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Subject: [EXTERNAL] Donlin Gold Draft EIS comment
Date: Tuesday, May 31, 2016 11:26:48 AM

TO WHOM IT MAY CONCERN:

Section 12(B) of PL 92-203, otherwise known as the Alaska Native Claims Settlement Act of December 18, 1971 (ANCSA), mandated the village corporations to select their first round land selections on or before December 18, 1974. Accordingly the Crooked Creek's ANCSA Corporation, after due liberation by its Land Selection Committee elected to select the area now known as Donlin Creek gold prospect. The Land Selection Committee discussed, among other things, the possibility of the development of the gold prospect whether or not they select the area where Donlin Creek gold prospect is. They wondered if this area was developed, would it be developed just like NYAC mined the mine down river from the village. How do I know this? During the implementation of Section 12 of ANCSA, I served as Deputy Director of the Land Department of Calista Corporation. One of my key responsibilities was to assist the village corporations located within the Calista Region to fully select their allotted ANCSA land entitlements based on their enrolled number of shareholders; I worked closely with the land selection committee of Crooked Creek during the last three months of 1974 leading to December 18, 1974 village land selection deadline.

The Land Selection Committee of Crooked Creek, in the end, elected to select the area where the Donlin Creek gold prospect is located. The committee concluded that if this area was going to be mined, among other things,

1. they would have a better opportunity and stronger voice on how this prospect is developed,
2. how this would create meaningful employment opportunities for the people of Crooked Creek, the people of Upper Kuskokwim and the Calista/AVCP region as a whole,
3. employees of the mine, if the area is developed, would have an opportunity to earn meaningful salaries for the employees.

Among the concerns raised was the potential of environmental harm to the area where Donlin Creek is now located. This is a valid concern and must be considered by the developers of the mine.

There are lessons that the developers of this mine must take into consideration. Lessons learned by the developers of Red Dog Mine must be studied by the developers of the Donlin Creek potential. Some of the lessons that must be taken into consideration include but are

not limited to:

1. The developers of the mine must have an outreach program to the people living in Crooked Creek, upper Kuskokwim and the Calista/AVCP region to attract potential employees living in these areas. The shareholders and the descendants of the Calista Corporation and The Kuskokwim Corporation must be given preferential treatment over all other potential employees when it comes to employment opportunities at Donlin Creek. The Calista/AVCP/The Kuskokwim regions have the greatest number of unemployment in the State of Alaska, perhaps in the United States of America. Giving preferential treatment for the people of the region over all other potential employees when it comes to employment opportunities at Donlin Creek will greatly improve this situation.
2. The developers of the mine must pay the employees, and in particular, the Alaska Native employees of the region with high enough wages such that their lives and living conditions will improve. To wit, pay the employees with high wages that will attract people of the region so that they will pursue employment opportunities at the mine.
3. The developers of the mine must consider and implement training opportunities for its employees so that upward movement for its employees will exist; to wit, be promoted upwards into managerial positions from lower positions.
4. One of the greatest lessons from the Red Dog Mine that Donlin must consider is that the Alaska Natives have customarily and traditionally are subsistence fishing and hunting people. During the early days of Red Dog Mine, the managers of the mine noted that during certain times of the year, the Alaska Native employees of the mine were either gone or a large percentage of them asking for leave about the same time during the year. Unfortunately, this, to my limited understanding, led to some of these people being laid off for their absences. The Red Dog Mine managers eventually learned that subsistence hunting and fishing was so important to the Native people of the NANA region that they began to take into consideration this aspect of the Alaska Natives. I learned this while I served as an employee of the Alaska Federation of Natives. Donlin must also take into consideration.

My comments are limited to potential positive opportunities that Donlin Creek will have for the people of Crooked Creek, The Kuskokwim Corporation and the Calista/AVCP region. It is likely that others may have addressed reasons why the mine should not be developed because of the potential negative impacts for the region. This is fine, however, the potential positive impacts of the mine development must also be given and taken into consideration as this project moves forward.

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