

## 3.23 TRANSPORTATION

This section describes the baseline conditions of the EIS Analysis Area transportation resources that may be impacted by the proposed Mine Site, Transportation Corridor, and Pipeline. The EIS Analysis Area for evaluation includes Dutch Harbor (Unalaska), the Kuskokwim River, and the natural gas pipeline corridor from the Mine Site to Cook Inlet. Discussion of transportation modes and infrastructure that extend beyond the Project Area is included to give context to the affected environment. Transportation services and access are limited in the largely undeveloped Project Area; transportation needs are not being met with existing transportation modes and infrastructure.

This section also describes potential impacts to transportation resources within the Project Area resulting from the Mine Site, Transportation Corridor, and Pipeline. Impacts are defined as effects on existing transportation, and focus particularly on whether new activities would cause congestion, exceed existing capacities, or displace existing transportation activities. As a matter of definition, new project-dedicated vessels or transportation infrastructure, such as the proposed new purpose-built river barges, new facilities at Angyaruaq (Jungjuk), and a new airstrip at the Mine Site add new dedicated transportation capacities, rather than putting the whole project transportation burden on existing infrastructure or displacing current users. The transportation analysis for the Environmental Consequences section covers the Construction, Operations, and Closure phases of the Donlin Gold Project, and is limited to the transportation modes and infrastructure that are important to the existing transportation system in the EIS Analysis Area.

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### SYNOPSIS

This section looks at the Donlin Gold Project's effects on regional transportation systems within the EIS Analysis Area. The focus is on the potential for project activities to strain existing infrastructure or displace existing transportation uses. Transportation resources within the Mine Site are limited to the few trails that cross the site and permanent alteration of these access easements and closure of the Mine Site to public access for the life of the mine would be the primary impacts. For the Transportation Corridor and Pipeline components, impacts to surface, air, and water transportation resources are evaluated. Of these, the greatest impacts would be to existing water transportation on the Kuskokwim River.

### EXISTING CONDITION SUMMARY

**Surface:** Surface transportation in the Project Area ranges from the developed local network of roads near the eastern terminus of the pipeline to the remote areas with few roads in the majority of the Project Area. In most of the Pipeline right-of-way (ROW), as well as in the area of the Mine Site, villages are not connected by road; out-of-village, land-based travel is restricted to foot, off-highway vehicle, and snowmachine use.

**Air:** Air transportation is the primary year-round mode of transportation in the EIS Analysis Area. In addition to the large Anchorage airport, regional air transportation hubs are found in Bethel and Aniak, and all villages have airports. Mail and important goods are delivered by air; travel within, as well as to and from, the area takes place by air; and air travel is of primary importance for medical care.

**Water:** Water transportation is important throughout the Project Area during the open water period of the summer. The Port of Anchorage is a major cargo hub for the state, especially the rail belt, while the Port of Bethel is the principal cargo hub for the Yukon-Kuskokwim (Y-K) Delta. Existing barge traffic on the Kuskokwim River supplies communities with fuel and goods, while small boat river travel supports the critical subsistence activities of fishing, hunting, gathering, and sharing, as well as inter-community family and social travel.

## EXPECTED EFFECTS SUMMARY

### Alternative 1 - No Action

This alternative would not affect transportation in the area. No changes are expected, beyond those that have already resulted from the exploration and baseline studies work.

### Alternative 2 - Donlin Gold's Proposed Action

**Mine Site:** With few and primitive trails existing and no water access, the Mine Site would have little effect on transportation resources.

#### Transportation Corridor:

Surface: Use of the Bethel Port site and Dutch Harbor fuel storage would create slight increases in road traffic.

Air: Frequent Donlin-sponsored flights to the dedicated airstrip near the Mine Site would move large numbers of personnel and supplies, without routing through regional hubs. The Donlin Gold Project could increase general demand for commercial air traffic in the region, but existing service could expand to meet this need.

Water: The greatest effects to water transportation from Alternative 2 would be associated with barging on the Kuskokwim River. Barges may disturb but would not prevent small boat travel. New port facilities in Bethel, a connected action but not a proposed action, would expand capacities to accommodate the volume of the Donlin Gold Project, without displacing other uses.

#### Pipeline:

Surface: Impacts from the Pipeline would be limited by remoteness and by controlled access to the ROW in the vicinity of Beluga. Impacts to the Iditarod National Historic Trail (INHT) are discussed in Section 3.16, Recreation and in Section 3.17, Visual Resources.

Air: Pipeline construction would require nine temporary airstrips that would be reclaimed when Construction was complete. Three public airports along the Pipeline route would also see increased use. Air traffic related to the Pipeline would be greatest during Construction, with intermittent monitoring flights throughout Operations. Impacts from other users of the cleared Pipeline ROW are detailed in Section 3.16, Recreation, and Section 3.21, Subsistence.

Water: The Pipeline would create slight increases in regional shipping during Construction and, to a lesser extent, Closure, but with little potential to displace other uses.

**OTHER ALTERNATIVES** – This section discusses differences of note between Alternative 2 and the following alternatives, but does not include a comprehensive discussion of each alternative's impacts if they are the same as or similar to Alternative 2 impacts.

**Alternative 3A - LNG Powered Trucks**

This alternative would reduce diesel fuel needs by two-thirds, resulting in a reduction in total annual river barging, from 122 round trips to 83, and a reduction in the amount of disturbance to other transportation users.

**Alternative 3B - Diesel Pipeline**

This alternative would eliminate diesel storage at Dutch Harbor, Bethel Fuel Terminal, and the Angyaruaq (Jungjuk) Port, as well as all of the diesel fuel barging. Total annual barging would be reduced, from 122 round trips to 64, further reducing disturbance to other transportation users. Three additional Donlin Gold airstrips have been proposed for use during Pipeline construction, and most of the airstrips would be left in place throughout Operations for diesel spill response capacity.

**Alternative 4 - Birch Tree Crossing (BTC) Port**

This alternative would reduce the distance traveled by barge by 75 river miles. This would eliminate barging effects on three communities: Aniak, Chuathbaluk, and Napaimute. The 76-mile mine access road would be longer than the road under Alternative 2 (30).

**Alternative 5A - Dry Stack Tailings**

No differences of note from Alternative 2.

**Alternative 6A - Dalzell Gorge Route**

This alternative would entail the creation of temporary airstrips at Pass Creek and Tatina, which are not included as part of Alternative 2. These two airstrips would be reclaimed after Construction.

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### 3.23.1 AFFECTED ENVIRONMENT: LOCAL AND REGIONAL TRANSPORTATION SYSTEMS

The local and regional transportation infrastructure in the EIS Analysis Area includes ports, barge landings, airports, local roads, and trails. The Kuskokwim River region is served by commercial air service from Anchorage to Aniak and Bethel. Generally, the EIS Analysis Area lacks a developed regional road system; those roads that do exist are found in the immediate vicinity of villages (ADOT&PF 2002). The Kuskokwim River serves as the primary transportation corridor during most of the year. Only very general data are available for air, marine, and surface traffic within the EIS Analysis Area since the information is either not recorded, or it is proprietary.

The EIS Analysis Area is geographically divided by the Alaska Range into the Kuskokwim River basin and the Cook Inlet basin. The Kuskokwim River basin extends from Kuskokwim Bay up the Kuskokwim River to Rainy Pass; the Mine Site, Transportation Corridor, and western portion of the Pipeline are located within this river basin. The Cook Inlet basin would host the eastern segment of the Pipeline ROW, extending from Beluga north and west to Rainy

Pass. The following description of transportation systems is organized by mode (i.e., surface, air, water) with subsections on the project components.

### 3.23.1.1 SURFACE TRANSPORTATION

#### 3.23.1.1.1 MINE SITE

There are a few primitive trails and easements that travel near or traverse the area immediately surrounding the Mine Site. Most of these trails, which were built to support placer mining operations in the past, are not currently usable by wheeled vehicles (ARCADIS 2013a). A historically used trail runs through the area, and placer mines have been operating along Crooked Creek and its tributaries since 1909. During the winter season, snowmachines or dog teams can use these trails to access the Project Area. Winter land access to the Mine Site from the south (Crooked Creek Village on the Kuskokwim River) is infrequent, and there are no marked trails. Refer to Section 3.15, Land Ownership, Management, and Use, for a discussion on trail easements near the Mine Site and Donlin's proposed Public Easement Plan.

#### 3.23.1.1.2 TRANSPORTATION CORRIDOR

Existing surface transportation modes within the Kuskokwim River basin vary by season and location. In addition to active trails, there are easements that represent historic use, as with R.S. 2477 easements, or serve to protect future access, such as section line easements and 17(b) easements. Many of these easements see very little contemporary use due to the remote location and limited population within the region. For a history of roads and trails in the Crooked Creek vicinity, see Brown (1985). More detailed discussion of R.S. 2477, section line, and 17(b) easements and their use can be found in Section 3.15, Land Ownership, Management, and Use, and Section 3.16, Recreation.

Development of surface transportation modes within the region is hindered by a relatively small population (less than one person per square mile), remote geographical location, relatively long distances between towns and villages, a small cash economy and limited tourism, a high density of wetlands and water bodies, poor soils (fine-grained organic), presence of permafrost, scarcity of aggregates for construction, harsh winter climate and short ice-free season, and construction restrictions in federally protected areas (such as the Yukon Delta National Wildlife Refuge) (ARCADIS 2013a).

During the winter, the frozen Kuskokwim River serves as a transportation corridor for snowmachines, off-highway vehicles, dogsleds, and light-duty passenger vehicles (cars and pickup trucks). There are approximately 28 miles of ice road on and along the Kuskokwim River in winter, which the City of Bethel occasionally pays to have plowed (City of Bethel 2011). Ice roads on the Kuskokwim River can extend from Bethel downstream to Eek and upstream to Aniak, although in many years the cleared roads are less extensive due to ice conditions. The river ice road supports heavy equipment and large trucks (up to 25,000 pounds [not including cargo]) for an average of one month each winter when ice thickness is sufficient. During the shoulder seasons of freeze-up and breakup, there typically are no motorized vehicles or boats on the river. Using the Kuskokwim River for winter travel by snowmachines (or less frequently dog teams) between Aniak and Crooked Creek is common, but travelers must be vigilant about dangerous conditions of thin ice and open water created by riffles, currents and changing

temperatures. An extensive system of marked winter trails runs between villages, which allows for local travel by snowmachine (or less frequently, dogsleds).

On the lower river, closer to the city of Bethel, hovercrafts provide summer and winter postal, freight, and passenger service to eight nearby communities, operating over open water, marshy land, and river ice. Hovercrafts are used year-round in the area between Napaskiak and Akiak on the lower Kuskokwim River, with the exception of short times during freeze-up and breakup periods.

Surface travel during the summer months is largely dominated by watercraft. Throughout most of the Kuskokwim River region, it is nearly impossible to travel on land between villages due to the lack of roads and rough terrain. There are some short roads that connect villages in close proximity to each other, but these are limited. Travel within villages is generally confined to gravel road systems, off-highway vehicles, or boardwalks.

#### 3.23.1.1.3 PIPELINE

The only organized communities along the Pipeline corridor are Tyonek and Beluga. No all-season roads connect the communities to the state's highway system; access to the communities is primarily by airplane. The Alaska Native Village of Tyonek (Tyonek) is located on a bluff on the northwest shore of Cook Inlet, 43 miles southwest of Anchorage. It has an airport and a network of gravel roads maintained jointly by the Tyonek Native Corporation and oil and gas companies who have facilities in the area. The community's largest network of roads leads from logging areas west of Tyonek to the dock and former chip mill operation at the North Foreland Barge Facility.

The community of Beluga is located 8 miles north of Tyonek, along Cook Inlet, 40 air miles southwest of Anchorage. Beluga is connected to Tyonek by road with a bridge over the Chuitna River. Gravel roads exist throughout the immediate surrounding area of Beluga, providing access to private homes, gas production facilities, the Chugach Electric Association power plant, the Beluga Airport, and the Beluga gravel barge landing (Ladd Landing). These roads are serviced by oil and gas companies with facilities in the area. The Beluga road network connects to roads on Tyonek Native Corporation lands south of the Chuitna River and to Cook Inlet Region, Inc. and State of Alaska lands to the north and west. A road along Chuitna River provides residents access to subsistence use areas. Ice roads occasionally cross the Susitna River and connect Beluga to the Matanuska-Susitna Borough road system during winter months (Kenai Peninsula Borough [KPB] 2003).

No all-season land access to the Pipeline corridor exists. The main surface transportation network is comprised of trails. The Pipeline corridor receives low levels of regular winter use from Anchorage, the Matanuska-Susitna Borough and local area residents

Surface travel along the Pipeline corridor north of Beluga and along the Pipeline corridor itself is generally limited to snowmachines and dogsleds during winter months. On-road vehicles (e.g., cars and trucks) and wheeled off-road vehicles are used on well-traveled roads and trails within communities during the summer and on frozen rivers and lakes during the winter. Snowmachines and dogsleds utilize the countless trails that crisscross the region surrounding the Pipeline, including the INHT. The INHT is suitable for mechanized use only in the winter.

The Susitna-Tyonek Trail (RST 200) is approximately 46 miles long, originating at the historic townsite of Susitna; it follows the Susitna River south then heads southwest along marshlands

at the base of Mount Susitna. The trail crosses the Theodore River and the Beluga River then follows the shoreline of Cook Inlet, crossing the Chuitna River and Beluga River, terminating at the community of Tyonek. Parts of this trail are known as Beluga Road, connecting the barge landing area to the Chugach Electric Association power plant and Beluga Airport.

There are several existing public roads that could be used for access routes to the Pipeline corridor. Oilwell Road is the closest public road to the Pipeline and could be a potential location for a terminus for an ice road to support Construction of the Pipeline. Oilwell Road is a gravel road located 60 miles northwest of Anchorage and 25 miles northeast of Skwentna. Oilwell Road is accessed from mile 5 of the Petersville Road, just west of the Parks Highway at Trapper Creek. The Willow Landing Route is an additional primary winter access corridor, which like Oilwell Road, has previously been used as a commercial/industrial winter trail. Each primary route would include several spur options or secondary routes to provide access to the Pipeline. The Pretty Creek Road is another existing public road with access to the Pipeline. Table 2.3-16 (Chapter 2, Alternatives) provides information on Winter Access Routes within the Susitna Valley, and Table 2.3-20 (Chapter 2, Alternatives) provides descriptions and identification of access roads.

### 3.23.1.2 AIR TRANSPORTATION

#### 3.23.1.2.1 MINE SITE

The existing Mine Site exploration camp airstrip is a 5,000-foot long privately owned gravel runway capable of handling aircraft as large as a C-130 Hercules (SRK 2016a). This runway is closed to the public, except in emergencies. All equipment, supplies, and personnel are transported by chartered aircraft from Aniak and Anchorage because at present there is no overland access to the Mine Site.

