

**Yukon-Kuskokwim Delta Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
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In Reply Refer To:  
OSM 24008

FEB 02 2024

Steven Cohn, State Director  
Bureau of Land Management  
222 W 7th Ave., #13  
Anchorage, AK 99513

Dear Mr. Cohn,

I write to you on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to request that the Bureau of Land Management (BLM) revoke the Record of Decision (ROD) and Pipeline Right of Way (ROW) easement for the natural gas pipeline intended to power the Donlin Gold Mine and initiate a supplemental environmental impact statement (EIS) for the Donlin Gold Project.

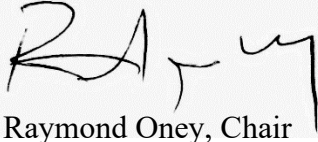
The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Yukon-Kuskokwim Delta Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act (FACA). Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on October 10-12, 2023, in Anchorage. Among the items discussed was the Donlin Gold Project. The Council is extremely concerned with the outdated information used in the Donlin Gold EIS and the lack of meaningful Tribal consultations during the National Environmental Policy Act process. The Donlin Gold EIS is outdated and does not sufficiently consider climate change impacts or the severe declines to Western Alaska salmon and the Mulchatna Caribou Herd that have occurred since it was released. It also does not accurately represent the significant negative impacts that the project will have to subsistence and traditional cultural practices. Additionally, the natural gas pipeline ROW was granted without considering the cumulative impacts that the mine will have to our region; the impacts of the pipeline and mine must be considered together because they go hand-in-hand.

Our Council asks BLM and the other cooperating agencies for the Donlin Gold Project to initiate a supplemental EIS to address the inadequacies found in the 2018 Final EIS and ROD. We also ask that the cooperating agencies follow the requirements of Executive Order 13175, as well as the more recent Presidential Memorandums on Tribal Consultation and Strengthening Nation-to-Nation Relationships (January 26, 2021) and Uniform Standards for Tribal Consultation (November 30, 2022), to ensure that the affected Tribes are meaningfully consulted, and that Indigenous Knowledge is incorporated and considered in the supplemental EIS and ROD. We also ask that the pipeline ROW easement be immediately revoked due to the need for revised analysis.

The Council thanks you for considering our requests. We look forward to your reply and to BLM action on this important issue. If you have any questions or would like to discuss this further, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or [brooke\\_mcdavid@fws.gov](mailto:brooke_mcdavid@fws.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Ray", is placed over a light gray rectangular background.

Raymond Oney, Chair

cc: Federal Subsistence Board

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

Office of Subsistence Management

Interagency Staff Committee

Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game

Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of Fish and Game

Administrative Record