many would there be? How long would they exist?	
2.3.2.3.4	2-86	“Construction camps would be moved as construction progresses...”	Identify how they will be moved and what equipment might be needed, such as <i>“primarily overland by heavy equipment”</i>	
2.3.2.3.4	2-91	Development of the pipeline storage yards would be initiated during the civil clearing and access season, which would occur generally one year before the pipe-laying season. Most of the pipeline material and equipment would come through the staging yards located at Beluga and Bethel. There would be 31 PSYs (not counting the Donlin Gold Mine site) in Spread 1 (MP 315 to MP 127), and 26 (not counting Beluga) in Spread 2 (MP 0 to MP 127). These sites would receive and store equipment during periods of no construction between seasons. Each PSY would cover about 1.5 acres, and would be cleared and graded before use. A gravel pad	how would the pipe would get from the Beluga and Bethel staging yards to the PSYs. Would it be driven overland? With what equipment? During what season? Would a road be necessary for this? Roads for PSY access are not listed in Table 2.3-20, if transporting them from either end of the pipeline these routes should be considered “temporary shoofly roads.” Transportation of all this pipe is a major undertaking and it needs to be made clear how it’s being done. If it’s driving along the corridor itself, the season, equipment, and number of vehicle trips should be made clear.	

		might be installed if the natural soil proved unsuitable.		
2.3.2.3.4	2-92	Figure 2.3-26	This figure is supposedly showing the PSYs, but they aren't shown. They are blue according to the legend, but the figure does not show 57 dots.	
2.3.2.3.4	2-95	Borrow site boundaries would be shaped to blend with surrounding natural land patterns and each site would be reclaimed consistent with approved, site-specific reclamation plans.	In order to assess impacts, we need to know the size of these and to see the reclamation plans in this document. Determining the requirements for borrow sites after the EIS is segmentation, and does not allow for a full analysis of project impacts.	
2.3.2.3.4	2-95	Material sites would be located, based on construction material needs, where appropriate materials can be found, and to minimize haul distances. The 70 potential material sites listed in Table 2.3-27 vary in size from 1 to nearly 50 acres and could provide more than sufficient gravel for the project. The location and number of material sites that may require a processing plant/crusher would be determined during final design. Material sites would be located during final design and sized to avoid mapped sensitive areas such as wetlands, cultural sites, sensitive species habitat, and other environmentally sensitive areas.	This plan does not provide sufficient analysis of impacts. There are a substantial number of these proposed, and unless we analyze the impacts of developing every one of them, with a processing plant/crusher, then we will not be able to fully understand the impacts of the project.	
2.3.2.3.4	2-99	All twelve airstrips would require storage for air operations and staging areas for pipeline construction materials. Actual facilities and area requirements for each airstrip would be determined during final design.	As with my comment above, the BLM cannot analyze impacts when we don't have a description of the "facilities and area requirements for each airstrip." Airstrips in this remote area could potentially have impacts on many resources and uses, and they need to be fully analyzed here. And if this	

			statement means that Table 2.3-28 isn't final, that needs to be called out in the table as well.	
2.3.2.3.4	2-100	Figure 2.3-27	Page 2-98 says there will be 12 airstrips, including 9 new ones, but the figure shows 10 new and two existing.	
2.3.2.3.5	2-103	Pipeline – Delivery... section	This information needs to be expanded on in the road and PSY sections in 2.3.2.3.4	
2.3.2.3.5	2-103	General	Section should provide estimate of number by class / type of vehicles for construction segments (winter vs. summer) and provide an estimate of number of daily vehicle passes at selected locations. (Repeat of BLM comment from Dec. 2013).	
2.3.2.3.5	2-103	General	This or previous section should identify the typical or planned width of the travel surface for materials delivery and job site access.	
2.3.2.3.5	2-104	Work pads would be installed to provide a level work surface during construction. Snow/ice, gravel, and/or graded work pads would be installed after clearing and grading.	Inadequate for BLM analysis. What size would the work pads be? How frequently would they be constructed? This needs to be detailed because it will affect potential impacts analysis.	
2.3.2.3.5	2-120	The need for blasting during project construction would be determined during final design. A Blasting Plan would be developed prior to construction for agency review, and would apply in all situations where blasting occurs.	Inadequate for BLM analysis. The amount, location, timing/season, etc of potential blasting along the pipeline route needs to be discussed in adequate detail.	
2.3.2.3.5	2-122	recovered and put back into place on top of the trench (the preferred method of natural revegetation).	Strongly agree with this method and would recommend that this be identified as a BMP.	
2.3.2.3.5	2-122	During winter construction, temporary erosion control measures would not be necessary. At the	Restate, during "typical winters" construction, temporary erosion control measures would be necessary.	

		latitudes at which the pipeline is to be laid in winter, the weather would be below freezing from the start of winter until spring breakup.	As we seen last year (2014) this was not the case and erosion from rain and runoff in much of the pipeline corridor may have occurred. Erosion control measures even in winter may be necessary some years depending on temperatures. A BMP that identifies a specific temp and duration where erosion control measures would be required in winter could be applied.	
2.3.2.3.4	2-123	“Revegetation of these disturbed areas would proceed in the same manner as in the ROW.	This statement, lacks specificity, and requires the reader to hunt throughout the document to determine what is being said, and effectively fragments the information. Similar incomplete references are made in a number of other locations. specify the proposed action (e.g., natural revegetation, active re-seeding, transplantings, etc.) such as detailed in p. 2-130.	
2.3.2.3.7	2-132	A Non-Native Invasive Species Prevention Plan would be developed and implemented during construction, operations and maintenance, and termination phases of the project and would include annual monitoring and treatment plans to mitigate impacts.	Include an Aquatic Invasive Species Prevention Identification of a trust fund to continue invasive monitoring if not included for monitoring the mine site water quality, dams, airport, road, and port into the future or perpetuity as identified. To fully evaluate this EIS a Non-Native Invasive Species Prevention Plan including Aquatic Species is required and needs to be made available for evaluation before EIS is completed	
Alternatives, Chapter 2	2-132	Other monitoring activities include cultural resources monitoring. A Non-Native Invasive Species Prevention Plan would be developed and implemented during construction, operations and maintenance, and termination phases of the project and would include annual monitoring	Describe what the Non-Native Invasive Species Prevention Plan would look like, what infrastructure/facilities would be incorporated, and what kind of treatments would be employed. Without this description for each alternative, including the No Action Alternative it is impossible to address environmental, social, and economic impacts.	

		and treatment plans to mitigate impacts.		
2.3.5.2	2-157-58	Table 2.3-37	Can we get a row at the bottom of this table showing total acres and volume in order to compare to the proposed action? Material volume is not included in table 2.3-43, although number of material sites is.	
2.3.2.3.7	2-142	Mass stability inspections of the tailings dam would be conducted according to ADEC requirements; annual inspections would likely be required, and more frequent inspections may also be conducted	Monitoring tailings dam with remote sensing devices should be identified as part of the monitoring program. This would help early detection of any movement or disturbance to the dam. In the event of a dam failure all possible prevention methods should be identified and used.	
2.3.7	2-165	Alternative 6A: "This alternative route is carried forward for analysis because it is feasible and would allow comparison of environmental impacts in Alt. 2."	(Repeat of comments of Feb. 2014) Since the Dalzell segment is not being considered in the POD it should be removed from this document, as it gives a reader the impression that this is an active alternative when it is not. Move the Dalzell alternative to Section 2.4	
2.3.8	2-172-188	Table 2.3-44	Why is this table in Chapter 2? This table is more appropriate either in Chapter 3, where you actually talk about resources and impacts to them.	
	2-177, 2-178, 2-179	<i>Terrestrial mammals</i> : habitat modification impacts intensity would be medium, long-term in duration, local in extent, and common in context. Invasive species impacts would be low in intensity (plants and Norway rat), temporary in duration, local in extent, and common in context.	The conclusion of "impacts would be low in intensity, temporary in duration, and local in extent" is not substantiated. Such conclusions cannot be made without knowledge of what a prevention, monitoring and mitigation plan is.	

2.3.8	2-185	Table 2.3-44	For cultural resources, the impacts from alternative 6A are not the same as Alternative 2. The pipeline route for 6A would have greater impacts on cultural resources, because of its alignment with the Iditarod NHT, its proximity to the Rohn cabin, and the project's use of the Rohn airstrip.	
2.3.8	2-185	Table 2.3-44	For cultural resources, we disagree with this analysis that says there will be no effects to cultural resources for the transportation facilities. This includes barging activities, which have a high likelihood of greatly increasing erosion along the Kuskokwim River, which therefore increases impacts to cultural resources along the River.	
CH 3 COMMENTS				
3.0.4	Global		The way direct and indirect effects are qualitatively described makes it challenging to compare resource impacts across alternatives.	
Environmental Analysis Chapter 3			<p>Invasive species prevention and management is best addressed and practiced across the landscape, not based on land owner/manager jurisdiction. This project is ripe for leading by example, pro-active implementation of best management practices consistently across land management jurisdiction, including all private, federal and state-managed lands. When management objectives are not completely parallel, the most conservative parameters should be instilled to set the standard across all jurisdictions.</p> <p>As in previous comments, the recommendation will again be made to establish a separate section to address all taxa of non-native invasive species prevention, mitigation and management</p>	

			in order to give this issue of concern due diligence with alternative design features and impact analyses.	
3.0.4.1	3.0-4	Context section	We disagree that the INHT is considered Important but not Unique. It is “protected by prescriptive legislation” as it says under Unique, and it “fills a unique social or ecological roll within the locality or the region,” as Unique also describes. The INHT is protected by the Trail Systems Act, it is the only winter NHT, and it is the only NHT in Alaska, making it unique nationally, not just regionally.	
3.0.4.2	3.0-5	Negligible: Impacts are generally extremely low in intensity (often they cannot be measured or observed), are temporary, localized, and generally do not affect unique resources. Minor: Impacts tend to be low intensity, of temporary duration, and local extent, although common resources may experience more intense, longer-term impacts.	Negligible;(Merriam-Webster) Not significant or important enough to be worth considering; Minor: (Merriam-Webster) inferior in importance, size, or degree: comparatively unimportant. These two meanings are so similar we recommend using one of them. On a continuum of scale there should not be two effects that are either Negligible or Minor and only one Moderate and one Major. This is a disproportional scale creating a Summary Impact that may be a misrepresentation towards the Negligible or Minor side of the scale.	
3.1	all	All Paleontology sections	Inadequate for BLM analysis. So little is known about the paleontology of the area. There is not enough information for agencies or the public to analyze impacts to resources from the proposed project.	
3.1.1.2	3.1-3	Whole section	We recommend Paleontology have its own section in the EIS. See comments in previous drafts – there are specific laws, regulations, and policies that apply to paleontological resources, and they need their own section in the EIS-	

