

## Smith, Neal

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**From:** mark leary <napaimute@gci.net>  
**Sent:** Wednesday, April 27, 2016 8:49 AM  
**To:** donlingoldeis, POA  
**Subject:** [EXTERNAL] Donlin Gold Draft EIS comment

To Whom It May Concern:

This is the first part of a two part statement the Native Village of Napaimute will be submitting. This part is based on long term observations of the changes in the region, our concern over the current direction we are heading and our vision for a better future for our young People.

Part two will be more science based and address in more detail some specific environmental concerns we have regarding the Project.

### **Part 1:**

We have been involved with the development of the Donlin Creek Project since its inception all those years ago. Throughout this long process we have strived to maintain a balanced view point on all of the issues surrounding this potential large-scale natural resource development coming to our region. We have made trips to open-pit mines both at our own expense and at the invitation of Donlin's developers. We have attended dozens of Donlin-related meetings throughout the years and visited the Project Site several times.

***Nobody ever mentions that there is already a large open-pit gold mine operating in Alaska, on a tributary of the Chena River which flows right through Alaska's second largest city – Fairbanks, which flows into the Tanana, which flows into the mighty Yukon. The Fort Knox mine has safely operated for two decades and is barely noticeable. We understand that there are significant differences between Ft. Knox and what a Donlin Creek open pit mine would be, but still it demonstrates how large scale resource development can be done with little or no noticeable impact to the environment at this time.***

After years of involvement with the development of the Donlin Project, with the public release of the Donlin EIS it is has been some what frustrating to watch all the “Johnny-Come-Latelys” jump on the band wagon in opposition to the Project. Many of them have no true understanding of the issues – especially the environmental ones.

Much of the most vocal & eloquent opposition comes in fact from relatively wealthy people with good jobs and fine homes with very limited experience in the region beyond their residences in Bethel..

Many of them have no vision for our future – the future of the region.

They have no understanding of what it's like to be a twenty-something young man living in a village in the middle of winter with little to no opportunity for anything except a dope pipe or a bottle of R & R whiskey. No jobs, no money for gas and good equipment to go out hunting or trapping. The illegal sale of alcohol and drugs is probably the second biggest factor in the quasi-economy of our region after government spending.

**Where is our region going to be in 20 years or 50 years without some true economic development?**

Our population is growing at third world country levels. Over half of our People are under the age of 25 and this percentage is growing. We have people in their 30's that are grandparents already! What are we going to have for all these young People?

More over-capacity prisons, more over-flowing cemeteries?

People have been complaining about their subsistence way of life being threatened by the development of Donlin Creek. Let me tell you that in a lifetime of traveling up and down this River and as person that still travels up and down it more than most – the country is empty. Especially the Middle and Upper Kuskokwim – the part of our region that would be most effected by the development of Donlin Creek.

There is no one out there anymore – not on an extended basis like they used to. There is still a lot of subsistence activity going on but most of it consists of short day trips close to home. The modes of transportation, tools, and equipment we have in these modern times has made subsistence hunting, fishing, and gathering so much easier. Oh, but they also take more money! And once you've completed your seasonal rounds of subsistence activities with vastly more effectiveness and efficiency than it took in traditional times - what do you do with all that spare time?

What are our young People going to have without some major economic development? Not everyone can work for YKHC, AVCP, or the school districts. And they'll have no money to go hunting, fishing, trapping, or gathering. So they continue to rely increasingly on public assistance programs. Public assistance is becoming an integral part of our Region's culture. It is also an enabler/enhancer of our more negative social aspects: unwed mothers becoming pregnant over and over again so they can get more assistance, fathers with no responsibility, free money for alcohol and drugs (yes people have figured out how to use public assistance for this), significant health problems and obesity from all the junk food that is bought with public assistance money, high crime, suicide, the list goes on and on.

**But if you ask any young person along the River today what they want most. Their answer isn't subsistence.**

**It's a JOB! Give a young person a job – an opportunity – and you change their life.**

With opportunity, a young person can be even more true Native – independent, self-sufficient, have more pride and self-esteem, be more of a Nukalpiaq (good hunter/provider) – the very core of our culture in this region.

Instead of being poor and dependent on government support. The definition of being Native is becoming more and more confused with the definition of poverty.

We may not want Donlin Creek but we need it. We can't go on like this – all we're doing is creating a big ghetto with millions of acres of empty unused country around it.

Allow for the development of just a few thousand acres to bring economic benefit to the greater Region – there will still be vast areas of untouched land and water that can be enjoyed by the People as they hunt, gather, and fish for food while at the same time having the economic means to do it even more effectively. And there will still be vast areas of land and water that will NEVER feel the impacts (negative or positive) of an open pit mine on a small tributary of the Middle Kuskokwim. Some People who live hundreds of miles from

Donlin talk like everything about their lives will be ruined. We bet they won't even notice a thing much like the People living along the Yukon aren't even aware of the Ft. Knox mine far away on a distant tributary.

