STATE OF ALASKA DEPARTMENT OF NATURAL RESOURCES DIVISION OF MINING, LAND AND WATER SOUTHCENTRAL REGIONAL LAND OFFICE

PRELIMINARY DECISION

ADL 206759
Copper River Seafoods, Inc.
Application for Lease
AS 38.05.075(c)

This Preliminary Decision (PD) is the initial determination on a proposed disposal of interest in state land and is subject to comments received during the public notice period. The public is invited to comment on this PD. The deadline for commenting is 11:59 PM January 15, 2026. Please see the Comments section of this decision for details on how and where to send comments for consideration. Only the applicant and those who comment have the right to appeal the Final Finding and Decision (FFD).

Proposed Action:

The Department of Natural Resources (DNR), Division of Mining, Land and Water (DMLW), Southcentral Regional Land Office (SCRO) has received a request from Copper River Seafoods, Inc. (CRS) to lease 4.8 acres of tidelands, more or less, for 25 years supporting their adjacent, upland-leased seafood processing facilities located in Naknek, Alaska. The location of the project area is further described as Alaska Tidelands Survey No. 1093 located within protracted Section 10, Township 17 South, Range 47 West, Seward Meridian, Alaska, containing 4.80 acres, more or less, according to the survey plat filed in the Kvichak Recording District on February 8, 1982 as Plat 82-2. CRS is proposing to use this site for continued use and maintenance of an existing wharf and crane.

SCRO is considering the issuance of a 25-year tideland lease to CRS for the operation and maintenance of their existing wharf and crane in support of upland fishing processing activities. SCRO would issue an Entry Authorization (EA) for completion of a survey prior to lease issuance.

Scope of Review:

The scope of this decision is to determine if it is in the State's best interest to issue ADL 206759. Immediately adjacent privately-owned uplands are leased by CRS from the owner, Paug-Vik, Inc., Ltd., effective 5/1/2022 through 4/30/2042, qualifying the customer, CRS, for application under AS 38.05.075(c) (Upland Owner/Lessee).

ADL 206759 ADL 206759 **ADL** 206759 ADL 206759 2.000 4.000 6.000 8,000 10,000 ft ADL 206759 consists of 4.8 acres of **DNR Lease Inventory** land, more or less, and is located in Drawn by Ben Powell, DNR Naknek, Alaska. The location of the NOTE: This map provides a graphical project area is further described as being representation of the lease sites and has within Section 10, Township 17 South, only been provided as a general reference. Exact location of the lease site may be Range 47 West, Seward Meridian. adjusted prior to lease issuance. This map is not intended for navigational purposes. World Imagery.

Figure 1: Overview Map of Project Area

Authority:

This lease application is being adjudicated pursuant to AS 38.05.035(b)(1) and AS 38.05.035(e) Powers and Duties of the Director; AS 38.05.075(c) Generally; and AS 38.05.945 Notice.

The authority to execute the PD, FFD, EA, and the lease has been delegated to the Regional Managers of DMLW.

Administrative Record:

Case file ADL 206759 constitutes the administrative record for CRS' lease application.

The administrative record for the proposed action consists of the Constitution of the State of Alaska, the Alaska Land Act as amended, applicable statutes and regulations referenced herein, the 2005 Bristol Bay Area Plan and other classification references described herein, and the casefile for the application serialized by DNR as ADL 206759.

Legal Description, Location, and Geographical Features:

The State land where this proposed lease is located is described as follows:

- Legal description: N1/2 of Section 10, Township 17 South, Range 47 West, Seward Meridian
- Geographical location: On the Naknek River, in Naknek, AK
- Approximate Lat/Long: 58°43'25"N, 157°1'30"W
- Area geographical features: Tidelands and submerged lands near the mouth of the Naknek River
- Existing surveys: ATS 1093
- Municipality/Borough: Bristol Bay Borough
- Native Corporations/Federally Recognized Tribes: Bristol Bay Native Corporation, Paug-Vik Incorporated Limited, Alaska Peninsula Corporation
- Size: 4.8 acres, more or less

Title:

A DNR Title Report (SC-87-242) issued on April 21, 1987 from DMLW's Realty Services Section, attests that the State of Alaska holds title to the subject tide and submerged lands under the Equal Footing Doctrine and the Submerged Lands Act of 1953.

Third Party Interests:

Mineral Order serialized as MO 1005 exists as a (closed) third-party interest.

