Section 4

Ambler Mining District Industrial Access Project Bureau of Land Management

SF299 Supplemental Narrative (43 CFR 2804.12)



Prepared on behalf of:

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1. A description of the project and the scope of the facilities.

The proposed project includes construction of a 211-mile gravel-surfaced industrial access road from the Ambler Mining District to the Dalton Highway (Appendix 4A: Figure 4-1, Sheet 1). A detailed description of the project and facilities is provided in Section 2, Corridor Supplemental Narrative. As part of this project, AIDEA is requesting from the Bureau of Land Management (BLM) a 250-foot-wide right-of-way (ROW) for the industrial access road (including turnouts on the road), seven material site areas (including one to be developed as a maintenance station after use as a material site), access roads to material sites and water sources, and a permit to use existing material sites along the Dalton Highway for material sources and/or staging areas during construction. AIDEA is requesting to use these areas both during construction and throughout the operations period for maintenance, for a period of 50 years.

A 250-foot-wide ROW is being requested throughout the alignment on BLM-managed lands. This ROW would be sufficient for construction access and staging, as well as operations and maintenance of the access road. There are some areas on State and NPS lands where a wider ROW would be needed (up to 455 feet) due to topography. Measures to reduce the road footprint may occur during later design stages.

AIDEA would hold the ROW granted and the road, but may procure road design, construction, maintenance and operation services through third-parties. This is a proven AIDEA business model and was successfully used to construct the Delong Mountain Transportation System (DMTS) which provides access to the Red Dog Mine in northwest Alaska. AIDEA owns the DMTS but it was constructed and is operated and maintained by private parties under contract to AIDEA.

The proposed ROW crosses BLM lands selected by the State of Alaska during the land selection process following statehood¹ on the western end of the proposed corridor near the Ambler River (Appendix 4A: Figure 4-2) and north and east of the Koyukuk River (Appendix 4A: Figure 4-4); land selected by Alaska Native entities² under the Alaska Native Claims Settlement Act of 1971 (ANCSA) a half-mile east of Square Creek (Appendix 4A: Figure 4-3); and land included in the Dalton Highway Utility Corridor from just south of the southwest corner of Gates of the Arctic National Park and Preserve near Bettles to the Dalton Highway near Milepost (MP) 161 (Appendix 4A: Figures 4-5 to 4-7).

Table 1 provides the townships, ranges, sections, and meridians of BLM lands crossed by the proposed corridor.

Construction of the proposed road would require the development of material sites and the installation of bridges, culverts, and access roads to reach proposed material sites or water sources (See Appendix 2: Figures 2-3 and Appendix 2: Map Sets 2B-1 and 2B-2). Figures 4-1 through 4-7 in Appendix 4A illustrate the location of the proposed project elements (access road, material sites, material site access routes, and turnouts) on BLM lands.

Up to three maintenance stations may be needed along the industrial access road, between the Dalton Highway and the Ambler Mining District. These three stations would be constructed in areas used as material sites during project construction; an airstrip would be associated with each maintenance site to provide access for transport of maintenance personnel and supplies during road construction and operations. One maintenance station is proposed on BLM lands near the Ambler River.

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¹ The State of Alaska was granted approximately 105 million acres by the federal government in 1959; approximately 90 million acres (85%) has been conveyed.

² Native-selected lands were selected by the NANA Regional Corporation, Inc., the Village of Kobuk, and Koovumeut, Inc. as part of ANCSA and conveyance of the property has not been completed.