3.1.2.3.4	3.1-29	Alaska Range paragraph	Inadequate for BLM analysis. This section and Figure 3.1-6 show that there are a lot of known fossil localities in the McGrath quad along the pipeline ROW corridor, but this section doesn't say whether these are vertebrate or invertebrate fossils, their age, etc. More info needed.	
3.1.2.3.4	3.1-31	Table 3.1-2	Inadequate for BLM analysis, several sections need PFYC. If they are federal lands, they need to be assessed for the potential for paleo resources. Also, this table has Xs to mark "data gaps," but also has "N/A" in several rows. Again, all federal lands need to be evaluated.	
3.1.3.2.3	3.1-45	and part of the mine site is rated Class 3b (east and south sides of pit, and areas beneath the WRF and TSF), meaning these rocks have unknown fossil potential and that further reconnaissance and research may be necessary to determine potential impacts. Quaternary vertebrate fossils have also been reported in overlying sediments in the area (Reuther et al. 2014).	Inadequate for BLM analysis. There is a portion of the project area that is considered PFYC 3b, making us unable to properly analyze effects from the proposed action.	
3.1.3.2.3	3.1-45-46	and local in extent, affecting roughly 30 Mt of waste rock covering 80 acres in the pit area, and 480 acres in the process facility area which may require grading of a bedrock ridge (Section 3.1.3.2.1). Potential beneficial effects from exposure of new fossils would be temporary during construction due to planned pit widening and earthworks in operations. New outcrops could be difficult to access, and the stratigraphic horizon from which	We disagree that the impacts are local in extent. Very little has been done regarding paleontology in the area, and the fossils would come from a regional geographic formation. The impacts on paleontological knowledge are regional in extent.	

		liberated fossils in loose rock come from may be obscured by material movement during construction.		
3.1.3.2.3	3.1-47	A Cultural Resources Management Plan (CRMP) is being developed as part of the proposed project that will include mitigation for potential paleontological resources as well as cultural resources. The CRMP will identify measures that would help to minimize effects on potential fossils encountered.	See above comments. This says that we will mitigate effects, but we cannot know what the effects may be when there is so little known about the paleo resources in the project area.	
3.1.3.2.3	3.1-47	Potential effects from barge-induced erosion in exposing these fossils in river bluffs are expected to be of low intensity (BGC 2007a), particularly when compared to natural erosion by river flooding and ice during breakup (Section 3.5, Surface Water Hydrology). Two critical sections of the river where barge tows may need to relay during low water conditions (Holokuk and Oskawalik North) are located in this area. Intermittent increased shoreline activities at these locations could contribute to localized bank/bluff erosion and increased access for unauthorized fossil collection. Depending on the presence or absence of vertebrate fossils at these specific locations, effects could range from low to high intensity and could affect common to important paleontological resources. The use of BMPs to prevent soil erosion (Section 3.2, Soils), however, is expected to minimize new exposures of fossils at these locations.	We disagree that the Kuskokwim River erosion will be of low intensity. The increase in river traffic, and it could increase the exposure and erosion of fossil bearing formations.	

3.1.3.2.3	3.1-49	No fossils have been recorded in the widely distributed Quaternary deposits in the Alaska Range foothills and Cook Inlet areas of the pipeline route, partly because they are poorly documented, but it is possible these deposits contain Pleistocene vertebrate remains of scientific interest (Druckenmiller et al. 2013). No PFYC values have been assigned to the Quaternary deposits.	Inadequate for BLM analysis. This is another data gap in this resource section.	
3.1.3.2.3	3.1-50	Impacts would be localized within the Project Area, and at locations having fossil potential: pre- Quaternary and Quaternary deposits along roughly 262 miles of the pipeline ROW, 80 miles of shoofly roads, and material sites covering about 1,000 acres.	We do not agree that effects are “local in extent” when the effects cover 262/315 miles of the pipeline ROW.	
3.1.3.2.6	3.1-53	Second bullet	Please edit this. Plans for “cultural” resources are inapplicable to plans for paleontological resources.	
3.4	3.4-6	Topic - Synthetic Database discussion.	A synthetic database was created for precipitation only. There was no explanation or discussion as to how this database was created or if it has been used of to establishing a climate baseline in any other NEPA documents.	
3.4		Tables 3.4-1, 3.4-3, and 3.4-4.	Table 3.4-1 for the Mine Site shows synthetic data used for many of the meteorological data parameters. In Table 3.4-3 for Transportation Facilities, the same values appear as in Table 3.4-1. Table 3.4-4 for the Pipeline appears to contain different values (e.g., generally high maximum and minimum temperature values). Check for consistency.	

3.4	3.4-6	For the purposes of establishing baseline conditions in this EIS, the synthetic datasets for precipitation, temperature, wind speed, and relative humidity are deemed more characteristic of the overall climate at the proposed mine site than the shorter term data collected on-site.	<p>The narrative presents an analysis that is unsubstantiated because it is impossible to see 30+ years into the future for any meteorological parameter. The details of the synthetic data analysis should be explained in an appendix.</p> <p>If synthetic datasets are to be used, the synopsis should commence with an acknowledgement that the meteorological record is limited. This should be followed up with a discussion of synthetic dataset development (e.g., how was the dataset assembled and compiled), and present a paragraph similar to the one at the top of page 3.4-6 for all meteorological parameters, as applicable.</p>	
3.8		Response Tom Coulter’s comment on table formatting (5th Bullet): Title and column headings for these tables are intended to stay with all parts of tables; including notes [no change was made].	<p>We suggest it would be easier for the reader to comprehend if “Title and Column Headings for these tables are intended to stay with all parts of tables”, and then start the table on a new page.</p> <p>In the latest draft, this problem went away for Table 3.8-28, but not start Tables 3.8-17 and 3.8-19</p>	
3.10.1		The AKNHP also tracks invasive plant species in the region through its Alaska Exotic Plant Information Clearing house (AKEPIC) database	<p>The AKNHP also tracks non-native invasive plant species in the region through its Alaska Exotic Plant Information Clearing house (AKEPIC) database. --- Please make this correction/addition throughout the document. Many native plants in Alaska, including fireweed and other desirable species, are native and invasive, and not of concern here. We need to be completely clear on what plants we are concerned about/addressing and those are the non-native species, both invasive and non-invasive.</p>	
3.10	4	Project Area	What is the geographic scope for the vegetation analysis?	

			<p>The definition of the project area seems to be the area only directly impacted by project activities.</p> <p>Subsequent analysis compares direct impacts within a watershed, although (this watershed is not specifically defined (pg. 52). we assume you are referring to 6 digit HUCs. Please confirm.</p> <p>Please see the BLM NEPA Handbook (pg. 58) for guidance on geographic scope. That page specifically refers to cumulative impacts, but this is also guidance for direct and indirect effects. My comments on this theme continue in comment 3.10-52.</p>	
3.10	8	Error! Reference source not found.	Please correct link to table.	
3.10	39-40	Paragraphs starting with: “Impact criteria...”, “Southwest Alaska vegetation...”, “Southcentral Alaska vegetation...”, and “Impact assessments were...”	<p>We are assuming these 4 paragraphs are the “Added text and extensive references (surveys and classifications for SCAK and SWAK regions) to further explain impact criteria assessment for vegetation” that was referred to in the disposition from Comment BLM 3, 3.10, pg. 31 (from PDEIS response to comments document).</p> <p>However, these paragraphs only seem to address the “Context” and “Geographic Extent” impact components. They do not describe how the “Magnitude and Intensity” nor how the “Duration” impact components were developed.</p> <p>BLM needs more clarity on how magnitude and duration levels were determined. Magnitude needs to be analyzed completely independent from context, duration, and geographical extent.</p>	
3.10	40	Table 3.10-7	The ‘Intensity and Magnitude’ levels are inconsistent with the general methods for	

			<p>determining level of impact described on pages 3.0-3 and 3.0-4.</p> <p>It was noted that the general methods are “...adapted as necessary for each resource” and that “...several resource sections have refined descriptions for the context criteria.” However, the inconsistencies between the general methods and the vegetation specific methods are much greater than simply an adaptation or refinement.</p> <p>The general methods describe a low intensity impact as “A change in a resource condition is perceptible, but it does not noticeably alter the resource’s function in the ecosystem or cultural context.” This contradicts the vegetation specific low intensity impact is described as “Impacts limited to removal of above-ground vegetation Little or no soil disturbance.” Removal of above-ground vegetation does alter the resource’s function including the alteration of wildlife habitat, biogeochemical cycle, and, successional patterns.</p>	
3.10	40	Table 3.10-7	<p>The “Magnitude” component methods are insufficient for BLM required analyses because they are not independent of the “Duration” component.</p>	
3.10	40	Table 3.10-7	<p>The “Duration” component method for vegetation is also not consistent with the general methods.</p> <p>A temporary impact on vegetation is: “Vegetation would be affected briefly but not longer than the span of 3 years and would be expected to return to pre-activity condition, such as areas cleared for construction only and reclaimed.”</p> <p>We are interpreting this to mean that vegetation will be removed and kept in that</p>	

			<p>state for 3 years, but full ecosystem function will not be restored until at least 20 years.</p> <p>The component of duration not being addressed.-This analysis is insufficient for BLM in that it doesn't give a rating appropriate for the realistic time period for habitat and other ecosystem function to return to pre-activity condition. Furthermore, the long-term level of duration impact component seems to imply that those areas will become functional again right after completion of the activity.</p> <p>Analysis of other projects, the Vantage Pomona Transmission Line http://www.blm.gov/or/districts/spokane/plans/files/VPH_230kV_Draft_EIS.pdf considers each veg type different (i.e. shrub and grass dominated systems will take a shorter time to return to pre-activity conditions as compared to older growth forest systems).</p>	
	3.10-46	General BMPs for invasion prevention, for all taxa (listed in Chapter 5, Impact Avoidance, Minimization, and Mitigation);	<p>Please include BMPs, for the prevention, management and monitoring of non-native invasive species.</p> <p>These need to be disclosed, incorporated into each Alternative design, and then adequate environmental analysis can occur. Without knowing what these BMPs are, or what is included in the HACCP, ISMP, we are unable to assess environmental impacts relative to non-native invasive species.</p> <p>While mentioned in this DEIS, it is not clear as to the extent of employing any BMPs, HACCPs, ISMPs, nor what these sub-plans/BMPs are and will involve. This is a recurring deficiency of the DEIS. Non-native invasive species is an important issue that should be proactively addressed</p>	

