

From: [Marleanna Hall](#)
To: [donlingoldeis_POA](#)
Subject: [EXTERNAL] Donlin Gold Project Draft Environmental Impact Statement
Date: Tuesday, May 31, 2016 3:52:35 PM
Attachments: [RDC Comments-Donlin Gold DEIS.pdf](#)

Good afternoon:

Please find RDC's comments for the Donlin Gold Project Draft Environmental Impact Statement attached.

Thank you,
Marleanna Hall
Executive Director
Resource Development Council for Alaska, Inc.
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Growing Alaska Through Responsible Resource Development

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May 31, 2016

Keith Gordon, Project Manager
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Via email POA.donlingoldeis@usace.army.mil

Re: Donlin Gold Project Draft Environmental Impact Statement

Dear Mr. Gordon:

The Resource Development Council for Alaska, Inc. (RDC) is writing to urge the U.S. Army Corps of Engineers to adopt Alternative 2 of the Donlin Gold Project Draft Environmental Impact Statement (DEIS).

RDC is a statewide business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism, and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

Mining and the Alaskan Economy

RDC knows resource development projects in Alaska can be done responsibly, with a strong focus on protecting the environment, including cultural activities and wildlife, providing well paying jobs, many of which require training and offer a lifetime of opportunity, and improving the long-term economic future for Alaska.

The Alaskan economy is dependent on natural resource development, and will continue to be indefinitely. Article VIII, Section I of the Alaska Constitution mandates "the settlement of Alaska's land and the development of its resources by making them available for maximum use consistent with the public interest," to encourage economic prosperity for Alaska's peoples.

Alaska, and Alaskans alike, depend on the development of natural resources to diversify and support the economy. Further, economic opportunities in rural Alaska are often scarce. The lack of family wage jobs in many regions has resulted in an outmigration of Alaska Natives from the lands their ancestors have lived on for thousands of years.

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Today, the mining industry in Alaska pays an average wage of over \$100,000 per year. Some of these jobs require technical skills and often offer training that can be used for similar or future jobs.

Lands under ANCSA

Under the Alaska Native Claims Settlement Act (ANCSA) the Calista Corporation (Calista) selected the mineral rights at the Donlin Gold project site and The Kuskokwim Corporation (TKC) selected the surface estate, both in efforts to benefit shareholders from the development and production of the mineral resources. This economic opportunity for shareholders and descendants of Calista is precisely the purpose behind Congress' grant of entitlement of these lands to Calista and TKC.

There are many social and economic benefits of this project to the region, state, and to the nation, including:

- Through the ANCSA 7(i) and 7(j) revenue sharing provisions, the Donlin Gold project will provide revenue to all Alaska Native regional and village corporations.
- The jobs and the economic stimulus provided by Donlin Gold would help sustain communities in the Yukon-Kuskokwim (YK) region and fund traditional subsistence activities.
- Rural Alaska is being impacted most by the reduction of state and federal dollars. Alternative 1 (the no project alternative) will likely have a negative impact on the YK region, as it would be a missed economic opportunity for both the region and Alaska to halt the Donlin Gold project.
 - As noted earlier, the mining industry in Alaska pays an average wage of over \$100,000 per year.
 - Due to the low price of oil and the decreased oil production in Alaska (until recently, North Slope oil production saw an annual decline of seven percent), state government is expected to reduce funding to communities across the state.
- The potential for lower cost energy options to the region such as the proposed natural gas pipeline which will have excess capacity should there be an interest in accessing natural gas to address the energy needs of the YK region.

Project Employment Projections

An estimated 3,000 jobs will be created during the approximate four-year construction phase, and up to 1,200 jobs for the estimated mine life of 27.5 years. These jobs will have a significant and positive impact on the local economy and the state, especially in a region that experiences some of the highest unemployment rates. This will likely lead to reduced out-migration, helping to maintain rural schools and culture, including a traditional way of life in the YK region.

Through the exploration stages, Donlin has shown a strong commitment to local hire and for supporting communities and cultures in the region. A project like this truly is a rare opportunity to improve the local economy where few, if any, other opportunities exist.

If developed, RDC believes the mine will be done in a way that creates opportunity for local employment and economic growth, while protecting the subsistence resources and culture of the region, and coexisting with the environment.

Alaska's Rigorous Permitting Process

Alaska has a rigorous permitting process that has already permitted the five large mines under the review of NEPA and the scientifically-based process which includes over 60 major state and federal permits and authorizations. Alaska's existing mines are operating to the highest standards and in harmony with our renewable resources. The Donlin Gold project description demonstrates an understanding of environmental concerns, a strong working relationship with members of the local communities, and features vigorous environmental management principles.

Conclusion

RDC appreciates the opportunity to comment in strong support of Alternative 2 of the Donlin Gold Project Draft Environmental Impact Statement, and looks forward to further participating in the public process for this important project.

Sincerely,



Marleanna Hall
Executive Director