

From: [Dave Harbour](#)
To: comments@DonlinGoldEIS.com
Subject: Donlin Gold Project
Date: Friday, March 29, 2013 5:47:07 PM

To: Mr. Don Kuhle
U.S. Army Corps of Engineers
P.O. Box 6898
Joint Base Elmendorf Richardson, Ak. 99506

Dear Mr. Kuhle:

During this scoping period the Corps should consider the following issues during the EIS process, among others:

1. The proposed project would occur on Native lands selected under ANSCA. The owners of the land are, therefore, the pre-eminent stakeholders. The project should be regarded as an implementation of the Alaska Native Claims Settlement Act and timely facilitated by federal agencies.
2. Greater weight should be given the opinion of the landowners whose property was transferred pursuant to Congressional action, than to parties who merely offer the Corps opinions.
3. Unreasonable delays in project development caused by federal agencies could be interpreted as a 'taking' of property rights lawfully transferred by the federal government for value the government has received: the settlement of various Native claims.

Dave Harbour

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