Small propeller-driven aircraft provide local air service for passengers, freight, and mail between Aniak and Crooked Creek. Crooked Creek Airport is a publicly owned (ADOT&PF 2011), public use community class airport located within the community of Crooked Creek, 10 miles south of the Mine Site on the Kuskokwim River. The airport has one gravel runway 2,000 feet long by 60 feet wide. Passenger boardings (enplanements) totaled 362 in 2012 (FAA 2017), air taxi operations were 1,436, and general aviation operations were 120, for total operations of 1,556 in 2002. Forecast operations for 2012 were 1,951 total operations (FAA 2017).

Airborne transportation to the Mine Site would rely on air traffic out of specific locations, as discussed in Section 3.23.1.2.2, Transportation Corridor, below.

#### 3.23.1.2.2 TRANSPORTATION CORRIDOR

Airspace along the Kuskokwim River is used by commercial and general aviation aircraft. Aircraft are the only four-season transportation mode in the Kuskokwim River area. Air transportation hubs in the region include the airports at Bethel and Aniak, which have runways longer than 5,000 feet.

Bethel serves as the larger regional air transport hub, providing regularly scheduled connections to 26 of the region's villages. The airport also serves as the distribution point for over 20 million pounds of mail and air cargo per year (ADOT&PF 2002). The Bethel Airport is



the third busiest airport in the state. The Bethel Airport has two paved parallel runways. Runway 01L/19R is 6,400 feet long and 150 feet wide, and runway 01R/19L is 4,000 feet long and 75 feet wide. The airport also has a gravel cross-wind runway that is 1,850 feet long and 75 feet wide. The airport has 208 based aircraft (FAA 2017). In the 12-month period ending on June 30, 2014, the airport had 122,000 operations, of those 65,857 were air taxi operations and 49,578 were general aviation operations. The route between Bethel and Anchorage is served by both jet and propeller craft. There is daily jet service between Bethel and Anchorage for passengers and cargo. Many small air taxi services operate from Bethel, serving 56 villages in the surrounding areas with scheduled and charter service. The Bethel Airport had 158,824 passenger enplanements in 2015 (FAA 2017).

Aniak is the next largest community along the Kuskokwim River, and also operates as an air service hub. Aniak Airport receives regular commercial turboprop service from Anchorage and serves as the mail distribution hub for a collection of 10 villages along the Kuskokwim River, including most of the villages near the Project Area. The Aniak Airport had 2,600 operations in calendar year 2014 and 13,771 passenger enplanements in 2015 (FAA 2017).

The Ted Stevens Anchorage International Airport is the largest airport in Alaska located 277 air miles east of the Mine Site. The airport had 2,525,893 passenger enplanements in calendar year 2015, and 261,961 total operations in the 12-month period ending in December 1, 2016 (FAA 2017). It is the second largest cargo airport (landed weight) in the U.S., reporting more than 17.1 billion pounds of cargo in 2015 (FAA 2017).

Other communities in the area have runways of 3,000 feet or less that accommodate small passenger and cargo planes (ADOT&PF 2002). Float planes are common throughout western Alaska during the summer, offering greater flexibility than wheeled planes because they can operate from rivers, lakes, and from Kuskokwim Bay. There is a float plane base in Bethel. Most light aircraft operate between Bethel and surrounding communities. Light aircraft equipped with skis operate between many of the communities during the winter.

State-owned and maintained runways available within the upper Kuskokwim basin include airports in Red Devil, Sleetmute, Stony River, McGrath, and Nikolai. In addition, private airstrips are located along the length of the western segment of the Pipeline.

#### 3.23.1.2.3 PIPELINE

Three publicly owned, public use airports are located within the Pipeline corridor, including Skwentna Airport, Rainy Pass Lodge Airport, and Farewell Airport (Table 3.23-1). The Skwentna Airport (airport code SKW) is located on the bank of the Skwentna River near the confluence with the Yentna River and is owned and operated by the Alaska Department of Transportation and Public Facilities (ADOT&PF). The airport serves mostly small aircraft that deliver passengers and supplies to the roadhouse and cabins in the area. It has a 3,400-foot long by 75-foot wide gravel runway with three based single-engine aircraft and 3,500 annual operations in 2015 (FAA 2017).

Rainy Pass Lodge Airport (6AK, also referred to as Puntilla Airport) is a publicly owned (by ADNR), public use airport comprised of a dirt surface runway that is 2,100 feet long by 25 feet wide. The airport is located approximately 125 miles northwest of Anchorage, adjacent to Puntilla Lake in Rainy Pass of the Alaska Range, near the Rainy Pass Lodge. Rainy Pass Lodge

Airport reported 244 annual operations comprised of 50 air taxi operations, 25 general aviation local operations, and 169 general aviation itinerant operations in 2014 (FAA 2017).

**Table 3.23-1: Summary of Airports Located in the Pipeline Corridor**

| Airport                | Owner                        | Use     | Annual Operations | Runway Length | Runway Surface | Runway Lighting | Based Aircraft | Services    |
|------------------------|------------------------------|---------|-------------------|---------------|----------------|-----------------|----------------|-------------|
| Skwentna (SKW)         | ADOT&PF                      | Public  | 3,500             | 3,400         | Gravel         | MIRL            | 0              | Cargo, Fuel |
| Rainy Pass Lodge (6AK) | ADNR                         | Public  | 244               | 2,100         | Dirt           | None            | 0              | None        |
| Tyonek (TYE)           | Village of Tyonek            | Private | Unknown           | 3,000         | Gravel         | LIRL            | 3              | None        |
| Beluga (BLG)           | Conoco Phillips Alaska       | Private | 5,600             | 5,002         | Gravel         | MIRL            | 0              | Cargo       |
| Beluga Heliport (5AK1) | Chugach Electric Association | Private | Unknown           | 40 x 40       | Gravel         | None            | 1              | Unknown     |
| Farewell (0AA4)        | FAA                          | Public  | Unknown           | 4,600         | Gravel         | None            | 0              | None        |
| Nikolai Creek (9AK3)   | DNR-MLW                      | Private | Unknown           | 4,100         | Gravel         | None            | Unknown        | None        |

Source: FAA 2017

The Farewell Airport (airport code 0AA4) is a public use, public airport owned by the U.S. Department of Transportation (FAA) located in Farewell, Alaska about 10 miles west of the South Fork Kuskokwim River. It has a 4,600-foot long by 30-foot wide gravel surface runway and reported 20 annual operations comprised of 10 air taxi operations and 10 general aviation local operations in 2014 (FAA 2017).

Privately owned, private use airstrips east of the Alaska Range are located in Beluga, Tyonek, Nikolai Creek, and many of the lodges in the Susitna River basin. Seasonally maintained or unmaintained airstrips are located along the Pipeline corridor. There is no scheduled air service to any airstrip within the eastern Pipeline corridor, although charter services from Anchorage and Matanuska-Susitna Borough airports are widely available (MSB 2008).

Beluga Airport (airport code BLG) is a private use airport owned by Conoco Phillips Alaska located 8 miles northeast of Tyonek. Prior permission is required to land. The airport is attended and has two gravel surface runways: 01/19 which is 5,000 feet long by 100 feet wide, and 09/27 which is 2,500 feet long by 60 feet wide. Annual operations totaled 5,600 in 1992 and included 500 air taxi, 100 local general aviation, and 5,000 itinerant general aviation operations.

The Tyonek Airport (airport code TYE) has a 3,000-foot long by 90-foot wide gravel runway that is owned by the Village of Tyonek and is connected by a local road to the nearby community of Beluga. Operations data is unavailable. Nikolai Creek Airport (airport code 9AK3) is a 4,100-foot long by 75-foot wide gravel runway located near Granite Point on the west side of Cook



Inlet 10 miles southwest of Tyonek. The airport is privately operated; however, it is located on state land and therefore classified as a public ROW (FAA 2017).

Other privately owned and operated airports in the vicinity of the eastern Pipeline corridor include: Talaheim Airport (airport code 1AK8) located 25 miles south of Skwentna, with a dirt runway that is 950 feet long by 35 feet wide; Talachulitna River Airport (airport code 1AK6) is located 10 miles south of Skwentna, and has a 1,800-foot long by 50-foot wide gravel runway; River John Airport (airport code 3AK9) is 6 miles east of Skwentna with a 1,850-foot long by 50-foot wide dirt runway. Kiska Metals has also constructed a runway at their Whistler camp located approximately 8 miles southeast of the Rainy Pass Lodge airport along the Skwentna River (KMC 2013).

Float planes are common throughout Alaska during the summer, offering greater flexibility than wheeled planes because they can operate from rivers, lakes, and bays. Float plane bases are located in Anchorage, the Matanuska-Susitna Borough, and in Bethel. Light aircraft equipped with skis operate from many of these same locales during the winter. Float and ski planes provide transport of passengers and light cargo for recreational activity in the area.

### 3.23.1.3 WATER TRANSPORTATION

#### 3.23.1.3.1 MINE SITE

Waterborne transportation to and from the Mine Site would rely on the Kuskokwim River, as discussed in Section 3.23.1.3.2, Transportation Corridor, below.

#### 3.23.1.3.2 TRANSPORTATION CORRIDOR

The principal transportation artery is the Kuskokwim River, an important and defining feature of the region, supporting local and commercial vessel traffic and commercial and subsistence fishing. The Kuskokwim River heads at the confluence of its East and North Forks and then flows southwest 500 miles to empty into Kuskokwim Bay (RWJ 2010a). The lower portion of the Kuskokwim River, from the village of Aniak south to Kuskokwim Bay, is contained within the boundaries of the Yukon Delta National Wildlife Refuge.

The main channel width of the lower Kuskokwim River between the Bering Sea and Napakiak ranges from 2 to 4 miles. The channel narrows considerably above the village of Napakiak where it is typically 0.4 to 0.7 mile wide between Napakiak and Kalskag. Above Kalskag to Stony River, the river channel is typically 0.5 mile or less in width but can expand to as much as 1 mile when side channels and/or bends in the river occur (RWJ 2010a). At the site of the proposed Angyaruaq (Jungjuk) Port, the river narrows to a width of approximately 0.25 mile or between 1,300 and 1,500 feet.

The depth of the river varies along its length; oceangoing barges can navigate upriver to Bethel and barges with drafts of up to eight feet can navigate as far upriver as Crooked Creek. The lower Kuskokwim River is characterized by one major channel with several smaller branches and is subject to tidal fluctuations that occur as far upstream as Akiachak (AGRA 1998). Project-related activities would be confined to the navigable waters of the Kuskokwim River and Kuskokwim Bay.

There are relatively few docks, ramps, or mooring facilities along the Kuskokwim River. Landing facilities at villages are usually unimproved riverbanks. River shoals are constantly

changing, and there are few navigational aids or charts for many parts of the river. The section of the Kuskokwim River from Crooked Creek to Bethel currently handles medium size barge tows (40 by 160 feet with a draft of 6-8 feet) (ADOT&PF 2002). Based on interviews with Kuskokwim River barge operators conducted in November and December of 2013, approximately 68 freight and fuel barge tows per year serve the villages upriver of Bethel (Ausdahl 2013; Clevenger 2013; Faulkner 2013; Jansen and Stauffer 2014; Leary 2013; Myers 2013). The typical barge tow is one barge pushed by one tug; however, Crowley Marine operates two and four fuel barge tows in a side by side configuration. Heavy barge traffic upriver of Bethel is not unprecedented. In the late 1970s and 1980s, widespread infrastructure construction, financed by the increase in state revenues from oil production on the North Slope, occurred in the Kuskokwim River region that increased barge traffic (BGC 2007c).

The Kuskokwim River supports a large volume of commercial barge, personal boat, and subsistence and commercial fishing traffic during the short ice-free summer season. Activity is concentrated on the lower river near Bethel and to a lesser extent around upriver villages (the activity around these upriver villages is less due to their smaller populations.). Commercial salmon fisheries, typically using drift nets, are concentrated in the lower reaches of the main stem of the Kuskokwim River. Both the main stem of the Kuskokwim River and its tributaries are used by local subsistence users for fishing and for fish camps. Set nets, subsistence drift net fishing, rod and reel fishing, dip netting, fish camps, and fish wheels are used along the Kuskokwim River and tributaries throughout the year, with concentrated effort during the salmon runs of the summer. In addition, hunting for moose, bear, caribou, marine mammals, and waterfowl, and gathering berries and firewood are often associated with travel by boat to access these resources (see Section 3.21, Subsistence). Guided fishing trips are also provided commercially for non-local fishermen on some Kuskokwim River tributaries (see Section 3.16, Recreation).

Ocean barges can access the mouth of the Kuskokwim River once shore-fast ice clears the main navigation channels, usually around late May. During the last 10 years, this date has been as early as May 1<sup>st</sup> and as late as early June. River barges may begin to move upstream of Bethel once the river is free of ice, generally between late April and June 1<sup>st</sup>. The Kuskokwim River typically begins to freeze up in early October, which abruptly ends the shipping season. Shipping seasons vary from year to year depending on the timing of ice break-up and freezing, and the available draft in the river. In addition, for the stretch of river between Bethel and Jungjuk, historical data on ice conditions and break-up indicate that river barges are usually able to move upstream of Bethel between April 24 and June 1, and that the river begins to freeze up again in early October.

According to the U.S. Coast Pilot (NOAA 2017), a seasonally maintained, basic buoy system marks the run through Kuskokwim Bay and up the river to Bethel. There are no shoreside or extended season markers for small boat navigation. No seasonal buoys mark the channel from Bethel to the proposed port sites. In the late fall, river depths at the Oscarville crossing, about six miles downriver from Bethel, can be as shallow as 14 feet.

The following partial excerpts (numbered sections in *italics*) from the U.S. Coast Pilot 9 (NOAA 2017) describe the difficulty in navigating the Kuskokwim Bay and Kuskokwim River.

(290) *The channels through the bay are not always apparent by the surface indications of the water. At times the channels will be smooth with rips on the shoals, and at other times the reverse will be true. The edges of the channels are often marked by long lines of foam, but occasionally the foam extends across the channels; it is well to approach these lines with caution. Navigation is recommended only at low water, when the*

mudflats are visible, enabling the channels between them to be followed. Because of the inequality of the tides, a vessel.

(291) The 40-mile approach through Eek Channel to Kuskokwim River is a maze of shifting sandbars, both visible and covered, and blind channels. The channels in the bay and river undergo constant change from year to year, because of the action of the sea, currents, and ice; extreme caution and continuous soundings are necessary.

(292) The procedure usually followed is for a small pilot boat from Goodnews Bay to precede the vessel through these waters, constantly feeling out the channels and sounding.

(293) During south storms a heavy sea makes up the bay nearly to Eek Island, at the head of the bay, and vessels caught on a shoal are in danger of breaking up.

(294) The channel through Kuskokwim Bay and up Kuskokwim River to the junction with Johnson River is marked by seasonal buoys. The markers above Kuskokwim River Buoy 12 are not charted. The deepest draft that should attempt to reach Bethel is about 15 feet.

