

STATE OF ALASKA
DEPARTMENT OF NATURAL RESOURCES
Division of Mining, Land and Water

APPLICATION FOR EASEMENT
AS 38.05.850

ADL# ADL 234754
(to be filled in by State)

Applications that are submitted with unfilled sections or inadequate explanation and/or without application fees, a location figure and/or a completed Division of Mining, Land and Water (DMLW) Environmental Risk Questionnaire will be deemed incomplete. Incomplete applications will be returned without review. See DMLW's current fee regulations (11 AAC 05) and associated Director's Fee Order for applicable non-refundable fee amounts. The filing of an application does not guarantee processing or approval of the requested authorization.

Applicant: GCI Communication Corp. Doing Business As: Unicom, Inc.

Agent: (if applicable; attach record of authorization to represent) Chris Haddox

Mailing Address: 2550 Denali St., Suite 1000 Email: jhaddox@gci.com

City/State/Zip: Anchorage, AK 99503

Primary Phone: 907-265-5400 Alternate Phone: N/A

General Location: Nunapitchuk-Kotlik (see Development Plan) Municipality: Bethel and Kusilvak Census Areas

Section(s): Multiple-See Attached Township: Multiple Range: Multiple Meridian: Seward & Kateel River

Section(s): _____ Township: _____ Range: _____ Meridian: _____

Attach a location figure, plan drawing or survey that shows the detailed location of the requested easement in relation to adjoining property boundaries and reference points. All features must be labeled.

Dimensions requested (Complete line 1 for a linear easement or line 2 for an easement with an irregular shape):

1. Length: (feet) 378,119.24 Width: (feet) 30

2. Area: 260.41 Are units in square feet or acres? (check one)

Term requested and rationale: Public Utility- Requested in perpetuity

Are you applying for a public or a private easement? (check one) Rationale:

Public easement for the transmission and distribution of utility services

Development plan summary/specific purpose of easement: (e.g., electric utility, fiber-optic cable, road, bridge, airstrip/airport, driveway, trail, drainage). This information will be used to determine the scope of use of the easement.

Unicom, Inc. proposes to bring high-speed broadband Fiber Optic internet service to coastal communities as part of the Airraq Network. In doing so, Unicom Inc. will extend their existing fiber-optic cable (FOC) and appurtenances network within a thirty foot wide public easement for the transmission and distribution of utility services from Nunapitchuk to provide the following communities with 2,000 Mbps internet speeds and affordable, unlimited data plans: Toksook Bay, Tununak, Emmonak, and Kotlik with connections for future service projects in Mertarvik and Alakanuk. See attached Development Plan.

Is this an existing use? Yes No. If yes, explain extent and duration of use to date:

Describe plans for initial construction. Be detailed. Include a list of authorizations for portions of the project that are proposed for construction on adjoining lands, other permitting, and/or third-party non-objections: (Use extra sheets as needed)

See attached Development Plan. Initially, the Fiber Optic Cable will be installed into a new Beach Vault (BV) setback from the adjacent waterbody Mean High Water (MHW) with a conduit stub. The conduit stub will be placed above Mean Low Water (MLW) and the associated Cable Landing Stations will be located on uplands. Private land authorizations will be obtained for the terrestrial route.

Additional authorizations will include:

United States Army Corps of Engineers (USACE) Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act; Alaska State Historic Preservation Office (SHPO); United States Fish and Wildlife Service (USFWS) protected species consultation; National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) Marine Mammal Protection Act consultation; NOAA NMFS Essential Fish Habitat consultation; State of Alaska Department of Fish and Game (ADF&G) Fish Habitat permits; Alaska Office of History and Archaeology, Section 106 of the National Historic Preservation Act; NEPA.

Anticipated construction timeframe: Summer 2027-Until Completed, potentially two years

If this authorization is granted, I agree to construct and maintain the authorized improvements in an acceptable manner, and to keep the area in a neat and sanitary condition; to comply with all the laws, rules, and regulations pertaining thereto; and provided further that upon termination of the easement for which application is being made, I agree to remove or relocate the improvements and restore the area without cost to the State and to the satisfaction of DMLW.

