

## DonlinGold EIS – BLM ANILCA Section 804 Analysis

Good afternoon, my name is Willie Kasayulie from Akiachak, Alaska and I serve on local tribal council for Akiachak Native Community and village corporation for Akiachak Limited. I will also disclose that I serve on the Board of Director for Calista Corporation.

During the implementation of ANCSA land selection process for Akiachak Limited, we worked with local elders to identify lands that would best provide access and availability to subsistence resources within a limited 115,000 acres allotted for selection under ANCSA based on the number of shareholders that were eligible for enrollment in 1970's.

Despite the restricted allotted lands, the Elders stated that our access to subsistence resources goes beyond the 115,000 acres Akiachak Limited owns. In fact the whole Calista region was the bread basket for the indigenous peoples that called the region home. Subsistence took place on land and waters where resources were accessible. In most cases lands adjacent to rivers, creeks and shorelands in the coast were used. Winter access to lands allowed our people to conduct subsistence activities away from the waterways.

With limited cash availability, family and close relatives would pool their financial resources to conduct subsistence activities. Which is true today too. The high cost of doing subsistence activities require a great deal of financial resources today. It means that individuals must have jobs to purchase hunting licenses, ammunition, food and fuel for their hunts. It means that any hunter will need to hunt until they are successful.

In all that we do to conduct subsistence activities, there are always risks and we are fully aware of the consequences long before westernized forms of utensils we use for granted today became available.

The Alaska Native and the American Indian are the most regulated people in the world by the federal and state governments. Even today, our own people from different subregions require us from the lower river to purchase access fees to hunt in their selected lands. Without access permit, we can't go above the high water mark to hunt as we have done so a mere 45 years ago.

We reject the assertion in the 804 analysis that there could be significant restrictions to subsistence, and we are offended that BLM contends they know more about subsistence than we do. In fact the 804 analysis seems to be more of a "scare" tactic. It makes us wonder who the BLM's expert was, and if local residents were contacted, because the analysis is more opinionated rather than substantive in content.

The 804 analysis was also conducted on State and ANCSA lands. I would like to see authorization of documents from the State of Alaska. I know that Calista Corporation Board of Directors have not approved such documents from BLM to conduct 804 Analysis on the corporate lands. BLM as a federal agency is responsible for federal lands. The law was intended to truly analyze subsistence related impacts of development on federal lands.

Many of us has seen wildlife roaming at oil fields in North Slope and along the Trans- Alaska Pipeline. If there were to be impacts on the subsistence resources along the TAP and oil fields, they would not be visible. I anticipate the same to occur on the pipeline ROW for the big game animals to browse.

There seems to be a lot of misleading statements in the 804 analysis and scare tactics used by BLM's "expert". We all know that any village organization, including mining operations, would have to adhere to NEPA and Clean Water Act for discharge of any water waste. The analysis seems to be leading as if discharge of water is already impacting the fish we depend upon, which is misleading. Water quality standards are developed to protect the uses of the State's waters, including fish and aquatic life.

Some parts of the region are easily accessible by urban hunters. There are costs associated with these areas and our people rarely, if not at all, hunt these areas. These areas have hunting conflict and pressure already existing due to influx of urban trophy hunters and it has nothing to do with subsistence and impact of Donlin project is nonexistent. The Farewell area would be best addressed by the State of Alaska by providing appropriate oversight of hunting .

Our preference for development is for minimal impact to the land and its renewable resources. It would seem BLM should have followed this guideline. We are opposed to a diesel pipeline because it would result in a substantial footprint with more requirements for maintenance. Alternative 3B is not favored since diesel power generation would result in more greenhouse emissions.

We expect any impacts to subsistence from the development of our land to be minimal. We appreciate the efforts of Donlin Gold to develop a project that is sensitive to the subsistence needs of our region. Being able to continue subsistence activities is a big concern because of increased cost of fuel and supplies in our area. Jobs at the mine will allow our shareholders and their families to have the time and financial resources to practice subsistence.

Finally, as Calista Corporation, we request a consultation with Department of the Interior and its' agencies to take place, as required by federal law and Executive Orders, in the very near future.