The Port of Bethel is the receiving, storing, and transshipment center for petroleum products and barged freight for Y-K Delta communities. It serves communities upriver on the Kuskokwim, downriver on the Kuskokwim, along the western coast of Alaska and along the Lower Yukon River. The Kuskokwim area commercial salmon industry also relies on the port for most of its infrastructure and processing requirements. Fuel, supplies, and other cargos loaded onto ocean-going barges in Seattle and elsewhere are delivered to Bethel, 78 river miles up from the mouth of the river where it empties into the Bering Sea. From Bethel, smaller river barges deliver supplies farther upstream. The shipping season is restricted to the ice-free period from approximately the beginning of June through the end of September each year.

Port of Bethel facilities include the small boat harbor, Brown's Slough, float plane area, beach #2 and public access areas (mainly used by recreational and subsistence users), the cargo dock, petroleum dock and seawall (mainly used by commercial users). The Port of Bethel cargo dock is a nine-acre facility utilized for off-loading, storing, and distributing cargo destined for Bethel and transshipment to other communities in western and northern Alaska. Because the Y-K Delta is not connected to any other community by road or rail, the Bethel general cargo dock and staging area are critical to the shipment of freight to the Delta. The cargo dock is used for offloading and loading sand, gravel, and freight and is capable of handling and storing hazardous materials (City of Bethel 2011).

The petroleum dock is used for loading and unloading bulk petroleum. The seawall is used for moorage of tugs, boats, and barges. Beach #1 is adjacent to the cargo dock and is used for landing craft and barges with ramps, giving those vessels roll-on/roll-off capabilities. In the winter time, this area is used to store boats and barges. In the spring, this area is used for shipyard work to get those boats and barges ready for the upcoming season. This is the only area in the region for these activities. Beach #1 has no room for expansion and is now at its limit for these activities (City of Bethel 2011). Bethel's port facility can dock ships up to 400 feet long at the primary freight dock and two small river barges along the Brown's Slough side of the port. The Petro Port can berth a 380-foot barge, and accommodates about 12 mainline fuel barges each year (City of Bethel 2011).

The shipping route to Bethel requires navigation within a channel marked by buoys deployed each year by the U.S. Coast Guard. The channel accommodates vessels with a maximum draft of 12 feet. Once vessels arrive in Bethel, loads are then offloaded/reloaded to vessels with maximum drafts of 6 feet to 7 feet for barging upriver. Crowley Marine currently has a barge/tug transfer operation for large barges at Helmick Point (50 river miles downstream of

Bethel) on the lower Kuskokwim River. This is an alternative barge transfer site where cargo from ocean going barges is transferred to smaller barges for deliveries upriver. Transit times from Helmick Point to Crooked Creek vary based on a number of variables, including the number of stops, river level, commercial fish openings, and the number of barges being pushed by the tug. A non-stop chartered shipment from Helmick Point would take 86.5 hours to reach Crooked Creek. A more typical multi-stop run takes about five to six days to reach Crooked Creek (RWJ 2010a).

The U.S. Coast Guard's Marine Casualty and Pollution Data files provide details about marine casualty and pollution incidents investigated by Coast Guard Offices throughout the U.S. The database allows analysis of accidents and incidents by a variety of factors including vessel or facility type, injuries, fatalities, pollutant details, location, and date. Additionally the Coast Guard Maritime Information Exchange (CGMIX) website has an online searchable database containing data and summary reports for investigations of reportable marine casualties (Incident Investigation Reports [IIR]) undertaken by the U.S. Coast Guard from November 2002 to present. A vessel casualty must be reported to the U.S. Coast Guard if it occurs upon the navigable waters of the U.S., within territories or possessions of the U.S., or whenever and wherever a casualty involves a U.S. vessel. Public vessels and recreational vessels are exempt from these reporting requirements (46 CFR 4.01-3). Casualties include: groundings; loss of main propulsion; primary steering or reduction in maneuverability; occurrences that reduce seaworthiness (fire, flooding, damage to or loss of fire extinguishing equipment, lifesaving or bilge pumping systems); loss of life; injuries requiring professional medical treatment; vessel damage exceeding \$25,000; and spills of oil and hazardous material. Typically, accidents, fatalities, injuries and other casualties are reported on Coast Guard standard form CG-2692 and entered into the Marine Information for Safety and Law Enforcement (MISLE).

A search for Kuskokwim in the IIR database resulted in nine investigation reports that were included in the MISLE database results and are shown in Table 3.23-2. An additional incident occurred June 4, 2015, where a barge was grounded near Kuskokwim Bay carrying an estimated 68,000 gallons of fuel. The Coast Guard found no damage to the tanks or hull, and identified no pollution resulting from the incident (Alaska Dispatch News 2015b).

**Table 3.23-2: Incident Investigation Reports for Kuskokwim River and Kuskokwim Bay**

| <b>Vessel Type</b> | <b>Location</b>                       | <b>Type</b>              | <b>Resolution</b>                                   | <b>Date</b>    |
|--------------------|---------------------------------------|--------------------------|-----------------------------------------------------|----------------|
| Fishing Vessel     | Kuskokwim River near Bethel           | Grounding; Oil Discharge | Spill cleanup and mitigation                        | Aug. 24, 2002  |
| Tug                | Kuskokwim River near Stacy's Crossing | Grounding                | Pilot boat freed the tug                            | Jun. 25, 2005  |
| Tug                | Kuskokwim River                       | Grounding                | Tug freed itself                                    | Jun. 25, 2005  |
| Tug and Barge      | Kuskokwim River                       | Grounding                | Tug freed itself and barge                          | Oct. 1, 2005   |
| Barge              | Kuskokwim River near Oscar Crossing   | Grounding                | Fuel was lightered off barge until it was refloated | Sept. 23, 2006 |

**Table 3.23-2: Incident Investigation Reports for Kuskokwim River and Kuskokwim Bay**

| Vessel Type    | Location                     | Type                      | Resolution                               | Date           |
|----------------|------------------------------|---------------------------|------------------------------------------|----------------|
| Fishing Vessel | Kuskokwim Bay                | Personnel Casualty        | Crewmember died from an onboard accident | Jun. 3, 2007   |
| Barge          | Kuskokwim River at Aniak     | Grounding; Fuel Discharge | Spill cleanup and mitigation             | Jun. 12, 2007  |
| Tug            | Kuskokwim River              | Collision                 | Damage to vessel                         | Sept. 11, 2007 |
| Tug            | Kuskokwim River near buoy 18 | Grounding                 | Tug freed itself                         | Aug. 20, 2009  |

Source: USCG 2014

The Port of Bethel's small boat harbor, Brown's Slough, float plane area, and beach #2 are mainly used by recreation and subsistence users. The total annual berth-days at these facilities between 2005 and 2009 averaged 102 days. The cargo dock, petroleum dock and seawall are mainly used by commercial users and total annual berth-days at these facilities averaged 132.5 days per year between 2005 and 2009 (City of Bethel 2011). During the same period, wharf tonnage averaged 25,334 tons per year, while the Petro Port received an average of 17 million gallons per year. About 20 percent of the fuel is delivered to villages served from Bethel each year.

The Port of Bethel had an average of 93.5 trips inbound and outbound by self-propelled vessels between 2007 and 2014 (Corps 2015) (Table 3.23-3). The highest numbers of trips were 144 in 2009 and the lowest numbers of trips were 44 in 2014. In 2006, the Port of Bethel reported 87,000 tons of commodities landed (Corps 2006b) of which 77,000 tons were gasoline and distillate fuel oil. Additionally, in 2006 Bethel had 224 total trips of vessels with drafts of 18 feet and less, 116 inbound and 108 outbound. Inbound trips were comprised of 53 self-propelled tow or tug vessels and 63 non-self-propelled vessels (40 dry cargo vessels and 23 tanker vessels). Outbound trips were comprised of one self-propelled dry cargo vessel and self-propelled 51 tow/tug vessel, 38 non self-propelled dry cargo vessels and 18 non self-propelled tankers.

Data on commercial vessel traffic on the Kuskokwim River is collected by the Corps' Navigation Data Center, Waterborne Commerce Statistics Center. Data collected includes number of trips by vessel type, direction (upbound and downbound), vessel draft, and year. A trip is a vessel movement and for self-propelled vessels, a trip is logged between every point of departure and every point of arrival. For loaded barges, a trip is logged from the point of the loading of the barge to the point of unloading of the barge. For empty barges, trips are logged from point of unloading to the point of loading.

Waterborne traffic movements are reported to the Corps by all vessel operators of record. The reports are generally submitted on the basis of individual vessel movements completed. For cargo movements, the point of loading and unloading of each individual commodity must be delineated. Domestic commerce excludes cargo carried on ferries, coal and petroleum products loaded from shore facilities directly into bunkers of vessels for fuel, insignificant amounts of government materials, and fish. A summary of data on movement of vessels at Bethel Harbor and on the Kuskokwim River is provided in Table 3.23-3 and Table 3.23-4, respectively. Trips

include self-propelled dry cargo, tanker and towboat vessels and non-self-propelled dry cargo and liquid tanker barge vessels.

**Table 3.23-3: Bethel Harbor, Commercial Vessel Trips, 2007-2014**

|               | Self-Propelled<br>Tow or Tug<br>Vessels | Non Self-<br>Propelled Dry<br>Cargo Vessels | Non Self-<br>Propelled Tanker<br>Vessels | Total |
|---------------|-----------------------------------------|---------------------------------------------|------------------------------------------|-------|
| 2014 Total    | 44                                      | 43                                          | 44                                       | 131   |
| 2014 Inbound  | 22                                      | 18                                          | 17                                       | 57    |
| 2014 Outbound | 22                                      | 25                                          | 27                                       | 74    |
| 2013 Total    | 46                                      | 57                                          | 56                                       | 166   |
| 2012 Total    | 95                                      | 92                                          | 46                                       | 235   |
| 2011 Total    | 73                                      | 87                                          | 32                                       | 192   |
| 2010 Total    | 105                                     | 98                                          | 33                                       | 231   |
| 2009 Total    | 144                                     | 128                                         | 20                                       | 293   |
| 2008 Total    | 99                                      | 98                                          | 36                                       | 231   |
| 2007 Total    | 142                                     | 136                                         | 16                                       | 298   |

Source: Corps 2015

**Table 3.23-4: Kuskokwim River Commercial Vessel Trips, 2014**

|               | Self-Propelled Tow<br>or Tug Vessels | Non Self-Propelled<br>Dry Cargo Vessels | Non Self-Propelled<br>Tanker Vessels | Total |
|---------------|--------------------------------------|-----------------------------------------|--------------------------------------|-------|
| 2014 Total    | 106                                  | 102                                     | 170                                  | 378   |
| 2014 Inbound  | 53                                   | 51                                      | 85                                   | 189   |
| 2014 Outbound | 53                                   | 51                                      | 85                                   | 189   |
| 2013          | 98                                   | 99                                      | 144                                  | 342   |
| 2012          | 147                                  | 141                                     | 108                                  | 402   |
| 2011          | 199                                  | 232                                     | 44                                   | 475   |
| 2010          | 151                                  | 123                                     | 56                                   | 330   |
| 2009          | 249                                  | 226                                     | 24                                   | 499   |
| 2008          | 148                                  | 138                                     | 41                                   | 327   |
| 2007          | 191                                  | 187                                     | 18                                   | 396   |

Source: Corps 2015.

Between calendar years 2007 and 2014 an average of 394 commercial vessel trips per year were logged on the Kuskokwim River and of those, an average of 161 trips were self-propelled vessels (Table 3.23-5). Approximately 88 percent of the total trips were made by vessels with drafts of 9 feet or less and 66 percent with drafts 5 feet or less. During that same period, an average of 222 total commercial vessel trips per year were logged at Bethel Harbor and of those, an average of 94 trips were self-propelled vessels (Corps 2015).



**Table 3.23-5: Kuskokwim River Commercial Vessel Traffic, CY2007-2014**

| <b>Vessel Type</b>                     | <b>CY2014</b> | <b>CY2013</b> | <b>CY 2012</b> | <b>CY2011</b> | <b>CY2010</b> | <b>CY 2009</b> | <b>CY2008</b> | <b>CY2007</b> |
|----------------------------------------|---------------|---------------|----------------|---------------|---------------|----------------|---------------|---------------|
| Self-propelled Dry Cargo               | 0             | 0             | 0              | 0             | 0             | 1              | 1             | 4             |
| Self-propelled Tanker                  | 0             | 0             | 0              | 0             | 0             | 0              | 0             | 0             |
| Self-propelled Towboat                 | 106           | 98            | 147            | 199           | 151           | 248            | 147           | 187           |
| Non self-propelled Dry Cargo           | 102           | 99            | 141            | 232           | 123           | 226            | 138           | 187           |
| Non self-propelled Tanker Liquid Barge | 170           | 144           | 108            | 44            | 56            | 24             | 41            | 18            |
| <b>Total:</b>                          | <b>378</b>    | <b>342</b>    | <b>402</b>     | <b>475</b>    | <b>330</b>    | <b>499</b>     | <b>327</b>    | <b>396</b>    |

Source: Corps 2015

River use is not evenly distributed either geographically or temporally; areas of concentrated activity can be found around communities and during fishery openings (RWJ 2010a). There is a particular concentration in the Bethel area between Napakiak and Akiachak, which is the most densely populated area along the river.

Little area-specific river traffic information is available for non-commercial vessels as data on non-commercial (personal and fishing) vessel traffic on the Kuskokwim River is not collected. The Alaska Department of Administration, Division of Motor Vehicles requires registration of all powered boats used on any water within the state. Data on registered boats in Bethel is available for the years 2001 through 2012; 701 boats were registered in 2012 (DMV 2013). Data on boats registered in other communities along the Kuskokwim River are lumped into an “Other Alaska” dataset so the number of boats registered in specific communities is unavailable.

In order to estimate volume and location of non-commercial vessel traffic on the Kuskokwim River, boat counts from fish and wildlife surveys were reviewed. Fishing activity and wildlife observation surveys conducted on the Kuskokwim River in the summer and fall of 2009 (RWJ 2010b) counted boats fishing and not fishing. The surveyed sections of the river included the reach from Georgetown (upstream of Crooked Creek) to Eek Island (mouth of the Kuskokwim), from Bethel to a point 10 miles downstream of Fowler Island (ADF&G Kuskokwim District Statistical Area 335-12), and between Helmick Point and the village of Tuntutuliak. As shown in Table 3.23-6, 2,569 boats were observed within the full reach between Georgetown and Eek Island, while 1,744 boats were observed on the stretch between Bethel and Fowler (Table 3.23-7), and 180 boats observed between Helmick Point and Tuntutuliak (Table 3.23-8). A review of the datapoints on boats observed fishing and not fishing from the activity survey indicated that approximately 421 boats were observed between Bethel and Georgetown over all observation dates in 2009. From these data, it is assumed that approximately 16 percent of non-commercial vessel traffic could be attributed to the river section from Georgetown to Bethel and 84 percent to the section downriver from Bethel.

