

From: [John Wallace](#)
To: [donlingoldeis, POA](#)
Subject: [EXTERNAL] Comments - Donlin
Date: Tuesday, May 31, 2016 10:34:47 PM
Attachments: [CommentsWallace.docx](#)

(Attached in Word format)

After reading and studying the Draft Environmental Impact Statement for the Donlin Gold Project I have the following comments-

To preface my comments, I would like to offer advice for future project documents such as this—I seen no comparatives anywhere in this document. As a project supporter it would be helpful to see other mine comparatives in Alaska in terms of impact. A comparative with, for example, Red Dog Mine, would be able to offer insight and analysis concerning real-world environmental and socio-economic impacts. As an example, the roads supplying the Donlin project could be compared against existing technologies used in an operating mine. Another example would be the economic benefits of an existing mine to a proposed project, in this case Donlin. This data would have been extremely useful and I that disturbing.

I am fully in support of the project. I listened in one session while a NovaGold executive compared the cost/benefit of a project to that of an airport in a Village. It made sense to evaluate need and cost, both environmental and economic, to a real world necessity in Rural Alaska. He made the case that all projects have a certain amount of impact, but that the benefit and necessity of such a project, in this case an airport, is often overlooked if that project is one that is fully in public need.

To that end, I would like to state that in my opinion, the Donlin project offers benefits outweigh the cost using a couple of the alternatives that I will list later.

There has been a great deal of talk about the negative impact to subsistence and that way of life that this project might bring. I would like to offer a differing view with regard to that way of life. We brought up our kids living a semi-subsistence lifestyle. I say semi-subsistence, because there are very, very few families and individuals that can sustain themselves in a true subsistence way of life. In this day of very high energy costs, it is virtually impossible to sustain a family through subsistence without some outside income. The cost of fuel, nets, firearms, ammunition, boats, motors, and snowmobiles has risen to a level that is extreme. When we first began our fishcamp, our costs were very manageable. In 1994 I purchased a new snowmobile for \$4000 and in 2000 a new boat motor for \$4500. Today those items cost at least three times that cost. In those days, a drum of fuel was a manageable expense and it might cost under \$100. Today in some places it is nearing four times that amount. The bottom line is that a subsistence lifestyle is very expensive. It has made it such that folks are going to the grocery store instead

of fully living from our lands. Couple that with a salmon disaster and it is very tough time.

We taught our kids the values of subsistence though, and each year harvested salmon, moose, birds, and berries from the land. That way of life was passed down from my wife's family and we passed it on to our kids. After graduation, both of our children moved into Anchorage as there were opportunities that are unavailable in Southwest Alaska. The cost to commute to Bethel is high and job requirements often make it so that they cannot participate now in that way of life. My daughter is going to be having a child this summer and we will not be able to pass those values onto the next generation. This is wholly because of the economic times here in Rural Alaska. As I look around I see many families in the same condition. Everyone has a child living away. It is unique to have the whole family stay. THIS is what a project like Donlin brings to our area. The associated economic ripple effect of a wealth GENERATOR will bring the possibility of keeping subsistence alive. We need a project such as this. We just need to do it safely.

As you drive through Bethel, it is uncommon not to see inebriates and other social problems. As you read the newspaper it is a sad state of affairs. It is so important for our people to have self-worth and self-value. A project such as Donlin that promotes, through employment, a healthy lifestyle can only be a good thing for our area and our State.

I do have a few alternatives that I would like to see implemented within the EIS. Granted, these are not the most inexpensive, but I think most prudent:

1) Alternative 3B- Diesel Pipeline

- a. Offers easier access to other users of pipeline.
- b. Diesel is more common to Villages, Organizations, and other Users for distribution and use.
- c. Retransportation More Common
- d. Combined Natural Gas/Diesel Line not evaluated.
 - i. All preliminary work completed, why not build in both with a partner.
- e. Cost- Higher Benefit-Higher and remains after Donlin Project ends.

2) Alternative 4- Birch Tree Crossing.

- a. Reduces traffic on the upper and swifter section of the river.
- b. Reduces mileage and spill or environmental exposure.
- c. Offers optional (Non-stated) return route for fuels from pipeline. (Above)

- d. Possible Pipeline back to Birch Tree
- e. Benefit to Region to have Fuel Point available on River instead of Dutch Harbor.
- f. Possible Road to Yukon could be combined centralizing commerce. Partnerships available to that end.
- g. Cost- Higher Benefit-Higher and remains after Donlin Project ends.

3) Alternative 5A- (Option 2) Dry Stack Tailings

- a. Long-Term Storage is encapsulated and buried.
 - i. Under Liner, Over Liner, Reclamation.
- b. Water quality issues dissipate
- c. Not sure why heated trucks are necessary. In winter, tailings could be stockpiled for burial during warmer time periods.

