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August 12, 2022

DNR, DMLW, Survey Section
Attn: Victoria Brown
550 W. 7th Avenue, Suite 650
Anchorage, Alaska 99501
submitted via email to: dnr.scro.donlin@alaska.gov

Re: AMA comments on EV 3-244

Dear Mrs. Brown:

The Alaska Miners Association (AMA) appreciates the opportunity to submit the following comments in response to Department of Natural Resources (DNR) consideration of EV 3-244 - an Easement Vacation to permanently vacate seven of the easements within the core operating area of the proposed Donlin Gold mine.

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. We are composed of more than 1,400 members that come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Our members include individual prospectors, geologists, engineers, suction dredge miners, small family mines, junior mining companies, and major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.

Restricting public access through the Donlin Mine is essential for the safety of the public and mine workers, and a necessary step for the safe development of the project. These public easements are part of a larger public access trail network that connects communities like Crooked Creek, Georgetown, and Flat, and even though these trails see little to no use, we agree that alternative access must be provided. The Public Easement Plan proposed by Donlin Gold, Calista Corporation, and The Kuskokwim Corporation (TKC) achieves these objectives by donating replacement easements to the State for orderly and continuous access through the area.

At the conclusion of mining activities and reclamation, public access through the mine area will be restored, and the plan allows for flexibility for the placement of these easements. Restored post-mining access, when combined with alternate access created during mining activities, will provide the public with greater access to lands around the Donlin Mine site than existed before mining activities began.

Calista Corporation, an Alaska Regional Corporation, selected the lands at the Donlin site pursuant to the Alaska Native Claims Settlement Act of 1971 (ANCSA), because of the known mineral potential and its ability to generate opportunity for the region. Donlin Mine, as proposed, will provide thousands of jobs during the three to four years of construction, and hundreds to thousands of employment opportunities throughout its operation. In addition to jobs, benefits include enhance infrastructure development and



transportation opportunities, tax revenue, ANCSA Section 7i and 7j revenue sharing, and support of Alaska businesses.

The public easements affected by EV 3-244 trace their origins to historic mining in this region, and as such should not hinder the continued effort to develop new, responsible mining resources.

In closing, AMA supports DNR's preliminary decision to vacate easements included in EV 3-244, and continue to support Calista Corporation, TKC, and Donlin Gold in the responsible development of the Donlin Gold Mine.

Thank you for your consideration, and please do not hesitate to contact me with questions.

A handwritten signature in blue ink, appearing to read 'DSK', is positioned above the typed name.

Deantha Skibinski
Executive Director