**Table 3.23-6: Summary of Boats on the Kuskokwim River from Georgetown to Eek Island during 10 Fishing Activity Surveys Conducted in Summer and Fall 2009**

| Fishing Activity Dates | Location (River Reach) from Downriver to Upriver | Number of Boats Fishing | Number of Boats Not Fishing | Number of Boats Not Fishing (at Villages) | Total Number of Boats Observed |
|------------------------|--------------------------------------------------|-------------------------|-----------------------------|-------------------------------------------|--------------------------------|
| 5/28/2009              | Bethel to Georgetown                             | 0                       | 24                          | 120                                       | 144                            |
| 6/10/2009 - 6/11/2009  | N. Eek Island to Georgetown                      | 54                      | 76                          | 143                                       | 273                            |
| 6/23/2009 & 6/26/2009  | N. Eek Island to Georgetown                      | 120                     | 84                          | 142                                       | 346                            |
| 7/11/2009              | N. Eek Island to Bethel                          | 11                      | 27                          | 72                                        | 110                            |
| 7/15/2009 - 7/16/2009  | N. Eek Island to Crooked Creek                   | 1                       | 82                          | 169                                       | 252                            |
| 7/22/2009 - 7/23/2009  | N. Eek Island to Crooked Creek                   | 1                       | 109                         | 145                                       | 255                            |
| 8/4/2009 & 8/12/2009   | N. Eek Island to Georgetown                      | 5                       | 122                         | 183                                       | 310                            |
| 8/18/2009 & 8/21/2009  | N. Eek Island to Georgetown                      | 72                      | 71                          | 179                                       | 322                            |
| 9/4/2009 & 9/10/2009   | N. Eek Island to Georgetown                      | 3                       | 109                         | 207                                       | 319                            |
| 9/17/2009 - 9/18/2009  | N. Eek Island to Crooked Creek                   | 0                       | 62                          | 176                                       | 238                            |
| <b>Totals</b>          |                                                  | 267                     | 766                         | 1,536                                     | 2,569                          |

Source: RWJ 2010a

**Table 3.23-7: Count of Boats on the Lower Kuskokwim River in ADFG Kuskokwim District Statistical Area 335-12 Summarized by Month from May 20, 2009 through September 29, 2009 between Bethel and Fowler Island**

| Date                    | Number of Boats Not Fishing | Number of Boats Fishing | Total Number of Boats |
|-------------------------|-----------------------------|-------------------------|-----------------------|
| May                     | 29                          | 3                       | 32                    |
| June                    | 291                         | 433                     | 724                   |
| July                    | 265                         | 191                     | 456                   |
| August                  | 181                         | 240                     | 421                   |
| September               | 122                         | 0                       | 122                   |
| Total 2009              | 888                         | 867                     | 1755                  |
| Total 2008 <sup>1</sup> | 839                         | 898                     | 1737                  |
| Total 2007 <sup>1</sup> | 685                         | 998                     | 1683                  |
| Total 2006 <sup>1</sup> | 771                         | 432                     | 1203                  |

**Notes:**

<sup>1</sup> Jewett et al. 2007a, b; 2008a, b, c; 2009a, b.

Source: RWJ 2010b.

**Table 3.23-8: Number of Boats on the Lower Kuskokwim River between Helmick Point and Tuntutuliak Summarized by Month from June 3, 2009 through September 24, 2009**

| Date                    | Number of Boats Not Fishing | Number of Boats Fishing | Total Number of Boats |
|-------------------------|-----------------------------|-------------------------|-----------------------|
| June                    | 42                          | 31                      | 73                    |
| July                    | 18                          | 14                      | 32                    |
| August                  | 29                          | 29                      | 58                    |
| September               | 17                          | 0                       | 17                    |
| Total 2009              | 106                         | 74                      | 180                   |
| Total 2008 <sup>1</sup> | 114                         | 193                     | 307                   |
| Total 2007 <sup>1</sup> | 112                         | 105                     | 217                   |

**Notes:**

1 Jewett et al. 2008a, b, c; 2009a, b.

Source: RWJ 2010a.

### Dutch Harbor

The Unalaska Department of Ports and Harbors manages, maintains and operates six City owned marine facilities at Dutch Harbor: the U.S. Coast Guard (USCG) Dock; the Unalaska Marine Center Dock; the Light Cargo Dock; the Robert Storrs International Small Boat Harbor; and the Carl E. Moses Boat Harbor. The Unalaska Marine Center Dock and USCG Dock consist of approximately 2,051 linear feet of dock face. The Unalaska Marine Center Dock offers cargo, passenger, and other port services. Horizon Lines operates a 30-ton crane and rail system for containerized cargo and North Pacific Fuel operates fueling facilities. Depth at mean lower low water (MLLW) alongside the berthing area is 40 feet. North Pacific Fuel's facilities include four marine fueling facilities. Offshore Systems, Inc. offers marine terminal services near the head of Captain's Bay in Dutch Harbor. Offshore Systems, Inc. provides 1,500 linear feet of dock space and around-the-clock stevedoring services. Unalaska Island marine traffic included 1,423 total domestic trips in 2009 (Northern Economics 2009).

#### 3.23.1.3.3 PIPELINE

Rivers in the Susitna watershed are shallow braided streams. Travel by water on the Susitna River and its tributaries is limited to small river boats due to the shallow channels. Freight delivery by barge on the Susitna River is not feasible.

Most of the bulk freight and heavy equipment used by residents and industry on the west side of Cook Inlet arrives by barge from the Port of Anchorage (POA) and is off-loaded at one of four barge-landing areas: Ladd Landing, Tyonek Landing, Granite Point Landing, and the Drift River Terminal (KPB 2003).

The Ladd Landing is located north of the mouth of the Chuitna River, between Tyonek and Beluga. This facility provides an off-loading point for equipment and supplies for the Chugach Electric Association power plant, natural gas fields, coal and mineral exploration activities and the domestic needs of the families living in the Beluga area. The tidelands belong to the State of

Alaska, while the uplands belong to the Kenai Peninsula Borough. The village of Tyonek also has a barge-landing beach located within the community, which is used for off-loading local equipment, fuel, and freight (KPB 2003).

A third barge-landing beach on the west side of Cook Inlet is located one mile west of Granite Point, between Shirleyville and the Granite Point Pump Station. This facility is privately owned and used to support the oil and gas activities, fishing, mining, tourism, and recreational use (KPB 2003).

Farther south, at the mouth of Drift River on Redoubt Bay and directly west of Kenai, there is a fourth barge-landing area. This is associated with the major oil tanker moorage at the Drift River Marine Terminal. The Drift River Terminal, consisting of two breasting dolphins and two mooring dolphins, can accommodate tankers up to 830 feet long. The facility, owned by Cook Inlet Pipeline Company, is exclusively for petroleum products and can only off-load ballast water and load crude oil through submerged pipelines that lead to tanks on shore. The oil is from wells in Cook Inlet that feed a pipeline that takes oil south paralleling the shore to the terminal area. This facility has undergone extensive construction to resolve flooding and safety problems resulting from the 1989-1990 eruption of Mount Redoubt, and berms were raised and reinforced in response to the 2009 lahars.

The North Foreland Barge Facility, owned and operated by Tyonek Native Corporation, is located on the northwestern shore of Cook Inlet near North Foreland, approximately 45 miles west of Anchorage and 1.5 miles southwest of the village of Tyonek. The wharf is approximately 1,500 feet long (KPB 2003).

The POA is the major point of entry for containerized cargo in Alaska. Approximately 240,000 containers move through the port annually (POA 2013a). The port provides an estimated 90 percent of the merchandise goods for 85 percent of Alaska's populated area, which includes over 200 village and rural towns across Alaska. The POA is also an important hub for fuel, providing 1.4 million gallons of fuel to western Alaska for heating oil, gasoline, and diesel (POA 2013a). It is also an important source of gasoline for the Anchorage and southcentral area. The POA is the only intermodal deep-water port in Alaska, fully operational year round and located only a few miles from one of the busiest cargo airports in the U.S. POA facilities include four ship berths and a published draft depth of -35 feet below MLLS which accommodates ships requiring 30 feet of draft (POA 2013a). There are three general cargo terminals and two petroleum product terminals.

Port MacKenzie on the west side of Knik Arm near Anchorage is a deep draft dock facility that is connected to the Southcentral Alaska road system. The port would be connected by rail to the Alaska Railroad mainline when construction of the new rail spur is complete, currently planned for 2017. The port can handle large ocean-going ships and has a barge offloading facility.

#### 3.23.1.4 CLIMATE CHANGE

Substantial arctic warming has occurred since the mid-20<sup>th</sup> century as reported in several studies (USGCRP 2014; IPCC 2013; Hinzman et al. 2013). In the Kuskokwim River area, there are anecdotal observations of early breakup, thin river ice, and open water in winter, which may be related to climate change. Climate change has been attributed to changes in ice roads and transportation on the frozen Kuskokwim River, reducing the window of time available for safe winter travel. Snowmachine travel during winter has also been impacted by increased

temperatures, with slushy conditions or a lack of snow cover observed in recent years. Section 3.26, Climate Change, describes current observations and trends.

Local observations of permafrost conditions in the Kuskokwim River area also note increased permafrost degradation along traditional use trails associated with the mild winter of early 2014 (ANTHC 2015). Local surface transportation systems and airstrips have been affected by climate change to the extent that climate change induced or accelerated riverine erosion and subsidence have damaged trails, roads, and runways.

### 3.23.2 ENVIRONMENTAL CONSEQUENCES

This section presents that analysis of potential impacts from the proposed action and alternatives. Increased transportation activity associated with the Donlin Gold Project is evaluated in terms of the likelihood to strain the existing regional transportation infrastructure and/or displace existing transportation activities. Potential impacts to transportation resources were determined by assessing the magnitude (intensity), duration, extent or scope, and context of anticipated impacts using specific impact criteria. The assessment criteria used to analyze each impact factor are described in Table 3.23-9 below.

**Table 3.23-9: Transportation Impact Methodology**

| Type of Effect                   | Impact Factor          | Assessment Criteria                                                                                              |                                                                                                                                                     |                                                                                                                                                |
|----------------------------------|------------------------|------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Effects on Transportation</b> | Magnitude or Intensity | Disturbance or displacement of transportation access, mode, or traffic levels may not be measurable or apparent. | Noticeable disturbance or displacement of transportation access, mode, or traffic levels.                                                           | Acute or obvious displacement of transportation access, mode, or traffic levels.                                                               |
|                                  | Duration               | Changes last during the Construction Phase.                                                                      | Changes would last through the life of the project.                                                                                                 | Changes persist after project Closure.                                                                                                         |
|                                  | Extent or Scope        | Effects realized by communities within a subregion, such as the Upper Kuskokwim or Central Kuskokwim.            | Effects realized by communities throughout the EIS Analysis Area.                                                                                   | Effects extend beyond the EIS Analysis Area.                                                                                                   |
|                                  | Context                | Affects transportation having alternate routes, facilities, or modes of transport.                               | Affects transportation with limited comparable alternate routes, facilities, or modes. Transport route or facility may be protected by legislation. | Affects transportation without comparable alternate routes or modes. Transport route or facility designated by legislation for transportation. |

### 3.23.2.1 ALTERNATIVE 1 – NO ACTION

Under the No Action Alternative, the Donlin Gold Project would not be undertaken and the required permits would not be issued. There would be no Mine Site, Transportation Corridor, or Pipeline. Consequently, there would be no project-related impacts, neither adverse nor beneficial, to transportation resources from implementation of the No Action Alternative. Current usage and trends would continue. Alternative 1 would have no additional effect on climate change as related to transportation resources in the EIS Analysis Area.

### 3.23.2.2 ALTERNATIVE 2 – DONLIN GOLD'S PROPOSED ACTION

Based on comments on the Draft EIS from agencies and the public, one route option has been included in Alternative 2 to address concerns due to pipeline crossings of the Iditarod National Historic Trail (INHT):

- North Option: The MP 84.8 to 112 North Option would realign this segment of the natural gas pipeline crossing to the north of the INHT before the Happy River crossing and remain on the north side of the Happy River Valley before rejoining the alignment near MP-112 where it enters the Three Mile Valley. The North Option alignment would be 26.5 miles in length, compared to the 27.2 mile length of the mainline Alternative 2 alignment it would replace, with one crossing of the INHT and only 0.1 mile that would be physically located in the INHT right-of-way (ROW). The average separation distance from the INHT would be 1 mile.

#### 3.23.2.2.1 MINE SITE

Under Alternative 2, Construction and Operations at the Mine Site would remove or prohibit use of approximately 9 miles of primitive trails that occur near the Mine Site, as well as an R.S. 2477 ROWs, which pass through or near the mine site. Donlin Gold has developed a Draft Public Easement Plan to temporarily relocate or vacate 17(b) easements and R.S. 2477 ROWs, providing alternate access for those routes (Donlin Gold 2017I). Use of the existing trails would cease, as they would be closed to public access for safety considerations. A list of R.S. 2477 ROWs is available in Table 3.15-1 and a list of Section 17(b) easements is available in Table 3.15-2, in Section 3.15.2.1, Land Ownership, Management, and Use. Since the trails and routes in the area currently do not support wheeled vehicles and are only occasionally used by snowmachines and dog teams in the winter months, potential direct and indirect effects associated with prohibiting use or relocating access would likely affect a very small number of users and the intensity of these impacts may not be measurable or apparent. The duration of changes in the vicinity of the mine site would last through the life of the project if the temporary closure of the easements lifts. Agencies may decide during reclamation to keep temporary closures in place, and therefore impacts may persist after Closure. The extent or scope of these effects would be realized by communities within the Upper Kuskokwim or Central Kuskokwim. Direct and indirect impacts to 17(b), R.S. 2477 ROW, and state public access easements are discussed in more detail in Section 3.15, Land Ownership, Management, and Use. There is no opportunity for water transportation near the Mine Site, and therefore direct and indirect effects to water transportation as a result of the Donlin Gold Project would not occur.



### 3.23.2.2.2 TRANSPORTATION CORRIDOR

#### Surface Transportation

A new access road would traverse varied terrain from the Mine Site to the Angyaruaq (Jungjuk) Port site near the mouth of Jungjuk Creek. Direct and indirect impacts to surface transportation from the Construction and Operations of the road from the Mine Site to the Angyaruaq (Jungjuk) Port site would be limited due to the remote character of the region. Traffic on the road would be limited to vehicles associated with the Donlin Gold Project (2,917 annual trips made by tractor-trailers) during the barging season and would not be open to the public or The Kuskokwim Corporation (TKC) shareholders during Operations. During Closure, the access road would remain in place and be maintained to provide access to the Project Area for perpetual monitoring and operation of the water treatment facility. After closure, the road may remain restricted for use by TKC shareholders. Because there are currently few roads in the area it is likely that local residents may want to use the port and road. However, the road would not pass near existing settlements or communities, nor would it connect with the existing road system (see Figure 2.3-12 in Chapter 2, Alternatives); therefore, use of the road is expected to be limited. As a result, the activities of the Donlin Gold Project would not intersect or otherwise impact the limited surface transportation infrastructure connecting or within the villages on the Kuskokwim River or in the Kuskokwim River basin. Due to the control of access and the lack of connection to existing roads or ROWs, there would be no effect to existing surface transportation and winter routes from Construction, Operations, or Closure of the road from Angyaruaq (Jungjuk) Port to the Mine Site.