After reading and studying the Draft Environmental Impact Statement for the Donlin Gold Project I have the following comments-

To preface my comments, I would like to offer advice for future project documents such as this—I seen no comparatives anywhere in this document. As a project supporter it would be helpful to see other mine comparatives in Alaska in terms of impact. A comparative with, for example, Red Dog Mine, would be able to offer insight and analysis concerning real-world environmental and socio-economic impacts. As an example, the roads supplying the Donlin project could be compared against existing technologies used in an operating mine. Another example would be the economic benefits of an existing mine to a proposed project, in this case Donlin. This data would have been extremely useful and I that disturbing.

I am fully in support of the project. I listened in one session while a NovaGold executive compared the cost/benefit of a project to that of an airport in a Village. It made sense to evaluate need and cost, both environmental and economic, to a real world necessity in Rural Alaska. He made the case that all projects have a certain amount of impact, but that the benefit and necessity of such a project, in this case an airport, is often overlooked if that project is one that is fully in public need. To that end, I would like to state that in my opinion, the Donlin project offers benefits outweigh the cost using a couple of the alternatives that I will list later.

There has been a great deal of talk about the negative impact to subsistence and that way of life that this project might bring. I would like to offer a differing view with regard to that way of life. We brought up our kids living a semi-subsistence lifestyle. I say semi-subsistence, because there are very, very few families and individuals that can sustain themselves in a true subsistence way of life. In this day of very high energy costs, it is virtually impossible to sustain a family through subsistence without some outside income. The cost of fuel, nets, firearms, ammunition, boats, motors, and snowmobiles has risen to a level that is extreme. When we first began our fishcamp, our costs were very manageable. In 1994 I purchased a new snowmobile for \$4000 and in 2000 a new boat motor for \$4500. Today those items cost at least three times that cost. In those days, a drum of fuel was a manageable expense and it might cost under \$100. Today in some places it is nearing four times that amount. The bottom line is that a subsistence lifestyle is very expensive. It has made it such that folks are going to the grocery store instead of fully living from our lands. Couple that with a salmon disaster and it is very tough time.

We taught our kids the values of subsistence though, and each year harvested salmon, moose, birds, and berries from the land. That way of life was passed down from my wife's family and we passed it on to our kids. After graduation, both of our children moved into Anchorage as there were opportunities that are unavailable in Southwest Alaska. The cost to commute to Bethel is high and job requirements often make it so that they cannot participate now in that way of life. My daughter is going to be having a child this summer and we will not be able to pass those values onto the next generation. This is wholly because of the economic times here in Rural

Alaska. As I look around I see many families in the same condition. Everyone has a child living away. It is unique to have the whole family stay. THIS is what a project like Donlin brings to our area. The associated economic ripple effect of a wealth GENERATOR will bring the possibility of keeping subsistence alive. We need a project such as this. We just need to do it safely.

As you drive through Bethel, it is uncommon not to see inebriates and other social problems. As you read the newspaper it is a sad state of affairs. It is so important for our people to have self-worth and self-value. A project such as Donlin that promotes, through employment, a healthy lifestyle can only be a good thing for our area and our State.

I do have a few alternatives that I would like to see implemented within the EIS. Granted, these are not the most inexpensive, but I think most prudent:

- 1) Alternative 3B- Diesel Pipeline
 - a. Offers easier access to other users of pipeline.
 - b. Diesel is more common to Villages, Organizations, and other Users for distribution and use.
 - c. Retransportation More Common
 - d. Combined Natural Gas/Diesel Line not evaluated.
 - i. All preliminary work completed, why not build in both with a partner.
 - e. Cost- Higher Benefit-Higher and remains after Donlin Project ends.
- 2) Alternative 4- Birch Tree Crossing.
 - a. Reduces traffic on the upper and swifter section of the river.
 - b. Reduces mileage and spill or environmental exposure.
 - c. Offers optional (Non-stated) return route for fuels from pipeline. (Above)
 - d. Possible Pipeline back to Birch Tree
 - e. Benefit to Region to have Fuel Point available on River instead of Dutch Harbor.
 - f. Possible Road to Yukon could be combined centralizing commerce. Partnerships available to that end.
 - g. Cost- Higher Benefit-Higher and remains after Donlin Project ends.
- 3) Alternative 5A- (Option 2) Dry Stack Tailings
 - a. Long-Term Storage is encapsulated and buried.
 - i. Under Liner, Over Liner, Reclamation.
 - b. Water quality issues dissipate
 - c. Not sure why heated trucks are necessary. In winter, tailings could be stockpiled for burial during warmer time periods.