			The long term, indirect effects are linked to cultural/traditional lifestyles that rely on such intact ecosystems for subsistence lifestyles.	
	3.10-41	Vegetation Community Composition Change (from accidental damage, dust, changes in water availability	Sentence is cut off. Please provide completed sentence for consideration.	
	3.10-47	Vehicles - Roads contribute to the spread of invasive species in two ways. Invasive species can grow in disturbed soil within the road corridor itself, usually at the edge. Typically, these species are adapted to disturbed areas and spread readily. In addition, roads are pathways for invasive species to be spread from other locations as people or vehicles incidentally move seeds or plant parts that are deposited along the road or are carried in/on equipment, supplies, or fill material.	In addition, road maintenance activities such as road grading, roadside mowing, and surface treatment/additional surfacing with contaminated gravel are major causes of introduction and spread of non-native invasive species in the transportation corridors.	
3.10	52	Table 3.10-8, Table 3.10-9, Table 3.10-10: Percentage of Vegetation Within Watershed	(please specify HUC level of watershed being used in this analysis (for the table caption) Rationale for this analysis decision is very important since it can either magnify or dilute the perceived impacts. we question the merit of using this geographic extent for vegetation analysis. Analyzing a linear feature at the spatial scale of a very large watershed does not seem appropriate. More effective examples include:	

			<p>2.5 miles surrounding the project footprint perimeter (GMT1 SEIS https://eplanning.blm.gov/epl-front-office/projects/nepa/37035/50832/55575/GMT1_Final_SEIS_Volume_1_Oct_2014_(2)_508.pdf. PDF pg. 158)</p> <p>Other BLM projects are using: 10 digit HUCs (Transwest Express (http://www.blm.gov/style/medialib/blm/wy/information/NEPA/hddo/twe/FEIS/2.Par.71332.File.dat/3-05_Vegetation.pdf, pg. 3.5-4) And I noticed that the wetland analysis for this project is using 10 digit HUCs.</p> <p>1 mile buffer from the linear feature centerline (Vantage Pomona Transmission Line http://www.blm.gov/or/districts/spokane/plans/files/VPH_230kV_Draft_EIS.pdf, pg. 3.5-5. For linear features, this special extent)</p> <p>An analysis of vegetation impacts at the 6 digit HUC level is insufficient to meet BLM permitting needs.</p>	
3.10	55	Table 3.10-10	<p>Does the 5,963.8 acres at the bottom of this table generally represent the 150' ROW? Does it include all areas that will have any form of vegetation remove? (areas cleared for construction and then immediately vegetation, areas that will be periodically "mowed" and areas that will not be reclaimed?)</p>	
3.10	56	While the vegetation disturbance in the construction areas would be Temporary...	<p>The disturbance will only last 3 years, but the impact of that disturbance is not temporary. Even the fastest recovering veg types (shrub, grass, deciduous) will take at least 10-20 years to return to pre-construction conditions.</p> <p>We feel that describing the duration as "a 3 year temporary impact" minimizes the disturbance.</p>	

3.12-27	Table 3.12-6		<p>As commented in the subsistence section, using these 4 “impact components” to address wildlife impacts has the effect of spreading impacts over the four variables and reducing the overall impacts to some lower level.</p> <p>This does not address impacts of the project to wildlife directly, and tends to reduce all impacts to minor.</p>	
3.12-39	Closure reclamation and monitoring	<p>The mine access road and mine camp airstrip would remain in place during the closure phase to support reclamation and monitoring activities at the mine site. Some supplies and fuel may need to be barged up to the Angyaruaq (Jungjuk) Port periodically but the numbers of barges needed would be much smaller than the operations phase and would be similar to the baseline conditions. The types of effects associated with the road and traffic, including behavioral disturbance, habitat fragmentation, and potential for injury and mortality, would continue but would be greatly reduced in magnitude after closure due to much reduced traffic volume. These potential effects would therefore be permanent but periodic, localized, and very small in magnitude compared to the operations phase effects</p>	<p>The mine access road, airstrip and river port will remain to support monitoring of the site into perpetuity. Compared to the infrastructure and disturbance there now (none), this is high , yet the analysis considers it “very small”</p> <p>That comparison is misleading and is not addressing the impacts of the permanent presence of a port, road airstrip and barge traffic to current conditions and that is not very small or minor.</p>	
3.12-44	Table 3.12-17	Summary of effects on terrestrial mammals from alternative 2 by impact type and project component.	We disagree that All impacts of the mine, pipeline and transportation infrastructure on	

			<p>terrestrial wildlife come out to minor or moderate using this impact type tool</p> <p>As before, this analysis tends to reduce impacts by spreading them out over the 4 variables.</p>	
3.12-162	Table 3.12-38	Table 3.12-38: Impact Levels of Alternative 2 by Impact Type and Project Component	All impacts to birds minor with 2 moderate-comments as above for similar impacts tables.	
3.13	3.13-3	which in the best circumstances would be minor, are characterized conservatively as moderate.	If identifying best circumstances as minor, Then the worst circumstances would be major? Where are they addressed in the document?	
3.13	3.13-129	potential direct and indirect impacts could result from:	In the Kuskokwim River, spawning habitat disruption from dislodging of eggs or sedimentation can result from natural flooding, ice break up, bank erosion, and riverbed scour (from both natural causes and marine traffic).	
	3.13-144	<p>To minimize or avoid impacts of prop wash forces on early life stages of fish and in recognition of ever-changing river conditions, a series of operational measures would be implemented that include:</p> <ul style="list-style-type: none"> ☐☐ Maintaining detailed logs of river conditions, including measurements of depths and current speeds and directions at critical reaches, by tug captains during each trip with information made immediately available to other fleet captains; ☐☐ Restricting passages through shallow and narrow river segments with sharp bends to one-way traffic using radio check control when approaching and after completing such passages; and 	<p>These 3 methods seem more directly related to safety impacts.</p> <p>To minimize or avoid impacts of prop wash forces on early life stages of fish (including larva from smelt)the following examples are recommended with the anticipated vessel travel.</p> <p>these may include but are not limited to:</p> <ol style="list-style-type: none"> 1. Reduce Speed 2. Reduce or restrict number of vessel passages when early life stages of fish are present. The greatest concentrations of seaward migrating salmon in the Kuskokwim River (traveling from tributaries to Kuskokwim Bay) are likely to occur between early May and late June, and possibly during hours of low light and rising water levels (Burril et al. 2009; Hillgruber & Zimmerman 2009). 3. Maintain a 2 to 1 depth ratio from the bottom of river. 	

		<p>Use of electronic charts, GPS radar overlay, barge speed and location monitoring, continuous crew training, river navigation aides along the travel route, and an ongoing analysis and mapping of areas with potential operational and ecological risks.</p>	<p>4 Reduce the physical effects of the vessel passage on the water column relative to wave forces and drawdown that alter water levels along the margins of the channel.</p> <p>5. Reduce effect in more confined segments of the channel, a relatively higher level of injury or mortality could occur to eggs, larvae, and possibly young-of-year resident or anadromous fishes that encounter shear forces from tug propellers, especially where these populations are concentrated.</p>	
	3.13-148	<p>anticipated fish injuries or mortalities from tug and barge traffic along the navigation channel would range from negligible to moderate depending on the seasonal timing of fish migrations, life stages, time of day, and the concentration of fish encountered by barge traffic relative to confined and shallow channel segments.</p>	<p>We disagree with finding. As identified depending on the seasonal timing of fish migrations, life stages, time of day, and the concentration of fish encountered by barge traffic relative to confined and shallow channel segments.</p>	
3.14	Figure 3.14-1	<p>SPECTACLED AND STELLER'S EIDER CRITICAL HABITAT NEAREST THE PROJECT AREA</p>	<p>If LNG is shipped into Cook Inlet to supply the gas pipeline for the mine, ship traffic will travel through cook inlet and Stellar's eider wintering habitat. For this reason, the source of the gas for the Donlin gold pipeline is within the scope of this EIS.</p>	
3.14	3.14-16 Also 3.14-40 for marine mammals	<p>Design features most important for reducing impacts to ESA-protected, candidate, and delisted bird species include: The project design includes a natural gas pipeline to decrease the amount of barging to transport diesel fuel. The design decision to use a natural gas pipeline instead of barging</p>	<p>Comparing this alternative with an alternative that is more impacting is not a mitigating design feature. Also see previous comment.</p> <p>There are potential impacts to eiders and marine mammals each time an ocean barge travels past.</p> <p>The decision to use a gas pipeline is not based on potential impacts to eiders and marine mammals, so it is not a design feature, simply because it has fewer impacts.</p>	

		110 Mgal of diesel per year was in response to community concern about barge traffic levels.		
3.14	3.14-16	Design features most important for reducing impacts to ESA-protected, candidate, and delisted bird species include: Barges would travel at 10 knots or less; and	We disagree, Stellar’s and Spectacles Eiders are known to collide with buildings built along the coast on the north slope, due to their direct, low flight habits. The speed of the barge does not mitigate collisions with eiders, especially at the mouth of the Kuskokwim where eiders concentrate and fly low to the water.	
3.14	3.14-44	Under Alternative 3B, the existing Tyonek North Foreland Barge Facility would be improved to accommodate vessels in excess of 30,000 gross tons and provide fuel unloading facilities capable of accommodating the proposed volume of diesel fuel. The dock would need to be extended an additional 1,500 feet. Dock construction at the port sites would involve pile driving. Dredging would not be required, as the dock would be extended out to the required water depth.	Under alternative 2 – the source of the natural gas is important because it may require LNG to be shipped into Cook inlet to supply the pipeline for the mine. This would require improvements to the Tyonek facility as well, and the additional shipping traffic may impact Cook inlet belugas. An analysis of using LNG shipped into Cook inlet to supply gas for the mine is not included.	
3.15.1.5.2	22	Like R.S. 2477 ROWs, absent other authorizations, section line easements have not been recognized on BLM-managed lands and it is unlikely that any of these assertions on BLM-managed lands would be processed prior to issuance of permits for this project. Section line easements are used primarily for transportation, but also for access for recreation. The proposed Project Area would encompass several section line easements.	BLM has not taken a position as to not recognizing a valid section line easement. Section line easements are a matter of law on a date specific time and when the rectangular survey of a section line occurred (if at all). The width is either 66 feet 100 feet or the width of the road constructed. For reference see 44LD513 &RS 2477 1978 BLM Staff Report. Without an in depth analysis of the date of rectangular surveyed along the route I recommend deleting the Section line easement section as a pipeline ROW would still be necessary even if a Section line easement	