Construction of the cargo terminal and additional fuel storage in Bethel is not part of the proposed action, and is a connected action (see Chapter 1, Purpose and Need, Section 1.2.1). The connected action would likely cause a slight increase in the number of vehicles traveling over existing roads in Bethel. As outlined in Section 3.23.1.1, Surface Transportation, surface traffic levels in the community of Bethel are relatively low, and construction vehicle travel would result in only a slight increase in daily traffic in the community. This slight increase in traffic may not be measurable or apparent, would last through Construction only, and the increase would be easily accommodated by the existing road network. Local traffic patterns would not be altered. During the Operations Phase of the Bethel Port site, low levels of additional traffic are estimated, and would result in a limited effect on local traffic patterns and use in Bethel. Donlin Gold would provide employee transportation; employee transportation is not estimated to affect local traffic patterns in Bethel.

Under Alternative 2, additional fuel storage would be needed in Dutch Harbor. Currently, no detailed plans have been developed for infrastructure in Dutch Harbor; however, there is requisite physical infrastructure and land available for storage and effects can be analyzed based on knowledge of prior projects. If construction of additional fuel storage were to occur at Dutch Harbor, it would be considered a connected action to the project. Minimal traffic would be added to local roads and the additional traffic from trips by construction workers and suppliers to the two ports may not be measurable and would not noticeably alter local traffic patterns.

The construction and maintenance of surface transportation facilities may not have a measurable or apparent effect on local transportation in Bethel and Dutch Harbor because of the small number of additional trips that would be generated for surface transportation. The

duration of direct and indirect impacts to surface transportation would last through the life of the project. The extent or scope of the impacts would be limited to the communities of Bethel and Dutch Harbor. The context of these impacts would affect transportation having alternative routes, facilities, or modes of transport.

### Air Transportation

During construction and operations of Alternative 2, workers, time-sensitive supplies, and equipment would be transported by plane to an airstrip at the Mine Site. Donlin Gold proposes to operate the airstrip for private, unscheduled use, chartered aircraft for flights from regional airport hubs (e.g., Bethel, Fairbanks, and Anchorage) to the Mine Site airstrip. Under normal operations, the airstrip would not be open to the public. In the event of an emergency, the airstrip could be used by planes not associated with the Donlin Gold Project. The proposed flights would increase local aviation operations to and from regional airport hubs, but would not create a new destination and access point for non-project related air traffic within the region. As a result, increases in regional airport hub air traffic would be limited to the regional hubs where the additional air traffic would represent a small increase relative to existing levels. The estimated numbers of air operations (by aircraft type) that would occur during Mine Site Construction and Operations are listed in Table 3.23-10. Estimates for closure have not been developed, but a conservative estimate could assume levels similar to construction. Actual levels would likely be less than levels for construction.

Under Alternative 2, local air traffic would increase by 5,148 annual operations during the 3-year construction period and 1,716 annual operations during Mine Site Operations. Regionally, these additional operations would be distributed between Ted Stevens Anchorage International (261,961 existing annual operations), Fairbanks International (119,898 existing annual operations), and Bethel (122,000 existing annual operations) airports (FAA 2017). For these airports, the proposed annual operations for the Donlin Gold Project would represent less than 5 percent of the total operations.

**Table 3.23-10: Estimates of Annual Operations<sup>1</sup> at Mine Airstrip**

| Phase        | Rotary Wing Aircraft                                | Fixed Wing Aircraft                                                                         |                              |                                | Total Annual Operations |
|--------------|-----------------------------------------------------|---------------------------------------------------------------------------------------------|------------------------------|--------------------------------|-------------------------|
|              |                                                     | Dash 8 Q300                                                                                 | Twin Otter Series 400        | Cargo Plane (TBD)              |                         |
| Construction | TBD<br>(local use in area of Mine Site development) | 2,808<br>(27 flights per week:<br>3 passenger flights per day,<br>6 cargo flights per week) | 2,184<br>(3 flights per day) | 156<br>(3 flights per 2 weeks) | 5,148                   |
| Operations   | TBD<br>(casual use)                                 | 936<br>(9 flights per week:<br>1 passenger flight per day,<br>2 cargo flights per week)     | 728<br>(1 flight per day)    | 52<br>(1 flight per 2 weeks)   | 1,716                   |

**Notes:**

1 Operations are equal to the number of arrivals and departures

Source: Fernandez 2013e

Alternative 2 could spur increased demands for commercial air service from contractors, suppliers, and local businesses involved directly or indirectly with operation of the mine. If demand on the existing air transportation infrastructure in the region was sustained, private sector air carriers would likely increase the number of flights accordingly, therefore minimizing long-term impacts to air transportation. Additional demand has the potential to increase traffic load at regional airports; however, impacts are expected to be limited given each airport is serviced by air traffic control towers.

Closure and reclamation activities would have a minimal impact on local and regional aviation operations as the number and frequency of flights into the mine airstrip related to reclamation activities would be small due to the decreased activity levels at the mine site. After reclamation activities are complete, aviation operations would consist of an occasional flight for post-Closure monitoring spread throughout the year.

The anticipated combined effects on air transportation in Alaska from Project-related air traffic during Construction, Operations, and Closure of the project would be less than a 5 percent increase to annual operations at the Bethel, Fairbanks, and Anchorage airports. The intensity of these impacts may not be measurable or apparent. The effects would last during Construction and Operations, and are anticipated to decrease during Closure. The extent or scope of impacts would be realized at the Mine Site, Bethel, Fairbanks, and Anchorage. The context of impacts would affect transportation that has alternative routes, facilities, or modes of transport. The Construction, Operations, and Closure of transportation facilities would be anticipated to have no effect on local commercial service (scheduled), as operations would be limited to private charter air traffic.

### Water Transportation

#### *Kuskokwim River*

During the summer months, the Kuskokwim River is traveled by small vessels engaged in commercial and subsistence fishing, transportation activities, as well as large vessels such as tugs and barges used to supply river communities upriver from Bethel. The majority of the small vessel traffic on the Kuskokwim River consists of high-speed river boats that tend to travel closer to the river bank compared to the larger, slower tug and barge combinations proposed under Alternative 2 for cargo transport. As a result, the barge traffic would result in limited direct displacement of existing smaller boat traffic along the proposed barge travel routes. There is, however, the potential for increased safety risk to small boats from barge waves, something local residents have expressed concern about. This could impair existing travel patterns by delaying or displacing small boat traffic from preferred routing. For the Donlin Gold Project, a 110-day shipping season from June 1 to October 1 is assumed (SRK 2013a), which includes periods with smaller load volumes or without barging due to low flows in the Kuskokwim River. An overview of barge traffic annual volume is shown in Table 3.23-11.

**Table 3.23-11: Estimated Number of River Barge Round Trips per Season**

|                          | Carrying                  | From   | To                                                           | Annual Barge Trips |
|--------------------------|---------------------------|--------|--------------------------------------------------------------|--------------------|
| Estimated current use    | Cargo/Fuel                | Bethel | Upriver communities                                          | 68                 |
| Construction (3-4 years) | Cargo                     | Bethel | Angyaruaq (Jungjuk) Port Site or BTC                         | 50 <sup>1</sup>    |
|                          | Fuel                      | Bethel | Angyaruaq (Jungjuk) Port Site or BTC                         | 19 <sup>2</sup>    |
|                          | Pipeline Materials        | Bethel | Staging area near Devil's Elbow, above Stony River (2 years) | 20                 |
|                          | Annual Construction Total |        |                                                              | 89                 |
| Operations (27 years)    | Cargo                     | Bethel | Angyaruaq (Jungjuk) Port Site or BTC                         | 64                 |
|                          | Fuel                      | Bethel | Angyaruaq (Jungjuk) Port Site or BTC                         | 58                 |
|                          | Annual Operations Total   |        |                                                              | 122 <sup>3</sup>   |

**Notes:**

1 Total would be 200 trips over four years. Exact distribution would be determined during final design.

2 Average; actual number would range from 9 to 29 annually.

3 Numbers represent peak years

Alternative 2 would increase commercial vessel traffic on the Kuskokwim River during Construction as cargo and fuel are transported to the Angyaruaq (Jungjuk) Port. Over the 4-year construction period, it is estimated that approximately 200 river barge round trips, or 50 per year, would be required to move cargo from Bethel to Angyaruaq (Jungjuk) Port. During Construction, a smaller number of fuel barges would be required, estimated at an average of 19 annual round trips, transporting an average of 10 million gallons each year during the 4-year construction period. In addition, there would be 40 barge trips over two years (20 per year) to deliver pipeline materials to a staging area above Stony River. Together these would represent approximately 89 barge tows round trips per year, or about 54 percent of the volume of barge traffic during Operations (about 122 barge round trips per year) (Enos 2013d). In comparison, it has been estimated that approximately 68 barge tows per year (round trips per season) currently occur annually to serve the villages upriver of Bethel (Ausdahl 2013; Clevenger 2013; Faulkner 2013; Jansen et al. 2014; Leary 2013; Myers 2013). The estimate of 68 barges is the number leaving Bethel to travel upstream. It would be expected that the further up the river a community is located, the fewer barges that would travel past annually. For this analysis, 68 barges is used as the baseline. The existing barge trips are typically tows of one or two barges, whereas the Donlin Gold Project barge traffic would be tows of four barges. The increase in summer shipping season barge traffic during Construction would represent an increase from 68 round trips as the baseline to 157 (baseline plus project traffic). The additional barge traffic during Construction would represent a large increase in river traffic relative to the existing levels of use on the river, but distributed along 199 miles of the Kuskokwim River (Bethel to Angyaruaq [Jungjuk] Port, or Stony River).

During Operations, the Donlin Gold Project would require approximately 122 cargo and fuel barge tows (round trips per season) from Bethel to supply the fuel and consumables needed at the Mine Site. In comparison to the current levels of barge traffic, these trips would represent a large increase in barge traffic along those segments of the river between Bethel and the Angyaruaq (Jungjuk) Port site. Adding baseline trips to new barging trips together would be a total of 190 annual barge trips on the Kuskokwim River. These elevated barge traffic levels

could increase congestion and disturbance of the commercial and non-commercial vessel traffic at narrow channel segments along the Kuskokwim River. Section 2.3.2.2.1 in Chapter 2, describes how a barge-loading plan for each trip would be created based on expected river conditions.

The magnitude of likely effects to commercial and non-commercial vessel traffic on the Kuskokwim River between Bethel and Angyaruaq (Jungjuk) would include a noticeable increase in barge traffic attributable to the Donlin Gold Project, and would noticeably affect existing traffic, but would not acutely displace existing transportation activities. The increase in summer shipping season barge traffic during Operations would increase from 68 baseline barge trips to a total of 190 annual barge trips. Another measure of change in barge frequency would be the average number of barge passings per day, and the average time interval between barge passings. The project-related total of 122 roundtrip barge tows per season would result in 232 barge passings (i.e., one-way transits) during the estimated 110 days shipping season. This would represent 2.2 barge passings per day, and an average interval between barge passings of 10.9 hours. While this would be a large increase in barge traffic relative to baseline river traffic estimates, the additional barge traffic under Alternative 2 would be distributed along 199 river miles of the river and interact on a limited basis with existing small boat use on the river.

At mine closure, the Angyaruaq (Jungjuk) Port facilities (including sheet piling and fill) would be removed and reclaimed, with only a primitive barge landing remaining to support monitoring, and operation of the Water Treatment Plant at the pit lake (after approximately 50-55 years) under Alternative 2. Water transportation would return to near baseline levels as Donlin Gold mine-related barge activity on the Kuskokwim River would decline to very low levels of traffic to support monitoring, thus reducing the potential to impact or displace traffic on the Kuskokwim River between Bethel and the port facility. The duration of these direct effects would extend through the life of the mine (27 years) and the extent or scope would affect communities along the Kuskokwim River from Bethel to Crooked Creek. The context of impacts would affect the Kuskokwim River transportation system, which serves communities along the river that are not served by roads.

#### *Port of Bethel*

The Port of Bethel is the receiving and shipping center for the Y-K Delta region, serving 53 communities. Under Alternative 2, the Port of Bethel would receive approximately 10 additional freight barges annually during Mine Site Construction over the approximate 15 to 20 freight barges the port currently receives. This would represent approximately a 50 percent increase in the number of annual freight barge receipts at Bethel. Similarly, during Operations of the Mine Site, an additional 14 mainline fuel barges and 12 cargo barges would dock in Bethel, more than twice the number of barges currently received at the dock annually (City of Bethel 2011).

Currently, barges dock perpendicular to the Bethel Port reducing the existing navigational clearance from approximately 400 feet to approximately 210 feet (refer to Section 3.5, Surface Water Hydrology, Figure 3.5-30). The proposed configuration with the port improvements under Alternative 2 would dock barges parallel to the port, reducing the existing navigational clearance from approximately 400 feet to approximately 300 feet. These improvements to port facilities along with the creation of additional cargo and fuel capacity would have a beneficial direct effect to the existing port facilities under this alternative.

Anticipated indirect effects of Alternative 2 on the Port of Bethel facilities would include a noticeable disturbance to traffic levels since there would be greater than a 10 percent change in the number of barge receipts. The potential to displace other uses may be offset by the additional barge, cargo and fuel capacity constructed at the port facilities in Bethel, although this is a connected action, not part of the proposed action. The duration of effects would continue over the life of the Project, and the extent or scope would affect communities throughout the region that rely on cargo shipments from Bethel. The impacts to the port would affect a transportation hub with limited comparable alternatives in the region.

### Summary of Transportation Corridor Impacts

The direct and indirect effects of Alternative 2 on existing transportation systems would result in noticeable congestion and limited displacement of current uses in narrow reaches of the Kuskokwim River at the Bethel Port facilities during the summer shipping season. Given the scale of use on the river system in the Bethel area, the barges associated with the Donlin Gold Project would be noticeable. The addition of project-related port facilities as a connected action and dedicated barge vessels would reduce the potential strain on existing infrastructure and displacement of current uses within Bethel. The duration of direct and indirect impacts to surface, air, and water transportation would extend through the life of the mine. The overall extent or scope of impacts would affect communities along the Kuskokwim River from Bethel to the Angyaruaq (Jungjuk) Port. For those communities affected, the context of impacts would affect transportation hubs and the Kuskokwim River, and would occur in an area not served by roads that relies extensively on water and air transportation resources.

#### 3.23.2.2.3 NATURAL GAS PIPELINE

##### Surface Transportation

Under Alternative 2, public access to the majority of the Pipeline ROW by way of surface transportation (e.g., OHV or snowmachine) would be limited by the remoteness of the route, lack of infrastructure (such as safety cabins), absence of a nearby population, and no additional hunting allowances. An overland route, the INHT, is already established in the same vicinity as the Pipeline ROW, which would help to keep use levels along the Pipeline ROW low. Construction of the Pipeline would temporarily interrupt surface transportation along the first 5 miles (MP 1 to MP 5) where it is co-aligned with existing transportation ROW, which is used intermittently by local area residents. Along these segments, and at other locations in the vicinity of Beluga where construction activities would impact existing access routes, alternate access would be provided or controlled access would be allowed. Notice of pipeline construction activity restrictions and information on how the public could coordinate access needs with construction activities would be provided.

