Alyeska pipeline SERVICE COMPANY

P.O Box 196660 ANCHORAGE, ALASKA 99519-6660 TELEPHONE (907) 787-8700

September 5, 2025 Letter No. 58063

Anthony Strupulis P.E., State Pipeline Coordinator
State Pipeline Coordinator's Section
Alaska Department of Natural Resources
550 West 7th Avenue, Suite 1100
Anchorage, AK 99501

RE: Trans-Alaska Pipeline System, Access Road 26 APL-2
Land Description Modification for Right-of-Way, ADL 206955
New Revetment, Gulkana River

Dear Mr. Strupulis:

Alyeska Pipeline Service Company, agent for the Trans Alaska Pipeline System Right-of-Way Lessees, hereby applies to modify the description of the referenced right-of-way permit to include additional state lands needed to accommodate the subject new construction. This follows the work review during the Monthly Lands and Permits Meetings earlier in the year and our meeting with your Right-of-Way team on April 17th.

The lands required for construction are described on Attachment A, and a narrative and drawings are enclosed describing the work in further detail. The lands needed to accommodate the new structure after construction will be precisely described upon completion of the as-built survey.

The work could start as early as October 10, 2025 and be complete in early November if the weather cooperates. Thank you for your consideration of this application, and please contact me at 787-8170, if more information is needed.

Sincerely

Peter C. Nagel, SR/WA
Land and Right-of-Way

Enclosures

cc: SPCS Records
April Simpson, SPCS

ATTACHMENT A

Township 9 North, Range 2 West (Copper River Meridian)

Sections 35 and 36, those lands below the line of Ordinary High Water of the Gulkana River extending about eight hundred (800) feet along that line and forty (40) feet in width and which are adjacent to Lots 1B, 1C-1, 1C-2, 1D, 2 and 5 of the Gulkana River Estates Subdivision as shown on Plats 78-15, 86-1 and 89-15 in the Chitina Recording District and also shown with revetment pattern on the attached drawings and comprising approximately 0.7 acres.

Trans Alaska Pipeline System, Access Road 26 APL-2, RHMP 147.4
Gulkana River Access Road Bridge Protection
Permit Narrative (Alyeska Pipeline Service Company, July 2025)

Purpose

The purpose of this project is to protect the integrity of the Gulkana River access road bridge from being damaged and isolated by river erosion. The bridge is located downstream of an outside meander bend which naturally migrates down valley and would misalign the river with the bridge opening if left unchecked.

Site Description

The location of the proposed project is within the Gulkana River Estates subdivision situated approximately one-half mile downstream of the USBLM Sourdough Campground and thirty-one highway miles north of Glenallen, Alaska. It is in the vicinity of the Trans-Alaska Pipeline one mile downstream of the pipeline-river crossing.

The Gulkana River is a popular recreational and sportfishing river that provides habitat for rainbow trout, arctic grayling, king salmon, red salmon, whitefish, longnose suckers, and lamprey. Vegetation consists mostly of spruce, aspen and cottonwood.

The access road follows the historic Ewan Lake Trail and is also known as Draper Boulevard within the adjacent private subdivision Gulkana River Estates, and its TAPS ID no. is 26 APL-2. Alyeska holds right of way from the State at the bridge (ADL 206955) and from the subdivision developer (Chitina RD Book 1 Page 363ff) and BLM (AA 8866) on the road. It is not gated and has critical value not only for operations of the pipeline but also for power and communications facilities by the State of Alaska, AT&T and Copper Valley Electric. The road with bridge also provides important access to Ahtna, Inc., the Bureau of Land Management and public for natural resource management and recreation.

The soils in the project area consist of silts and gravels which are susceptible to hydraulic erosion. The riverside lots in the subdivision upstream of the bridge have been subject to progressive bank erosion that has accelerated in recent years, while those downstream are on an accreting inside bend protected from such erosion.

Problem Description

Prior to pipeline construction, significant volumes of gravel was mined for the highway in the area adjacent to the outside meander bend. Afterwards, gravel mining continued on the south side of the road for both highway and other non-pipeline needs. The river has eroded completely the narrow, mined-area buffer strip upstream of the bridge and now abruptly extends to the east across a 300-foot-long stretch of the prior bank there.

