

## **Public Comment on the Donlin Gold Project Draft Environmental Impact Statement**

By George Owletuck, MA

Egan Convention Center, Anchorage, AK

January 28, 2016

This commentary is offered as an individual from the region, born in Bethel and raised in subsistence lifeways hunting, fishing and gathering at Marshall, AK. This commentary provides a vision to demonstrate how the Donlin Creek project could be leveraged to address the need for infrastructure and low cost energy in the region.

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 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 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 can provide 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 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 \$37.9 Billion at a \$1,114/oz spot-price for gold on January 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 megawattage electrical power plants to serve multiple villages using high-power electric interties.

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.

**From:** [donlingoldeis, POA](#)  
**To:** [Craig, Bill](#)  
**Subject:** FW: Donlin Gold Draft EIS comment  
**Date:** Thursday, February 25, 2016 6:48:40 AM  
**Attachments:** [image001.png](#)  
[Public Comment on the Donlin Gold Project Draft Environmental Impact Statement.pdf](#)

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

From: George Owletuck [<mailto:GOWletuck@calistacorp.com>]  
Sent: Wednesday, February 03, 2016 10:36 AM  
To: donlingoldeis, POA <[POA.donlingoldeis@usace.army.mil](mailto:POA.donlingoldeis@usace.army.mil)>  
Subject: [EXTERNAL] Donlin Gold Draft EIS comment

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