

Smith, Neal

From: Craig, Bill
Sent: Monday, April 18, 2016 2:20 PM
To: Bellion, Tara; Evans, Jessica; Smith, Neal
Subject: FW: [EXTERNAL] Donlin Gold DEIS comment submitted
Attachments: IHTA Donlin DEIS Resolution 4.12.2016 Final Signed.pdf

-----Original Message-----

From: donlingoldeis, POA [<mailto:POA.donlingoldeis@usace.army.mil>]
Sent: Monday, April 18, 2016 1:12 PM
To: Craig, Bill
Cc: Newman, Sheila M POA
Subject: FW: [EXTERNAL] Donlin Gold DEIS comment submitted

Bill, FYI.

Sheila, last item is another request for an extension.

-----Original Message-----

From: Judy Bittner [<mailto:judy.bittner@gmail.com>]
Sent: Sunday, April 17, 2016 2:13 PM
To: donlingoldeis, POA <POA.donlingoldeis@usace.army.mil>
Subject: [EXTERNAL] Donlin Gold DEIS comment submitted

The Iditarod Historic Trail Alliance, a non-profit organization, submits the attached comments on the Donlin Gold DEIS.

Submitted on April 17, 2016



IDITAROD HISTORIC TRAIL ALLIANCE
P.O. Box 2323
Seward, AK 99664

RESOLUTION 16-01

Resolution passed by the Iditarod Historic Trail Alliance commenting on the Corps of Engineers Donlin Gold Project DEIS and the impacts to the Iditarod National Historic Trail

WHEREAS, the Iditarod National Historic Trail (INHT) is a unique historic and recreational 2400-mile trail system Congressionally designated a National Historic Trail under the National Trails System Act in 1978 as a scenic, recreational and historic transportation route through Alaska, and

WHEREAS, the National Trails System Act Section 7 (c) states other uses of National Trails are not to create substantial interference to the nature and purpose of the designated trail, and

WHEREAS, the INHT is administered by the Bureau of Land Management and is a part of the National Landscape Conservation System and guided by the *INHT Comprehensive Management Plan*, and

WHEREAS, the Iditarod Historic Trail Alliance (Alliance) is a non-profit organization and a partner to INHT land managers as set out in the National Trails System Act, Section 7(h), and is dedicated to the preservation, protection and cooperative management of the significant recreation, historic and cultural resources of the Iditarod National Historic Trail, and

WHEREAS, parts of the Iditarod National Historic Trail date back thousands of years to trade routes used by Alaska Natives, today's Iditarod National Historic Trail began with an Alaska Road Commission scouting expedition in mid-winter 1908 which led to the 1910-11 marking and building of the trail, and

WHEREAS, as stated in 1978 by Congress, the nature and purpose of the INHT is that it "offer(s) a rich and diversity of climate, terrain, scenery, wildlife, recreation, and resources in an environment largely unchanged since the days of the stampedes. It is the isolated, primitive quality of this historical environment that makes the National Historical Iditarod Trail proposal unique. Nowhere in the National Trail System is there such an extensive landscape, so demanding of durability and skill during its winter season travel. On the Iditarod, today's adventurer can duplicate the experience and challenge of yesteryear", and

WHEREAS, the Alliance believes that the pipeline project permanently and irreversibly changes and destroys the integrity and scenic quality of the INHT in the affected segments through actions which include:

- the clearing of a 150-foot wide swath of trees and vegetation along the 58 miles of where the pipeline is co-located on, intersects with, or located within the trail corridor parallel to the Iditarod National Historic Trail,
- 4 miles co-located, 10.5 miles within 1000 feet and 13 crossings of the INHT,
- above ground inspection pipes and mile markers placed every mile along the pipeline,

- the pipeline’s permanent primitive road paralleling, crossing and/or occupying the Iditarod National Historic Trail from Skwentna to Puntilla Lake,
- the exchange of the historic and scenic Happy River Steps of the Iditarod National Historic Trail with a construction road,
- 12 winter routes and Shoofly Road crossings, 4.2 miles collocated and 6.5 miles proximate to the INHT,
- three gravel pits, two construction camps, six mobile sledge mounted crew camps, and
- two 5,000 foot airstrips within the INHT corridor,