During the approximate three year pipeline construction period, two winter access corridors (approximately 46 and 50 miles respectively) would be used to transport equipment and supplies to the Pipeline ROW proposed under Alternative 2. These winter routes would provide access to the Pipeline ROW from the road system, either from Willow or Petersville Road. Each route has been previously used for commercial oil and gas exploration, but neither is currently being used for these purposes. Since there is little to no existing traffic on those



routes (SRK 2013b), no direct or indirect effects on other transportation uses would be expected from Alternative 2 on these two winter access corridors.

Existing roads, trails, or other public routes encountered during Construction and Operations of the Pipeline would be protected and connectivity would be maintained. Measures utilized to maintain surface transportation corridors would include provisions for suitable permanent crossings where the buried pipeline would intersect existing trails. If Construction physically impacts roads, trails, or other public routes, these routes would be restored. Public access to the ROW would be restricted during Construction due to safety considerations. For more information on impacts to trails and recreation resources, see Section 3.15, Land Ownership, Management, and Use, and Section 3.16, Recreation.

Following completion of Construction, a 5-acre site would be developed in the Beluga area to store compressor station materials, pipeline materials, OHVs, and snowmachines that would be used during Operations. As a result of this development, there would be a slight increase in the use of transportation infrastructure, such as public ROWs and roads, which would likely be noticeable in the vicinity of Beluga. However, given the current low levels of use by local Beluga residents, oil and gas operations, and the maintenance and operations of Chugach Electric Association's Beluga power plant, there would be minimal impact to transportation resources in the Beluga area.

Under Alternative 2, Pipeline decommissioning would include removal of above-ground facilities. Materials that could be salvaged or recycled would be transported to either Anchorage or the Mine Site where they would be dismantled, salvaged, recycled, and disposed as appropriate. Since all below grade pipe would be abandoned in place, including HDDs, Pipeline decommissioning would not involve the construction of new routes (winter or summer) or the creation of additional temporary airstrips.

The direct and indirect effects of Alternative 2 to surface transportation from the Construction and Operations of the Pipeline would include disturbance or displacement of transportation access, modes, or traffic levels that may not be measurable or apparent. This is primarily due to the remoteness of the Pipeline ROW, low levels of use on existing roads in the vicinity of Beluga, and the controlled access to the ROW. The duration of effects to surface transportation would last throughout the life of the Pipeline. The extent or scope of effects would generally occur along those portions of the Pipeline in the vicinity of Beluga. Disturbances would affect transportation by having to create alternate routes, facilities, or modes of transport. No new temporary or permanent public vehicular access is proposed.

### Air Transportation

During Pipeline Construction, personnel (approximately 960 annual operations) and fuel would be transported to construction airstrips on both fixed-wing and rotary (helicopter) aircraft. Nine new airstrips and three existing airports (Beluga, Farewell, and the Donlin Mine Site), would be used (for a listing, see Table 2.3-28 in Chapter 2, Alternatives). The nine new airstrips utilized during Pipeline Construction would be closed to public access and reclaimed following Construction, and therefore, would be unavailable for public use afterward. Other temporary airstrips in the area have been successfully rendered unusable by aircraft once project use has completed (Donlin Gold 2016c). Under this alternative, the Farewell Airport would require an upgrade of its runway surface that would require the runway to be closed during the resurfacing. This closure is anticipated to extend for a six month period, but the disturbance

would be distributed between both the first and second year of winter construction periods, and would also depend on the Pipeline segment construction schedule. During the resurfacing periods, local operations at the Farewell Airport would be temporarily disrupted and planes would have to use adjacent runways or nearby lakes for access.

The improvements to the Farewell Airport would represent a beneficial impact to the transportation facilities in the region. Existing airports, however, would experience an increase in operations during a single winter or summer season while Pipeline Construction is occurring. The increase would be noticeable, but would not displace existing operations.

Anticipated frequency of aviation operations during the Operations Phase of the Pipeline would consist of approximately 24 helicopter overflights per year and one fixed-wing flight per week from Anchorage to Beluga for security and monitoring purposes. These flights would take off and land at airstrips and lakes currently used by light aircraft. The infrequent Pipeline overflights and landings would not impact current air transportation due to existing low levels of flights in the region, nor would the weekly flights from Anchorage.

Anticipated effects to aviation from closure and reclamation activities associated with the pipeline decommissioning and reclamation would consist of a small number of flights to transport personnel for Closure activities. Similar to Operations, these flights would occur near airstrips and lakes currently used by light general aviation aircraft and would have a negligible impact to air transportation in the region.

In summary, the direct and indirect effects to local aviation at existing airports would range in intensity from disturbances or displacement that may not be measurable or apparent to disturbances that would be noticeable during Construction, with reduced use levels during Operations and Closure. The duration of impacts would occur primarily during the Construction Phase, but a lower level of air traffic primarily associated with monitoring the Pipeline would occur over the life of the project. The extent or scope of impacts would affect communities where there are a large number of alternate airports and float/ski plane accessible lakes in the region. Existing operations would not be displaced. Some beneficial impacts persisting after project Closure would include improvements to Farewell Airport as air transportation infrastructure in the region.

### Water Transportation

During Pipeline Construction, pipe and other heavy construction materials would be shipped by ocean cargo barge from consolidation terminals in Seattle or Vancouver to the Port of Anchorage (POA) for temporary storage and deployment to the Beluga barge landing. The POA would experience a temporary increase in shipments. This increase would be slight relative to overall cargo shipments received at the POA, which received an average of 970 receipts per year between 2007 and 2011. During the first two years of Construction, 20 barge tows would transport the Pipeline materials from the POA to the Beluga barge landing. The resulting traffic into the Beluga Port would increase slightly as a result of Pipeline construction. Other materials used for Pipeline construction would be barged on the Kuskokwim River from Bethel to the Angyaruaq (Jungjuk) Port (included in the estimated 50 barge tow round trips per year during four years of construction) and in an estimated 20 barge tow round trips to the Kuskokwim Landings, near Devil's Elbow at the point where the pipeline crosses the Kuskokwim River. Transportation effects from barging on the Kuskokwim River were discussed above in Section 3.23.2.2.2, Transportation Corridor.

No effects to water transportation from Operations of the Pipeline are anticipated. No transport via water would occur to support the Pipeline Operations.

Pipeline Closure would include removal of above-ground Pipeline facilities. Materials that could be salvaged or recycled would be transported to Anchorage by barge from the Beluga barge landing to the POA where they would be dismantled, salvaged, recycled, and disposed as appropriate. The increase in barge traffic at the Beluga Port and POA as a result of these activities would be minimal relative to other port traffic. Effects to water transportation from the Construction, Operations, and Closure of the Pipeline under Alternative 2 would include relatively few barge receipts and barge trips on the Kuskokwim directly associated with the Pipeline. The intensity of these impacts may not be measurable or apparent. The duration of these impacts would only take place during the Construction Phase and pipeline decommissioning. The extent or scope would be limited to Beluga and the Kuskokwim River from Bethel to the Angyaruaq (Jungjuk) Port site. The context would affect communities in the area that are not served by roads.

### Summary of Pipeline Impacts

The overall direct and indirect effects of Construction, Operations, and Closure of the Natural Gas Pipeline under Alternative 2 on existing transportation systems would include relatively limited disturbance or displacement from the increase in trips for surface, air, and water transportation. The intensity of these disturbances may not be measurable or apparent. The duration of impacts for transportation would extend through the life of the Pipeline, but impacts would primarily occur during Construction. Improvements to existing airports, however, would persist after Project Closure and impacts to water transportation would occur only during Construction and Closure. The extent or scope of impacts to transportation would occur in isolated places, including remote airstrips and isolated communities. The context would affect communities that rely on water and air transportation resources and are not served by roads.

#### 3.23.2.2.4 CLIMATE CHANGE

The Donlin Gold Project would contribute to climate change through the production of greenhouse gases as discussed in Section 3.8, Air Quality. The amount of greenhouse gas emissions from implementation of Alternative 2 is not likely to create climate change effects to transportation. However, if current climate change trends persist, impacts to transportation would likely be similar to those discussed under the Affected Environment (Section 3.23.1.4), including adverse impacts to winter travel on frozen water bodies and transportation infrastructure degradation from subsidence and riverine erosion caused by melting permafrost.

#### 3.23.2.2.5 SUMMARY OF IMPACTS FOR ALTERNATIVE 2

Applying the methodology defined in Table 3.23-9 to the information and data presented in this section, Alternative 2 has potential direct and indirect impacts on existing transportation systems. Table 3.23-12 provides a summary of impacts by the four assessment criteria.

There would be direct and indirect impacts to summer and winter trails that pass through or near the Mine Site. Impacts would affect a few intermittent users of many trails in the area and the intensity of these impacts may not be measurable or apparent. The duration of these

changes would persist after Closure, as the trails would not be replaced. The extent or scope of these effects would be realized by communities within the Upper Kuskokwim region. Existing surface transportation would not be greatly altered, or extend beyond the Mine Site. There is no opportunity for water transportation near the Mine Site, and therefore no direct and indirect effects to water transportation would occur in this area.

The predominant impact of the Alternative 2 Transportation Corridor on existing transportation systems would involve noticeable disturbance or displacement of existing uses from increased barge traffic between the Bethel and Angyaruaq (Jungjuk) ports, and increased barge receipts at the Port of Bethel during the summer shipping season. The potential level of strain on infrastructure and displacement of existing uses would be offset by the addition of infrastructure in the Bethel Port facilities (as a connected action) and dedicated barge vessels. The duration of direct and indirect impacts to surface, air, and water transportation infrastructure and use levels would last through the life of the Project. The extent or scope of impacts would be realized by communities throughout the EIS Analysis Area, given that communities along the Kuskokwim River from Bethel to the Angyaruaq (Jungjuk) Port would be affected. For those communities affected, the context of impacts would affect transportation with limited comparable alternate routes, facilities, or modes. Impacts would affect transportation hubs and the Kuskokwim River, and occur in an area not served by roads that relies extensively on water and air transportation resources.

The predominant impact of the Pipeline Construction, Operations, and Closure on existing transportation systems (surface, air, and water) would be driven by the limited increase in trips and the remote location of the Pipeline ROW. The intensity of these changes may not be measureable or apparent. While the duration of potential impacts would extend through the life of the Pipeline, beneficial permanent improvements to existing airports would partially offset direct impacts. The extent or scope of these impacts would be realized by communities throughout the EIS Analysis Area, including remote airstrips and isolated communities. The context of impacts would affect communities that rely on water and air transportation resources and are not served by roads (Table 3.23-13).

#### 3.23.2.2.6 MITIGATION AND MONITORING FOR ALTERNATIVE 2

Effects determinations take into account impact reducing design features (Table 5.2-1 in Chapter 5, Impact Avoidance, Minimization, and Mitigation) proposed by Donlin Gold and also the Standard Permit Conditions and BMPs (Section 5.3) that would be implemented.

Design features important for reducing impacts to transportation include:

- Donlin Gold's surface use agreements with Calista and The Kuskokwim Corporation (TKC) include the Donlin Advisory and Technical Review Oversight Committee (DATROC), which is active and meets quarterly. Appropriate Project communications would be managed under the purview of the DATROC, ultimately in the form of advisory subcommittees (e.g., barge subcommittee, subsistence subcommittee). Donlin Gold has committed to two subcommittees, the barge subcommittee and subsistence subcommittee, which would act in parallel to engage and inform local communities;
- Mine transportation facilities, access routes, airstrips and other transportation infrastructure would be sited along ridge tops whenever possible to minimize wetlands and stream impacts;

- Ocean and river fuel barges would be double hulled and have multiple isolated compartments for transporting fuel to reduce the risk of a spill;
- The barge operations system was designed to avoid the need for dredging the navigation channel in the river;
- Donlin Gold would implement barge guidelines for operating at certain river flow rates, and conduct ongoing surveys of the Kuskokwim River navigation channel to identify locations that should be avoided to minimize effects on bed scour and the potential for barge groundings. As part of the proposed operation, equipment will be available to free or unload/lighter barges in the event of groundings. The equipment will be available as part of ongoing operations, it will not all be dedicated standby equipment;
- To reduce impacts on existing river traffic and potential for groundings and accidents, Donlin Gold would establish navigational aids and develop procedures for queuing in narrow channels. Donlin Gold vessels would use state-of-the-art navigation and communication equipment;
- The project design includes a communication program, managed under purview of a DATROC barge subcommittee to keep local communities informed of the schedules and current status of barge traffic as well as minimize displacement of subsistence fishing by barges (see Appendix W for Donlin Gold's Barge Communication Plan). Donlin Gold would consult with people experienced with navigation on Kuskokwim River to incorporate local knowledge as they are designing their barging operations and guidelines. The communication plan would outline steps to avoid potential conflict. In the event of any barging-related conflict or concern, Donlin Gold is committed to resolving issues with stakeholders through an established conflict or concern resolution process;
- The project design includes new, dedicated transportation equipment and infrastructure (such as the new port at Angyaruaq (Jungjuk), the Mine Site airstrip, and the double-hulled barges) that would minimize impacts to existing regional transportation facilities and activities;
- Donlin Gold would have helicopters available for logistics to support activities such as monitoring/surveillance or special projects on the transportation corridor; which would reduce the need for overland travel and associated roads/trails;
- River pilots would be used for all tug and barge traffic between the mouth of the Kuskokwim River and Bethel (see Appendix W for Donlin Gold's Barge Communication Plan); and
- The project design includes a natural gas pipeline to decrease amount of barging to transport diesel fuel. The design decision to use a natural gas pipeline instead of barging 110 Mgal of diesel per year was in response to community concern about barge traffic levels.

Standard Permit Conditions and BMPs important for reducing impacts to regional transportation systems include:

- Designing and installing culverts and bridges on transportation routes for fish passage;

- Development and maintenance of ODPCPs, SPCC plans, and FRPs;
- Preparation and implementation of a Reclamation and Closure Plan (SRK 2017f); and
- Implementation of Stormwater Pollution Prevention Plans (SWPPPs) and/or Erosion and Sediment Control Plans (ESCPs) and use of industry standard BMPs for sediment and erosion control.

Additional measures are being considered by the Corps and cooperating agencies to further minimize project impacts, as reasonable and practicable, and are further assessed in Chapter 5, Impact Avoidance, Minimization, and Mitigation (Section 5.5 and Section 5.7). Examples of additional measures being considered that are applicable to this resource include:

- For marine barging in the Bering Sea – implement measures to minimize the risk of spills, including: avoiding operation of watercraft in fall and winter and in the presence of sea ice to the extent practicable; using double-hull tanks for fuel transport to reduce tank rupture risk; and using fully operated vessel navigation systems composed of radar, chartplotter, sonar, marine communications systems, and satellite navigation receivers, as well as automatic identification system (AIS) for vessel tracking; and
- Transport mercury by air (rather than by barge) to a regulated storage facility.