			existed. At a minimum delete red language and like comment on previous draft if you state that there are Section line easements, please identify them.	
3.15.1.5.3	23		A Public Easement Plan was submitted to BLM and signed by Donlin, Calista, the Kuskokwim Corporation, and Spencer Lyman. This document proposed specific vacation of various 17b easements and dedication of new easements as well as relocation of the State of Alaska's FAS 231 road. This section should identify the specific actions on the easements proposed by the Public Easement Plan and have maps showing the proposed changes which are available in the Public Easement Plan	
3.15.2.1.1	27		EIN 15 D1 and EIN 11 D1 need to be added. See comment above about adding information on the Public Easement Plan submitted to BLM and signed by Donlin, Calista, the Kuskokwim Corporation, and Spencer Lyman (suggest adding as appendix). Also noted in this section is that RS2477 ROW would need to be "relocated or vacated". It is our understanding that RS2477's cannot be relocated. The State may dedicate a public easement on State lands. Please revise.	
3.15.2.1.3	31		The FAA has a withdrawal (ANS 189) located at the Farewell Airport this should be disclosed in the document as to the effect of the withdrawal and management actions within the withdrawal.	
3.15.2.1.3	33		Delete any reference to a "Permanent ROW" It is expected that the ROW will exist for the life of the mine and then be decommissioned.	
3.15.3.2.1	38		Although any changes to 17b easement numbers or location will not change management of the easements, BLM must take action on vacating/relocating existing 17b easements because of the Donlin project. The	

			actions are management actions and should be identified in this section. Also, the Public Easement Plan submitted to BLM and signed by Donlin, Calista, the Kuskokwim Corporation, and Spencer Lyman has a new dedicated easements in the mine location which would change ownership of the land as TKC would dedicate land and BLM would be acquiring new land.	
3.15.3.2.3	45		BLM believes that future management actions may be necessary due to increased public access, recreational and subsistence use. Reference 3.15-38 and 3.15-2.	
3.15.3.2.5	51		Under pipeline impacts BLM believes that future management may be impacted due to increased access, recreational and subsistence use. Reference 3.15-38 and 3.15-2. The table states no impacts and does address potential future management actions due to increased public access and use. Additionally, are potential spur lines to power villages possible?	
3.15.3.2.6	3.15-52		A potential mitigation from increased access might be for the BLM to entertain closing the ROW to OHV.	
3.23.2.2.3	3.23-26		We disagree that surface transportation would be limited due to remoteness. There is no basis for this statement. After construction, the new ROW would provide OHV access route from urban to rural AK. As seen in the Iditarod race trail, once a new trail is established use increases over time.	
3.16	Global		The BLM has continued discussions with cooperating agencies and requested formal engagement from our solicitor's office about the interpretation and possible implications of the "substantial interference" section of the National Trails Act (section 7c) as it relates to project impacts on the INHT.	

			While the proposed pipeline route will have an effect on the INHT, the extent of responsibility under the NTA still needs to be determined and what, if any, revision to the EIS may be necessary to adequately assess impacts to INHT.	
3.16	All	<p>“Per Corps direction, no change in EIS until BLM and State of Alaska have resolved management decisions.” (from “response to agency comments”)</p> <p>Adding general recreation impacts to Iditarod NHT impacts for an overall summary of recreation impacts.</p>	<p>Of BLM April 2015 comments 1, 2, 3, 5, 11, 12, 13, 17, 19, 20, 21, 22, 23 and 24, only a couple involved unresolved BLM/SOA issues. The majority involved deficiencies in this chapter.</p> <p>The result of deferring revisions that describe the impacts to recreation on the Iditarod NHT in the camera ready version continue to be deficient. , all listed comments from PDEIS are re-stated.</p> <p>Adding recreation impacts to impacts to the Iditarod NHT has an effect diminishing the findings of overall effects for the Iditarod NHT, while driving up the statement of overall effects for the all other recreation resources. This issue could be prevented by making a separate analysis of impacts for the INHT from each of these separate categories.</p>	
3.16.1		Synopsis section/pipeline: “historic significance <i>to Alaska...</i> ”	<p>Revise indicating Iditarod NHT is a resource of <u>national</u> significance.</p> <p>One of the criteria for Congressional designation as a National Trail is <i>national significance</i>, so the listing as a National Historic Trail confers national significance to the trail. (Repeat of BLM April 2015 comment).</p>	
3.16.3	3.16.12	Table 3.16.3	Context / Unique heading: National Trail System designation confers unique status upon a resource. As a Congressional designation, it is equivalent to wilderness designation, also a Congressional designation, therefore should be	

			listed as 'unique'. Revise table to show National Trails as 'unique'.	
3.16.3.2.3	All	Discussion of impacts to recreation associated with the Iditarod NHT.	Although improved from previous drafts, conclusions continue to underestimated in terms of magnitude, intensity, longevity, and context.	
3.16.3.2.3	3.16-19	1 st para, last sentence: "...segments on or near the INHT would be considered important..."	Replace word 'important' with word 'unique'.	
same	3.16-20	4 th para, last sentence: "...potential impacts would be important in context."	Replace word 'important' with phrase "...to a unique resource."	
3.16.3.2.3	3.16-20	The ROW may provide an optional route as attractive to winter recreationists as the INHT, and may increase the use of both the INHT and the proposed pipeline ROW for commercial guided and dispersed recreation off-road travel, sport hunting, and sport fishing where the two are in close proximity. Due to the remoteness, high cost of access at these distances from large population centers, and low population of the area, the increase would likely be minimal. Recreation use would likely remain low in intensity and concentrated around small, rural communities such as Skwentna, Susitna, and Farewell. No new public surface vehicular access would be created by the ROW (SRK 2013b). Although the pipeline would be decommissioned in place as part of project closure, the potential access route could persist beyond the life of the project if there was enough use to prevent vegetation regrowth. If this	We disagree that, the increase in use will be minimal. When going from no access to access, an increase can be anticipated from what it was before the ROW was constructed. it will be concentrated around rural communities, but not at all that increase in use of the ROW and INHT will be minimal.	

		occurred, the impacts could be more permanent in duration. Since the proposed ROW would extend impacts regionally and would affect portions of the INHT, which is designated for recreation purposes, the potential impacts would be important in context.		
same	3.16-21	2nd para, 2 nd last sentence: "...INHT, impacts are expected to be important in context."	Replace 'important in context' with phrase "...to a unique resource."	
same	3.16-22	2nd para, last sentence: "...pipeline would affect recreation resources of important context when near the INHT...."	Replace 'important context' with "...unique."	
3.16.3.7	3.16-28-29	Whole section	Inadequate for BLM analysis. This section only addresses the fact that the ROW will affect a larger segment of the INHT, trail itself, but fails to address the resources associated with it, specifically the Rohn airstip and cabin. These are important regional recreation resources, and the Rohn cabin is an important checkpoint along the Iditarod race route. Impacts from the proposed route need to be addressed.	
3.17	Global		<p>The BLM has continued discussions with cooperating agencies and requested formal engagement from our solicitor's office about the interpretation and possible implications of the "substantial interference" section of the National Trails Act (section 7c) as it relates to project impacts on the INHT.</p> <p>While the proposed pipeline route will have an effect on the INHT, the extent of responsibility under the NTA still needs to be determined and what, if any, revision to the EIS may be necessary to adequately assess impacts to INHT.</p>	

3.17-1	All	Entire section	Adding descriptions of impacts to landscape resources to the linear resource of the INHT results in a severe understatement of impacts for the INHT.	
3.17.1	3.17.5	Para. 5	Restatement of BLM May 2015 comment 2, para. 2 and 3. In response to disposition, disagree. Conformance and subsequent use of these distinct viewing zones continues to make this analysis framework insufficient for identifying and detailing impacts to the Iditarod NHT. In conclusions please break out impacts to INHT due to the unique nature of this congressional designated recourse. (General visual then INHT itself).	
same	Same	Para. 2: “No ranking of scenic quality was completed on non-BLM-administered lands as part of this assessment.”	This statement seems to be contradicted by the documents analysis of SQRU’s for the INHT on State lands, although it may be that the intent of this sentence is to communicate that the VRI system was not applied to non-BLM lands. If so please revise accordingly. If not, revise sentence for consistency with later use of SQRU’s.	
3.17.3	3.17-25	Conformance with existing VRM Class III objective(s) based on level of visual contrast expected to result from the proposed action.	The Affected Environment section does not appropriately identify the applicable BLM VRM class(es). The reader first encounters a BLM VRM class designation (III) in the introduction to the Environmental Consequences. This must be first identified in the Affected Environment. Furthermore, the bulleted statement in the Environmental Consequences section is not clear that VRM Class III is, in fact, the VRM class. In the Affected Environment revision, please be direct on what the VRM classes are. In the impacts discussion, please be clear on how many miles of each class are crossed.	

Section 3.17.3.3.5		Any actual mitigation measures for impacts to the INHT would be agreed to as a part of the Section 106 compliance process and outlined in a Programmatic Agreement.	Disclose the status of this in the EIS. "Actual mitigation measures for impacts to the INHT" should be identified in Chapter 5 and must be coordinated with the BLM.	
3.17.3	3.17-25	Bullets 2 and 3.	Restatement of BLM May 2015 comment 9. By overly focusing on the middle to far viewing areas, the analysis is built to underestimate the immediate foreground impacts to INHT users.	
3.17.3.1.1	3.17-27	Entire paragraph	Please clarify whether the analysis is of the cleared ROW width (150') or the operations ROW (50'). Previous disposition comments (on digital representations, not this issue) state the analysis is based on a 50' operations ROW, not the entire cleared length. If such a width is used, it will result in an underestimation of impacts to visual resources, such as in Figures 3.17-16A thru E.	
3.17.3.3.3	3.17-40 to 3.17-67.		Restatement of all unaddressed BLM May 2015 comments 15, 16, 17, 18, 19, 20, 21, 22, 24, 25, 26, 27. At this stage 'Management decisions' between the SOA and should not preclude the description of potential impacts and the above comments.	
3.17.3.3.3	3.17-55	First paragraph in this section.	Breaking down the analysis of temporary visual impacts into vegetation clearing, construction infrastructure, pipeline delivery and pipeline installation is not necessary as it dilutes the effect of the combined impact of each activity, of which will be occurring mostly at the same time (within a one year period). This impedes reader understanding of the actual impacts by focusing on individual parts rather than the overall impact on the entire visual scene.	