Table 1: Townships, Ranges, Sections, and Meridians Crossed by the Proposed Alignment

| Township | Range | Section(s) | Meridian |
|---------------------------------|-------------|--------------------------------|------------------|
| State of Alaska Selected Lan | ds | | |
| 020N | 009E | 18 | W . 1D' |
| 020IN | 008E | 2, 11, 12, 13 | Kateel River |
| <u>026N</u> | <u>017W</u> | <u>25</u> | <u>Fairbanks</u> |
| Native-selected Lands | | | |
| 019N | 011E | 13, 14, 23, 24, 26 | Kateel River |
| Dalton Highway Utility Corridor | | | |
| 025N | <u>014W</u> | <u>6</u> | - Fairbanks |
| 025IN | <u>015W</u> | 1, 7, 8, 9, 10, 11, 12 | |
| 026N | <u>013W</u> | 14, 15, 16, 20, 21, 22, 29, 30 | |
| U20IN | <u>014W</u> | 25, 26, 27, 28, 29, 31, 32 | |

AIDEA is not proposing to install fiber optic cables as part of this project; however, AIDEA believes that communications companies may be interested in installing communications cables in the future and that this should be considered as a reasonably foreseeable project in the environmental review process.

Material quantities needed for the proposed project and estimated material quantities available in the identified material sites are discussed in the Corridor Supplemental Narrative (Section 2).

Table 2 summarizes impacts to BLM lands from the proposed project. Table 3 breaks out the impacts from the various project elements (the industrial access roadway, access roads to water sources and materials sites, airstrips, and material sites).

Table 2: Summary of Impacts on BLM-Managed Lands from Proposed Project

| Industrial Access Road Project | Quantity |
|------------------------------------|------------|
| Industrial Access Road (Miles) | <u>25</u> |
| Overall Project Footprint (Acres) | <u>640</u> |
| Overall Wetlands Impacts (Acres) | <u>315</u> |
| Overall Open Water Impacts (Acres) | <u>0</u> |
| Overall Upland Impacts (Acres) | <u>325</u> |

Table 3: Breakdown of Impacts on BLM-Managed Lands from Proposed Project

| Project Element | Quantity |
|--|-----------------|
| Industrial Access Road (IAR) Impacts (Acres) | <u>288</u> |
| IAR Impacts to Wetlands (Acres) | <u>175</u> |
| IAR to Open Water (Acres) | <u>0</u> |
| IAR Impacts to Uplands (Acres) | <u>113</u> |
| Support Access Road (SAR) Impacts (Acres) | <u>5</u> |
| SAR Impacts to Wetlands (Acres) | <u>2</u> |
| SAR Impacts to Open Water (Acres) | <u>0</u> |
| SAR Impacts to Uplands (Acres) | <u>3</u> |
| Airstrip Impacts (Acres) | <u>49</u> |
| Airstrip Impacts to Wetlands (Acres) | <u>10</u> |
| Airstrip Impacts to Open Water (Acres) | <u>0</u> |
| Airstrip Impacts to Uplands (Acres) | <u>39</u> |
| Material Site Impacts (Acres) | <u>297</u> |
| Material Site Impacts to Wetlands (Acres) | <u>128</u> |
| Material Site Impacts to Open Water (Acres) | <u>0</u> |
| Material Site Impacts to Uplands (Acres) | <u>169</u> |
| Material Sites (No.) | <u>7</u> |
| Bridges (No.) – Small (<50 feet) | <u>1</u> |
| Bridges (No.) – Medium (50 to 140 feet) | <u>1</u> |
| Bridges (No.) – Large (>140 feet) | <u>0</u> |
| Culvert (No.) – Minor (<3 feet) | <u>182</u> |
| Culvert (No.) – Moderate (>10 feet) | <u>6</u> |
| Culvert (No.) – Major (4 - 10 feet) | <u>0</u> |

A more detailed description of BLM lands <u>affected</u> and specific <u>project effects on State-selected</u>, <u>Native-selected and Dalton Highway Utility Corridor lands are included below</u>,

State-Selected Lands

State-selected lands owned by the BLM are encountered at the <u>western end of the</u> proposed project corridor, along the Ambler Lowlands, approximately 200 miles to the west of the Dalton Highway.