Classification and Planning:

The project area is subject to the Bristol Bay Area Plan (BBAP), Region 11 (Bristol Bay Borough Area), Unit R11T-01 (Naknek Community), map number 3-11. The designation for the proposed lease is waterfront development, which converts to a classification of Waterfront Development Land. The management intent for this unit, which only contains the State-owned tidelands and submerged lands immediately adjacent to the communities of Naknek and South Naknek, notes that it should support commercial and industrial uses and structures (p. 3-176).

Additional plan designations and management intent (p. 3-172), note that areas of the Naknek River near the community of Naknek accommodate the needs of the extensive fishery in the area, including tideland support facilities. Pages 3-75 through 3-76 of the BBAP note the significance of commercial salmon harvest in the area, deep concentrations of set net fishing permits occurring near the mouth of Naknek River, and that the subsistence harvest of red salmon as a food staple in Kvichak Bay (north of ADL 206759) as being "intensive."

Page 3-91 notes that hunting and fishing camps along the Naknek River date from 3,000 to 4,000 B.C., reinforcing the traditional, fish-harvesting use applied for by this lease. Page 3-151 further notes that "salmon fishing is the mainstay of the economy" and that "many...commonly travel to Naknek each summer to fish or work in the canneries." Page 3-164 of the BBAP notes the main facility in Naknek of the Port of Bristol Bay as the largest commercial freight dock in Bristol Bay and "hub" for Southwestern Alaska cargo.

As an existing authorization that has already been subjected to public process, agency review, and extensive internal deliberation, supported by the emphasis placed on its activity and specific location within the Bristol Bay Area Plan, this project is clearly consistent with relevant land use designation, classification, and management intent.

Traditional Use Findings:

The proposed site is located within the Bristol Bay Borough. Pursuant to AS 38.05.830 a traditional use finding is not required.

Access:

The applicant may access the site via their privately leased, upland facility belonging to the village corporation, Paug-Vik Incorporated, Limited, and via the Naknek River, a public and navigable waterway.

Access Along Navigable and Public Waters:

Nearly all shore and tide lands in the State of Alaska are subject to a To and Along easement (AS 38.05.127 and 11 AAC 51.045). The purpose of this easement is to uphold the constitutional right of the public to have free access to, and use of, the State's waterways. At the proposed lease site, no To and Along Easement is currently reserved. The lease site, located within the Naknek River, is classified as a navigable waterbody. In accordance with AS 38.05.127 and 11 AAC 51.045, a To and Along Easement will be reserved at this location.

Public Trust Doctrine:

Pursuant to AS 38.05.126, all authorizations for this site will be subject to the principles of the Public Trust Doctrine; specifically, the right of the public to use navigable waterways and the land beneath them for navigation, commerce, fishing, hunting, protection of areas for ecological studies, and other purposes. These rights must be protected.

Agency Review:

Information and comments received from sections within DMLW prior to and during agency review have been considered and included in the preparation of this preliminary decision. An agency review was conducted on 9/11/2025. The deadline for agency comments was 10/1/2025.

The following agencies were included in the review:

- DNR Division of Agriculture
- DNR Division of Forestry & Fire Protection
- DNR Division of Geological & Geophysical Surveys
- DNR Division of Oil and Gas / State Pipeline Coordinator Service
- DNR Division of Parks and Outdoor Recreation / Office of History and Archaeology –
 State Historic Preservation Office
- Department of Environmental Conservation
- Department of Fish & Game
- Department of Transportation & Public Facilities
- U.S. Army Corps of Engineers
- U.S. Bureau of Land Management
- U.S. Coast Guard

- U.S. Environmental Protection Agency
- U.S. Fish and Wildlife Service
- U.S. National Park Service
- U.S. National Oceanic and Atmospheric Administration National Marine Fisheries Service

A total of two agency comments were received during the review period and are summarized below:

Comment: On October 1, 2025, ADF&G responded as follows:

"ADF&G has no objection to the issuance of this lease; however, we have the following comments and recommendations:

- 1. Marine Mammal Considerations:
- a. There is no marine mammal critical habitat designated within the project area. However, there are several marine mammals with ranges overlapping with the project area including spotted seal, bearded seal, fin whale, humpback whale, ringed seal, North Pacific right whale, and northern sea otter.
- b. If the lessee has documented any negative marine mammal interactions, we request to be kept informed of them. Please direct any relevant information to Alaska Department of Fish and Game Marine Mammal Program at dfg.dwc.mmcomments@alaska.gov.
- c. As soon as possible, please report an injured, entangled, or dead marine mammal to the NOAA Fisheries Alaska Statewide 24-hour Stranding Hotline: (877) 925-7773. If the stranded animal is a sea otter, please call the U.S. Fish and Wildlife Service (1-800-362-5148, business hours) or the Alaska SeaLife Center Hotline (1-888-774-7325, 24 hours).
 - d. To reduce risks to marine mammals:
 - i. Dispose of food waste and garbage properly to avoid attracting marine mammals to the area.
 - ii. Store fuel securely to prevent entry into the marine environment. A spill kit should be kept on-site for any potential spills.
 - iii. Keep lines used to tether vessels taut and out of the water whenever possible to reduce the risk of entanglement.
- 2. Avoiding Conflict with Wildlife:
- a. Wildlife Safety & Attractants: All fuel, trash, food, fish waste, gray water, and other potential wildlife attractants (including petroleum-based products) must be securely stored in bear-resistant containers. These containers should be made of durable materials

such as metal or hard-sided plastic and have tight-fitting lids with secure latches. Only containers specifically designed and approved for bear resistance should be used. Where feasible, electric fencing should also be installed around food and waste storage areas.

b. Bear Safety: Guidance on staying safe in bear country and avoiding negative interactions, including the use of bear-resistant containers and electric fences, is available on the ADF&G website: http://www.adfg.alaska.gov/index.cfm?adfg=livingwithbears.main

- c. Reporting Wildlife Interactions: Any human-wildlife conflicts should be reported to ADF&G's Division of Wildlife Conservation: https://www.adfg.alaska.gov/index.cfm?adfg=reportwildlifeencounter.main
- 3. USFWS Resources: Project activities may affect species listed under the Endangered Species Act (ESA) and other sensitive resources, such as migratory birds, which are managed by the U.S. Fish and Wildlife Service (USFWS). We recommend using the Information for Planning and Consultation (IPaC) tool (https://ipac.ecosphere.fws.gov/) to identify USFWS trust resources that may be present within the project boundary, including the likelihood of presence during project activities. For further details, contact the Southern Alaska Fish & Wildlife Field Office at 907-271-2888 (phone) or 907-271-2786 (fax).
- 4. Public Access: Leased activities should not impede public use of state waters, including access for recreation, fishing, and general navigation."

Response: SCRO acknowledges the comment, will inform CRS of and recommend that CRS adhere to all ADF&G comments, which will be accomplished through publication of this decision document.

Comment: On October 1, 2025, the Division of Geological & Geophysical Surveys (DGGS), DNR, responded as follows:

"Physiography. The Copper River Seafood parcel review area is in the Naknek C-4 Quadrangle (1:63,360 scale) within the Nushagak-Bristol Bay Lowland Physiographic Province, a lowland with abundant outwash and morainal deposits along Bristol Bay. Low-lying coastal areas include estuaries that appear to drown river mouths (Wahrhaftig, 1965).

Surficial Geology. Published surficial geological mapping, at a scale of 1:250,000 (Riehle and Detterman, 1993), indicates that the review area generally consists of unsorted angular to subangular deposits of drift and ice-contact deposits forming subdued ridges and highly modified end moraines along the Bristol Bay coast. Deposits include kettles partially infilled with loess and organic deposits and are sometimes mantled by outwash deposits of poorly to moderately well-sorted, stratified sand and gravel.

An examination of imagery reveals that the review area, directly adjacent to the river, has been modified by fluvial processes, likely due to flooding and erosion along the Naknek River. The exposed nature of the region's bluffs makes them vulnerable to groundwater seepage, overland runoff, and slumping, as evident in the imagery (Overbeck and others, 2020).

Permafrost. Permafrost is generally considered to be absent in the area (Jorgenson and others, 2008). However, Overbeck and others (2020) report that geotechnical surveys presented at the 2019 Alaska Forum on the Environment show permafrost underlying a wastewater treatment facility in Naknek. Site-specific investigations are necessary to address the distribution and potential impacts of permafrost in the review area. Still, care should be taken because freeze-thaw processes can impact development activities, depending on the material's character.