			The average viewer of construction activities will view most of these activities occurring at the same time, therefore the description of impacts should be limited to “construction” and a detailed description of the combined impacts should be provided between 3.17-57 and 3.17-60.	
3.17.3.3.3	3.17-55-67	Whole section	We disagree with the conclusion that the visual impacts to the INHT will be temporary and confined only to the construction seasons. Because of the nature of vegetation growth in Alaska, one can see ROW corridors that were cleared of vegetation 100+ years ago. For example the old Fairbanks-Valdez Trail, or the WAMCATS. Clearing vegetation is not reversed quickly or easily, and the visual footprint of construction activity will be there for decades.	
3.17.3.3.3	3.17.57	2 nd para, 1 st sentence: “Temporary direct impacts from vegetation removal could affect resources that are important in context.” 2 nd sentence:	Impacts of vegetation removal will be very long term (longer than the life of the mine and recovery may be modified by climate change elements); delete word “temporary”. Replace word “important” with “unique” here and in all other references in this section (and the document); the Iditarod received National Historic Trail status due to its unique nature character and therefore should correctly be ranked higher than ‘important’. See BLM May 2015 comment 22 for background to following. This section, even after some changes by the writers, underestimates the visual impacts to the unique users of the Iditarod NHT. “Construction...actions could be seen by the winter recreationists where the trail intersects	

			<p>the proposed construction ROW (MP 50-52 and MP 86-106)".</p> <p>Note the pipeline crosses the trail, not the other way around as it is currently described.</p> <p>As currently stated this is an insufficient analysis and definition of impacts to visual resources, mainly for the INHT. In conclusions please break out impacts to INHT due to the unique nature of this congressional designated recourse. (General visual then INHT itself).</p>	
3.17.3.3.3	3-17.61	2 nd para, last sentence,	Between words 'potential' and 'change' add word "negative".	
same	Same	Physiographic province sequence.	<p>In the section immediately preceding this one, the effects from construction on the pipeline are described from south to north. In this section they are described from north to south. For consistency and reader understandability, select one sequence and use for all descriptions. Additionally, the previous section uses pipeline mileposts as the means to classify construction impacts on each segment, while this section uses physiographic provinces. This makes it hard for the reader to compare and follow impact progression from construction to operations. We recommend one classification system and use throughout.</p>	
same	3.17.-62	Section: <i>"Iditarod National Historic Trail"</i>	<p>The concept of Scenic Quality Rating Units is provided for the first time to the reader without introduction on what it was developed for or how used. a detailed explanation of the concept is provided in Section 3.20.1.4, but no reference is made here about that.</p> <p>Use of the SQRU's in this document is a misapplication of this concept, as it is designed to rate the macro or large scale view-shed, rather than a narrow trail corridor. As a result,</p>	

			it is inherently biased to understate the visual impacts to the INHT trail corridor.	
3.17.3.3.3	3.17-64	Para. 2	Restatement of BLM May 2015 comment 22. Additionally, this section misstates the severity of impacts by focusing on overall Scenic Quality, which represents a large acreage, and as a result dilutes the impacts on the immediate trail corridor of the INHT.	
Same	same	Para. 3, last sentence: "Indirect effects...affect a common resource."	Delete word 'common', replace with 'unique'.	
same	3.17-66	Natural Gas Pipeline Summary	Restatement of BLM May 2015 comment 25.	
	3.17-69 to 72	Table 3.17-4	Revise currently insufficient finding to be consistent with BLM May 2015 comment 25; provide separate table for INHT.	
3.17.3.8.2	3.17-80-81	Whole section	Inadequate for BLM analysis. As with the recreation section, this section only addresses the fact that the ROW will affect a larger segment of the INHT, trail itself, but fails to address the resources associated with it, specifically the Rohn airstip and cabin. These are important regional resources, and the Rohn cabin is an important checkpoint along the Iditarod race route. Visual impacts from the proposed route need to be addressed.	
3.18	8		Some information listed as NA in Table 3.18-3 is now available from the latest publication of American Community Survey data	
3.18	13	"but the chum salmon commercial harvest from \$1.8 million"	Correct typo	
3.18	NA		Please refer to comments made on this section in the preliminary DEIS in April 2015, which appear not to have been addressed. In particular, we suggest the need for socioeconomic monitoring not just using existing regularly collected data. Many assumptions need to be followed through to see	

			what actually happened, for example, the percent of regional workers employed and the types of jobs they get; the percent of workers who leave the region; the number of people who move to the region for jobs, and social conflict within villages.	
3.20	Global		<p>The BLM has continued discussions with cooperating agencies and requested formal engagement from our solicitor's office about the interpretation and possible implications of the "substantial interference" section of the National Trails Act (section 7c) as it relates to project impacts on the INHT.</p> <p>While the proposed pipeline route will have an effect on the INHT, the extent of responsibility under the NTA still needs to be determined and what, if any, revision to the EIS may be necessary to adequately assess impacts to INHT.</p>	
3.20	All	Whole section	<p>Many of BLM's comments were not addressed: "Per Corps direction, no change in EIS until BLM and State of Alaska have resolved management decisions."</p> <p>There is a discussion going on about ROW grants and the National Trails System Act, but this should not affect the cultural resource analysis. The criteria under which we evaluate the INHT as a cultural resource will not change based on issue being referred to. As a result, many of BLM's comments in this section have not been addressed.</p>	
3.20	3.20-1	Based on current information, 10 of the 41 identified sites are recommended as eligible for inclusion in the NRHP and one, the Iditarod National Historic Trail (INHT), is considered eligible for listing on the NRHP.	While the EIS looks at all cultural resources, for the purposes of section 106, a significant resource is something eligible for the NRHP, it really doesn't matter whether it is eligible, nominated, or listed, for analysis this distinction is unnecessary.	

3.20	3.20-1	The Corps, as the lead federal agency responsible for the development of the EIS	The Corps, as the lead federal agency for NEPA and the NHPA	
3.20	3.20-1	Those impacts that could not be avoided would be high in intensity and permanent in duration; however, data recovery could be implemented to adequately mitigate or resolve adverse effects.	Change second clause to: However, data recovery and other mitigation could be implemented through the PA to adequately offset or resolve adverse effects.	
3.20	3.20-1-2	General synopsis comment	Please be clear when analyzing direct or indirect effects. There are a few places in this synopsis where you say that X site is outside the project footprint and therefore won't be affected. It might not be directly affected, but it could still be adversely affected through indirect effects (visual, noise, etc). Since we haven't formally evaluated these sites yet, we don't know under what criteria they are eligible, and therefore how they might be affected by direct or indirect effects. Otherwise, saying they won't be affected is misleading and might turn out to be incorrect.	
3.20	3.20-2	The proposed pipeline component would also impact the INHT, during both the construction phase of the pipeline as well as through a change in the setting of the INHT.	See comments in earlier versions. Regardless of the resolution of general INHT management issues related to ROW grants and NTSA, <i>as a cultural resource</i> , the INHT will be impacted in specific ways and those impacts need to be detailed in this analysis.	
3.20	3.20-2-3	Expected Effects summary	Again, please revise, considering that sites within the APE might have direct effects, indirect effects, or both, and revise the effects determinations accordingly.	
3.20	3.20-2-3	Expected Effects summary	See comments throughout section 3.20 regarding the analysis and effects determinations. The BLM disagrees with these findings.	

3.20	3.20-3	Alternative 6A summary	Please clarify, If there are 5 impacted sites under Alt 2 but 2 impacted sites under Alt 6A, then the number of known archaeological sites impacted would be reduced by 3, not 2.	
3.20	3.20-3	Unavoidable impacts along the length of the proposed pipeline corridor, coupled with impacts to the INHT, are expected to result in a moderate summary impact.	See comments in previous versions of the DEIS – the BLM disagrees with the conclusions on the impacts to the INHT	
3.20.1	3.20-5	3 rd para, “Guidance provided...not applicable...for this analysis”.	It has never been implied this policy was applicable for this NEPA document, and it has been stated at a few sentences earlier that BLM does not manage the segments of Trail in question. Recommend delete.	
3.20.1	3.20-5	No federally managed segments of the INHT would be affected under any alternative evaluated in this EIS, as the affected segments of the INHT are on state land.	We disagree the BLM manages about a mile of trail around Rohn, which would be effected (at least indirectly if not directly) by Alt 6A.	
3.20.1.1	3.20-5	Whole section.	See comment from previous version. This section is inadequate for an understanding of how the PA relates to the cultural analysis in the EIS.	
3.20.1.1	3.20-7	Whole section	See comment from previous version. This section only discusses an APE for direct effects –indirect effects still not addressed.	
3.20.1.1.4	3.20-11	Historic Context, 3 rd para, last sentence.	Flat and Iditarod were founded and developed at the same time, with Iditarod being the main supply center and transportation hub, and Flat being the center of the gold fields, until WWI. During WWI, mining substantially decreased, and Iditarod was mostly abandoned in the early 1920’s when the river shifted away from the town site. With the introduction of air service, Flat became the population center of the area until after WWII.	

3.20.1.1.5	3.20-13	Red Devil Mine sections	This information, while interesting, is largely not germane to this analysis and reflects an in equal treatment of historic resources in this section.	
3.20.1.1.6	3.20-15	Whole section	Lots of regional archaeological work on the INHT missing here, including the original survey work done in the early 1980s along the whole INHT corridor. that the work in Iditarod and Flat, being in the same region as the mine, would warrant a mention as well.	
3.20.1.1	3.20-15	Whole section	This section seems misnumbered (3.20.1.1.6, then 3.20.1.1, then 3.20.1.2). Please review and revise.	
3.20.1.1	3.20-15	None of these sites are located directly within the maximum geographic area of potential effects to cultural resources, i.e. the project's APE (Reuther et al. 2004).	Please change throughout to reflect my above comments – "APE for direct effects."	
3.20.1.2	3.20-16	One significant prehistoric site (SLT-094) was identified during the 2006 field survey(Table 3.20-1).	What about "insignificant" sites? Please make sure the affected environment info is clear and quantified. Say that "X sites were found during the 2006 surveys, Y of which are recommended eligible for inclusion in the NRHP." Or the equivalent. You do this sometimes, but it is inconsistent throughout the document.	
3.20.1.3	3.20-18	Arch background section	Please clarify why some previous arch research is summarized here. For the rest of the project, all previous arch research is summarized above in 3.20.1.1.6, and then the following sections describe research done for the Donlin mine project itself. But for the pipeline, nothing is mentioned in the previous research section, and a little is mentioned here along with work done by Donlin archaeologists. It makes this section confusing.	