The State-selected properties contain the beginning of the proposed project alignment in Section 2, Township 2N, Range 8E, Kateel River Meridian (Figure 2). The proposed corridor would begin approximately one mile south of the Ambler River and travel to the southeast. Approximately one half-mile from the project start, the presence of an unnamed creek would require the construction of a 140-foot-long bridge to span the waterway. The proposed alignment then continues for approximately 2.7 miles before entering State-owned lands.

<u>Three</u> potential material sites have been identified within the State-selected lands:

- A 43-acre site located within Section 2, Township 2N, Range 8E, Kateel River Meridian, immediately north of the beginning of the proposed alignment, and approximately 0.7 miles south of the Ambler River; and
- A 113-acre site partially located in the State-selected property in Section 18, Township 2N, Range 9E, Kateel River Meridian, approximately 0.7 miles northwest of the Shungnak River.
- A portion of a 50-acre site that may occur within Section 25, Township 26N, Range 17W, Fairbanks Meridian, 2 miles north of the Koyukuk River.

Only one maintenance station and airstrip is proposed on BLM-managed lands. It would be located on the material site in Section 18 described above.

A summary of project impacts on State-selected lands is shown in Table 4 and a breakdown of impacts by project element is shown in Table 5.

Table 4: Summary of Impacts of the Proposed Project on State-selected Lands

| Industrial Access Road Project | Quantity |
|---------------------------------------|----------|
| Industrial Access Road Length (Miles) | 3 |
| Overall Project Footprint (Acres) | 199 |
| Overall Wetlands Impacts (Acres) | 104 |
| Overall Open Water Impacts (Acres) | 0 |
| Overall Upland Impacts (Acres) | 95 |

Table 5: Breakdown of Impacts of the Proposed Project on State-selected Lands

| Project Element | Quantity |
|--|----------|
| Industrial Access Road (IAR) Impacts (Acres) | 30 |
| IAR Impacts to Wetlands (Acres) | 23 |
| IAR Impacts to Open Water (Acres) | 0 |
| IAR Impacts to Uplands (Acres) | 7 |
| Support Access Road (SAR)Impacts (Acres) | 1 |
| SAR Impacts to Wetlands (Acres) | <1 |
| SAR Impacts to Open Water (Acres) | 0 |
| SAR Impacts to Uplands (Acres) | <1 |
| Airstrip Impacts (Acres) | 49 |
| Airstrip Impacts to Wetlands (Acres) | 10 |
| Airstrip Impacts to Open Water (Acres) | 0 |
| Airstrip Impacts to Uplands (Acres) | 39 |
| Material Site Impacts (Acres) | 120 |
| Material Site Impacts to Wetlands (Acres) | 70 |
| Material Site Impacts to Open Water (Acres) | 0 |
| Material Site Impacts to Uplands (Acres) | 49 |

| Material Sites (No.) | 3 |
|--|----|
| Bridges (No.) – Small (<50 feet) | 1 |
| Bridges (No.) – Medium (50 to140 feet) | 1 |
| Bridges (No.) – Large (>140 feet) | 0 |
| Culvert (No.) – Minor (<3 feet) | 40 |
| Culvert (No.) – Moderate (>10 feet) | 2 |
| Culvert (No.) – Major (4 - 10 feet) | 0 |

Native-Selected Lands

The proposed alignment would cross approximately <u>3.2 miles of Native-selected lands currently owned</u> by BLM <u>(Figure 3).</u> The proposed alignment enters the Native-selected parcel approximately 0.5 miles east Square Creek and crosses the property to the northeast, south of the Ambler Lowlands.

Two potential material sites have been identified on Native-selected lands in this area:

- A 50-acre site in Sections 13, 14, 23 and 24, Township 19N, Range 11E, Kateel River Meridian; and
- A 31-acre portion of a 40-acre material site in Sections 4 and 35, Township 19N, Range 11E, Kateel River Meridian.

A summary of project impacts on Native-selected lands is shown in Table 6 and a breakdown of impacts by project element is shown in Table 7.

