

From: [George Owletuck](#)
To: [donlingoldeis, POA](#)
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Subject: [EXTERNAL] Donlin Gold Draft EIS comment
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[Donlin Creek comment Letter Owletuck.pdf](#)

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"22 CFR Part 125.4 (b) (9) applicable."

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May 31, 2016

Keith Gordon, Regulatory Division
Alaska District
CEPOA-RD-Gordon
P.O. Box 6898
JBER, AK 99506-0898

Dear Mr. Gordon,

Thank you for extending opportunity to submit comments on the Draft Environmental Impact Statement for the Donlin Creek mining project. My name is George Owletuck, from Marshall, AK on the lower Yukon River. I have been on the Board of Directors for the Marshall Village Corporation—Maserculiq, Inc.—an Alaska Native Corporation under the Alaska Native Claims Settlement Act, (ANCSA) 1993-2000, and 2001 to 2016. As a board member, it is my duty to facilitate economic development and job opportunity for shareholders. I was born in Bethel and raised in subsistence lifeways hunting, fishing and gathering at Marshall, AK—this commentary is presented as an individual from the region.

The Donlin Gold project would bring \$100 million dollars in payroll a year to our region, employing up to 3,000 local residents. Those dollars would contribute to our subsistence lifestyle by allowing us to buy boats and motors to access the fish and game. Additionally, the employment will provide opportunity for participation in private health insurance, significantly reducing the burden on the Indian Health Service at the Yukon-Kuskokwim Health Corporation in Bethel. Private health insurance will provide up to 3,000 local residents opportunity to seek health care from private health care providers in Anchorage.

The construction of a natural gas pipeline to Donlin Creek could be extended to add critical energy infrastructure to the region. A cost-benefit analysis should be conducted to extend this base infrastructure to the proposed Birch Tree Crossing Port—or Aniak—on the Kuskokwim River and be evaluated as a potential site for mega-wattage electric power generation using electric inter-ties and as a potential site to produce LNG for distribution to the region.

Local LNG production will reduce Diesel Barging with the use of LNG-Powered Haul Trucks, which would reduce impacts to fish and subsistence fishing in narrow reaches of the Kuskokwim River. Local Traditional Knowledge is the best source for unbiased, authoritative expertise in the analysis of subsistence impacts by this project. Any assertions about potential impacts to subsistence should

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originate from the people who live in the region, not urban agencies with conclusions about subsistence impacts unsubstantiated by baseline data. Any subsistence analysis on ANCSA land under Section 810 of ANILCA should be done by the land owners, not by US Bureau of Land Management bureaucrats who have provided biased analysis that grossly overstates the proposed projects' impacts on subsistence. The Draft EIS completed by the Corps of Engineers better reflects the potential impacts of the project. However, no one understands the importance of subsistence and the economic benefit of this project better than the people who live in—and are from—the region.

Annual Airport Operations at the Mine Airstrip are estimated at 5,154 total annual flight operations for the construction phase and 1,718 flight operations for the Operations phase. These flight operations should be viewed as an opportunity for partnership with the Yuut Yaqungviat flight school in Bethel, AK to recruit, train and hire local residents to begin careers in aviation.

The Donlin Creek ore-body is estimated to produce 34 million ounces of gold over 25 years valued at \$40.14 Billion at a \$1,216.5/oz spot-price for gold on May 2016. Industry, the State of Alaska and the federal government should consider using public-private partnerships to underwrite the existing lack of infrastructure in the region for low-cost energy. Federal/State legislation should be introduced to provide for industry tax-credits and other incentives to extend the gas pipeline beyond the Birch Tree Creek Port site, and to underwrite sub-regional mega wattage electrical power plants to serve multiple villages using high-power electric interties.

I support Alternative B and expect that the Donlin Creek mine will be developed safely and the jobs created will greatly under-write our region's subsistence culture. Finally, it is noted with gratitude the efforts of the US Army Corps to provide transparency and engage the public on commentary for the Donlin Gold Project Draft Environmental Impact Statement.

Thank you for the opportunity to comment.

Respectfully,



George Owletuck