3.20.1.4	3.20-19	The APE was found to contain 41 identified cultural resources (Table 3.20-1), inclusive of the INHT.	See comments from previous DEIS version regarding calling the INHT a single cultural resource, when it has several AHRS site numbers, based upon USGS quadrangles.	
3.20.1.4	3.20-20	The site dates to ca. 44300 BP and is recommended as eligible to the NRHP	Assuming this is a typo?	
3.20.1.4	3.20-21	These have been recommended as ineligible for the NRHP because they lack ability to yield important archaeological or historical data, and because better-preserved water diversion structures are present elsewhere (Hays et al. 2011).	We disagree with this conclusion. During the PA development process these features will be found eligible, due to the relative lack of features like this in the region.	
3.20.1.4	3.20-21	The INHT is Congressionally-designated and the trail system is considered eligible for nomination to the NRHP, but the specific segments that intersect the APE are not reflected in the AHRS and therefore do not have site numbers in Table 3.20-1.	See comments from previous DEIS version regarding assigning the INHT segments AHRS numbers.	
3.20.1.4	3.20-23	Table 3.20-1	Why are there no eligibility criteria for the INHT?	
3.20.1.4.1	3.20-24	INHT Nature and Purpose	Other previous comments have more accurately described the 'nature and purpose' of the Iditarod NHT. Restatement of BLM May 2015 Cultural Comment 32. Section is otherwise inadequate as written. Change # of National Historic Trails from 16 to 19.	
3.20.1.4.1	3.20-23-26	Whole INHT section	See comments from previous DEIS version. Viewshed is indeed important to the INHT as a cultural resource. However, the SQRUs and the VRI analysis is already discussed in the Visual resource section of the EIS,. A summary of the findings is appropriate, as it relates to the trail as a cultural resource. How the viewshed impacts	

			from the project would impact the NRHP eligibility of the INHT, and how it impacts the characteristics for which it was listed as a NHT, are what needs to be discussed here.	
3.20.1.4.2	3.20-27	Further development of the PA and Section 106 consultations with affected tribes may result in additional documentation of TCPs in the future.	Add something indicating that tribes have already come forward with some potential TCPs, but that further development of the PA....etc will result in the identification of potential TCPs within the project area.	
3.20.3		Whole Environmental Consequences section	<p>This whole analysis will change dramatically between the DEIS and the final EIS it makes review difficult.</p> <p>This whole analysis of impacts is based upon an APE that hasn't been finalized or agreed to amongst consulting parties, and stands upon several premises, including INHT values and the potential for indirect effects to be adverse, that most of the analysis that follows in invalid in my professional opinion. With the section 106 barely begun, the foundation for this analysis is missing.</p>	
3.20.3.1	3.20-27-28	Whole APE section	<p>See above comments about the APE for both direct and indirect effects. This APE as defined is inadequate for BLM analysis and will result in changes in analysis and impacts between the DEIS and the Final.</p> <p>The BLM disagrees with the Corps opinion that only one APE is sufficient. It is extremely difficult to read this chapter as a reasonable analysis when the APE hasn't been agreed upon and the entire section 106 process has barely begun.</p>	
3.20.3.1.1	3.20-28	Whole section	Visual is not the only type of indirect effects. Noise (daily explosive blasting), vibrations (from blasting or heavy equipment), and air pollution including dust have all been found to have significant indirect impacts to cultural resources.	

3.20.3.1.1.	3.20-29	Figure 3.20-1	The BLM disagrees that the APE should not include a buffer around the Kuskokwim River downriver from Jungjuk Port. Concerns have been expressed from potential consulting parties regarding the potential for the project to increase riverbank erosion, and therefore to effect the cultural resources there. To completely remove the lower Kuskokwim from the APE is a serious flaw in this analysis. Again, not enough of the section 106 process has been completed in order to properly analyze impacts.	
3.20.3.1.1	3.20-30	Table 3.20-3	See previous comments that the INHT is a unique, not an important resource.	
3.20.3.1.1	3.20-30	Effects: Important (text)	The classification of the INHT as an 'important' rather than a 'unique' resource is incorrect. Designation of a trail resource under the National Trails System Act is equal in stature to the Wilderness Act or Wild and Scenic River Act. Any classification of a National Historic Trail below 'unique' is deficient. Revise accordingly.	
3.20.3.1.2	3.20-31	Effects may be considered not adverse when the property is of value only for its potential contribution to archaeological, historical, or architectural research, and when such value can be substantially preserved through the conduct of research.	This isn't accurate. The effects are still adverse, but they can be reasonably resolved or mitigated through data recovery, if it is determined to be eligible only under criterion D.	
3.20.3.1.3	3.20-31-32	Whole section	We disagree with the basis of this analysis. The analysis of impacts to the INHT as a cultural resource needs to integrate many factors, not all of which are addressed here. The reliance on the SQRUs in the INHT CMP is far too great. This needs to integrate NRHP criteria (ie, the characteristics that make the INHT eligible for the National Register); NTSA criteria (ie, what makes the INHT distinctive and unique, and worthy of listing as a NHT), and as an important	

			feature for subsistence and recreation in Alaska. One could argue that segments of the INHT (maybe not within the Donlin project area, but the analysis still needs to be done) could also qualify as a TCP.	
3.20.3.1.3	3.20-32	The number of crossings (intersections) between the INHT historic route and the proposed pipeline ROW;	using the number of intersections/crossings between the INHT and the pipeline minimizes the impacts to the trail. The pipeline would damage the integrity of a whole segment of the INHT, both directly and indirectly, and to say that it will only directly impact the trail at a small number of discreet points minimizes the impacts to the INHT as a landscape-level resource.	
3.20.3.1.3	3.20-32	Table 3.20-5	Again, see my previous comments on use of SQRUs as the basis for analysis – this table is basing all of the determination of effect on SQRUs, despite the fact that other factors are discussed, and are more important to consider.	
3.20.3.1.4	3.20-33	The PA will provide agencies with a consistent framework for evaluating NRHP significance and project effects as project development proceeds. It will also define treatment protocols and the process by which those protocols would be implemented.	Change to: The PA will provide agencies with a framework for completing the section 106 framework in a phased manner. This will include identification and evaluation of cultural resources, consultation, and mitigation of effects.	
3.20.3.3	3.20-24	The INHT system is listed in the NRHP.	See comments in previous EIS versions – this isn't true. A thematic nomination for the INHT and its resources is working its way through the system, but it is inaccurate to say the INHT system is NRHP listed. Please revise throughout.	
3.20.3.3.1	3.20-35	The extent of effects would be local, affecting a single site within the mine site area.	we disagree that effects on a site are local – the effect extent should be determined based on the cultural resource's <i>value</i> , not upon the fact that the project is only impacting one one-acre site in the mine footprint. If the importance of the site is its contribution to Alaska history, world history, lower Kuskokwim history, etc, that is	

			how the extent of impact should be determined. If IDT-260 is eligible because of its potential to contribute to the history of mining in Alaska, then the extent of impacts should be regional. Please revise this and following impacts analysis accordingly.	
3.20.3.3.3	3.20-37	The extent of effects would be local, affecting five sites within the proposed pipeline area. As impacts would occur to cultural resources recommended as eligible for the NRHP that would be significant at the local level, effects would be important in context.	See previous comments; again, the BLM disagrees that the extent of impacts would be local.	
3.20.3.3.3	3.20-39	Specifically, the buried natural gas pipeline corridor under Alternative 2 would be collocated with the INHT for 4.0 miles and adjacent (within 1,000 feet) for approximately 10.5 miles.	This seems like it is minimizing impacts to the INHT,. Table 3.20-8 shows that the pipeline would repeatedly intersect/be co-located/adjacent with the INHT every few miles for 64 miles. 64 miles is a lot more than the 14.5 miles stated in the text and used for analysis of impacts.	
3.20.3.3.3	3.20-39-40	Whole INHT section	We disagree with the conclusion that impacts to the INHT are temporary. The vegetation changes to the pipeline corridor are permanent – they will last for decades past when maintenance brush-clearing is over.	
3.20.3.3.3	3.20-39	Table 3.20-8; Criteria for Eligibility / INHT	It appears the mileage and number of intersections between the pipeline ROW and the Iditarod NHT is incorrect in this table, as compared to mileage identified in other sections. Alternative 2 includes a trail crossing at approx. MP 50.5 (not included here), numerous construction ROW's, shoofly and temporary roads between Happy River and Shirley Lake (MP 86 to 95) and MP 104 to 106. None of these are included in this tally. Additionally, mileage is included that appears to	

			represent the Dalzell alternative (everything beyond MP 106), and the Goodman Pass alternative routes. These should be removed from the table.	
3.20.3.3.3	3.20-39 and 40		Restatement of BLM Cultural comment 33; otherwise insufficient as written. Change description of impacts to INHT as 'high', 'permanent', to a 'unique' resource, for an extended area. Revise mileages of intersections and co-locations to be consistent with those given in 3.16.3.2.3; currently not consistent as written (see next comment).	
same	3.20-40	Table 3.20-9	Number of crossings does not include "temporary" roads and shoofly roads (which unless all material is removed, will be long-term or permanent in nature). Table 3.16-5 lists 13 crossings. Length of colocation is listed as 4.0 miles in Table 3.16-5, and ROW proximate to Trail as 10.5 miles, while this table lists them as 3.5 miles and 5.5 miles respectively. Revise this table to be consistent with Table 3.16-5.	
Same	3.20-40 to 43	<i>Alaska Range Physiographic Province</i> text	Restatement of BLM May 2015 Cultural comment 33. The analysis should analyze effects against the 'nature and purpose' (as described in comment 32) of the Trail; as currently written is overly reliant on SQRU framework and consistently under values the potential impacts to the INHT.	
3.20.3.3.3	3.20-40-44	Whole section	See previous comments on SQRU analysis. Please summarize visual impacts	
3.20.3.3.5	3.20-44-45	Whole Alt 2 summary section	We disagree with the conclusion that impacts to the INHT segments are moderate. The impacts are high intensity (loss of integrity on criteria other than D), impacts are permanent, extent is extended (affects the integrity of the INHT, which	

			extends far beyond the EIS analysis area), and the trail is unique in context. That all results in a high impact to the INHT.	
3.20.3.3.5	3.20-44 to 45	Summary – Alternative 2	Restatement of BLM May 2015 Cultural comment 52. Insufficient description of impacts to INHT. Vagueness of proposed avoidance and design mitigation, etc. makes the description of potential impacts equally vague, and therefore insufficient.	
3.20.3.3.5	3.20-46	Table 3.20-13	please clarify how you get to moderate impacts for the pipeline when there are permanent, extended, important impacts, even disregarding my comments above about INHT impacts conclusions, this table would lead me at least to a moderate/high impact, if not a high.	
3.20.3.3.6	3.20-47	First bullet	Why are we talking about paleo here? Is this cut and pasted from somewhere else? Paleo needs to be addressed in its own section of the EIS.	
3.20.3.4	3.20-47	all	If the APE is amended as BLM recommends, this section will have to be revised to show fewer impacts to resources in the river corridor as a result of reduced barging.	
3.20.3.8	3.20-49-50	Whole section	As I've said previously, this alternative analysis leaves out the Rohn CCC cabin in the analysis. Any impacts to that site are a major impact and would change the impact analysis results.	
3.20.3.8	3.20-50	Last paragraph on this page.	The BLM strongly disagrees with this conclusion. Alternative 6A would have greater impacts to the INHT and its resources, including the Rohn Cabin, which would result in overall far greater impacts to cultural resources as a whole. please clarify in Table 3.20-15 the difference in miles of INHT impacted, and then how you concluded "overall direct and indirect effects would generate the same conclusion" .	