Table 6: Summary of Impacts of the Proposed Project on Native-selected Lands

| Industrial Access Road Project | Quantity |
|---------------------------------------|----------|
| Industrial Access Road Length (Miles) | 3 |
| Overall Project Footprint (Acres) | 116 |
| Overall Wetlands Impacts (Acres) | 29 |
| Overall Open Water Impacts (Acres) | 0 |
| Overall Upland Impacts (Acres) | 87 |

Table 7: Breakdown of Impacts of the Proposed Project on Native-selected Lands

| Project Element | Quantity |
|--|----------|
| Industrial Access Road (IAR) Impacts (Acres) | 32 |
| IAR Impacts to Wetlands (Acres) | 15 |
| IAR Impacts to Open Water (Acres) | 0 |
| IAR Impacts to Uplands (Acres) | 18 |
| Support Access Road (SAR)Impacts (Acres) | 2 |
| SAR Impacts to Wetlands (Acres) | 1 |
| SAR Impacts to Open Water (Acres) | 0 |

| SAR Impacts to Uplands (Acres) | 1 |
|---|----|
| Airstrip Impacts (Acres) | 0 |
| Airstrip Impacts to Wetlands (Acres) | 0 |
| Airstrip Impacts to Open Water (Acres) | 0 |
| Airstrip Impacts to Uplands (Acres) | 0 |
| Material Site Impacts (Acres) | 81 |
| Material Site Impacts to Wetlands (Acres) | 13 |
| Material Site Impacts to Open Water (Acres) | 0 |
| Material Site Impacts to Uplands (Acres) | 68 |
| Material Sites (No.) | 2 |
| Bridges (No.) – Small (<50 feet) | 0 |
| Bridges (No.) – Medium (50 to140 feet) | 0 |
| Bridges (No.) – Large (>140 feet) | 0 |
| Culvert (No.) – Minor (<3 feet) | 39 |
| Culvert (No.) – Moderate (>10 feet) | 1 |
| Culvert (No.) – Major (4 - 10 feet) | 0 |

Dalton Highway Utility Corridor

After crossing the Koyukuk River, the proposed alignment crosses Pope Creek just upstream of the confluence with Harriet Creek, approximately one-half mile south of the Koyukuk River. The proposed alignment proceeds generally southeast, ascending into the foothills of the Jack White Range and crossing Harriet Creek. After crossing Harriet Creek, the proposed alignment proceeds generally east, crossing onto BLM lands from State land about 4 miles south of the Middle Fork Koyukuk River. The proposed alignment continues for 18.4 miles on BLM property within the Dalton Highway Utility Corridor, proceeding east and northeast roughly 1 to 4 miles south of and parallel to the Middle Fork Koyukuk River. The proposed alignment crosses a combination of uplands and wetlands along the north flank of the Jack White Range while proceeding east/northeast between the Middle Fork Koyukuk River and the South Fork Koyukuk River. Approaching the Dalton Highway, the proposed alignment crosses John Creek before descending out of the Jack White Range, following an existing winter trail to reach the Dalton Highway near milepost 161. The terminus at the Dalton Highway is roughly one-quarter mile south of the existing access road leading west to the Tramway Bar.

Two potential material sites have been identified on BLM lands in the Dalton Highway Utility Corridor. Although these sites have not been field-verified, these are very preliminary locations and sizes and would likely be refined with further investigation:

- A 50-acre site located in Sections 27 and 28, Township 26N, Range 14W, Fairbanks Meridian;
 and
- A 50-acre site located in Sections 26 and 35, Township 26N, Range 14W, Fairbanks Meridian.

Two existing material sites on BLM land along the Dalton Highway are also proposed for material sources and/or staging of personnel and equipment for construction activities. A permit for use of these existing sites is also requested of BLM.

A summary of project impacts on Native-selected lands is included in Table 8 and a breakdown of impacts by project element is shown in Table 9.