Regarding the specific issues covered in the Draft EIS:

**Barge traffic:** not an issue. Our administrator grew up on barges on the Kuskokwim River and was a captain for 10 years. The River is a big place. A couple of barges a day is nothing. People forget the immense amount of barge traffic we had in the 1980's when the State was flush with oil money and splashed it all over our region paying for the construction of new schools, multi-purpose buildings, clinics, fire stations, and just about any other thing a community asked for. In addition to the greater volume of freight/fuel barge traffic there was also a viable commercial fishery going on in the 1980's that included significant large vessel traffic – especially in the Lower River. With several fish processors operating in Bethel and 800 commercial fisherman there was a lot of large vessel activity on the River. Somewhere we have a picture of 14 freight barges, large fish processing ships, Japanese tramp steamers, and assorted tenders lined up in front of Bethel at one time. There was also a constant stream of barges hauling gravel from the middle to lower Kuskokwim. Up until recently every rock on every road, runway, and building foundation pad in the lower River came down by barge from the Kalskag- Aniak area. Sometimes these barges were drafting as much as 10 feet!

The best thing though would be the implementation of those LNG trucks – just a better alternative in so many ways – including reduced barge traffic – since the public perception is that this a big issue in this Donlin EIS process.

**The Port Site:** We've always favored the Birch Tree Crossing Alternative for several reasons.

1. The River from Birch Tree downstream to Bethel is relatively easy for barges to navigate at just about any River level. Upstream of Birch Tree there are several tricky spots which have more potential for barging problems.
2. The other reason we've favored Birch Tree is because in almost any year you can have a safe, reliable ice road from Bethel to Birch Tree. Even in a mild winter like the one we're experiencing now you get 60-90 days of ice road trucking – this could be an important transportation alternative if summer River conditions are extreme and limiting. A safe, maintained ice road would also bring great economic/social benefit to the People of the region.
3. We also like the idea of the 80 mile road from Birch Tree to Donlin – the first major road in our region that could be a real asset when the mine closes. The road would also open up other mineralized areas for development and perhaps even provide a transportation connection to the Yukon River someday.
4. The road might also have the potential to serve as the route for any extension of the natural gas pipeline to the rest of the region.

**Dry Stack Tailings** – we prefer this alternative. Any process that further reduces the amount of water that needs to be monitored and treated “in perpetuity” and reduces risk to the watershed has to be a good thing.

**Natural Gas Pipeline** – not an issue – already a well established practice throughout the world – including Alaska – with the added benefit of the potential to extend and supply natural gas to the lower Kuskokwim and beyond.

**Air Quality** – mercury emissions have been one of our greater environmental concerns, it seems to have been addressed, but those entities responsible for issuing permits for the Project must ensure that it is.

**Hazardous Materials and Waste Management:** the transport and handling of hazardous materials isn't an issue – there are well-developed almost universal safety systems in place for this issue. Many toxic, hazardous materials are safely transported throughout our State in general and Region in particular everyday. On a tour of the Golden Sunlight Ore Processing Facility in Montana years ago our administrator stuck his hand in the cyanide solution. His hand still works just fine today.

**Water Quality** – this is perhaps the biggest concern for everyone who lives along the River. It seems to have been addressed adequately but we would like a clearer more understandable plan for treatment of water in “perpetuity” including financial planning to support this on going work. We don't ever want to worry that our River is polluted and that its not safe to eat what we get from it.

We think it would be good to be able to demonstrate what the true effects would be in the unlikelihood of a catastrophic release of contaminated water into the Kuskokwim. Over the years we have observed man-made and natural contaminations of the River and see how quickly they are diluted and their effects flushed out in a relatively short period of time.

It's ironic that no one says much about a sewer lagoon in Bethel that is being used at seven times the capacity it was designed for being discharged regularly into the Kuskokwim River. Where's the water quality there?

The Kuskokwim River is a large river with a lot of water moving through the watershed. Crooked Creek isn't even the half way point of the Kuskokwim's length. There would still be over half of the River's water coming down uncontaminated to further dilute the already quickly disseminated contaminated water.

This may be over simplifying it but in our minds it would be like releasing 1,000,000 gallons of dry powdered red Kool Aid into the River at Crooked Creek. How long would the water stay red downstream? It might hurt a few fish in the immediate area for a short time, but a majority of of the main stem of the Kuskokwim would feel minimal effects if any at all. And again there would be vast areas of the watershed that would have no negative effects.

The other issues identified and analyzed aren't worth spending too much more time discussing. Things like marine mammals, bald eagles, wetlands etc. Again look at our region as whole – it's a vast area – most of it will never be touched by natural resource development and will remain as it has throughout the millennia.

Our region has been famous for opposing natural resource development yet always open to more low-risk/no-risk government spending. In the 1970's and 80's regional leaders opposed oil & gas exploration. Now they would welcome it!

Another example of our region's strong resistance to change that we remember is when they were first proposing to use a hovercraft to deliver mail and freight from Bethel to our outlying villages. There was great opposition to this. Many People publicly spoke against the use of the hovercraft fearing that it would scare away fish and game and damage other subsistence resources.

Now the hovercraft is an accepted part of everyday life in the Lower Kuskokwim. No harm done.

There are risks associated with the development of Donlin Creek into a world class open pit gold mine, but great efforts have been taken in the planning for this Project to minimize these risks. And yes, there will be a relatively small area of the Kuskokwim Watershed that will never be the same, but this is a risk and a limited

change in the natural environment that we need to take – for the economic, social, and even cultural future of our young People.

Thank you.

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