During moderate breakup events, ice may be pushed into the low-lying, mined area without overtopping the road. At higher breakup flood events, the same low ground infills with water overtopping the road at a designed low point several hundred feet back (east) from the bridge. The overflowing water then fills the low-lying mined area on the south side and exits back to the river via a maintained flood relief swale immediately downstream of the bridge. These low, previously mined areas are still noticeable because they fill up with water especially at higher river stages, even without flow overtopping the road. Although the bridge,

road and swale configuration have slowed the meander migration to date and provided needed flood relief, the progressive bank erosion upstream would eventually increase the likelihood of the main river channel avulsing through the mined area, cutting the road and isolating the bridge.

Project Description

A low rock revetment along most of the existing bank will be installed (see attached drawings). An area along the bank approximately thirty feet wide will be cleared of vegetation for construction equipment access. The work will prevent further erosion of the riverbank and migration of the meander bend thereby reducing the likelihood of more severe flooding and stream avulsion.

Alternatives Considered:

1. Construction of a revetment along entire original bank line across the 300-foot segment was discarded because it would be more intrusive to the river and isolate it from its natural relief point at the adjacent low areas.
2. Armoring the road only was discarded because it would ignore the need to stabilize the existing upstream bank that is critical for maintaining current river alignment.

Environmental Considerations

To minimize impacts to recreational users and fish habitat, construction will be implemented in the Fall season.

All work will be done from the top of existing bank and no instream work will be needed with the exception of the equipment bucket. All equipment refueling and maintenance will occur in a designated area with secondary containment set back at least 100 feet from the riverbank. Equipment will be cleaned of all excess grease and oil prior to the start of the project and will be inspected regularly to prevent potential spills.

Any excavated material will be spread with organic soils and TAPS seed mix on the cleared area along the bank to promote natural revegetation.

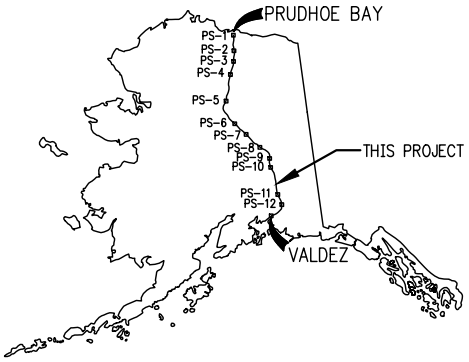
There will be minimal impact to aquatic life. The structure will follow the existing bank line, and all equipment will operate from the top of bank. Primary potential impacts to fish habitat will be confined to the structure footprint and temporary while the natural river sediment load recovers the rock. No loss of wetlands is expected, and no additional mitigation is planned.

Construction Sequence

The project is expected to take 21 days to complete in late Fall, 2025.