Table 8: Summary of Impacts of the Proposed Project on Dalton Highway Utility Corridor Lands

| Industrial Access Road Project | Quantity |
|---------------------------------------|----------|
| Industrial Access Road Length (Miles) | 19 |
| Overall Project Footprint (Acres) | 325 |
| Overall Wetlands Impacts (Acres) | 181 |
| Overall Open Water Impacts (Acres) | 0 |
| Overall Upland Impacts (Acres) | 143 |

Table 9: Breakdown of Impacts of the Proposed Project on Dalton Highway Utility Corridor
Lands

| Project Element | Quantity |
|--|----------|
| Industrial Access Road (IAR) Impacts (Acres) | 226 |
| IAR Impacts to Wetlands (Acres) | 137 |
| IAR Impacts to Open Water (Acres) | 0 |
| IAR Impacts to Uplands (Acres) | 89 |
| Support Access Road (SAR)Impacts (Acres) | 2 |
| SAR Impacts to Wetlands (Acres) | 0 |
| SAR Impacts to Open Water (Acres) | 0 |
| SAR Impacts to Uplands (Acres) | 2 |
| Airstrip Impacts (Acres) | 0 |
| Airstrip Impacts to Wetlands (Acres) | 0 |
| Airstrip Impacts to Open Water (Acres) | 0 |
| Airstrip Impacts to Uplands (Acres) | 0 |
| Material Site Impacts (Acres) | 96 |
| Material Site Impacts to Wetlands (Acres) | 44 |
| Material Site Impacts to Open Water (Acres) | 0 |
| Material Site Impacts to Uplands (Acres) | 53 |
| Material Sites (No.) | 2 |
| Bridges (No.) – Small (<50 feet) | 0 |
| Bridges (No.) – Medium (50 to140 feet) | 0 |
| Bridges (No.) – Large (>140 feet) | 0 |
| Culvert (No.) – Minor (<3 feet) | 103 |
| Culvert (No.) – Moderate (>10 feet) | 3 |
| Culvert (No.) – Major (4 - 10 feet) | 0 |

2. The estimated schedule for constructing, operating, maintaining, and terminating the project.

The proposed project would begin construction in 2019. Due to the extent of this project and the associated logistics, the road construction would likely be phased over several years. The Phase I Pioneer Road would be constructed in two years. The Phase II Single-Lane Road would be constructed in one to two years following completion of the Pioneer Road. Construction of the Phase III Two-Lane Road would require an additional two years after the completion of Phase II. The road would remain in operation as long as mineral exploration and production activity in the Ambler Mining District is in operation. The road is expected to be in operation for up to 50 years and a 50-year ROW is being requested.

3. The estimated life of the project and the proposed construction and reclamation techniques.

The road is expected to be in operation for up to 50 years. Road design and construction information is provided in Section 2, Corridor Supplemental Narrative. A typical plan view of proposed construction camps is included as Appendix 4A: Figure 4-8. Construction camps are proposed to be located within the boundaries of the areas identified as material sites, as shown on Appendix 4A: Figure 4-9. Construction camp locations are shown on Appendix 4A: Figure 4-10.

Reclamation is proposed once material exploration and mine operations in the Ambler Mining District are completed and when access to the region is no longer necessary. This would be expected to occur 50 years after road construction. Reclamation measures would include removal of embankment, culverts and bridges; re-grading to establish more natural ground contours and drainage patterns; and re-vegetation of the area through seeding or planting of native vegetation. Appropriate native plant materials would be identified in cooperation with the Alaska Plant Materials Center and with each landowner. Since reclamation methods are likely to improve between now and the end of the road's useful life, it should be anticipated that a detailed reclamation plan would be developed closer to road closure.

4. A map of the project, showing its proposed location and existing facilities adjacent to the proposal.

Map sets for the proposed project are included in Appendix 2B.

