

**From:** [Eric Nelius](#)  
**To:** [donlingoldeis, POA](#)  
**Subject:** [EXTERNAL] Donlin project / barging perspective / EIS comment  
**Date:** Tuesday, May 31, 2016 8:32:28 AM  
**Attachments:** [image003.png](#)  
[Nelius\\_Donlin\\_Perspective.pdf](#)

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To Whom it May Concern:

Please review the attached letter, which includes my perspective in regard to the barging proposal for the Donlin Gold project.

Regards.

Eric Nelius  
[Brice Marine LLC](#)  
907.888.6517  
BRMARlogo



Mr. Keith Gordon  
Regulatory Division  
US Army Corps of Engineers  
CEPOA-RD-Gordon, P.O. Box 6898  
Joint Base Elmendorf Richardson, AK 99506-0898

RE: Donlin Gold Project EIS – Draft EIS Comments

Dear Mr. Gordon:

My name is Eric Nelius, I'm a born and raised Alaskan. I've worked in Western Alaska as a Merchant Marine since 1995. The bulk of my career has been spent operating within the rivers and coast, from Dutch Harbor to Kotzebue Sound, as a tug captain for Northland Services (NSI). NSI was a regional leader in coastal & river village cargo delivery for over 30 years, it was recently purchased by Lynden and now operates as Alaska Marine Lines. Since 2013, I've worked as Port Captain for Brice Marine, where I help manage a fleet of shallow draft tugs & barges designed specifically for operations in Western Alaska. I've taken pride in my profession and appreciate every opportunity, relationship & lesson the region has offered.

One of the more identifiable concerns in regard to the development of Donlin Gold's proposed project has to do with the potential impacts of additional barge traffic on the river.

There has been apprehension voiced about the possibility of increased barge traffic interfering with subsistence and commercial fishing. I do not anticipate any issues in this regard. I spent 16 seasons operating a tug in Bristol Bay during the height of the sockeye salmon fishery. Gillnet fishermen of every variety (commercial & subsistence, drift & set net) plug the waters in that region for nearly 3 months. Barge traffic there, during high season, eclipses any river traffic proposed by Donlin for the Kuskokwim. Tug operators and fisherman have been safely working among each other in Bristol Bay for decades. Operating within the [Navigational Rules](#), set and enforced by the Coast Guard is the first step toward safe operation in the river. The Rules provide guidelines that help mariners make prudent, concise decisions while operating among others on the water. Every tug captain is trained & required to follow the rules as written. Strict adherence to the Rules will keep people and equipment safe while operating in an environment where such a thorough understanding of them is less apparent.

Good communication is always a key element to avoiding conflict or dangers on the water. Safe travel in high traffic zones is typically initiated with some form of communication. When cell phone or VHF radio contact is not possible, or when low visibility circumstances are present, it is common to utilize a pilot skiff to run ahead in order to establish passing arrangements. In my experience, this face to face method of establishing contact ends up benefiting both parties down the road. It creates a healthy foundation for communications in the future. For a project that will last 30 years or more, forming connections between tug operators and village fisherman will prove beneficial. In Bristol Bay, I worked hard at cultivating working relationships among fishermen. There came a time, not long after taking my first command, when I noticed that many gillnetters would see me coming and slowly move out of the way, net in tow. This was most certainly a result of my efforts to establish a positive working relationship with them. I fully expect that we will develop a similar approach to working among village fisherman and tug captains on the Kuskokwim.

There are also concerns in regard to barge groundings. The simple, most important factor in the avoidance of a grounding situation is to have up to date, valid bathymetry data. Attention needs to be given to the development of a system that not only records this data, but communicates it to the right people. Determining real time water levels and trends, from several locations along the river will be key for defining allowable barge drafts. Combining good information and careful load planning will help prevent grounding. The repetitive nature of the trip between Bethel and Jungjuk Creek will also provide for a thorough understanding of the river's real time bathymetry. This daily survey will translate into well planned loads that minimize risk and keep barges moving, even during the shallowest operating weeks. Loading barges within allowable limits, predicated by water depths that change daily is nothing new to the mariner. Grounding is a legitimate concern everywhere in the marine environment, not just on the Kuskokwim. Using good management practices & procedure execution, they do not happen.

The current operational plan for delivery of cargo between Bethel and the port site at Junjuk Creek has been discussed and developed for nearly 20 years. I have only recently been brought into the forum. I believe the current plan and vessel design to be the most safe & efficient way to move cargo on the Kuskokwim. The vessels will be built using the advice and knowledge from operators and engineers that I consider to be the most experienced, qualified and respected in the business. The multi barge "raft" concept will work well at extremely low, yet navigable water levels. Having an option to move smaller units across shallow and/or narrow crossings will increase maneuverability enough to eliminate risk of grounding. In my opinion, based on my experience on the Kusko and Western Alaska rivers in general, circumstances requiring the barges be separated and relayed will be very rare. It is important to recognize that this method of barging is proven & used on a much grander scale on many rivers, all over the world. This plan does not "reinvent the wheel".

As a mariner, this project is exciting to contemplate. The challenges it presents are all very real, but unquestionably solvable. In my opinion, the concerns and fears in regard to barging on the Kusko are due to people's lack of knowledge. Even the most informed people/groups typically have little understanding of how a tug and barge moves during its day to day operation. Reality is that the industry is well regulated & safety/drill driven, it has analyzed and educated participants from past experience and is ever evolving.

I am looking forward to the project's development and will continue to participate as a merchant marine professional during each phase.

Respectfully,  
  
Eric Nelius

Licensed Captain  
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