Construction Materials. There is some potential for construction materials resources in the area, especially in areas where outwash deposits are of significant thickness. However, drift deposits often have a higher silt and clay content, and adjacent areas, mapped as outwash, might be better targets for material resources.

Seismic Hazards. This area is not near any known recent faulting (Bender and others, 2021; Koehler, 2013). The region's overall seismic hazard potential is low to slightly elevated (Powers and others, 2023).

Ashfall Hazards. This area is subject to ash fall from erupting Alaska Peninsula volcanoes. Past ash events include Aniakchak 1931, Novarupta (Katmai) 1912, and multiple older tephras (Mulliken and others, 2018; Worden and others, 2018).

Radon Hazard. Radon, a naturally occurring cancer-causing radioactive gas, is modeled to be low to moderate in concentration in this area (https://maps.dggs.alaska.gov/radon/). The Environmental Protection Agency's (EPA) Action Level for radon is 4 pCi/L; the EPA suggests homeowners consider radon mitigation for test results of 2–4 pCi/L. Any home, school, or building can have high levels of radon and should be tested."

Response: SCRO acknowledges the comment, will inform CRS of and recommend that CRS adhere to all DGGS comments, which will be accomplished through publication of this decision document.

Lease Discussion:

Although CRS maintains a current 55-year tideland lease at this location, effective July 21, 1989 through July 20, 2044, they have applied for a different 25-year term, which overlaps with the existing lease term. The purpose for the proposed new term is to align with terms and dates for a security assignment (a transfer of rights in a contract to a third party as a form of collateral, utilized to secure a loan or other obligation), which will enable CRS to continue its existing upland fish processing and shipping operations. No changes are proposed or planned concerning the tideland lease in terms of development beyond what is currently authorized. Currently authorized structures

include an 80ft by 80ft dock made of marine grade lumber and steel with the following additional features/structure:

- Top Deck, Caps, Stringers and Subfloor are all marine-grade lumber.
- Pilings are a combination of treated wood and steel, numbering 96 in total.
- 6 Pilings support a permanently mounted hydraulic crane.
- 3 side of the dock have ladders leading down to the river floor, 1 side is parallel to access road and attached to the road.
- The 3 sides that have access to the river bottom have 12"x12" timber barriers as the surrounding top deck barrier.

The proposed lease will be subject to the terms of SCRO's standard lease document (available for review upon request) and any stipulations based, in part, upon the following considerations.

Development Plan:

The Development Plan (DP) attached to this decision (Attachment A) and dated May 19, 2025 is under consideration by SCRO. Should the proposed lease be granted, it is anticipated that the DP will need to be updated throughout the life of the lease as activities and/or infrastructure are added or subtracted. All updates must be approved, in writing, by SCRO before any construction, deconstruction, replacement of infrastructure, or change in activity. SCRO reserves the right to require additional agency review and/or public notice for changes that are deemed by SCRO to be beyond the scope of this decision.

Hazardous Materials and Potential Contaminants:

No hazardous materials are stored within the confines of the tideland leasehold. Rather, within the upland facilities (which are leased from the village corporation), CRS utilizes two 500-gallon diesel tanks and one 300-gallon gasoline tank utilized for servicing their vehicles and generator. All fuel tanks have secondary containment and roofing to protect tanks from the elements.

The use and storage of all hazardous substances must be done in accordance with existing federal, state, and local laws. Debris (such as soil) contaminated with used motor oil, solvents, or other chemicals may be classified as a hazardous substance, and must be removed from the lease site and disposed of in accordance with state and federal law.

Lease Performance Guaranty (bonding):

In accordance with AS 38.05.035 and AS 38.05.860, CRS will be required to submit a performance guaranty for the lease site.

- \$15,000.00 Performance Bond: A \$15,000 performance bond is currently on file, which will satisfy this requirement if a new lease is issued. This bond will remain in place for the life of the proposed lease. The bond amount is based upon the level of development, amounts of hazardous material and/or substances on site, and the perceived liability to the State. This bond will be used to ensure the applicant's compliance with the terms and conditions of the lease issued for their project. This bond amount will be subject to periodic adjustments and may be adjusted upon approval of any amendments, assignments, reappraisals, changes in the DP, changes in the activities conducted, or changes in the performance of operations conducted on the authorized premises, and as a result of any violations to one or more of the authorizations associated with this project.
- **Reclamation Bond:** SCRO is reserving the right to require a reclamation bond due to noncompliance issues during the term of the lease or near the end of the life of the project.