Applicant's Signature  Date: 2/3/2026

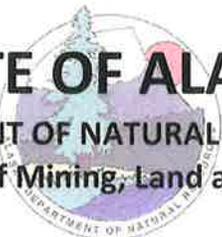
This form must be filled out completely and submitted with the applicable fees. Failure to do so will result in a delay in processing. AS 38.05.035(a) authorizes the director to decide what information is needed to process an application for the sale or use of state land and resources. This information is made a part of the state public land records and becomes public information under AS 40.25.110 and 40.25.120 (unless the information qualifies for confidentiality under AS 38.05.035(a)(8) and confidentiality is requested, AS 43.05.230, or AS 45.48). Public information is open to inspection by you or any member of the public. A person who is the subject of the information may challenge its accuracy or completeness under AS 44.99.310, by giving a written description of the challenged information, the changes needed to correct it, and a name and address where the person can be reached. False statements made in an application for a benefit are punishable under AS 11.56.210.

In submitting this form, the applicant certifies that he or she has not changed the original text of the form or any attached documents provided by the Division. In submitting this form, the applicant agrees with the Department to use "electronic" means to conduct "transactions" (as those terms are used in the Uniform Electronic Transactions Act, AS 09.80.010 – AS 09.80.195) that relate to this form and that the Department need not retain the original paper form of this record: the department may retain this record as an electronic record and destroy the original.

<p>For Department Use Only Application received date stamp</p>
<p>Receipt Types:</p> <p><input type="checkbox"/> 13A Pipeline Easement</p> <p><input type="checkbox"/> 13 Other Easement</p>

ADL # 234754

STATE OF ALASKA
DEPARTMENT OF NATURAL RESOURCES
Division of Mining, Land and Water



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APPLICANT ENVIRONMENTAL RISK QUESTIONNAIRE

The purpose of this questionnaire is to help clarify the types of activities you propose to undertake. The questions are meant to help identify the level of environmental risk that may be associated with the proposed activity. The Division of Mining, Land and Water's evaluation of environmental risk for the proposed activity does not imply that the parcel or the proposed activity is an environmental risk from the presence or use of hazardous substances.

Through this analysis, you may become aware of environmental risks that you did not know about. If so, you may want to consult with an environmental engineer or an attorney.

GCI Communications Corp.		Unicom, Inc.	
Applicant's Name		Doing Business As	
2550 Denali St., Suite 1000		Anchorage	AK 99503
Address		City	State Zip
907-265-5400	907-265-5400	jhaddox@gci.com	Chris Haddox
Message Phone	Work Phone	Email	Contact Person

Describe the proposed activity:

Unicom, Inc. proposes to bring high-speed broadband Fiber Optic internet service to coastal communities as part of the Airraq Network. In doing so, Unicom Inc. will extend their existing fiber-optic cable (FOC) and appurtenances network within a thirty foot wide public easement for the transmission and distribution of utility services from Nunapitchuk to provide the following communities with 2,000 Mbps internet speeds and affordable, unlimited data plans: Toksook Bay, Tununak, Emmonak, and Kotlik with connections for future service projects in Mertarvik and Alakanuk. See attached Development Plan.

In the course of your proposed activity will you generate, use, store, transport, dispose of, or otherwise come in contact with toxic and/or hazardous materials, and/or hydrocarbons? Yes No. If yes, please list the substances and the associated quantities. Use a separate sheet of paper, if necessary.

Unleaded gasoline and diesel fuel for equipment (excavator, backhoe, trencher). Quantities not to exceed 50 gallons in total for each piece of equipment. Lubrication oils, grease, and coolant for equipment maintenance. No fuel storage or refueling of equipment will occur on State of Alaska lands.

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If the proposed activities involve any storage tanks, either above or below ground, address the following questions for each tank. Please use a separate sheet of paper, if necessary, and, where appropriate, include maps or plats:

a. Where will the tank be located?

Not Applicable

b. What will be stored in the tank?