### 3.23.2.3 ALTERNATIVE 3A – REDUCED DIESEL BARGING: LNG-POWERED HAUL TRUCKS

Under Alternative 3A, there would be a reduction in diesel storage requirements in Dutch Harbor, Bethel Fuel Terminal, and Angyaruaq (Jungjuk) Port from approximately 40 Mgal to 13.3 Mgal per year relative to Alternative 2 and a reduction from 122 to 83 total barge trips (Table 3.23-13) during Operations. Refer to Section 2.3.3.2 (Table 2.3-45) for more detail on barge trips. This large reduction in diesel fuel requirements would result in a decrease in fuel shipments from refineries in the Pacific Northwest to Dutch Harbor. As a result, only 2 round trips per year for fuel would be required under Alternative 3A, rather than 7 round trips under Alternative 2, and fuel shipments from Dutch Harbor to Bethel would be reduced to 5 round trips, compared to 14 seasonal round trips under Alternative 2. Correspondingly, fuel shipments by river barge from Bethel to Angyaruaq (Jungjuk) Port would be reduced to 19 round trips per season, compared to 58 round trips for fuel transport under Alternative 2. This reduction in barge traffic only applies to fuel transfers and does not affect barge traffic needed to move cargo to the mine site.

When river barge traffic for both fuel and cargo are taken into consideration, Alternative 3A would result in an estimated 83 annual round trips between Bethel and Angyaruaq (Jungjuk) Port, compared to an estimated 122 annual round trips under Alternative 2. This would represent a daily average of 1.5 barge passings and an average interval of 16 hours between barge passings.



**Table 3.23-12: Alternative 2 Impacts by Project Component**

| Project Component                                                             | Assessment Criteria <sup>1</sup>                                                                                                                                                                                                                                                        |                                                                                                                          |                                                                                                                 |                                                                                                                                                                  |
|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                               | Magnitude or Intensity                                                                                                                                                                                                                                                                  | Duration                                                                                                                 | Extent or Scope                                                                                                 | Context                                                                                                                                                          |
| <b>Mine Site</b>                                                              |                                                                                                                                                                                                                                                                                         |                                                                                                                          |                                                                                                                 |                                                                                                                                                                  |
| Surface Transportation Facilities (Air and Water transportation do not apply) | Disturbance or displacement of transportation access, mode, or traffic levels may not be measurable or apparent.                                                                                                                                                                        | Changes would last the lifetime of the project.                                                                          | Effects would be realized by communities within a sub-region, such as the Upper Kuskokwim or Central Kuskokwim. | Impacts would affect transportation having alternate routes, facilities, or modes of transport.                                                                  |
| <b>Transportation Corridor</b>                                                |                                                                                                                                                                                                                                                                                         |                                                                                                                          |                                                                                                                 |                                                                                                                                                                  |
| Surface Transportation Facilities                                             | Disturbance or displacement of transportation access, mode, or traffic levels may not be measurable or apparent.                                                                                                                                                                        | Changes would last through the life of the project.                                                                      | Effects would be realized by communities within a sub-region, such as the Upper Kuskokwim or Central Kuskokwim. | Impacts would affect transportation having alternate routes, facilities, or modes of transport.                                                                  |
| Air Transportation Facilities                                                 | Disturbance or displacement of transportation access, mode, or traffic levels may not be measurable or apparent.                                                                                                                                                                        | Changes would last through the life of the project.                                                                      | Effects would be realized by communities throughout the EIS Analysis Area.                                      | Impacts would affect transportation having alternate routes, facilities, or modes of transport.                                                                  |
| Water Transportation Facilities: Kuskokwim River                              | During Construction and Operations, there would be noticeable disturbance or displacement of transportation access, mode, or traffic levels. During the Closure Phase, Disturbance or displacement of transportation access, mode, or traffic levels may not be measurable or apparent. | Changes would last through the life of the project.                                                                      | Effects would be realized by communities throughout the EIS Analysis Area.                                      | Impacts would affect transportation with limited comparable alternate routes, facilities, or modes. Transport route or facility may be protected by legislation. |
| Water Transportation Facilities: Ports                                        | During Construction and Operations, there would be noticeable disturbance or displacement of transportation access, mode, or traffic levels. During the Closure Phase, Disturbance or displacement of transportation access, mode, or traffic levels may not be measurable or apparent. | Changes would last through the life of the project. Upgrades of existing facilities would persist after project Closure. | Effects would be realized by communities throughout the EIS Analysis Area.                                      | Impacts would affect transportation with limited comparable alternate routes, facilities, or modes. Transport route or facility may be protected by legislation. |

**Table 3.23-12: Alternative 2 Impacts by Project Component**

| Project Component                                                             | Assessment Criteria <sup>1</sup>                                                                                                                                                                                                                                                        |                                                                                                                        |                                                                                                                 |                                                                                                                                                                  |
|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                               | Magnitude or Intensity                                                                                                                                                                                                                                                                  | Duration                                                                                                               | Extent or Scope                                                                                                 | Context                                                                                                                                                          |
| <b>Pipeline</b>                                                               |                                                                                                                                                                                                                                                                                         |                                                                                                                        |                                                                                                                 |                                                                                                                                                                  |
| Surface Transportation Facilities (Air and Water transportation do not apply) | Disturbance or displacement of transportation access, mode, or traffic levels may not be measurable or apparent.                                                                                                                                                                        | Changes would last through the life of the project.                                                                    | Effects would be realized by communities within a sub-region, such as the Upper Kuskokwim or Central Kuskokwim. | Impacts would affect transportation having alternate routes, facilities, or modes of transport.                                                                  |
| Air Transportation Facilities                                                 | During Construction and Operations, there would be noticeable disturbance or displacement of transportation access, mode, or traffic levels. During the Closure Phase, Disturbance or displacement of transportation access, mode, or traffic levels may not be measurable or apparent. | Changes would last during the Construction Phase. Upgrades of existing facilities would persist after project Closure. | Effects would be realized by communities within a sub-region, such as the Upper Kuskokwim or Central Kuskokwim. | Impacts would affect transportation having alternate routes, facilities, or modes of transport.                                                                  |
| Water Transportation Facilities: Ports                                        | Disturbance or displacement of transportation access, mode, or traffic levels may not be measurable or apparent.                                                                                                                                                                        | Changes would last during the Construction Phase.                                                                      | Effects would be realized by communities throughout the EIS Analysis Area.                                      | Impacts would affect transportation with limited comparable alternate routes, facilities, or modes. Transport route or facility may be protected by legislation. |

**Notes:**

- 1 The expected impacts account for impact reducing design features proposed by Donlin Gold and Standard Permit Conditions and BMPs that would be required. It does not account for additional mitigation measures the Corps is considering.

**Table 3.23-13: Annual Barge Traffic Comparisons, Alternatives 2 and 3A**

|       | <b>Alt 2</b> | <b>Alt 3A</b> |  |
|-------|--------------|---------------|--|
| Cargo | 64           | 64            |  |
| Fuel  | 58           | 19            |  |
| Total | 122          | 83            |  |

Under Alternative 3A, the increase in barge traffic relative to baseline would be smaller than that of Alternative 2. However, the increase in barge traffic for both ocean and river barges under Alternative 3A, though less than Alternative 2, would still result in noticeable disturbance and limited displacement of other uses at the Bethel Port facilities and in narrow reaches of the river. The extent or scope, duration, and context of these effects would be the same as discussed under Alternative 2.

The direct and indirect effects to surface, air, and water transportation at the Mine Site from Construction, Operations, and Closure would be the same as Alternative 2. Effects to surface and air transportation facilities from use of LNG-powered haul trucks during Operations would be the same as Alternative 2. Effects to surface, air, and water transportation from Pipeline Construction, Operations, and Closure would be the same as Alternative 2.

Impacts associated with climate change would be the same as discussed for Alternative 2. The effects determinations take into account applicable impact reducing design features, as discussed in Alternative 2. Examples of additional measures being considered that are applicable to this resource are listed under Alternative 2.

#### 3.23.2.4 ALTERNATIVE 3B – REDUCED DIESEL BARGING: DIESEL PIPELINE

Alternative 3B would substitute a diesel pipeline for the natural gas pipeline, reducing barging on the Kuskokwim River from 122 annual barge trips during Operations in Alternative 2 to 64 annual barge trips in Alternative 3B. It would also require an additional 19-mile pipeline segment to access a new diesel fuel dock on the west side of Cook Inlet.

Two options to Alternative 3B have been added based on Draft EIS comments from agencies and the public:

- **Port MacKenzie Option:** The Port MacKenzie Option would utilize the existing Port MacKenzie facility to receive and unload diesel tankers instead of the Tyonek facility considered under Alternative 3B. A pumping station and tank farm of similar size to the Tyonek conceptual design would be provided at Port MacKenzie. A pipeline would extend northwest from Port MacKenzie, route around the Susitna Flats State Game Refuge, cross the Little Susitna and Susitna rivers, and connect with the Alternative 3B alignment at approximately MP 28. In this option, there would be no improvements to the existing Tyonek dock; a pumping station and tank farm would not be constructed near Tyonek; and the pipeline from the Tyonek tank farm considered under Alternative 3B to MP 28 would not be constructed.
- **Collocated Natural Gas and Diesel Pipeline Option:** The Collocated Natural Gas and Diesel Pipeline Option (Collocated Pipeline Option) would add the 14-inch-diameter

natural gas pipeline proposed under Alternative 2 to Alternative 3B. Under this option, the power plant would operate primarily on natural gas instead of diesel as proposed under Alternative 3B. The diesel pipeline would deliver the diesel that would be supplied using river barges under Alternative 2 and because it would not be supplying the power plant, could be reduced to an 8-inch-diameter pipeline. The two pipelines would be constructed in a single trench that would be slightly wider than proposed under either Alternative 2 or Alternative 3B and the work space would be five feet wider. The permanent pipeline ROW would be approximately two feet wider. This option could be configured with either the Tyonek or Port MacKenzie dock options.

The Port MacKenzie Option would utilize the existing facility at Port MacKenzie to receive and unload diesel tankers instead of the Tyonek facility discussed under Alternative 2. A pipeline would extend northwest from Port MacKenzie, route around the Susitna Flats State Game Refuge, cross the Little Susitna and Susitna rivers, and connect with the Alternative 3B Pipeline alignment at approximately MP 28.

The Mine Site impacts would be identical to those discussed under Alternative 2. The extent or scope, duration, and context of all impacts would be the same as for Alternative 2. Impacts associated with climate change would also be the same as discussed for Alternative 2. The discussion under this alternative focuses on differences in intensity of impacts to the Transportation Corridor and Pipeline under Alternative 3B. The effects determinations take into account applicable impact reducing design features, as discussed in Alternative 2 for all options. Although the location of impacts would be shifted from Tyonek to Port MacKenzie under that Option, impacts would be the same. Examples of additional measures being considered that are applicable to this resource are listed under Alternative 2.

#### 3.23.2.4.1 TRANSPORTATION CORRIDOR

Effects to surface and air transportation from the diesel Pipeline during Construction and Operations of the Donlin Gold Project would be the same as discussed for the natural gas pipeline in Alternative 2.

Under Alternative 3B, diesel fuel would be shipped via ocean barge to Tyonek, where the diesel Pipeline would begin, and cargo would be transported to the Mine Site along the Kuskokwim River via river barge. Consequently, diesel storage requirements in Dutch Harbor, at the Bethel Dock Yard area, and Angyaruaq (Jungjuk) Port would be substantially decreased relative to Alternative 2, a reduction of approximately 27.5 Mgal annually; 10 Mgal of onsite diesel storage would be required. In addition, most of the fuel shipment requirements proposed under Alternative 2 would be eliminated, including 7 annual ocean barge fuel shipments to Dutch Harbor, 14 annual ocean barge fuel trips from Dutch Harbor to Bethel, and 58 annual river barge fuel trips from Bethel to Angyaruaq (Jungjuk) Port (Table 3.23-14). Refer to Section 2.3.3.4 (Table 2.3-46) for more detailed barge trips. These trips were required to ship diesel fuel to the Mine Site for Operations. Construction of the Angyaruaq (Jungjuk) Port, access road, and Mine Site would require shipping some quantity of diesel fuel to Angyaruaq (Jungjuk) Port. As shown in Table 3.23-14, the 19 fuel shipments by barge during Construction would be the same as discussed for Alternative 2. Cargo would continue to be transported to the Mine Site by ocean barge (12 annual round trips to Bethel) and river barge (64 annual round trips from Bethel to Angyaruaq (Jungjuk) Port). Alternative 3B, however, would reduce peak annual project barge traffic on the Kuskokwim River to an estimated 64 additional round trips per

season from the estimated 122 additional round trips per season proposed in Alternative 2. This would represent a daily average of 1.2 barge passings and an average interval of 20 hours between barge passings.

**Table 3.23-14: Annual Barge Traffic Comparisons, Alternatives 2 and 3B**

|                    | Alt 2  |      | Alt 3B |      |
|--------------------|--------|------|--------|------|
|                    | Const. | Ops. | Const. | Ops. |
| Cargo              | 50     | 64   | 50     | 64   |
| Fuel               | 19     | 58   | 19     | 0    |
| Pipeline Materials | 20     | N/A  | 20     | N/A  |
| Total              | 89     | 122  | 89     | 64   |

Under Alternative 3B, the increase in barge traffic on the river relative to the existing baseline river barge traffic would be smaller than that under Alternative 2. However, when considered in relation to Alternative 2, the potential for disturbance and displacement from the smaller increase in barge traffic for both ocean and river barges under Alternative 3B may not be measurable or apparent. The lower volume of increased traffic would result in less disturbance (i.e., impact to boater safety) and reduced displacement of existing patterns of river traffic relative to Alternative 2.

#### 3.23.2.4.2 DIESEL PIPELINE

Effects to transportation from Pipeline Construction and Closure would be similar to Alternative 2. However, portions of the temporary gravel access roads developed during Construction would be left in place after Construction to provide increased diesel spill response capabilities. This alternative would require additional airstrips and staging areas for Pipeline Construction, and most of the airstrips would need to be left in place throughout the operating life of the Pipeline for diesel spill response capacity. Table 2.3-47 (Chapter 2, Alternatives) lists the airstrips associated with Alternative 3B.

Alternative 3B would also require an additional 12 cargo and fuel shipments to Tyonek North Foreland Barge Facility or Port MacKenzie terminal for construction of the fuel terminal and an additional pipeline segment from either Tyonek to Beluga or to Port MacKenzie. Additional cargo barge trips from Anchorage would also be required to transport Pipeline construction materials. These additional barge trips are expected to have a minimal impact on transportation resources.