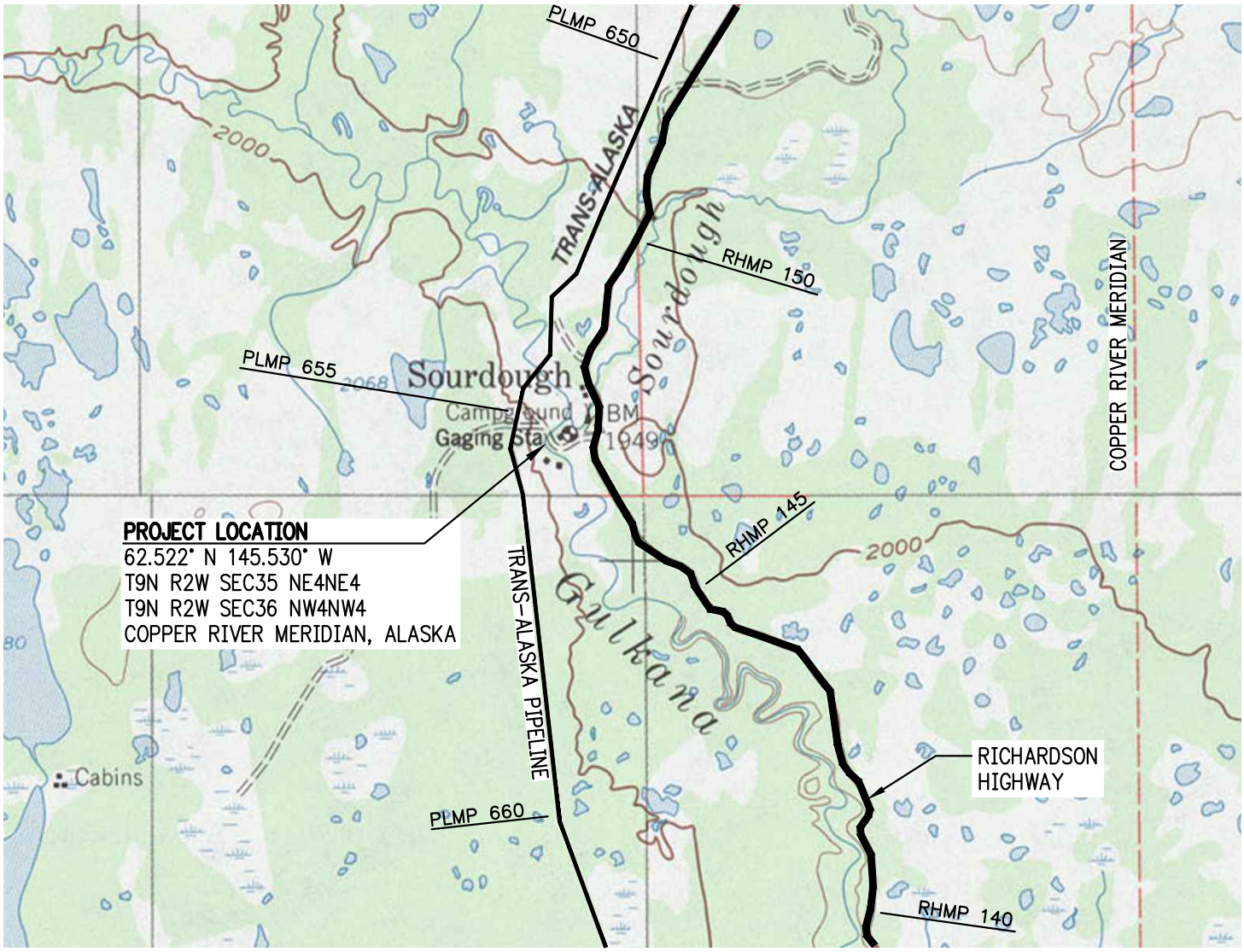
1. Mobilize personnel and equipment
2. Survey to layout project footprint
3. Clearing and grubbing as needed for equipment access
4. Install riprap along bank
5. Fill/Grade/seed area as needed to prevent surface runoff
6. Dispose of excess material, clean up work site and demobilize

Equipment to be used will include rock trucks, loaders, backhoes, and fuel trucks.

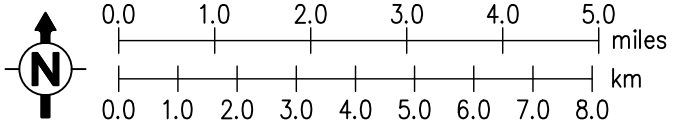


ESTIMATED MATERIAL QUANTITIES

		BELOW OHW	ABOVE OHW	TOTAL
REVETMENT	CLASS III–IV RIPRAP (CY)	3,400	1,800	5,200
	CLASS III–IV RIPRAP (SF)	19,200	12,800	32,000
KEY	CLASS III–IV RIPRAP (CY)	0	250	250
	CLASS III–IV RIPRAP (SF)	0	800	800



MAP SOURCE: USGS, 1985



ADJACENT PROPERTY OWNERS:
STATE OF ALASKA (BELOW OHW),
PRIVATE (ABOVE OHW)

ALYESKA PIPELINE SERVICE CO.

GULKANA RIVER ACCESS ROAD BRIDGE PROTECTION
26-APL-2, RHMP 147.4
LOCATION MAP

TRANS ALASKA PIPELINE SYSTEM

REV.	DWN.	CKD.	APPR.
D	MTH	AJN	JPD

DATE: 04/21/25 | PLATE 1

SCALE: AS NOTED | SHEET 1 OF 4

AUTOCAD DWG. DO NOT REVISE MANUALLY.