Not Applicable

c. What will be the tank's size in gallons? Not Applicable

d. What will the tank be used for? (Commercial or residential purposes?)

Not Applicable

e. Will the tank be tested for leaks? Not Applicable

f. Will the tank be equipped with leak detection devices? Yes No. If yes, describe:

Not Applicable

Do you know or have any reason to suspect that the site may have been previously contaminated? Yes No.

If yes, please explain:

A review of ADEC Contaminated Sites in the Project area has determined contaminated sites are present in select areas near the planned FOC route. An ADEC Contaminated Sites Management Plan has been developed to manage any impacted soils discovered during construction.

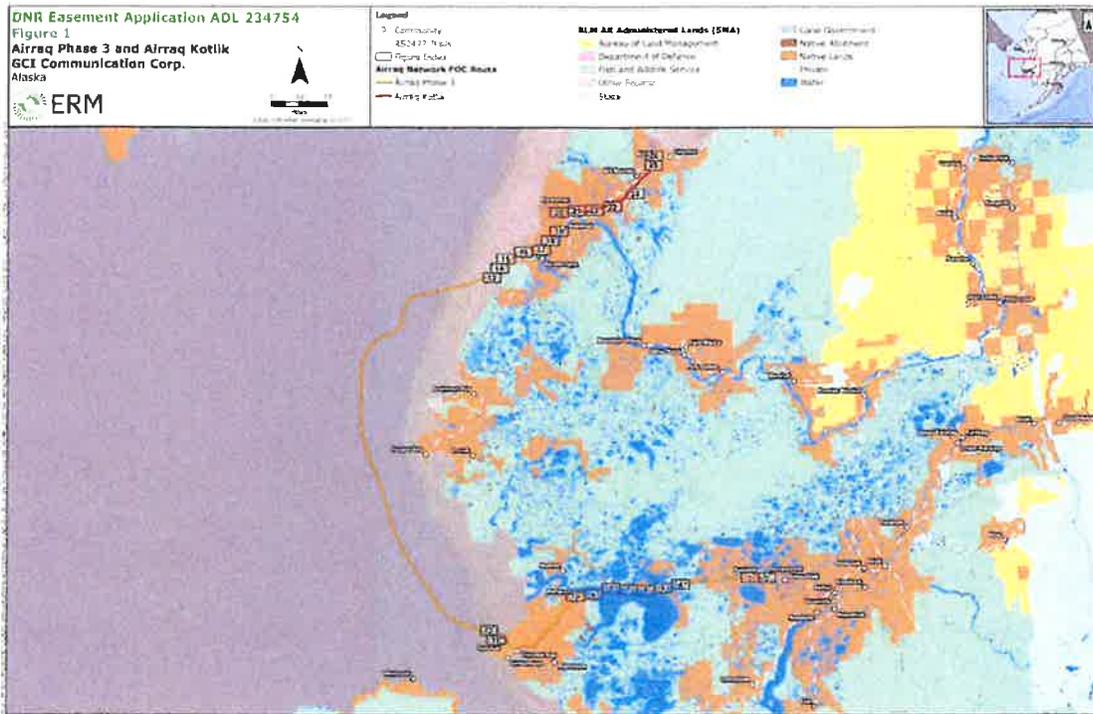
I certify that due diligence has been exercised and proper inquiries made in completing this questionnaire, and that the foregoing is true and correct to the best of my knowledge.

Applicant Signature:  Date: 2/3/2026

AS 38.05.035(a) authorizes the director to decide what information is needed to process an application for the sale or use of state land and resources. This information is made a part of the state public land records and becomes public information under AS 40.25.110 and 40.25.120, unless the information qualifies for confidentiality under AS 38.05.035(a)(8) and confidentiality is requested, or qualifies for confidentiality AS 43.05.230, AS 45.48, or other state or federal laws. Public information is open to inspection by you or any member of the public. A person who is the subject of the personal information may challenge its accuracy or completeness under AS 40.25.310, by giving a written description of the challenged information, the changes needed to correct it, and a name and address where the person can be reached. False statements made in an application for a benefit are punishable under AS 11.56.210. In submitting this form, the applicant agrees with the Department to use "electronic" means to conduct "transactions" (as those terms are used in the Uniform Electronic Transactions Act, AS 09.80.010 – AS 09.80.195) that relate to this form and that the Department need not retain the original paper form of this record: the Department may retain this record as an electronic record and destroy the original.