Insurance:

CRS will be required to submit proof of liability insurance to SCRO, with the State of Alaska listed as a "NAMED" insured party. CRS will be responsible for maintaining such insurance throughout the term of the EA and the lease.

Survey:

In accordance with AS 38.04.045, CRS must complete an approved survey according to the requirements and standards of DMLW's Survey Section prior to lease issuance. The draft survey must be submitted for review to the Survey Section within **one year** of issuance of the survey instructions. If the submitted survey is accepted by DMLW, the measurements identified will be used to accurately calculate the total acreage. The survey must depict the leased boundaries and the To and Along easement in accordance with AS 38.05.127 and 11 AAC 51.045.

Entry Authorization:

SCRO is proposing to authorize CRS entry onto state land through the issuance of an EA while they are completing the required survey for the lease site. The proposed EA would be issued after the FFD goes into effect. The effective date of the EA will be the start of the lease term length.

Compensation and Appraisal:

In accordance with AS 38.05.840, state-owned land may only be leased if it has been appraised within two years before lease issuance. SCRO has coordinated with DMLW's Appraisal Unit, and an appraisal of the existing lease was approved August 9, 2024, specifying the annual lease fee at

the fair market value of the leasehold, which increased annual rent to \$6,500.00 per year. In accordance with AS 38.05.105, the proposed EA and lease will be subject to reappraisal at five-year intervals after the issuance of the proposed authorization.

Subleasing:

Subleasing is permissible through AS 38.05.095, if the proposed lease is approved. A sublease is defined as improvements not owned by the lessee that are located within the leasehold on the land or located on structures owned by the lessee. A sublease pertaining to the proposed lease includes but is not limited to, user agreements, license agreements, communication site agreements, or any contracts between the lessee and other commercial entities. All potential subleases must first be approved in writing by SCRO. Depending on the activity of any potential subleases, SCRO is reserving the right to reevaluate the need for further agency review and/or public notice before making a determination on the appropriateness of the proposed sublease. Sublease compensation to the State will be determined by SCRO according to AS 38.05.073(m), under the authority of AS 38.05.075(a) Leasing Procedures. In any case, the sublease fee for commercial activities will not be less than 25% of the annual fee paid to leaseholder by the sublessee.

Assignment of Lease:

The proposed lease, if issued, may be transferred or assigned to another individual or corporation only with written approval from DMLW. A lease will not be assigned to an entity if that entity does not meet the statutory requirements of the lease, or if the lessee is considered not to be in "good standing" with DMLW or any other agency authorization. DMLW reserves the right to amend the terms of the lease prior to assignment.

Reclamation:

In accordance with AS 38.05.090(b), all lessees must restore their lease site to a "good and marketable condition" within 120 days after termination of the lease. What level of reclamation constitutes as being "good and marketable" is at the discretion of SCRO.

Public Notice of the Preliminary Decision:

Pursuant to AS 38.05.945, this PD will be advertised for a 30-day public comment period. Notice will be posted on the Alaska Online Public Notice System at

http://aws.state.ak.us/OnlinePublicNotices/Default.aspx and the post offices located in Naknek, South Naknek, and King Salmon. Courtesy notices will also be mailed or emailed to neighboring property owners, permit/lease holders, and other interested parties on December 16, 2025, for a 30-day public comment period.

Comment(s):

This decision is subject to both public and agency comments, and all comments received by the comment deadline will be considered in the FFD. Only those who comment and the applicant have the right to appeal the FFD.

Written comments about this project must be received in this office no later than 11:59 PM on January 15, 2026 to be considered.

To submit comments, please choose one of the following methods:

Postal: Department of Natural Resources

Division of Mining, Land and Water Southcentral Regional Land Office

ATTN: Audrey Gilroy

550 West 7th Avenue, Suite 900C Anchorage, AK 99501-3577

Email: audrey.gilroy@alaska.gov

Fax: (907) 269-8913

Questions about the lease portion of this project can be directed to Audrey Gilroy at (907) 269-8111.

If public comments result in significant changes to the Preliminary Decision, additional public notice will be given. To be eligible to appeal the Final Finding and Decision, a person must provide written comments during the Preliminary Decision comment period per AS 38.05.035(i)-(m).