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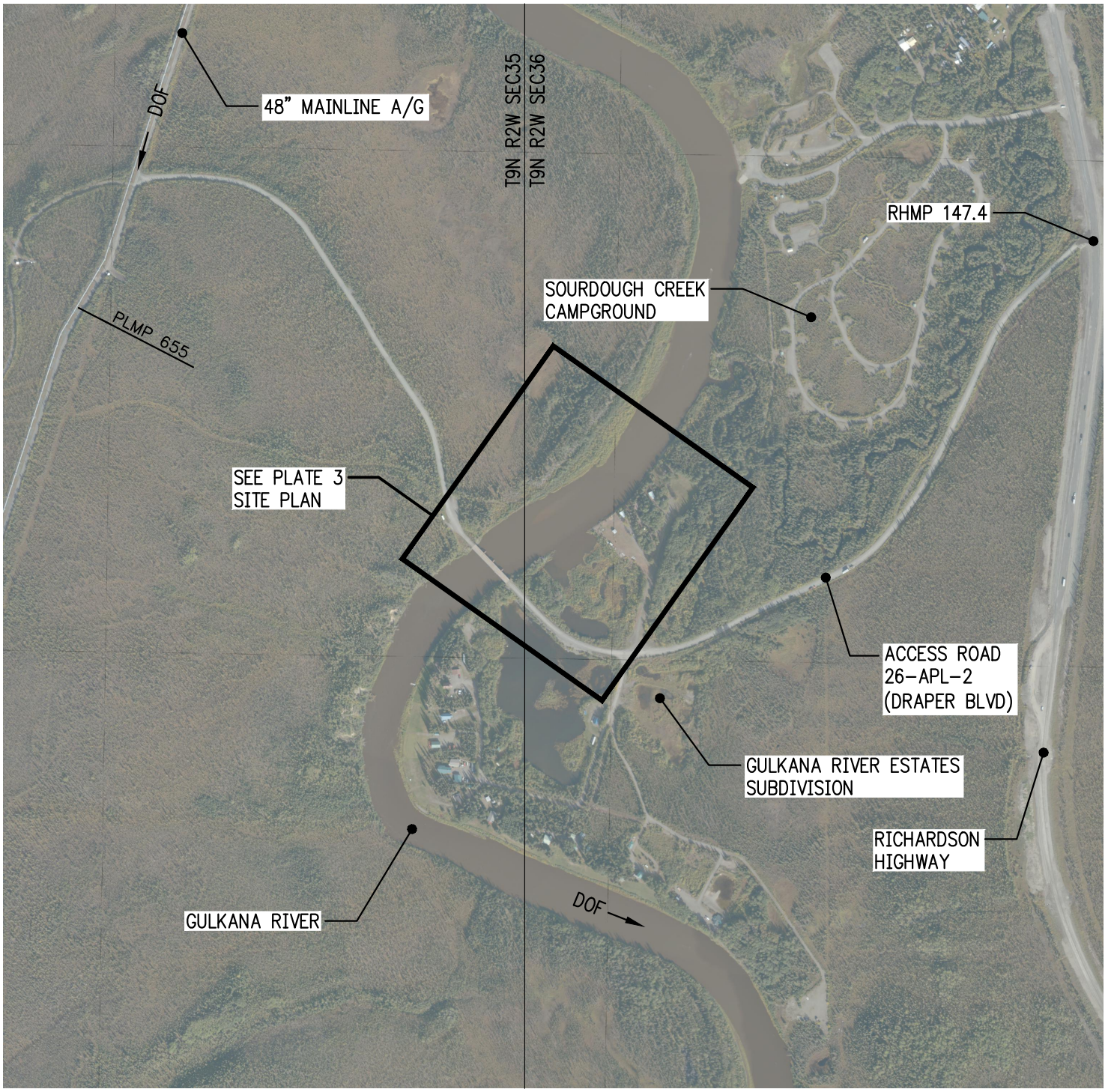

PHOTO DATE: 2021

VICINITY MAP

SCALE: 1" = 700'

GRAPHIC SCALE

0 700 1400

FEET

ADJACENT PROPERTY OWNERS:
STATE OF ALASKA (BELOW OHW),
PRIVATE (ABOVE OHW)

ALYESKA PIPELINE SERVICE CO.

