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**To:** [donlingoldeis, POA](#)  
**Subject:** [EXTERNAL] Donlin Gold Draft EIS comment  
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To the USACE:

We support, and are in favor of this development/project for the Region and the State of Alaska. Please find the following items that we would like to be added to the public review process in support of Donlin Gold and the planned development.

### **Environmentally Responsible Development**

- Donlin Gold has conducted extensive studies to develop an environmentally and socially responsible gold mine project.
- The Donlin Gold project was designed to reduce the overall footprint of the mine and allow for safe management of water over the mine life and post closure.
- The natural gas pipeline proposal is a result of conversations with the region about reducing the amount of diesel barges on the Kuskokwim River. The use of natural gas for power generation, instead of diesel, will also reduce air emissions.
- Donlin Gold will be the first large mine in Alaska to use a synthetic liner underneath its entire tailings impoundment. Additionally, dry closure of the tailings storage facility at the end of the mine's life is a "best practice" Donlin Gold is proposing to ensure an environmentally responsible mining project.
- The tailings dam will be constructed of engineered rock fill and use a downstream construction method that is the most stable of all tailings dam types, designed for water storage and to withstand earthquakes.
- Donlin Gold will employ state of the art mercury emissions controls. To ensure the mercury emissions are well below air quality standards.
- Donlin Gold will construct an active water treatment plant to ensure that water that is discharged from the site is treated to meet water quality standards.

### **Job Opportunities and Economic Stimulant**

- Improved transportation and communications infrastructure to support the mine, including port and pipeline facilities, can provide better services and lower cost of energy, goods and services to local residents.
- More than \$480 million has been spent on exploration of the property, engineering and environmental studies, camp support, flight services, fuel and other supplies, with most of that expended in the last 10 years
- The job skills and training received while working at the mine will prepare the workforce for future work opportunities, creating a value that extends beyond the life of the mine.
- Donlin Gold will support organizations that offer job skill training for a prepared workforce.
- 3,000 construction jobs for 4 years and between 600 and 1,200 jobs for the 27.5 estimated life of the mine, will have a significant and positive impact on the economy of the region and the state.
- In addition to direct employment and contracting opportunities associated with Donlin Gold, many indirect business opportunities are anticipated in areas such as logistics, transportation, training, education and health care.

### **Rights and Goals of Calista and TKC**

- The land and resources belong to the shareholders of TKC and Calista. It is TKC's and Calista's right and duty to support development of their natural resources for the benefit of

the people of the region.

- Calista selected the mineral rights at Donlin Gold, and TKC selected the surface estate during the Alaska Natives Claims Settlement Act (ANCSA), so their shareholders would benefit from the development and production of the mine. This economic opportunity for shareholders and descendants is precisely the purpose behind Congress' grant of entitlement of these lands to Calista and TKC.
- As ANCSA corporations, Calista and TKC have two primary goals: generate profit for the corporation and its shareholders and provide other socio-economic opportunities and benefits to shareholders and their descendants. The Donlin Gold project will assist Calista and TKC in meeting these goals.
- The ANCSA corporations recognize the importance of subsistence lifestyle and the possibility of achieving unity and managing the land for both modern and traditional uses.

### **Benefits to the Region and Alaska Natives**

- 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 and their shareholders.
- The jobs and the economic stimulus provided by Donlin Gold would help sustain communities in the 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) would have a negative impact on the YK region.
- New, high-paying jobs will allow more residents to remain in the YK region and finance the purchase of supplies needed to maintain their traditional way of life for generations to come.
- With a local hire record of up to 90% at their camp during exploration, Donlin Gold has proven their commitment to hiring local residents.
- By reducing turnover rate from over 300% to 5% during the exploration phase, Donlin Gold has demonstrated their commitment to retaining qualified employees.
- The proposed natural gas pipeline will have excess capacity should there be an interest in accessing natural gas to address the energy needs of the YKI region.
- Donlin Gold's continued presence in the region over the past two decades, and the partnerships developed between the company and Alaska Native Corporations and with local communities, represent tremendous opportunities for shareholders and the broader YK community.

### **Transparent Operations**

- Donlin Gold has a proven record of discussing the project's plans with the people of the region and listening to what they have to say about the region and the proposed project, including meetings and materials in the Yup'ik language.
- Donlin Gold is committed to developing a project consistent with the values of the Yup'ik and Athabascan cultures of the region.

Thank you,

**DANIEL.ESPARZA**

President

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“22 CFR Part 125.4 (b) (9) applicable.”