



April 20, 2016



Mr. Keith Gordon, Project Manager
U.S. Army Corps of Engineers, Alaska District
CEPOA-RD-Gordon, P.O. Box 6898
JBER, AK, 99506-0898

RE: Comments on Donlin Gold Project Draft Environmental Impact Statement

Dear Mr. Gordon:

Bering Straits Native Corporation (BSNC) appreciates the opportunity to provide input into and comments on the Draft Environmental Impact Statement (DEIS) for the Donlin Gold project. As President & CEO of BSNC, I worked with NOVAGOLD RESOURCES (NOVAGOLD) as the company explored, began development of, and ultimately closed the Rock Creek project outside Nome, Alaska. The relationship between BSNC and NOVAGOLD grew to be a strong relationship, with the company consistently fulfilling its commitments to BSNC. I believe that NOVAGOLD will act in good faith in its future dealings with the indigenous population in the Calista region, as they consistently demonstrated great respect for our culture and ways of life when we engaged with them on issues of concern to BSNC and its shareholders.

Once NOVAGOLD definitively decided not to advance the Rock Creek project in 2010, the company entered into negotiations with BSNC for the sale of the project. In addition, NOVAGOLD worked with BSNC and the Sitnasauk Native Corporation, owner of most of the surface lands at the project, to develop a revised closure plan for the project. The two-phase plan was submitted to and approved by the Alaska Department of Natural Resources (ADNR).

At its sole expense, NOVAGOLD completed Phase 1 of the plan, which involved eliminating all sources of contact water at the mine site that would require active water treatment prior to discharge and removing all remaining hazardous chemicals and fuel. The Phase 1 closure activities were completed to the full satisfaction of ADNR in October 2012 and all Phase 1 financial assurance was released. Upon completion of the Phase 1 reclamation, NOVAGOLD sold the Rock Creek project to BSNC and transferred all of the remaining financial assurance that the company had provided to ADNR to ensure completion of final closure. Through a number of consultants with mining expertise, BSNC fully explored a variety of opportunities to restart the Rock Creek project. Ultimately, BSNC decided to implement Phase 2 of the closure plan, which was completed in 2015 and fully accepted by ADNR.

Even though the Rock Creek project did not succeed as a mine, the operation did not cause environmental damage, and NOVAGOLD fulfilled all of its obligations to the State and BSNC.



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Since acquiring the land and other assets of the Rock Creek project, BSNC has completed several related transactions, including land exchanges and equipment sales that have benefitted BSNC and its shareholders.

Based on my experience with NOVAGOLD, I am confident that NOVAGOLD's participation in the Donlin Gold project will benefit the Calista Corporation (Calista), The Kuskokwim Corporation, as well as their respective shareholders, descendants and non-Native residents of the region. I believe that the project will bring much needed economic development to the Calista region, and important economic benefits to Alaska Native people throughout the State because of the Section 7(i) clause of the Alaska Native Claims Settlement Act (ANCSA). Seventy percent of the project royalties received by Calista for mining on their land will be shared with the other regional corporations, including BSNC, because of the Section 7(i) provision. These benefits will help us achieve our mission of "improving the quality of life of our people through economic development while protecting our land and preserving our culture and heritage." I urge the USACE to emphasize these state-wide benefits to Alaska Native people and the shareholders, descendants, and non-Native residents of the Calista region in the FEIS, and give them important consideration in its Record of Decision.

I commend and respect NOVAGOLD for its integrity in honoring its commitments and for its appreciation for and support of Alaska Native Corporations through its fair and transparent business dealings with BSNC. I encourage the federal and state agencies to approve the permits necessary to construct and operate the Donlin Gold project. I strongly believe that it can be developed in an environmentally and socially responsible manner, while providing meaningful economic, employment, training, and self-determination opportunities for Alaska Native and non-Native people throughout the State.

Quyaana,

A handwritten signature in blue ink, appearing to read "Gail R. Schubert", is written over a faint, larger version of the same signature.

Gail R. Schubert
President & CEO



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