Signature page follows

Recommendation:

SCRO has completed a review of the information provided by the applicant, examined the relevant land management documents, and has found that this project is consistent with all applicable statutes and regulations. SCRO considered three criteria to determine if this project provided the best interest to the State and the development and enjoyment of its natural resources. The criteria include direct economic benefit to the State, indirect economic benefit to the State, and encouragement of the development of the State's resources. This authorization provides a direct economic benefit to the State with the collection of fees for ADL 206759 and an indirect economic benefit through the encouragement and development of the State's resources. The authorization of this lease is in the State's best interest as it will continue to provide development of the Bristol Bay Borough and allow for the continued utilization of an existing lease and associated infrastructure. It is recommended that SCRO issue a 25-year lease to CRS.

12/16/2025

Audrey Gilroy, Natural Resource Specialist 2

Date

Preliminary Decision:

It is the determination of the Division of Mining, Land and Water that it may be in the State's best interest to issue a tidelands lease for 25 years to CRS, as described above. Upon authorization of the lease, the applicant will be required to pay the annual lease fee of \$6,500.00, submit a \$15,000.00 performance bond, and provide proof of liability insurance. This Preliminary Decision shall now proceed to public notice.

<u>Cinnamon Micelotta</u>

12/16/2025

Cinnamon Micelotta, Acting Leasing Unit Manager Division of Mining, Land and Water, Southcentral Regional Land Office Date

Attachments

 $\label{eq:Attachment A - Development Plan} Attachment \ B - Location \ Map$





COPPER RIVER SEAFOODS

1400 East 1st Avenue - Anchorage, AK 99501 Phone: 907 522.7806 Fax: 907.274.0348 www.CopperRiverSeafoods.com

Copper River Seafoods, Inc. Tidelands Lease ADL 206759, Naknek Site Site Development Plan

NARRATIVE:

Copper River Seafoods, Naknek location operates a Salmon Production Facility at 0.5 Peninsula Hwy, Naknek, Alaska 99633. The legal description of the property is USS 2356. This is to be considered private property, with access via Peninsula Hwy. The dock and river access has road entry through the Southeast section of the property.

Terrain and ground cover consists of tundra and low level ground scrub bush. There are no known proposed changed to the property at this time.

The upper section of the property consists of 6 permanent building structures; Bunkhouse, Maintenance Shop, Production Facility, Storage Building and 2 houses. The lower level/dock area has an existing vessel dock with 1 building. There are no known proposed changes or additions relating to structures at this time.

Main power/electricity is supplied by Naknek Electric Association. We also have a 1meg generator to aid with our freezing operation in the facility.

Water is supplied by water well. All sources are approved by the State of Alaska (PWSID AK2262282). Domestic Sewar is supplied by the borough, and seafoods production waste water operates under a State approved waste water permit (APDES AKG521078). Trash and refuse is taken directly to Naknek Landfill.

The only hazardous materials on site are 2ea, 500 gallon diesel tanks and 1ea, 300 gallon gasoline tank used for servicing our vehicles and generator. All 3 tanks are serviced by the city of Naknek, and long term storage doesn't take place. Each tank has existing containment, and a roof covering. The fuel servicing tanks are located road-side of Peninsula Hwy, on the upper level of the property, adjacent to the production facility.

Vehicle use is limited to a small fleet of 6 passenger vehicles, 2 semi tractors, 1 dump truck, 6 forklifts, 2 telehandlers and 2 larger flatbed trucks. Parking generally takes place by the maintenance shop and loading dock/warehouse areas. During operations, we have a fully functioning maintenance shop, with 2 vehicle/rolling stock mechanics that maintain our vehicles/forklifts. Vehicles have a documented daily conditional inspection that guarantees maintenance issues/leaks are addressed immediately.

This operation is considered much smaller than the other companies/operations in the area, but we plan on being present in this location well into the future. We operate seasonally, generally from May 1 to August 31. During peak season (July and August) we have up to 135 employees on site. The team consists of roughly 12 managers/supervisors, and the rest are general-class employees. We have 1 year-round employee that provides security during the offseason.

Our Maintenance Team is on site from May to September, and consists of 10 technicians. One

Maintenance Supervisor oversees 2 vehicle/rolling stock mechanics, 2 refrigeration techs, 1 electrician and
4 site techs. The team maintains all aspects of the operations, from housing to production. Contractors may
be called in on occasion to provide specialty support that is beyond the capability of our maintenance team.