WHEREAS, the recreational patterns and experience of INHT users will be impacted by sound and air pollution, ground disturbance, and traffic of heavy machinery during construction causing the overall feel and interpretation of the area to change as the land changes from undeveloped to industrial use, and

WHEREAS, the Donlin Gold Project will result in permanent man-made features within the viewshed of the trail and within the INHT corridor, permanently changing the landform, introducing structures not currently present, and modifying vegetation patterns, all of which interfere with the historic, cultural and scenic values of this internationally recognized trail, and

WHEREAS, the Donlin Gold Project substantially interferes and adversely changes the character and setting of segments that currently retain excellent integrity of feeling, setting, location and association, and have been evaluated in the *INHT Comprehensive Management Plan* as Class A Scenic Quality Rating Units (SQRUs). These Units include: SL06, SL08, AR01, AR02, AR03, AR04, AR05, and AR06. Descriptive narratives for these segments includes:

- “views become expansive, with long vistas in all directions”,
- “extremely remote trail section”,
- “expansive and uninterrupted views occur in all directions due to lack of vegetation along the trail”,
- “steep, jagged mountain peaks form narrow U-shaped valley”,
- “definite enclosure along trail sections creates tight visual corridor,
- “the valley opens and becomes broader, providing expansive views to the west”,
- “significant transition area between two physiographic provinces”, and
- “expansive Alaska Range falls behind, while Kuskokwim Lowlands approach ahead”, and

WHEREAS, the Iditarod Historic Trail Alliance believes the Donlin Gold Project will have major direct and indirect impacts on the INHT and meets the impact criteria of High Intensity (Magnitude), Permanent in Duration, Extended in Extent, and Unique in the Context of the resource as defined in the DEIS Section 3.0.4.1 because of its status as a Congressionally designated National Historic Trail,

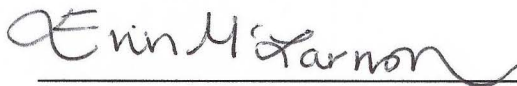
NOW, THEREFORE BE IT RESOLVED that the analysis of the impacts to the Iditarod National Historic Trail are not adequately identified or conveyed in a complete and concise manner that allows for an understanding of the scope and scale of the cumulative adverse impacts to the Iditarod National Historic Trail during construction, operations, and reclamation phases in the DEIS, and the Iditarod Historic Trail Alliance urges the Corps of Engineers to:

1. re-examine the DEIS and require an alternative that re-routes the pipeline to avoid impacts to the INHT and preserve its historical, cultural and scenic qualities,
2. address the scope and scale of the adverse impacts and substantial interference to the nature and purpose of the Congressionally designated INHT under the authorities of the National Trails

System Act and Section 106 of the National Historic Preservation Act, as well as the National Environmental Protection Act

3. address the impacts to the recreational experience, setting, and feeling discussed in DEIS Section 3.16 and permanent changes in condition of the INHT caused by all construction and permanent infrastructure features, including the pipeline ROW, the Shoofly roads and construction features,
4. require a more thorough documentation and disclosure of methodology and data for the conclusions reached within DEIS Section 3.17 on the scenic viewshed ratings and viewshed summary impact conclusions included in Table 3.17-5, and
5. address impacts on the INHT viewshed in DEIS Section 3.17 caused by all constructed features, including but not limited to camps, airstrips, roads, pipeline markers, and Shoofly roads, and the pipeline ROW, during all three phases: the construction phase, the project operation phase, and the permanent viewshed impacts after the project is complete. These impacts should be addressed for each trail segment and landmark features in DEIS Section 3.17.3.
6. extend the comment period to ensure the public has adequate time to review the very large complex DEIS document, understand its content, and make comment.

Respectfully Submitted,



Secretary



Date