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Department of Natural Resources (ADNR) managed lands, including submerged land from 3 miles offshore to the mean high water substrate of navigable rivers and lakes, as well as other streams, lakes, and ponds within wetland-dominated landscapes.



Project activities include the following components:

- Marine Route — This route involves installation of broadband submarine FOC within marine environments below MLW. These segments are either trenched or laid on the seafloor.
- Overland Route- This route involves installation of broadband FOC along terrestrial landscapes, including wetlands, inland lakes, and stream crossings. Lightweight submarine cables will be used when crossing wetlands, and armored submarine cable will be used where crossing rivers.

2. PURPOSE AND NEED

The purpose of the Project is to deliver fast, reliable broadband service to Emmonak, Kotlik, Toksook Bay, and Tununak Alaska Native Village Statistical Areas and socially vulnerable communities in the Bethel and Kusilvak Census Areas, as part of a program that meets grant funding requirements provided by RUS ReConnect. The Proposed Action would aid in providing broadband service in rural areas that do not have sufficient access while facilitating the expansion of broadband services and infrastructure, fueling rural economic development within these

communities, and benefiting approximately 2,127 people, 33 businesses, and five educational facilities.

3. CONSTRUCTION METHODS

Project construction of the landfall, marine, and overland components will include marine, intertidal, and terrestrial elements, which are described below. Unicom anticipates initiating construction for Airraq Phase 3 during the summer/fall of 2026 and completing it by the end of 2027. Unicom anticipates initiating construction for the Airraq Kotlik segment the winter of 2027. It is anticipated that Airraq Kotlik construction will be completed by the end of 2028. Construction activities would take place primarily during daylight hours for the marine components, and primarily during nighttime hours during the overland components in the winter months. Though marine operations are 24 hours, in certain areas like Baird Inlet or within 3 nautical miles of land, crews will likely be aboard smaller vessels of opportunity than usually only operate 12 hours a day due to crew size limitations. The following describes marine, intertidal, and terrestrial operation areas:

- "Marine" operations occur within areas below MLW in marine waters.
- "Intertidal" operations occur within areas between MLW and High Tide Line (HTL).
- "Terrestrial" operations occur within areas above HTL.

3.1 MARINE OPERATIONS

The following describes operations that occur in the marine environment, outside of intertidal areas.

- Cable will either be laid on top of the seafloor or buried with a plow. Cable will be laid on the seafloor within areas identified as low risk to cable disturbance or when traversing seafloor substrates that do not allow for plowing.
- When placing cable on the seafloor, bathymetric conditions will be analyzed so the vessel can lay the cable with the engineered slack necessary to allow the cable to conform to the seafloor. Plowing will be used where there is significant risk of outside disturbance to the cable. Local reroutes or cable armoring will be implemented in high-risk areas where the substrate does not allow for plowing.
- Prior to plowing operations on the seabed, a pre-lay grapnel run (PLGR) will be conducted along segments of the cable-laying route selected during the desktop studies. The objective of the PLGR operation will be to identify and clear any seabed debris (e.g., wires, hawsers, fishing gear) deposited along the route. PLGR is conducted by pulling a grapnel along the route over the seabed. Any debris recovered by the grapnel will be discharged ashore upon completion of the operations and disposed in accordance with local regulations. If debris cannot be recovered, then a local re-route will be planned to avoid the debris. The PLGR operation will be conducted to industry standards, employing towed grapnels, and the type of grapnel will be determined by the nature of the seabed.