GULKANA RIVER ACCESS ROAD BRIDGE PROTECTION
26-APL-2, RHMP 147.4
VICINITY MAP

TRANS ALASKA PIPELINE SYSTEM

REV.	DWN.	CKD.	APPR.	DATE:	PLATE
D	MTH	AJN	JPD	04/21/25	PLATE 2
				SCALE: AS NOTED	SHEET 2 OF 4

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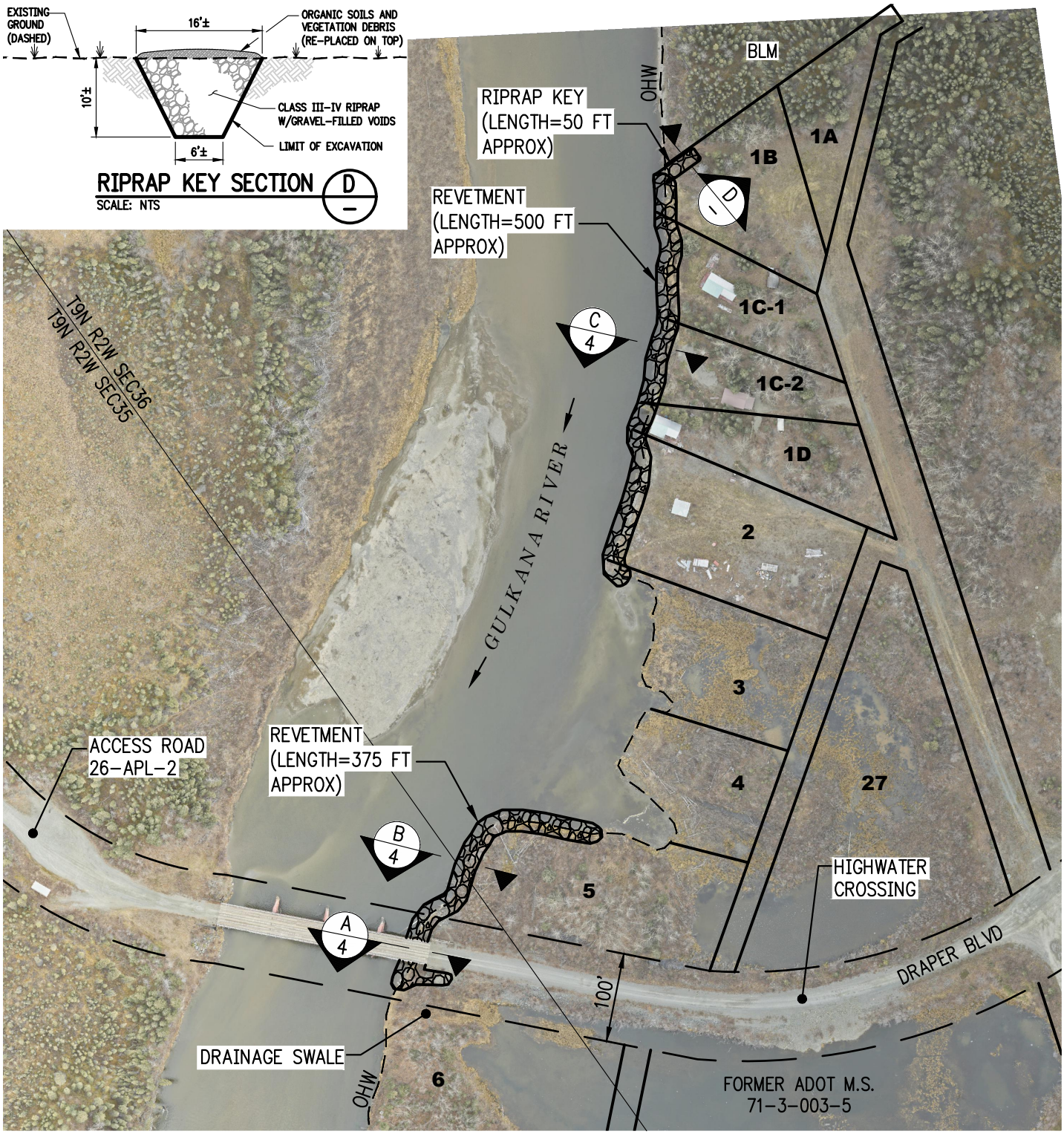