3.20	3.20-53-54	Table 3.20-16	Please revise this table. There are many changes to the impact analysis that need to be done that will change the conclusions summarized in this table.	
	3.21-2	<p>Donlin Gold’s Proposed Action – The mine site summary impact would be minor, with the exception of a moderately (beneficial) income effect. Crooked Creek residents would see continued low intensity displacement from historic use areas at the mine site, but this displacement would be reduced after closure.</p> <p>Competition for subsistence resources near the mine site would be eliminated during the life of the mine by the implementation of Donlin Gold policies of no hunting and fishing from the mine site.</p>	<p>We disagree with this statement and the analysis used to get there. The mine would permanently change the area, change access for subsistence users and change wildlife population distribution across the area, especially for the residents of Crooked Creek.</p> <p>No hunting by mine workers would be assumed, but that will not change the impacts to subsistence from the mine itself, and the changes it brings to wildlife population distribution and changes in access to the area from non-subsistence users.</p> <p>The displacement of Crooked Creek residents from subsistence use areas will increase over the life of the mine as the pit and tailings expand, and will remain permanent after closure, with a threat of contamination of the entire watershed into perpetuity. The area will be forever changed for local subsistence users, and cannot be fixed or reclaimed to what it was before the mine is developed. This document is not adequately addressing these issues, and underestimating impacts to subsistence, both short and long term.</p>	
	3.21.2	The summary impact for transportation facilities would be minor, except moderate for disturbance to subsistence fishing in narrow reaches of the Kuskokwim River. These impacts are generally low in intensity, except for medium intensity effects from barging in	Impacts to subsistence on the Kuskokwim River may not be minor, and may affect the entire length of the River from the ocean to the mine. Barging intensity and frequency is underestimated, as barge rafts of 4 barges per tow may likely not always be feasible, as river depth and water flows in summer may not be enough to barge rafts of the proposed weight	

		narrow, shallow segments, and medium intensity impacts regarding displacement of access to fish camps near Angyaruaq (Jungjuk) Port site.	and size. More barge trips and lighter loads are likely, making the frequency of barge trips and passings on the river much higher than estimated in the proposed action. Openings for salmon fishing may likely not coincide with barge traffic at times, and prevent subsistence activities when fishing is allowed. Barging may affect the entire length of the river, not just narrow areas, and thereby impact subsistence fishing and travel on the river, affecting subsistence user access on the river and fish populations may have a greater impact this analysis is showing.	
	3.21.2	Summary impact for the pipeline would be minor, except moderate for increased competition near Farewell Airstrip. During construction, intensity of effects on subsistence hunting and fishing is low because there is little overlap between subsistence use areas and the pipeline right-of-way and because the disturbance during construction is limited to short periods. During operations, the intensity of effects from the buried pipeline is low, but less than during construction.. However, increased activity at the Farewell Airstrip would constitute a localized moderate intensity increase in competition, affecting the subsistence uses of the communities of McGrath, Nikolai, and Telida.	A new corridor between Cook inlet and the Kuskokwim river will not be minor, and likely will affect subsistence resource distribution and hunter access. The pipeline and improved access from remaining airstrips will cause improved access to the area by both subsistence and non-subsistence users, and would change game population distributions that are important to subsistence. The pipeline corridor will provide new access for fall hunting seasons and winter travel, and will affect access for both sport and subsistence users.. Competition from non-subsistence users may affect subsistence users near Cook Inlet (Tyonek, Beluga) and in the Kuskokwim river watershed.	
	3.21-139	The direct impacts due to changes in subsistence resources at the mine site would be of low intensity for Crooked Creek residents, given the very limited impacts to plant, bear, fur bearer and fish subsistence resources in the	The mine will involve regular blasting with explosives; mining truck traffic, cargo and fuel truck traffic on the mine access road, barging of fuel and cargo on the Kuskokwim river, and an expanding area of the mine pit and tailings areas over the life of the mine.	

		<p>Crooked Creek use area overlapping or adjacent to the mine site. Adjustments to the seasonal round would be minor and alternative resources are readily available.</p>	<p>Historically activities like these have changed the distribution of wildlife resources important to subsistence and access to them by hunters. We disagree that those activities would be of low intensity to crooked creek residents who live adjacent to the mine. That is not minor, and will impact subsistence resources. please clarify how these activities can be of low intensity and minor crooked creek residents that live closer to the mine</p>	
	3.21-139	<p>Closure and reclamation of the mine site would have positive impacts on habitat and wildlife of low to medium intensity, as these would be noticeable. Without the disturbance of the mine operation, and with revegetation of the main features of the mine, wildlife such as bears and furbearers are likely to reoccupy the mine site. After 50 years, when the pit lake fills, the discharge of treated pit water would increase stream flow in Crooked Creek, with negligible seasonal water temperature increases. The pit lake would introduce a new standing water structure, but changes in waterfowl resources would not be noticeable.</p>	<p>We struggle to understand how closure and reclamation of this mine will have positive effects on wildlife and subsistence resources in a reasonable time frame. It is very unlikely the area could sustain a natural balance of wildlife resources for many years after closure.. The pit lake and tailings dams represents a threat to water quality in crooked creek and the Kuskokwim river into perpetuity, and the closed mine would represent an equal water quality threat to fish in the watershed . Water from the pit and tailings dams will create a situation that is physically and financially difficult to prevent contamination of the Kuskokwim watershed. This is a concern and is not adequately addressed.</p>	
	3.21-152	<p>Summary – Alternative 2 Mine Site For the mine site, the following discussion takes into account impacts to subsistence due to changes in resources, changes in access, changes in competition, and changes in sociocultural practices. The intensity of impacts would be from none to low intensity for most communities in the EIS Analysis Area.</p>	<p>As mentioned in above comments, we disagree with this analysis and how it can be concluded that impacts to subsistence would be none to minor, and only beneficial for increased employment.</p>	

		<p>Since the subsistence practices of Cooked Creek residents have historically relied in small part upon resources from the mine site, the intensity of impact would be low, and small adjustments in the seasonal round would sustain harvest levels. For Bering Sea Coast villages relying on migratory waterfowl that pass through the mine site, low intensity impact would result from perceived contamination of waterfowl at the mine site. Socio-cultural impacts associated with potential mine employment would be low intensity beneficial for most villages in the EIS Analysis Area, and medium beneficial in the Central Kuskokwim subregion due to a concentration of employment in communities nearer the mine site. Low to medium intensity impacts would result from changes in outmigration and rotational work shifts. During closure and reclamation, the intensity of effects would be low, but less than during operations.</p>		
3.21	<p>Table 3.21-23 alternative 2 Impact Levels by Project component</p>		<p>This table concludes that all impacts to subsistence from the mine, transportation facilities and pipeline are minor, or at most moderate in 2 areas. All of the subsistence impacts are based on the analysis in this table, and use magnitude and intensity, duration, geographic extent and context to determine an impact. It does not analyze impacts directly, but spreads them out over these 4 variables.</p> <p>As a result we feel the impacts from such a large, long term project are understated.</p>	

3.26	20	Permafrost loss is expected to due thawing from positive feedbacks between warming temperatures, increased woody vegetation, and lower-snow winters.	Typo: Permafrost loss is expected due to thawing from positive feedbacks between warming temperatures, increased woody vegetation, and lower-snow winters.	
CH 4 COMMENTS				
4.2	Global		The scope of analysis as written does not objectively describe the cumulative impacts in such a way that residual effects can be determined.	
4.2.2	4-4	Figure 4.3-1	I don't understand this figure. All I see on it is the Donlin Mine, not any other projects/future actions.	
4.3.1.1.3	4-15	Overall, the contribution of Alternative 2 to cumulative effects to paleontological resources would be minor.	I disagree with this conclusion. This is a dramatically larger project than past and future actions in the region. As the largest Army Corps-led project in the US, this would have a large cumulative impact on fossil formations across central and western Alaska.	
Chapter 4	4.3.1.2.4 Soil Quality/ contaminated sites	The implementation of Alternative 2 would have minor to moderate impacts on soil quality/contaminated sites in the proposed Project Area. Overall, the incremental contribution of Alternative 2 to cumulative effects to soil quality/contaminated sites would be minor due to low intensity of localized impacts after proposed mitigation measures are employed	The mine and tailings will create a pit lake and tailings dam that will contain heavy metals and low pH and may threaten soils and water into perpetuity. We struggle to understand How this results in minor cumulative effects to soil and water.	
Chapter 4 page 4-26	4.3.1.5.1 Surface Water Hydrology	The implementation of Alternative 2 would have minor to moderate impacts on surface water hydrology in the proposed Project Area. Overall, the incremental contribution of Alternative 2 to cumulative effects to surface water would be minor to moderate,	The mine pit, tailings storage and dams, roads and river port will have direct and indirect impacts to the entire Kuskokwim River watershed. The threat of contamination of crooked creek and the Kuskokwim River from the mine pit and tailings will last into perpetuity after closure. We struggle to understand how this results in a minor to moderate cumulative effect.	

		considering the localized high intensity changes in resource character during the life of the project, and relatively small area of effects on surface water.		
Chapter 4 page 4-27	4.3.1.6 1 Ground water	The implementation of Alternative 2 is likely to have minor to moderate impacts, and potentially could have high impacts on groundwater in the proposed Project Area during operations. Overall, the incremental contribution of Alternative 2 to cumulative effects to groundwater would be minor, even considering the localized high intensity changes in resource character during the life of the project, because the effects of the proposed project on groundwater are limited to a relatively small area and for the most part are not permanent.	We struggle to understand how this results in a minor or localized impact to crooked creek and the Kuskokwim watershed. This mine is large and will create a permanent pit that may affect ground water after closure.	
Chapter 4	4.3.1.7.2 surface water quality page 4-31	Overall, the implementation of Alternative 2 would have minor to moderate direct and indirect impacts on surface water quality in the proposed Project Area. Impacts would range from low to high intensity, temporary to long-term in duration, localized to regional in extent, and affecting a common to important resource. As a result, the additive incremental cumulative impacts attributable to Alternative 2 would be minor to moderate.	Alternative 2 will alter over 20,000 acres during construction and operations of the mine, pipeline and transportation infrastructure. This is a scale of magnitude more than what is occurring there now. we struggle to understand the cumulative effect as minor to moderate. It is affecting surface water from Cook Inlet to the Kuskokwim river watershed. That is not localized, temporary or minor.	

