

The LOGBOOK of CSP²

The CENTER for SCIENCE in PUBLIC PARTICIPATION

"Technical Support for Grassroots Public Interest Groups"

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PROPOSED DONLIN GOLD MINE, ALASKA

THE DONLIN MINE

Donlin is a proposed gold mine near the banks of the Kuskokwim River, one of the largest and most important subsistence rivers in Alaska. The land is owned by Alaska Native corporations.

If approved, it will be the biggest mine in Alaska, mining 59,000 tons per day.

Arsenic, selenium, antimony, and mercury are tied up in the ore and represent environmental risks.

Donlin will be the first Alaskan mine to process the ore in a manner that releases gaseous mercury. Mercury will need to be captured, stored, and eventually moved out of this remote area. There are no roads – even the fuel to power the mine site will come as LNG through a 300-mile long pipeline from Cook Inlet.

These challenges, and the proximity of the mine to the Kuskokwim River, highlight the value of bringing tribal and independent technical voices into the EIS

The Proposed Donlin Gold Mine

by Kendra Zamzow

At CSP² we provide technical analysis of potential environmental risks from proposed mines and we review Environmental Impact Statements (EIS) on behalf of communities and tribes.

The EIS process

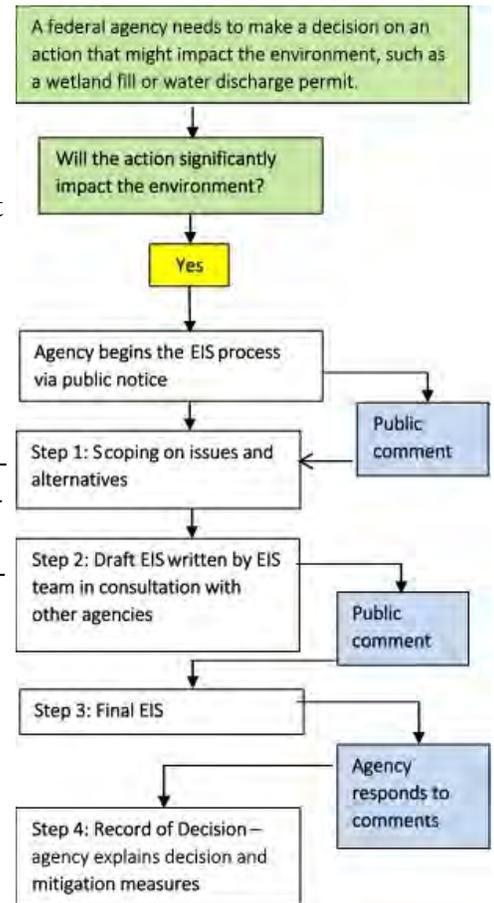
The EIS process allows for public comment, usually for 30-60 days at two points: before and after the draft EIS is produced.

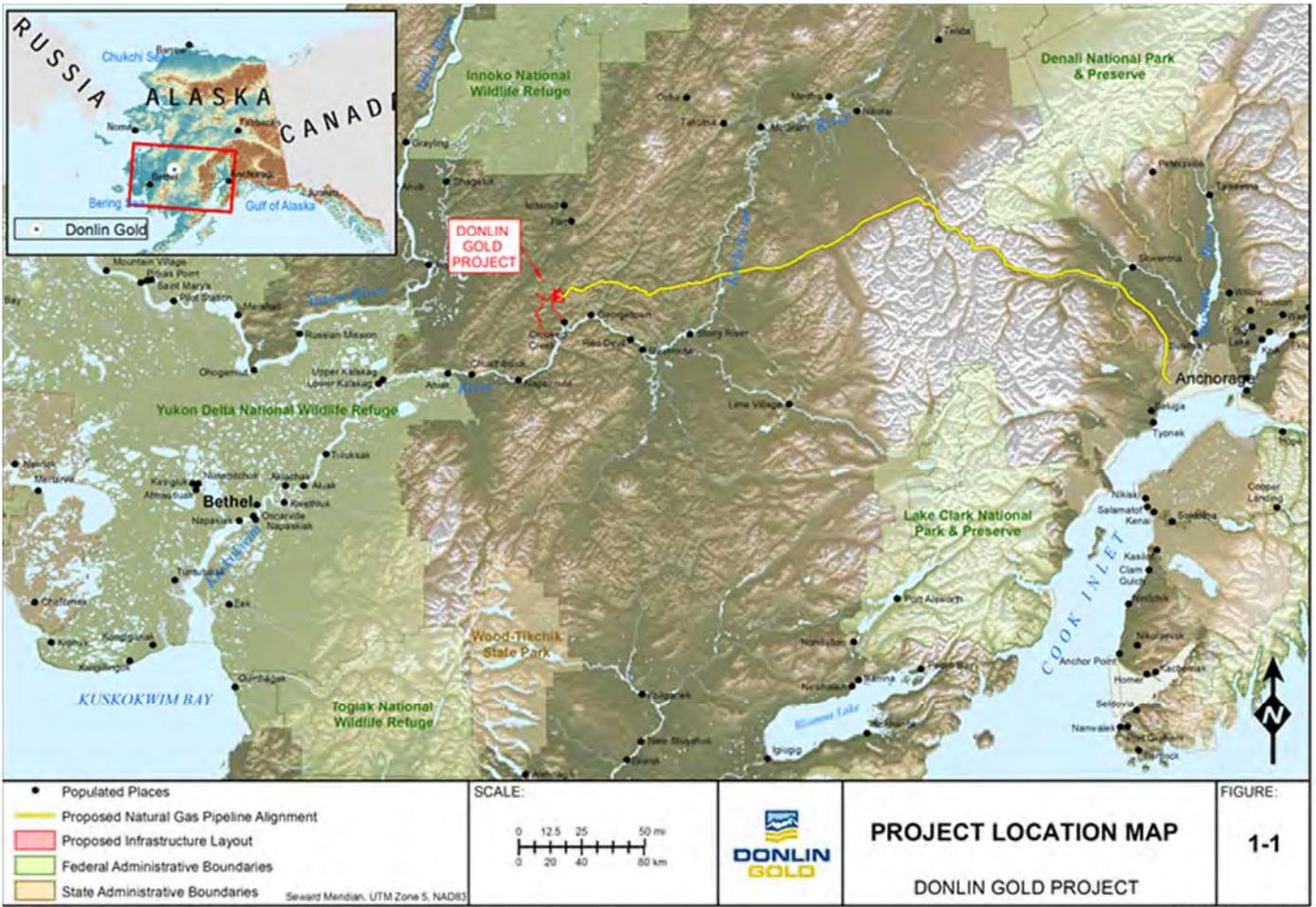
Writing an EIS is a multi-year process. The draft and final EIS development discussions are held by the federal permitting agency, with invited federal and state agency representatives, talking with the mining proponent and their consultants, wrestling with questions like:

Public comments provided during the scoping period are considered, but outside of the brief public comment periods, in most cases the people who live in and use the area, who will see their lives changed as an industrial complex moves in, have little or no opportunity to shape the project.

Inclusion of tribal governments

The EIS process for Donlin began in October 2012, at which point the lead agency, the US Army Corps of Engineers (ACOE) sent a letter to 66 potentially-affected federally-recognized tribes to invite them to





be cooperating agencies in reviewing draft EIS material.

The Kuskokwim River is dotted with small villages. The “hub” village of Bethel is 145 miles downstream from Donlin. The villages closest to



the mine include Crooked Creek, Georgetown, Red Devil, Sleetmute, Chuathbaluk, Upper and Lower Kalskag, and Napamaiute. The tribal governments of villages that would be impacted now

had an opportunity for a seat at the table.

Precedent-setting cooperation

Six villages signed on as cooperators. Having a group of villages as cooperating agencies is unprecedented in Alaska. One of the villages, Chuathbaluk, asked CSP2 to be their technical consultant to work with six villages signed on as cooperating agencies, with the same status as federal and state agencies consulted during the EIS process. This is unprecedented in Alaska. Tribal government representatives and their consultants now have access to draft material, can provide grounds for alternative actions, identify where new information needs to be gathered to determine impacts, and review documents with the mining company, state, and federal agencies.

The Chuathbaluk Traditional Council engaged CSP2 as their technical consultant, to review hydrogeology, geochemistry, and mine waste management related to the mine project.

Chuathbaluk has identified resources important to them and alerted CSP2 to potential problems they would like investigated and addressed. All CSP2’s

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analyses are sent to the tribe for approval, and submitted to the EIS team by the tribe.

The future of EIS engagement

This is a new and important way for tribes to engage in natural resource decisions. Combining local voices with technical expertise early on in the development of the draft EIS opens up the potential for tribes to engage in meaningful discussions that could shape a project. This approach is applicable for all large-scale projects, not just mining projects.

This new level of engagement, while encouraging, is still a difficult and long process. The EIS process is geared to move a project into permitting. Tribes can engage in the EIS process without giving up This is a new and important way for tribal governments to engage in natural resource decisions. Combining local voices with technical expertise early in draft EIS development opens up the potential for meaningful discussions that could shape a project, for all large-scale projects.

This new level of engagement, while encouraging, is still a difficult and long process. It still includes only government representatives – tribal, state, or federal – not members of the general public. The EIS process is geared to move a project into permitting.

Tribes can engage in the EIS process without giving up their right to oppose or support the mine. The balancing act comes as they set aside their position on a project, and work within the process to develop options that will make for a better mining project.

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FROM THE EXECUTIVE DIRECTOR

If you haven’t heard, the EPA recently announced its intent to issue a 404(c) determination that would effectively prohibit the proposed Pebble mine in Bristol Bay, Alaska. CSP2 has been providing technical support to groups that oppose the Pebble mine, including commercial fishermen, sports fishermen, and subsistence users, since 2007.



Dave Chambers is the Executive Director of CSP²

Despite what some claim, no one is unbiased, especially on a project like this. It is CSP2’s policy to provide objective analysis and information. Sometimes this means telling a client what they don’t want to hear. In the case of Pebble, the project proponents have called CSP2 “anti-mine” and “biased” on numerous occasions. My response has always been that CSP2 provides objective, not biased, analysis – even if the project proponents don’t like it. I have also noted that after working on an issue for 7 years, if I have not reached a conclusion about the relative merits of a project after this amount of time, then I couldn’t really call myself a professional.

The EPA determination may spell the end of Pebble, but it still does not protect Bristol Bay fisheries from similar mines, and the State of Alaska is aggressively promoting large scale mining for that area. The “pro-fisheries” groups that oppose the Pebble mine know that they have more work to do to protect fisheries resources in Bristol Bay.

Another interesting recent happening was the failure of the tailings dam at Mt Polley, BC. I have written and spoken extensively for the past several years on what I see as the underestimation for tailings dam failures. The universal response from the mining industry, its consultants, and the regulatory agencies is that a tailings dam failure is not realistic when a reputable engineering company designs a dam which is maintained by a responsible mining company. Well, this is what happened at Mt Polley. In fact, the same company that designed the Mt Polley dam also did a similar dam design for Pebble. Enough said.

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