

From: [Craig, Bill](#)
To: [Bellion, Tara](#); [Evans, Jessica](#)
Subject: FW: [EXTERNAL] Donlin Gold Draft EIS comment
Date: Wednesday, March 30, 2016 10:22:10 AM
Attachments: [Donlin Mine EIS Comments srb.pdf](#)

-----Original Message-----

From: donlingoldeis, POA [<mailto:POA.donlingoldeis@usace.army.mil>]
Sent: Wednesday, March 30, 2016 6:21 AM
To: Craig, Bill
Subject: FW: [EXTERNAL] Donlin Gold Draft EIS comment

-----Original Message-----

From: Sam Brice [<mailto:samrobert@me.com>]
Sent: Tuesday, March 22, 2016 12:36 PM
To: donlingoldeis, POA <POA.donlingoldeis@usace.army.mil>
Subject: [EXTERNAL] Donlin Gold Draft EIS comment

Please find my comments regarding the Donlin Gold Draft EIS, attached.

Thank you,

Sam Robert Brice

Fairbanks, AK

Sam Robert Brice
504 Bennington Drive
P.O. Box 84822
Fairbanks, AK 99708

March 22nd, 2016

Ref: Comments regarding the Donlin Mine Draft EIS

To Whom It May Concern:

I am submitting these comments regarding the Donlin Gold Mine Draft EIS currently out for public comment. I'm a lifelong Alaskan of 52 years born in Fairbanks, AK and continue to live there. I have spent my entire working career involved with civil infrastructure related construction projects throughout rural Alaska. The work has required our company (Brice Incorporated) to own and operate numerous tug / barge and landing craft vessels for more than 40 years to transport construction equipment and materials on Alaska's Rivers and Coastal waterways, including the Kuskokwim River. Because of this significant time and experience gained working in rural Alaska, I understand the challenges rural Alaskans face balancing traditional subsistence activities and the economics of living there. Simply put, there are not many "good" jobs available to support the high cost of living in the rural communities. Donlin Mine presents such an opportunity. Additionally, because of the numerous items listed below, the project should be viewed favorably and the construction alternative selected:

Barging Issues

Our Companies face numerous challenges each year during the compressed barging season in western and northern Alaska supporting our jobs. Some of the most common include:

- Working with communities on mutually agreeable operational windows and schedules to minimize impacts to subsistence and commercial activities; fishing, hunting, migration schedules, etc.
- Adverse weather creating potentially hazardous impacts to operations – low water conditions, high water conditions, rough water conditions, changing channels due to scour and / or erosion, etc.
- Navigating shallow and / or narrow waterways to access work locations.

Donlin Gold would implement guidelines for barge operations to minimize the potential for impacts.

Minimally this includes measures as follows:

- Adjusting loads based on water level of river to avoid risk of grounding.
- Establishing navigational aids and procedures for operating in narrow channels.
- Barges would use state-of-the-art navigation and communication equipment.
- Implementing a communication program to keep local communities informed of barge schedules and status.

Barging comments in reference to the EIS

- The increase in barge traffic is unreasonably characterized in the EIS. The EIS focuses on a percentage increase of barge traffic while placing little context on the rest of boat activity on the Kuskokwim River. The level of existing barge traffic (less than 1 per day [0.6]) would increase to less than two per day (1.7 barges per day during operations). The EIS does little to put this in

context with the 100 to 200+ boats that could be encountered on any given summer day on the Kuskokwim River.

- The inclusion of Dutch Harbor in the impact assessment is unnecessary and speculative. Whether or not a third-party may require additional diesel storage simply extends the area of project influence beyond that required by NEPA.
- Barges have been running on the river for decades with little impact.
- Most erosion or scouring is a natural occurrence that takes place during spring break-up and high water events. Any additional impact from a couple barges per day is inconsequential in comparison.

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 in the region.
- 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 local and statewide organizations that offer job skill training for a prepared workforce.
- 3,000 construction jobs for 4 years to construct the mine and between 600 and 1,200 jobs for the 27.5 estimated life of the mine, will create significant positive impacts 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.

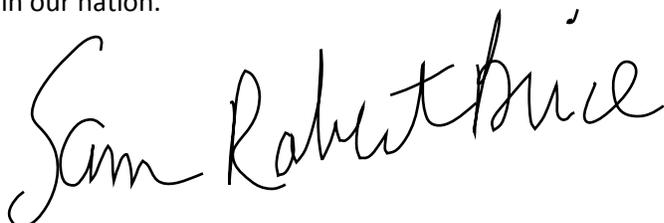
Benefits to the Region and Alaska Natives

- 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.
- The proposed natural gas pipeline will have excess capacity should there be an interest in accessing economical, clean burning natural gas to address the energy needs of the YK region.
- Donlin Gold's continued presence in the region over the past two decades, and the partnerships developed between the company, Alaska Native Corporations and 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 for the opportunity to submit the above comments regarding this extraordinary opportunity for the Lower Yukon-Kuskokwim Region of our State, one of the most economically challenged regions in our nation.

A handwritten signature in black ink that reads "Sam Robert Bruce". The signature is written in a cursive, flowing style.