Chapter 4	4.3.1.9 1 noise and vibration	Alternative 2 would have minor impacts to noise levels in the proposed Project Area. The contribution of Alternative 2 to cumulative effects to noise would also be minor.	Alternative 2 involves blasting, mining trucks hauling, crushing and grinding ore for processing, barges on the river, hauling fuel and cargo from the river to the mine. we struggle to understand why it is not cumulative and how it is considered a minor increase to noise level.	
4.3.3.2.1	4-43	The direct and indirect effects to recreation under Alternative 2 would be minor. The contribution to recreation cumulative effects is also considered minor.	We disagree with this conclusion. As the largest Army Corps-led project in the US, this may have a large cumulative impact on recreation across central and western Alaska	
4.3.3.6.1	4-45	The direct and indirect effects to cultural resources under Alternative 2 would be moderate and the contribution to cumulative effects to cultural resources is also considered moderate.	We disagree with this conclusion. As the largest Army Corps-led project in the US, this would have a large cumulative impact on cultural resources across central and western Alaska. It will have direct and indirect impacts on several NHRP-eligible sites, including several miles of the INHT, a unique cultural resource of national importance.	
4.3.3.6.2	4-45	The pipeline component of Alternative 6A would have greater impacts to the affected portion of the INHT, but the overall impact rating would remain the same as in Alternative 2.	We disagree with this conclusion. Alternative 6A particularly will have more impacts to cultural resources than the proposed action. It will affect a larger portion of the INHT, and it will have direct and indirect effects on the Rohn CCC cabin, a NRHP listed site, and a contributing element to the INHT.	
CH 5 COMMENTS				
Chapter 5, in general	n/a	General comment	The direct, indirect and cumulative effects analysis relies on the use of generic, qualitative impact conclusion statements (e.g., minor, common, moderate, etc.). Lack of specificity and quantitative conclusions will make precise identification of unavoidable impacts warranting mitigation and mitigation actions suitable for offsetting those impacts very challenging.	
5.1.1	Global		Emphasis on only USACE authority to require compensatory mitigation – needs to be	

			<p>expanded to acknowledge that BLM also has authority under SO 3330, FLPMA, and draft MS-1794.</p> <p>Chapter 5 doesn't provide identification of unavoidable impacts to BLM managed resources that might warrant compensatory mitigation, making it deficient for BLM purposes.</p>	
General			<p>Again, as recommended in previous comment opportunities, it is recommended that an all-inclusive Chapter is developed to address the prevention, management and monitoring for all taxa non-native invasive species. Otherwise, this important issue and potential impacts gets lost in the add-on to various sections, diminishing the significance.</p>	
Chapter 5	5-2	<p>It is beyond the scope of this EIS to list all BMPs, but they would be included as individual permit conditions.</p>	<p>BMPs for preventing the introduction and spread are not beyond the scope of this EIS. Identify the "industry standard" BMPs relating to preventing introduction and spread of non-native invasive species.</p>	
Chapter 5, in general	n/a	<p>General Comment – In the October 9, 2015 <i>Response to Agency Comments on the PDEIS</i> (Chapter 5, specifically), the contractor indicates that BLM was asked to provide language regarding the BLM's compensatory mitigation requirements. (This was originally requested by AECOM Project Manager, Bill Craig via email to Alyssa Sweet on September 22, 2015.)</p> <p>The comment provided in the next column is intended to address that request.</p>	<p>The BLM's authority to require compensatory mitigation is derived from:</p> <p><i>Secretarial Order 3330, Improving Mitigation Policies and Practices of the Department of the Interior</i> (2013). The Secretarial Order states that, "for impacts that cannot be avoided or effectively minimized, the Department should seek ways to offset or compensate for those impacts to ensure the continued resilience and viability of our natural resources over time."</p> <p><i>Federal Land Policy and Management Act (FLPMA)</i> (1976). Under FLPMA, the BLM has the responsibility to manage the public lands for multiple use and sustained yield. FLPMA requires that "Use of the public lands....minimize adverse impacts on the</p>	

			<p>natural, environmental scientific, cultural, and other resources and values...of the public lands involved.” 43 U.S.C. § 1732(d)(2)(a).</p> <p><i>BLM Regional Mitigation Manual MS-1794.</i> Agency policy allows the BLM to condition land use authorization on the successful performance of compensatory mitigation either on- or off-site from the impacts.</p> <p>(Note, additional authorities apply, however this are most germane to BLM’s needs on this EIS.)</p>	
5.1.2	5-2	<p>Mitigation measures recommended for consideration by EIS Team Subject Matter Experts, the lead and cooperating agencies, federally recognized tribal governments, and the public during the NEPA process.</p>	<p>BLM also has responsibility to identify the Conditions including all required mitigation for any Mineral Leasing Act ROW issued pursuant to this Final EIS. BLM takes a regional approach to mitigation and focuses on achieving the highest benefit to help offset the impacts of projects on Federal lands.(ES-1-28).</p>	
Chapter 5	5-4	<p><i>Mitigation measures discussed in an EIS must cover the range of impacts of the proposal. The measures must include such things as design alternatives that would decrease Pollution emissions, construction impacts, esthetic intrusion...</i></p> <p><i>... However, to ensure that environmental effects of a proposed action are fairly assessed, the probability of mitigation measures being implemented must also be discussed.</i></p>	<p>Without the comparison of the No Action Alternative, we have no measurable way to discuss the resulting environmental, social, economic impacts of the various Action Alternatives.</p>	
5.1.1	5-1	Table 5.1-1	<p>Table 5.1-1 needs to acknowledge that the BLM can also require compensatory mitigation; adjust 3rd column accordingly.</p> <p>Supplement fourth row of table to acknowledge Secretarial Order 3330, FLPMA, and BLM policy</p>	

			as the authorities by which the BLM can seek compensation for unavoidable impacts.	
5.1.1	5-2	Table 5.1-1	<p>The last row of the table implies that monitoring by Donlin Gold is voluntary (“Monitoring may be proposed...”).</p> <p>Revise to reflect that monitoring is required by 40 CFR 1505.2 (c) for all adopted mitigation measures. See 40 CFR 1505.2 (c): <i>“(c) State whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted, and if not, why they were not. A monitoring and enforcement program shall be adopted and summarized where applicable for any mitigation.”</i></p>	
5.1.2	5-2	Monitoring to assess that mitigation measures are achieving the expected results or monitoring for adaptive management may be used as an assessment tool. Any such post-EIS requirements are not considered in this EIS.	Section 5.1.2 second full paragraph, second to last sentence - change “may” to “shall” in reference to monitoring. Refer to 40 CFR 1505.2 (c).	
5.1.2	5-3	<p>First sentence on top of page 5-3 in reference to compensatory mitigation:</p> <p>Compensatory mitigation is only applicable to unavoidable impacts to waters of the U.S. after avoidance and minimization efforts have been made.</p>	This sentence is incorrect as it implies that only the Corps can require Compensatory mitigation. The BLM can require compensatory mitigation as well. Revise accordingly, citing authorities provided in previous comments.	
5.2	5-6	Table 5.2-1: Design Features	Remove Table 5.2-1. All design features should have been introduced in Chapter 2, Alternatives descriptions. Repeating these measures in Chapter 5 adds unnecessary length to the document and is confusing to the reader. Chapter 5 should instead focus on measures	

			<p>that are additional to those that have been incorporated into the project design.</p> <p>Additional discussion:</p> <p>The Chapter 3 impacts analysis should have evaluated the impacts of alternatives assuming full implementation of the design features identified in Chapter 2.</p> <p>The Chapter 3 impacts analysis should have disclosed the impacts remaining given incorporation of those design features. The impacts remaining are the impacts ripe for additional mitigation (i.e., additional avoidance and minimization measures not incorporated into the project's design; repair, restoration, and rehabilitation measures; and true compensatory mitigation measures).</p> <p>Given this, Chapter 5 should summarize the unavoidable adverse impacts - the impacts that remain after all avoidance and minimization options in the project's design have been exhausted; outline the mitigation options for repairing, rehabilitating, restoring, off-setting or otherwise compensating for those impacts; evaluate the anticipated residual impacts (impacts remaining after these mitigation measures are applied); and, finally, identify how mitigation will be monitored or adapted for optimal effectiveness.</p> <p>As written, Chapter 5 reiterates information that should, and largely does, appear in Chapter 2; it does not meet the intent of NEPA related to the identification of measures that rectify or compensate for unavoidable impacts nor does it</p>	
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			adequately outline required effectiveness monitoring for all resources impacted.	
	5-8	The project design includes routing transmission lines in proximity to the road, where possible, to reduce additional vegetation impacts.	Buried transmission lines may be considered to reduce visual impacts and preserve the viewshed of the natural landscape.	
	5-19	Non-native Invasive Species Prevention Plans;	This is listed as “more prominent BMPs and standard permit conditions”. What are those BMPs? please provide examples.	
5.3	5-19	Compliance with Section 106 Programmatic Agreement and Cultural Resources Management Plan, including adequate survey prior to ground-breaking activities and protocol for inadvertent discovery of cultural resources;	we disagree that complying with a legally binding document should be considered a BMP or mitigation measure.	
	5-29	Mit 28 Install signs that clearly distinguish trails from the pipeline ROW at points where the pipeline crosses trails to guide trail users to stay on the trail and off of the pipeline ROW where the two are not co-located. As practicable, revegetate, or otherwise block access to, a narrow strip of the pipeline ROW where it crosses the trail to help steer and keep trail users on the trail and reduce the visual effect of the pipeline ROW crossing. Effective: Yes Feasible: Yes Practicable: Yes	We disagree with the conclusion that this “BMP” is effective, feasible, and practicable. Trail users will find a way to travel the pipeline corridor regardless of signage and barriers. Signs will become a an firearms target, and berms will easily be overcome.	
5.6	5-31	(entire section on Compensatory Mitigation)	Section 5.6 only speaks to the Corps’ compensatory mitigation authority. Revise to acknowledge DOI and BLM’s compensatory	

			mitigation authorities (Secretarial Order 3330, FLPMA, and BLM's Mitigation Policy).	
5.7	5-32	Table 5.7-1	To allow for cross-walking, the second column of this table ("Mitigation Measure Description") must include the corresponding mitigation measure I.D. provided in the first column of Table 5.5-1.	
APPENDIX COMMENTS				
Appendix M	Global		No draft/conceptual Compensatory Mitigation Plan has been developed for BLM managed resources.	
App. M	219	PRM- 03, Non-native Plant Species Removal Projects	We have concerns that inclusion of an invasive species plant removal compensatory mitigation PRM plan will get confused with permit responsibilities for prevention and removal of invasive plants. Is this project being proposed for existing invasive populations in the region that are not associated with the mine project? some clear separation between what this plan is suggesting and right-of-way permit requirements will be needed.	