6 LOT #, GULKANA RIVER ESTATES
PLAT 78-15, 86-1, 89-15, CHITINA RD

SITE PLAN

SCALE: 1"=160'
CONTOUR INTERVAL=2 FT

PHOTO DATE: 2024

GRAPHIC SCALE
0 160 320
FEET

ADJACENT PROPERTY OWNERS:
STATE OF ALASKA (BELOW OHW),
PRIVATE (ABOVE OHW)

ALYESKA PIPELINE SERVICE CO.

GULKANA RIVER ACCESS ROAD BRIDGE PROTECTION
26-APL-2, RHMP 147.4
SITE PLAN

TRANS ALASKA PIPELINE SYSTEM

REV.	DWN.	CKD.	APPR.
D	MTH	AJN	JPD

DATE: 04/21/25
PLATE 3
SCALE: AS NOTED
SHEET 3 OF 4

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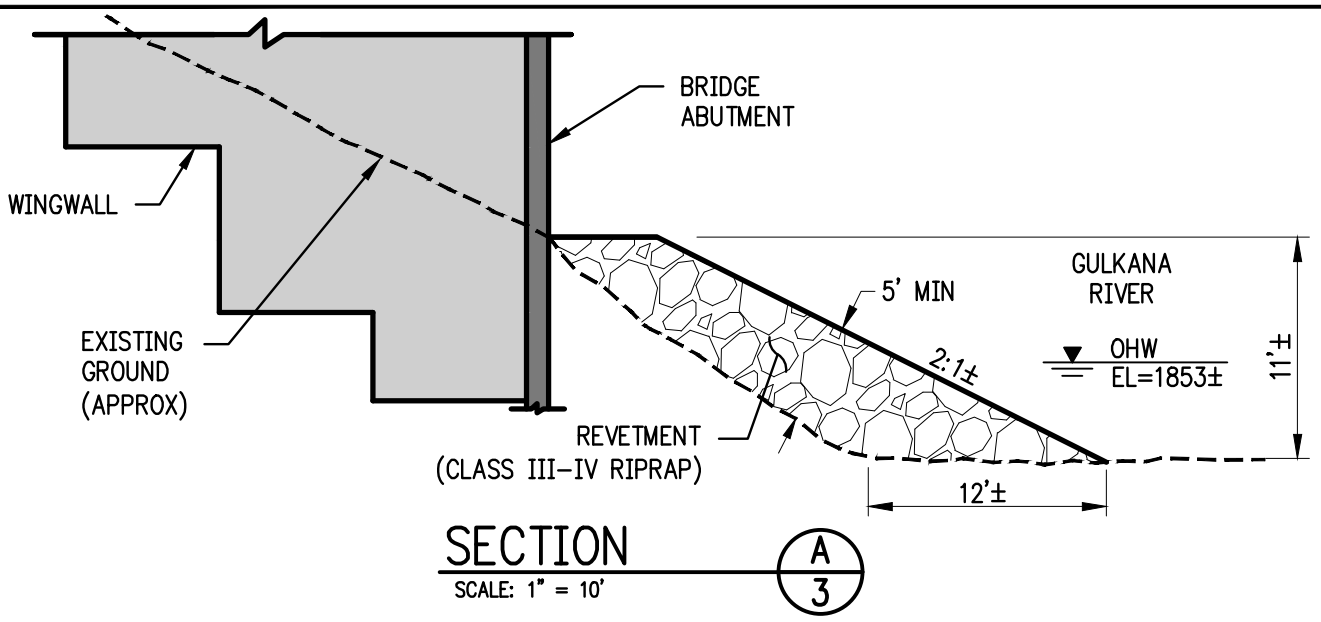
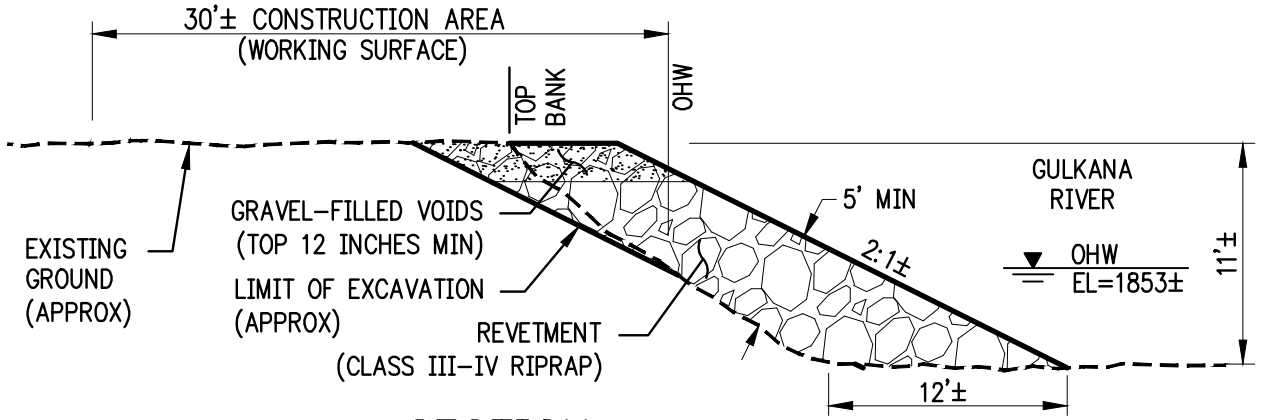


