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Growing Alaska Through Responsible Resource Development

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March 29, 2013

Don Kuhle, Regulatory Division

U.S. Army Corps of Engineers

P.O. Box 6898

Joint Base Elmendorf Richardson, AK 99506-0898

Via: comments@DonlinGoldEIS.com

Re: Donlin Gold Project EIS Scoping

Dear Mr. Kuhle:

The Resource Development Council for Alaska, Inc. (RDC) is writing to urge the U.S. Army Corps of Engineer (Corps) to include social and economic benefits, and other potential opportunities that development of Donlin Gold may create, in the Donlin Gold Project Environmental Impact Statement (EIS).

RDC is a statewide business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism, and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC requests the Corps include the following in the EIS: the social and economic benefits of this project to the region, state, and nation; the potential for lower cost energy options to the region; and, job opportunities leading to reduced out-migration, which will help maintain rural schools.

The Donlin Gold project is located in Southwest Alaska, approximately 277 miles west of Anchorage, nearest to the community of Crooked Creek. The Donlin project is located in a region of Alaska that experiences some of the highest unemployment rates and has few other opportunities. Through the exploration stages, Donlin has shown a strong commitment to local hire and for supporting communities and cultures in the region. A project like this is truly a rare opportunity to improve the local economy where the option for meaningful employment is scarce.

The project is on surface land owned by The Kuskokwim Corporation, and subsurface land owned by Calista Corporation. These lands were selected under the Alaska Native Claims Settlement Act (ANCSA) specifically for their mineral development potential. Royalties paid to Calista will in part be redistributed to other regional and village corporations, pursuant to the 7(i) and 7(j) provisions of ANCSA.

Other projects and project benefits to Alaska

The Northwest Arctic Borough is home to Teck and NANA Regional Corporation's Red Dog Mine, a surface mine and mill that produces zinc, lead, and silver in concentrates. Red Dog, one of the largest zinc mines in the world, both in terms of production and reserves, employs more than 550 people, of which 56 percent are NANA shareholders. In partnering with NANA, Red Dog operations make royalty payments to NANA, with much of the money being redistributed to other regional and village corporations.

As a result, the Red Dog Mine has not only been beneficial to NANA, but to all Alaska Native Corporations through the shared wealth provision of ANCSA. RDC encourages the Corps to fully analyze the significant benefits, both socially and economically, the Donlin Gold project has had, and will have on the region and throughout the state of Alaska.

Further, the Red Dog Mine has been described as a model of responsible resource development, founded on the principles of consensus, cooperation and mutual respect between a mining company and indigenous people.

Donlin Gold can provide opportunities while protecting the environment

If developed, RDC believes the Donlin Gold project will be done in a way that creates opportunity for local employment and economic growth, while protecting the subsistence resources and culture of the region, and protecting the environment.

RDC supports a rigorous permitting process that reviews and analyzes all potential impacts and benefits, including those that have a positive influence on the economy. Alaska has seven existing large producing mines that were permitted under the rigorous review of NEPA and the scientifically based permitting process that includes over 60 major State and Federal permits and authorizations. Alaska's existing mines are operating to the highest standards and in harmony with our renewable resources. Donlin's project description demonstrates an understanding of environmental concerns, displays vigorous environmental management principles, and will be scrutinized under a rigorous process that will require as many as 100 State and Federal permits and authorizations.

In conclusion, RDC urges the Corps to include the following in the EIS:

- the social and economic benefits of this project to the region, state, and nation, not just from jobs, but royalties and other payments;
- the potential for lower cost energy options to the region, that could benefit both residential and commercial, and provide for energy infrastructure to the region;

- and, job opportunities leading to reduced out-migration, which will help maintain rural schools, as well as provide well-paying jobs allowing people in the region to maintain subsistence activities in their lives.

RDC will continue to participate in the public process for this project, which will likely provide responsible economic prospects for this region and for Alaska, while protecting the subsistence resources. Further, the EIS process gives Alaskans adequate time to fully review the project documents, and to provide input on the plans.

RDC appreciates the opportunity to comment on this important process.

Sincerely,



Marleanna Hall
Projects Coordinator