

From: [Jason Brune](#)
To: [Gordon, Keith POA](#); m1spence@blm.gov; [donlingoldeis, POA](#)
Subject: [EXTERNAL] CIRI Comments on Donlin EIS
Date: Saturday, May 28, 2016 9:29:59 AM
Attachments: [CIRI Donlin EIS Comments.pdf](#)

Dear Mr. Gordon and Mr. Spencer,

Please find CIRI's comments on the Donlin EIS attached, submitted both to the COE for the EIS and the BLM for the 810 analysis. Thank you for the opportunity to submit comments.

Jason Brune
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Cook Inlet Region, Inc. [CIRI](#)
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May 28, 2016

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

Dear Mr. Gordon:

Cook Inlet Region Inc. (CIRI) appreciates the opportunity to provide comments in support of Donlin Gold's (Donlin) proposed project as outlined in Alternative 2. CIRI is an Alaska Native Regional Corporation formed under the Alaska Native Claims Settlement Act (ANCSA) and one of the largest private landowners in Southcentral Alaska, with more than 1.3 million acres of subsurface estate and similar surface estate split between CIRI and its 7 village corporations.

The proposed 315-mile long, 14-inch diameter pipeline will cross CIRI lands for approximately 7 miles. Donlin worked closely with CIRI to identify potential options and we support the route selected. We do not feel there will be any conflicts with subsistence users in the region arising from the pipeline's construction or use of the Farewell airstrip. Along with a stable source of energy for the Donlin project, CIRI supports the potential this pipeline has to provide energy for local communities and other development opportunities along the pipeline corridor in the future. In addition, Donlin will provide a market for Cook Inlet natural gas which will help lure more exploration investment, including to CIRI land.

While we are supportive of a natural gas pipeline to energize this project, we have concerns with the alternative that suggests building a diesel pipeline. We also have concerns that many of the non-project proponent alternatives, if adopted, are not only technologically impossible, but they do not consider the financial implications and may lead to the project not being constructed. The agencies should give special care to make sure proposed alternatives are actually realistic.

When approved, the Donlin gold mine will provide thousands of well-paying jobs in a region that possesses some of the highest unemployment rates in the state. These economic opportunities can help revive rural communities and ultimately preserve cultures. The economic benefits of Donlin will not be limited to Southwest Alaska. In fact, Donlin's effects will be felt statewide. Located on Calista land, Donlin will ultimately benefit not only Calista and its shareholders, but all of the other ANCSA regional and village corporations and their shareholders as well, including CIRI, through 7i/7j distributions.

This type of project is ultimately what ANCSA envisioned and CIRI recognizes both Calista's and the Kuskokwim Corporation's support for the project as the land owners. We appreciate that Donlin has worked with them, and us, to ensure subsistence resources and the subsistence way of life along the proposed project footprint are not only considered, but likely enhanced. Subsistence is not free. We recognize that by providing economic opportunities and jobs for shareholders and residents of the region, subsistence opportunities will be maintained and Alaska Native cultures will ultimately be preserved. To that end, the no build alternative that is envisioned in this EIS will have a major effect on the region, leading to fewer jobs in the area, out-migration of people, and ultimately Alaska Native cultures that could disappear. This alternative is unacceptable.



In conclusion, CIRI enthusiastically supports Donlin's plans outlined in Alternative 2 and we urge the Corps of Engineers and the coordinating agencies to expeditiously approve this project. In addition to our comments, we would like to endorse the comments submitted by the ANCSA Resource Managers group as well as the ANCSA Regional Association. Thank you for the opportunity to submit comments.

Sincerely,
COOK INLET REGION, INC.

A handwritten signature in blue ink, which appears to read "Jason W. Brune".

Jason W. Brune
Senior Director, Land & Resources

cc: Mark Spencer, BLM, ANILCA Section 810 Subsistence Impact Analysis Coordinator