During Pipeline Operations, two fuel tankers per month would berth at the terminal facility, for a total of 24 barge trips per year. On average, 100 tanker barge trips move in and out of Cook Inlet annually to meet current demand (Cape International 2012). Impacts to water transportation in Cook Inlet may not be measurable or apparent since the function of marine transport would not change or exceed capacity. The duration would extend through the life of the Project. The extent or scope would be limited geographically to the Cook Inlet which regularly serves tanker traffic. The context would affect marine transportation that is typical in the area of Cook Inlet and has capacity to accommodate additional demand.

Impacts to surface and air transportation under the Operations Phase of Alternative 3B would be similar to Alternative 2, as the airstrips and shoofly roads left in place during Operations of the Mine Site would still be used, as discussed in Section 3.16.3.4, Recreation. The surface transportation facilities would be located in remote locations without connectivity to population centers.

#### 3.23.2.5 ALTERNATIVE 4 – BIRCH TREE CROSSING (BTC) PORT

The discussion under this alternative focuses on differences in intensity of impacts to the Transportation Corridor under Alternative 4. This alternative would substitute the BTC location for the upriver port, resulting in a reduction of barging distance from 199 miles to Angyaruaq (Jungjuk) Port in Alternative 2, to 124 miles to the BTC Port in Alternative 4. The BTC Port itself would be approximately the same design as that proposed for Angyaruaq (Jungjuk) with the exception that the BTC Port would be 62 acres in size and the Angyaruaq (Jungjuk) Port would be 21 acres in size due to terrain. The BTC mine access road would be 76 miles long, as compared to a 30 mile long mine access road under Alternative 2.

Impacts to transportation from the Mine Site and Pipeline would be the same as under Alternative 2. The extent or scope, duration, and context of all impacts would be the same as for Alternative 2. Impacts associated with climate change would also be the same as discussed for Alternative 2. The effects determinations take into account applicable impact reducing design features, as discussed in Alternative 2. Examples of additional measures being considered that are applicable to this resource are listed under Alternative 2.

##### 3.23.2.5.1 TRANSPORTATION CORRIDOR

Under Alternative 4, effects to air transportation facilities would be the same as Alternative 2. For surface transportation, construction of a temporary winter access road from Crooked Creek to the vicinity of the Mine Site to access material sites for road construction could encourage public access from Crooked Creek during the first winter of construction. Following Construction, however, the temporary access road would be reclaimed to limit future surface transportation during Operations. Aside from this localized and brief change in access during Construction, the impacts to surface transportation would be the same as Alternative 2. Alternative 4 would also require a road from the BTC Port site to the Mine Site that would be longer than the road from the Angyaruaq (Jungjuk) Port to the Mine Site (76 miles versus 30 miles, respectively). The impacts to surface transportation would be the same as Alternative 2 since the BTC Road would not be accessible from communities in the area or open to the public.

Development of the BTC Port and the extension of the road to the BTC Port site under Alternative 4 would reduce effects on water transportation, relative to Alternative 2, by eliminating Project-related barge traffic upriver of the BTC. The barging distance from Bethel to the BTC would be approximately 124 river miles, a reduction of 75 river miles from Alternative 2 (which would be 199 river miles from Bethel to the Angyaruaq [Jungjuk] Port site) (see Table 3.23-15). The reduced barging distance would result in shorter round trip barge transportation times from Bethel to the BTC Port. However, the same number of tows (consisting of two fuel and two cargo barges) would be required under Alternative 4 as is proposed in Alternative 2 since the amount of cargo and fuel, and hence the barge loads, would remain the same. While the number of trips would remain the same, the trips associated with Alternative 4 would be



completed more quickly and result in fewer days of barge traffic during the shipping season. An important additional feature of Alternative 4 is that the Kuskokwim River narrows above BTC. With the upriver port at BTC under this alternative, the communities of Aniak, Chuathbaluk, and Napaimute would not see impacts from barging associated with the Project.

**Table 3.23-15: Annual Transportation Distances Comparisons, Alternatives 2 and 4**

|                  | Alt 2 – Miles | Alt 4 – Miles | Difference in Miles |
|------------------|---------------|---------------|---------------------|
| Barge            | 199           | 124           | -75                 |
| Mine Access Road | 30            | 76            | 46                  |

Alternative 4 would have fewer days of barge traffic than Alternative 2, but there would still be a large increase in traffic relative to the baseline conditions. However, disturbance and displacement of other uses would be reduced from Alternative 2 levels, and may not be measurable or apparent. The duration of these impacts would last the life of the Project. The extent or scope of effects would be realized by communities of the lower Kuskokwim River. For those communities affected, the context of impacts would affect transportation with limited comparable alternate routes, facilities, or modes, since this area not served by roads.

#### 3.23.2.6 ALTERNATIVE 5A – DRY STACK TAILINGS

Alternative 5A would use the dry stack tailings method instead of the subaqueous tailings storage method that would be used under Alternative 2. This method would not change the effects to surface, air, or water transportation from Mine Site Construction, Operations, and Closure; effects would be the same as discussed under Alternative 2. Alternative 5A would result in an increased demand for diesel and consumables, which would place increased demand on the barge supply chain. However, the increase would be minimal relative to the amount of barge traffic proposed. Impacts associated with climate change would also be the same as discussed for Alternative 2. The effects determinations take into account applicable impact reducing design features, as discussed in Alternative 2. Examples of additional measures being considered that are applicable to this resource are listed under Alternative 2.

#### 3.23.2.7 ALTERNATIVE 6A – MODIFIED NATURAL GAS PIPELINE ALIGNMENT: DALZELL GORGE ROUTE

Alternative 6A would realign the Pipeline between MP 106.5 and MP 152.7 to the west of the proposed route in Alternative 2, and would traverse Dalzell Gorge. For the Mine Site, the potential direct and indirect impacts to transportation resources during Construction, Operations, and Closure under Alternative 6A would be the same as those described under Alternative 2. The extent, duration, and context of all impacts would be the same as for Alternative 2. The discussion under this alternative focuses on differences in the Transportation Corridor and Pipeline under Alternative 6A.

For the Transportation Corridor, under Alternative 6A, two new airstrips would be built at Pass Creek and Tatina. These would likely be reclaimed after Construction and would have no lasting impacts to transportation in the region. Therefore, effects to surface, air, and water

transportation from Transportation Corridor Construction, Operations, and Closure would be the same as Alternative 2.

For the Pipeline, approximately 42.9 miles of this alignment would be located in the vicinity of the INHT, compared to 13.1 miles in Alternative 2. Section 3.16, Recreation, discusses how this would affect use of the trails in the area. This alignment would not change the effects to surface, air, or water transportation during Construction, Operations, and Closure. Effects would be the same as Alternative 2.

Impacts associated with climate change would also be the same as discussed for Alternative 2. The effects determinations take into account applicable impact reducing design features, as discussed in Alternative 2. Examples of additional measures being considered that are applicable to this resource are listed under Alternative 2.

#### 3.23.2.8 ALTERNATIVES IMPACT COMPARISON

A comparison of the impacts to transportation by alternative is presented in Table 3.23-16.

Table 3.23-16: Comparison of Impacts by Alternative\* for Transportation

|                                   | Alt. 2 – Proposed Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Alt. 3A – LNG-Powered Haul Trucks                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Alt. 3B – Diesel Pipeline                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Alt. 4 – BTC Port                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Alt. 5A – Dry Stack Tailings                                                        | Alt. 6A – Dalzell Gorge Route                                                                                           |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| Impact-Causing Project Components |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                     |                                                                                                                         |
| Mine Site                         | Primitive trails affected – 9 miles                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Same as Alternative 2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Same as Alternative 2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Same as Alternative 2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Same as Alternative 2.                                                              | Same as Alternative 2.                                                                                                  |
| Transportation Corridor           | <p><b>Surface Transportation</b><br/>Road constructed – 30 miles</p> <p><b>Water Transportation</b><br/>Marine barges (cargo) to Bethel per season</p> <ul style="list-style-type: none"><li>16 barges (Construction)</li><li>12 barges (Operations)</li></ul> <p>Marine barges (fuel) to Bethel per season</p> <ul style="list-style-type: none"><li>14 barges (Construction)</li><li>14 barges (Operations)</li></ul> <p>Marine barges (fuel) to Dutch Harbor per season</p> <ul style="list-style-type: none"><li>4 barges (Construction)</li><li>7 barges (Operations)</li></ul> <p>Kuskokwim River barging distance – 199 miles</p> <p>River barges (cargo) from Bethel to Angyaruaq (Jungjuk) Port site per season</p> <ul style="list-style-type: none"><li>50 barges (Construction)</li><li>64 barges (Operations)</li></ul> <p>River barges (fuel) from Bethel to Angyaruaq (Jungjuk) Port site per season</p> <ul style="list-style-type: none"><li>19 barges (Construction)</li><li>58 barges (Operations)</li></ul> <p><b>Air Transportation</b><br/><i>Construction:</i><br/>Annual Operations at Mine Airstrip of Fixed Wing Aircraft: 5,148<br/><i>Operations and Maintenance:</i><br/>Annual Operations at Mine Airstrip of Fixed Wing Aircraft: 1,716</p> | <p><b>Surface Transportation</b><br/>Same as Alternative 2.</p> <p><b>Water Transportation</b><br/>Marine barges (cargo) to Bethel per season</p> <ul style="list-style-type: none"><li>Same as Alternative 2</li></ul> <p>Marine barges (fuel) to Bethel per season</p> <ul style="list-style-type: none"><li>14 barges (Construction)</li><li>5 barges (Operations)</li></ul> <p>Marine barges (fuel) to Dutch Harbor per season</p> <ul style="list-style-type: none"><li>4 barges (Construction)</li><li>2 barges (Operations)</li></ul> <p>River barges (cargo) from Bethel to Angyaruaq (Jungjuk) Port site per season</p> <ul style="list-style-type: none"><li>Same as Alternative 2.</li></ul> <p>River barges (fuel) from Bethel to Angyaruaq (Jungjuk) Port site per season</p> <ul style="list-style-type: none"><li>19 barges (Construction)</li><li>19 barges (Operations)</li></ul> <p><b>Air Transportation</b><br/>Same as Alternative 2.</p> | <p><b>Surface Transportation</b><br/>Same as Alternative 2.</p> <p><b>Water Transportation</b><br/>Marine barges (cargo) to Bethel per season</p> <ul style="list-style-type: none"><li>Same as Alternative 2.</li></ul> <p>Marine barges (fuel) to Bethel per season</p> <ul style="list-style-type: none"><li>14 barges (Construction)</li><li>0 barges (Operations)</li></ul> <p>Marine barges (fuel) to Dutch Harbor per season</p> <ul style="list-style-type: none"><li>4 barges (Construction)</li><li>0 barges (Operations)</li></ul> <p>River barges (cargo) from Bethel to Angyaruaq (Jungjuk) Port site per season</p> <ul style="list-style-type: none"><li>Same as Alternative 2.</li></ul> <p>River barges (fuel) from Bethel to Angyaruaq (Jungjuk) Port site per season</p> <ul style="list-style-type: none"><li>19 barges (Construction)</li><li>0 barges (Operations)</li></ul> <p><b>Air Transportation</b><br/>Same as Alternative 2.</p> | <p><b>Surface Transportation</b><br/>Road constructed – 76 miles</p> <p><b>Water Transportation</b><br/>Marine barges (cargo) to Bethel per season</p> <ul style="list-style-type: none"><li>Same as Alternative 2.</li></ul> <p>Marine barges</p> <ul style="list-style-type: none"><li>Same as Alternative 2.</li></ul> <p>River barges</p> <ul style="list-style-type: none"><li>Same as Alternative 2.</li></ul> <p>Kuskokwim River barging distance – 124 miles</p> <p><b>Air Transportation</b><br/>Same as Alternative 2.</p> | Same as Alternative 2 except for seven additional cargo barge round trips per year. | Same as Alternative 2.                                                                                                  |
| Pipeline                          | <p><b>Surface Transportation</b><br/>Winter access routes – 58 miles</p> <p><b>Water Transportation</b></p> <ul style="list-style-type: none"><li>River barges (pipe and equipment) from Bethel to Angyaruaq (Jungjuk) Port site per season: 20 (Construction, first year)</li></ul> <p><b>Air Transportation</b><br/>Existing airports to be upgraded: 3 airports<br/>Temporary airstrips to be constructed: 9<br/>Helicopter overflights per year: 24 flights (Operations)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Same as Alternative 2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p><b>Water Transportation</b><br/>Marine barge (fuel) trips per year in the Cook Inlet: 24</p> <p><b>Air Transportation</b><br/>Same as Alternative 2, except for the addition of three new proposed airstrips; Rainy Pass Lodge, Tatlawiksuk, and George River airstrips.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Same as Alternative 2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Same as Alternative 2.                                                              | Same as Alternative 2, except for the addition of two new airstrips proposed for construction at Pass Creek and Tatina. |

Table 3.23-17: Comparison of Impacts by Alternative\* for Transportation

|                            | Alt. 2 – Proposed Action                                                                                                                                                                                                                                                                                                                                                                                                                                               | Alt. 3A – LNG-Powered Haul Trucks                                                                                                               | Alt. 3B – Diesel Pipeline                                                                                                     | Alt. 4 – BTC Port                                                                                                                                                                                                                | Alt. 5A – Dry Stack Tailings | Alt. 6A – Dalzell Gorge Route |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------|
| Direct or Indirect Impacts |                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                 |                                                                                                                               |                                                                                                                                                                                                                                  |                              |                               |
| Mine Site                  | Few intermittent users (e.g., snowmachines and dog teams) would be affected by the removal of trails at the Mine Site.                                                                                                                                                                                                                                                                                                                                                 | Same as Alternative 2.                                                                                                                          | Same as Alternative 2.                                                                                                        | Same as Alternative 2.                                                                                                                                                                                                           | Same as Alternative 2.       | Same as Alternative 2.        |
| Transportation Corridor    | <p>Increase in barge traffic between the Bethel and Angyaruaq (Jungjuk) ports would impair existing travel patterns by delaying or displacing small boat traffic from preferred routing.</p> <p>Increase in barge receipts at the Port of Bethel would displace other uses, but would be offset by the additional barge, cargo and fuel capacity constructed at the port and an increase to navigational clearance when a barge is docked (as a connected action).</p> | Reduction in barge trips and less on-site diesel storage due to a large increase in barge traffic relative to the existing baseline conditions. | Smaller increase in barge traffic. Less on-site diesel storage would be needed.                                               | <p>The mine access road would be 46 miles longer than Alternative 2 and would impact surface transportation.</p> <p>For barge transportation, reduced disturbance and displacement of other uses, relative to Alternative 2.</p> | Same as Alternative 2.       | Same as Alternative 2.        |
| Pipeline                   | Disturbance or displacement of existing transportation uses from the increase in trips for surface, air, and water transportation.                                                                                                                                                                                                                                                                                                                                     | Same as Alternative 2.                                                                                                                          | Impacts to water transportation in Cook Inlet would occur since the new marine transport would not change or exceed capacity. | Same as Alternative 2.                                                                                                                                                                                                           | Same as Alternative 2.       | Same as Alternative 2.        |

**Note:**  
\* The No Action Alternative is presumed to have no impacts.