5. A statement of your financial and technical capability to construct, operate, maintain, and terminate the project.

AIDEA is a Public Corporation formed by the State of Alaska in 1967. Please see the Alaska State Statutes and AIDEA Bylaws included as Attachment 1 to the SF-299 application. AIDEA's capability to construct, operate, maintain and terminate the project is evidenced by the successful Delong Mountain Transportation System (DMTS) at Red Dog Mine.

6. Any plans, contracts, agreements, or other information concerning your use of the right-of-way and its effect on competition; and

There is currently no access to the Ambler Mining District. The proposed industrial access road would be operated as a controlled access road and would allow only permitted uses. Any commercial trucking operation supporting the mining operations would be authorized to use the road if they can meet the permit standards that would be developed.

7. A statement certifying that you are of legal age and authorized to do business in the state(s) where the right-of-way would be located, and that you have submitted correct information to the best of your knowledge.

AIDEA is a Public Corporation formed by the State of Alaska in 1967. Please see the Alaska State Statutes and AIDEA Bylaws included in Attachment 1 to the SF-299 application. The signature on page 2 of the SF-299 application form serves as AIDEA's certification that it is authorized to do business in Alaska and the correct information has been submitted to the best of its knowledge.

(b) If you are a business entity, you must also submit the following information:

- (1) Copies of the formal documents creating the entity, such as articles of incorporation, and including the corporate bylaws; (*see Attachment 1 to SF-299*).
- (2) Evidence that the party signing the application has the authority to bind the applicant; (<u>see</u> *Board resolution in Attachment 1 to SF-299*).
- (3) The name and address of each participant in the business; (AIDEA is the only participant).
- (4) The name and address of each shareholder owning 3 percent or more of the shares, and the number and percentage of any class of voting shares of the entity which such shareholder is authorized to vote; (AIDEA is a public corporation fully owned by the State of Alaska. See Attachment 1 to SF-299).
- (5) The name and address of each affiliate of the business; (*N/A*).
- (6) The number of shares and the percentage of any class of voting stock owned by the business, directly or indirectly, in any affiliate controlled by the business; (See #4 above).
- (7) The number of shares and the percentage of any class of voting stock owned by an affiliate directly or indirectly, in the business controlled by the affiliate; (See #3 and #4 above).
- (8) If you have already provided the information in paragraphs (b)(1) through (7) of this section to BLM and the information remains accurate, you need only reference the BLM serial number under which you previously filed it. (N/A)
- (c) BLM may require you to submit additional information at any time while processing your application. See §2884.11(c) of this chapter for the type of information we may require.

The Alaska National Interest Land Conservation Act (ANILCA) requires a consolidated application be submitted to all relevant federal agencies. This application is designed to provide the information required on the SF299 consolidated application form and additional information requested by the federal agencies during pre-application consultations without duplicating information in the submittal for each agency. Therefore, additional information on the proposed project, the purpose and need for it, and potential environmental, social, and economic effects of the proposal is included in the Corridor Supplemental Narrative (Section 2), the National Park Service (NPS) Supplemental Narrative (Section 3), the U.S. Army Corps of Engineers submittal (Section 5), and the U.S. Coast Guard submittal (Section 6). Section 2 and its appendices contain figures and studies relevant to the entire corridor, while information specific to NPS-managed areas is included in the appendix to this BLM submittal.

(d) If you are a Federal oil and gas lessee or operator and you need a right-of-way for access to your production facilities or oil and gas lease, you may include your right-of-way requirements with your Application for Permit to Drill or Sundry Notice required under parts 3160 through 3190 of this chapter.

<u>N/A.</u>

(e) If you are filing with another Federal agency for a license, certificate of public convenience and necessity, or other authorization for a project involving a right-of-way on public lands, simultaneously file an application with BLM for a grant. Include a copy of the materials, or reference all the information, you filed with the other Federal agency.

See SF299 and all Attachments.