- In waters shallower than 40 feet, trenching will occur within areas where cable protection from other environmental conditions, such as surf action and ice scouring, are needed. At these depths, trenching will be conducted by a jet sled, which is a self-propelled cable trenching system that uses water pressure to destabilize the seafloor and bury the cable. The water used for jetting will be supplied from the surface by high pressure hoses. This system will allow for jetting pressure and flow rates to be manipulated based on local conditions. The pressurized water will focus on the seafloor, liquifying the substrate. The cable will then sink within the trench without side cast. The elimination of side cast results in limited and temporary impacts. The jet sled will be accompanied by divers who will monitor trenching performance and assist in operations.
- Plow burial within waters deeper than 40 feet will be conducted using a cable plow. Plowing within deep sea segments will protect the FOC against activities known to cause cable faults such as ground fishing operations, shallow anchor dragging, and earthquakes. The cable plow will be pulled along the seafloor by a tow wire connected to the cable ship. The cable will be fed through the plow's share blade, penetrating seafloor sediments under the plow up to 5 feet deep while excavating a path 1 foot wide. The cable will exit the lower aft end of the share blade, and the sediments will immediately collapse on top of the cable, behind the plow. This form of burial will eliminate side cast because excavated substrate will be returned to the penetration immediately after the cable is laid. As a result of the immediate burial, absence of side cast, and narrow excavation footprint, cable plowing incurs only minimal and temporary impacts.
- The contracted vessels will lay lightweight, single or double armor submarine cable. The submarine cable, measuring up to 1-inch in diameter, is constructed from benign materials and will not carry an electrical current.
- Upon completion of cable laying operations, a post-lay inspection burial will be conducted using a ROVJET 207, or similar remotely operated vehicle (ROV). The purpose of the post-lay inspection and burial is to inspect portions of the cable ship route where laying operations may have encountered difficulties. These difficulties may include plow failure, unplanned cable repair, uncontrolled cable payout, or other unplanned events. Where burial corrections need to be made, the ROV will use jet burial, similar to but less powerful than that of the jet sled. The ROV will be operated remotely from the cable laying ship; pulsed sounds will be generated from the ROV, and cameras will be used for positioning and orientation.

In general, equipment in the marine environment may include:

- Cable ship (in waters deeper than 40 feet)
- Tug, barge, large landing craft, small landing craft stored on the cable ship, or Alaska Vessel of Opportunity (in waters shallower than 40 feet)
- Cable plow
- Jet sled
- ROV
- Dive team

The Project's marine portion of the route would be installed during the summer months when the water is not frozen, and no ice accumulation is present.

3.2 INTERTIDAL OPERATIONS

The following describes operations that will occur in the intertidal areas.

- This trenching will use conventional land-based excavation equipment and methods, and care will be taken to protect the shoreline from future erosion.
- For the cable trench in intertidal areas, the maximum side cast width will be 5 feet, for an overall disturbance width of 8 feet. Minimal excess material is anticipated after compaction of the trench post-construction. Any excess material still present will be disposed of at an upland location.
- For all intertidal work (between MLW and HTL), care would be taken to protect shorelines from future erosion and best practices would be employed to address stormwater runoff concerns. All construction operations would only occur during low tide. Construction mats would be used in areas without firm coarse sediments such as cobbles and boulders to protect the sediment from slumping and erosion. Similar mats were used in Airraq Phases 1 and 2 and are anticipated to cause temporary compaction with no permanent impacts. All impacts and alterations of shorelines would be temporary.

In general, equipment in the intertidal environment may include:

- Rubber wheel backhoe
- Tracked excavator or backhoe
- Utility truck and trailer to deliver materials
- Chain trencher or cable plow (optional)
- Hand tools (e.g., shovels, rakes, pry bars, wrenches)
- Survey equipment
- Winch or turning sheave
- Small utility boat to run the pull line to the beach
- Landing craft similar to the marine vessel Unalaq (high freight capacity landing craft)
- Splicing equipment, small genset, and splicing tent

3.3 TERRESTRIAL OPERATIONS

For all locations, the following general construction methods apply:

- Overland route segments crossing extensive wetlands will be installed in the winter months, when the substrate is frozen, to minimize ground disturbances, and shallow trenching in the tundra will not take place if the ground is not frozen.
- A lightweight submarine cable will be deployed from spools that are towed by light tracked vehicles. Lightweight submarine cables will be coated in high-density polyethylene and measure approximately 0.35 inches in diameter. A splice joint case 10 inches in diameter and

