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State Pipeline Coordinator's Section
550 W 7th Avenue Suite 1100
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Phone: (907) 269-6479 Fax: (907) 269-6880
Submitted via email: spco.records@alaska.gov

Re: Commissioner's Decision to Remand to Division Donlin Pipeline Right of Way lease; additional comments

To Whom It May Concern:

The Alaska Miners Association writes to comment on the Decision on Remand for the right of way (ROW) lease for the gas pipeline for the proposed Donlin Gold project. This follows our original comment letter of March 19, 2019.

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. We are composed of more than 1,400 members that come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Our members include individual prospectors, geologists, engineers, suction dredge miners, small family mines, junior mining companies, major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.

Mines are incredibly energy-intensive operations, requiring significant and stable sources of energy. In its pursuit of mine development, Donlin Gold listened to the region and ultimately proposed a natural gas pipeline as the option that addressed concerns of river traffic from fuel barges. There are some big benefits that come from this proposal. While Donlin will construct the pipeline for mine use, this brings natural gas 300 miles closer to Southwest Alaska, enhancing opportunities for the region to consider accessing this new energy source. This is obviously huge for a region with some of the highest energy costs and highest poverty levels in the State – undoubtedly in the best interest of the State. Donlin Gold has designed a “common carrier” pipeline to carry surplus capacity in the event other user groups evolve, and the draft lease requires Donlin to provide access to these potential future users.

From an environmental perspective, Donlin's pipeline is designed for minimum impact. It will be entirely buried with the exception of two major fault crossings, where it will be placed above ground. The pipeline will require minimal permanent infrastructure and all temporary infrastructure will be reclaimed according to law and the proposed lease stipulations. The State Pipeline Coordinator's Section (SPCS) has appropriately updated its cumulative impacts analysis to meet the requirements of Alaska law; this provides for a complete decision in which the lease should be finalized.

Donlin has been a good neighbor in planning this pipeline. They've worked with the Iditarod Trail and Iron Dog organizations to ensure minimum overlap and conflict with race routes and has determined the pipeline can be constructed with no disruption to the race programs and trails. During the project review under Section 106 of the National Historic Preservation Act, Donlin committed to adding four safety cabins along the trail through the Alaska range when the pipeline is constructed as part of the project mitigation.

Finally, the jobs associated with the construction of this pipeline should not be overlooked. In the 2-3 years of construction, hundreds of new jobs will be available to Alaskans, plus ongoing security and maintenance work.

Finally, AMA would like to acknowledge and thank DNR for its efforts for an inclusive public process which included hearings at key regional hubs (i.e. Tyonek, Skwentna, McGrath, Bethel, Anchorage, and Aniak) of the communities in proximity of the Donlin Gold pipeline ROW lease, and the multiple opportunities for comment along the process.

AMA believes this pipeline will be constructed in accordance with the highest safety, environmental, and social standards and we urge you to approve the right of way lease.

Thank you for the opportunity to comment.

Sincerely,



Deantha Skibinski
Executive Director