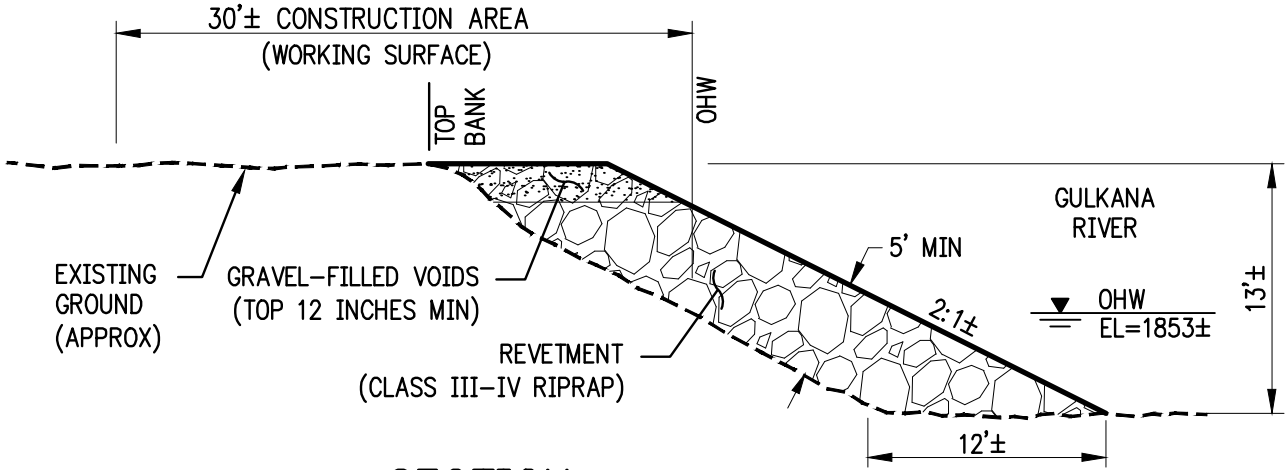
SECTION A/3

SCALE: 1" = 10'



SECTION B/3

SCALE: 1" = 10'



SECTION C/3

SCALE: 1" = 10'

ALYESKA PIPELINE SERVICE CO.

TRANS ALASKA PIPELINE SYSTEM

GULKANA RIVER ACCESS ROAD BRIDGE PROTECTION
26–APL–2, RHMP 147.4
SECTIONS

DATE: 04/21/25

PLATE 4

REV.	DWN.	CKD.	APPR.
D	MTH	AJN	JPD

SCALE: AS NOTED

SHEET 4 OF 4

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