18 inches long will be located approximately every 20,000 feet along the route, joining spool segments. Most of the cable will be surface-laid to reduce wetland impacts but will be buried when the route is near trails, crosses streambanks and riverbanks, or is in other places where the cable may be susceptible to damage. The cable will be laid with slack to allow it to settle on the vegetation and conform to changing surface features and environmental conditions. The cable will sink to the bottom of lakes and ponds that are crossed but care will be taken at all stream crossings to ensure the cable is buried under the stream during the winter lowest flow periods. Additionally, unless the cable is being routed on riser poles, it will be buried within 0.25 to 0.6 miles of each receiving community.

- Trenching activities will be conducted with a backhoe along streams and riverbanks. If permafrost is present during trenching, the trenching would only occur within the vegetative mat above the permafrost, and the permafrost would be left intact.
- The tundra lay route will be inspected the following summer and any cable found caught in brush or otherwise found not to be conforming with the terrain will be set in place by hand and possibly hand buried where cable crosses established game trail or ATV trail.
- For the cable trench in intertidal and terrestrial areas, anticipated maximum excavation dimensions would be 3 feet wide by 3 feet deep, and the maximum side cast width would be 5 feet, for an 8-foot overall disturbance width. When the situation allows, chain trenchers will replace the backhoe for excavation. Chain trenchers excavate smaller trenches and have less associated side cast. When deemed necessary, additional protections may be provided to the cable at landfall locations with split pipe articulated armor. Conduit installation will be conducted in a controlled manner using best management practices prior to the arrival of the cable ship. Up to 300 meters (approx. 984 feet) of Split pipe articulated armor may also be used at the four landing sites, to provide additional protection for the Project cable.
- Trenches will be excavated using backhoes and conventional trenching methods, and best management practices will be employed to prevent erosion and water discharge. Excavated material will be temporarily side cast. Landfall substrates are primarily composed of cobble or larger materials. In instances where landfall locations require excavation in soft substrates, such as mudflats or beaches composed primarily of other fine sediments, side cast material will be underlaid with geotextile, ice pads, or similar material to allow for removal of the temporary material to the maximum extent practical. Standard trenching techniques will be used to trench and re-grade trenched areas to pre-existing contours. Trench design and backfill methods have been created with the intention of preventing constructed areas from collecting excess water and acting as a drain.

In general, equipment in the terrestrial environment may include:

- Rubber wheel backhoe
- Tracked excavator or backhoe
- Small bulldozer or other tracked machine to remove snow
- Tucker or other tracked transport vehicle
- Light tracked vehicle

- Utility truck and trailer to deliver materials
- Rock saw
- Chain trencher or cable plow (optional)
- Hand tools (e.g., shovels, rakes, pry bars, wrenches)
- Survey equipment
- Winch or turning sheave
- Small utility boat for larger rivers
- Splicing equipment, small genset, and splicing tent or enclosure

Multiple approaches to fiber installation were considered before choosing the overland route proposed herein. In addition to the overland route, two submarine paths were considered, one where the cable would have been laid far enough offshore that conventional, cable ship-based installation methods could be used for a portion of the route. A river-based route, and an entirely tundra-based route were also considered. However, none of these alternative approaches offered the safety and security to provide for the network's availability requirements and needs.

3.4 ACCESS AND CONSTRUCTION OVERVIEW

Intertidal and terrestrial construction site access will be via landing craft to the shore and by fixed wing aircraft to community airports. No permanent buildings will be constructed on state land; temporary weather tents may be used during construction. Power sources for construction will include portable generators. Overland construction activities will require artificial lighting and may take place 24/7. All construction waste will be collected and disposed of at a permitted landfill. Hazardous substances used during construction will include unleaded gasoline, diesel, lubrication oils, grease, and coolant for equipment. No fuel storage or refueling of equipment will occur on state lands. Construction crews are expected to consist of approximately eighteen workers. Worker lodging will be within existing communities and aboard marine vessels.