SEE NEXT 3 PAGES FOR PLAT/DRAWINGS:

- RECORDED PLAT
- PLAT WITH MARKUPS
- SATELLITE VIEW

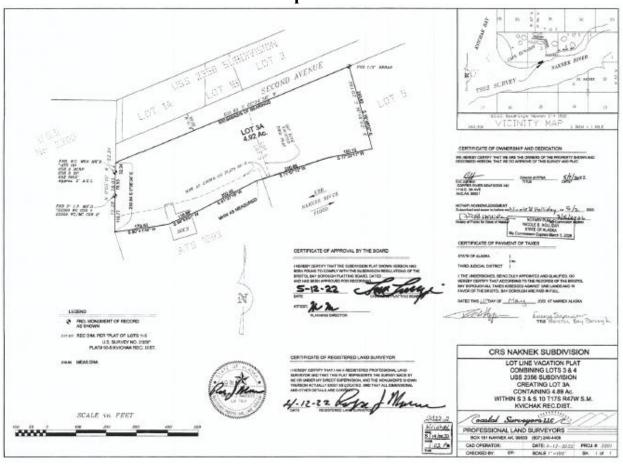


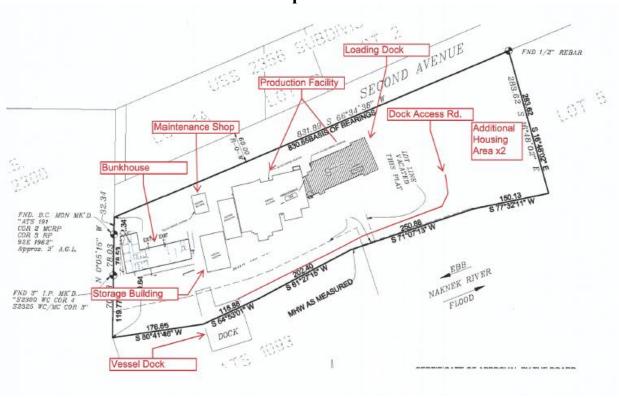
Naknek

CRS Ownership



Imagery @2022 CNES / Airbus, Maxer Technologies, Map data @2022 200 ft







COPPER RIVER SEAFOODS

Main Administrative Office 1400 E First Ave., Anchorage, AK 99501 Phone: (907) 522-7806 · (888) 622-1197 · Fax: (907) 274-0348 www.CopperRiverSeafoods.com

Addendum 1 - Development Plan

Copper River Seafoods, Inc Tidelands Lease ADL 206759, Naknek Site Site Development Plan

In addition to the information provide in the narrative the following upgrades have been made to the dock:

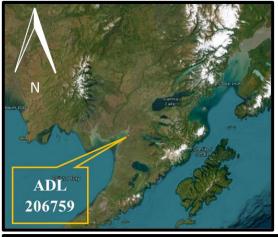
Dock dimensions are 80'x80'.

Materials: Marine Grade Lumber and Steel.

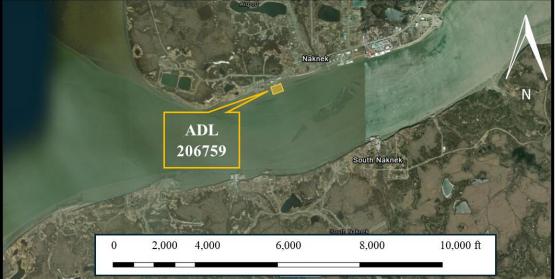
- Top Deck, Caps, Stringers and Subfloor are all marine-grade lumber.
- Pilings are a combination of treated wood and steel, numbering 96 in total.
- 6 Pilings support a permanently mounted hydraulic crane.
- 3 side of the dock have ladders leading down to the river floor, 1 side is parallel to access road and attached to the road.
- The 3 sides that have access to the river bottom have 12"x12" timber barriers as the surrounding top deck barrier.

Attachment B Location Map

ADL 206759







ADL 206759 consists of 4.8 acres of land, more or less, and is located in Naknek, Alaska. The location of the project area is further described as being within Section 10, Township 17 South, Range 47 West, Seward Meridian.

DNR Lease InventoryDrawn by Ben Powell, DNR



NOTE: This map provides a graphical representation of the lease sites and has only been provided as a general reference. Exact location of the lease site may be adjusted prior to lease issuance. This map is not intended for navigational purposes. World Imagery.