

## **TIPS FOR WRITING EFFECTIVE PUBLIC COMMENTS ON THE TULSEQUAH CHIEF HOVERBARGE PROPOSAL**

January 2008

The Alaska Department of Natural Resources (DNR) is reviewing Redcorp Ventures' proposal to service its Tulsequah Chief mine with a combination of hoverbarge, amphitrac and shallow draft tug. As part of this process DNR is conducting an Alaska Coastal Management Program (ACMP) review and is accepting public comments.. DNR has specific guidelines regarding these comments and this memo has tips on writing your comments so that they will receive maximum consideration by DNR.

Comments must identify how the hoverbarge proposal is inconsistent with the ACMP by noting the specific ACMP standard(s) and explaining how the project is inconsistent with the standard(s). Your comments should tell DNR that the hoverbarge proposal is inconsistent with the ACMP Transportation Standard (11AAC 112.280) and Habitat Standard (11AAC 112.300) because:

- Although Redcorp has not provided detailed information on its proposal, there is enough information to raise substantial concerns that the hoverbarge/amphitrac/tug will degrade important fish and wildlife habitats, harm adult and juvenile salmon and eulachon, adversely effect fishermen and boaters, disrupt wildlife feeding and migration patterns and disrupt water flow patterns. Redcorp has not provided information to demonstrate that it can avoid, minimize or mitigate these impacts. Its project description documents and permit applications are full of speculation, unsupported assumptions and conclusions made without data, studies or field experience.
- The Taku River is Southeast Alaska's most productive salmon river and is not the right place to experiment with unproven, new technology. Redfern must provide substantial new hard science and field tests to demonstrate how it will protect Taku salmon, wildlife and their habitats, avoid conflicts with existing user groups and ensure protection of the Taku's sustainable fisheries and water quality.
- Despite specific evidence to the contrary and with no detailed information of their own, Redfern simply assumes there is a continuous deep channel and assumes that the hoverbarge will avoid churning up sediments, disturbing spawning salmon and harming incubating eggs and rearing juvenile salmon. Travel through shallow water and over gravel bars could cause channelization and other habitat damage and disturb juvenile and adult salmon. ADFG states that there is a high potential for channelization on the East Side of Canyon Island and Redcorp provides no studies or data to address this problem
- The barge is likely to churn up sediment in the lower river and to harm spawning eulachon. Redcorp provides no specific data on how this will be avoided.
- Redcorp has not identified key habitats for fish and wildlife.
- Redcorp claims the vessels can safely operate in depths of 3 feet or more without damage to habitat or salmon, but provides no data to support this claim. No data about the effects of wakes, prop wash or downblast from the hoverbarge fans is provided and no channel depth and width data is provided for the area upstream of the Sand Flats.
- There is no specific, tested data on the vessels' maneuverability and guarantees that the vessels can avoid collisions and interference with the commercial gillnet fleet, sport, subsistence and personal use fishermen, recreational boaters and with the ADFG Canyon Island fish wheels. Redcorp claims it will produce a Transportation Communications Plan prior to operation, but such plan should be available for review prior to permitting.

- The hoverbarge is likely to disrupt ice formation and breakup and could disturb wildlife migration and feeding patterns, especially for moose and for marine mammals feeding on the eulachon run.
- Redcorp has provided no specific test results or data to demonstrate that the vessels can safely handle the natural hazards in the Taku of high winds, heavy seas and strong currents.

DNR is also reviewing applications from Redfern for a Title 41 Fish Habitat Permit and a Title 38 Land Use permit. DNR is accepting public comment on the Land Use permit, and, although there is no specific requirement for public process on the Fish Habitat permit, DNR has stated it will accept comments on this permit also. Commenters should state that Redcorp has not met the requirements for either permit due to the reasons mentioned above and in addition because:

- The hoverbarge is likely to result in habitat alterations that could significantly decrease the productivity of the fish and wildlife habitats at risk in the Taku. Redcorp has not provided adequate information to demonstrate that its proposal would not significantly degrade the Taku. Redcorp's permit applications deny that any channelization or bank alterations will occur, but there is clear evidence that this could occur.
- Redcorp has not provided a Spill Response Plan or other details as to how it will avoid releasing toxins such as oil, diesel fuel and cyanide into the Taku. Such a plan must be available for review before any permitting decision is made.
- Redcorp has not shown how it will avoid interference with commercial, sport or subsistence fishing now has it shown with any detail, studies or data that its proposal will not reduce harvestable levels of salmon or moose.
- Redcorp has not provided adequate data on Taku fish and wildlife habitats nor on the depth and width of the Taku River channel.

**Submit comments to DNR. Send a copy to Gov. Palin**

**Tulsequah Chief Project Comments**

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For more information, check out [www.riverswithoutborders.org](http://www.riverswithoutborders.org) for updates and ways to help.

Find DNR information at [www.dnr.state.ak.us/mlw/mining/largemine/tulsequah/index.htm](http://www.dnr.state.ak.us/mlw/mining/largemine/tulsequah/index.htm)