

## DEPARTMENT OF THE ARMY PERMIT

**Permittee:** IPOP, LLC; Beau Epstein  
**Project Name:** Bonanza Channel Placer Project  
**Permit Number:** POA-2018-00123  
**Issuing Office:** Pacific Ocean Division

Note: The term "you" and its derivatives, as used in this permit, means the permittee or any future transferee. The term "this office" refers to the appropriate district or division office of the Corps of Engineers having jurisdiction over the permitted activity or the appropriate official acting under the authority of the commanding officer.

You are authorized to perform work in accordance with the terms and conditions specified below.

### **Project Description:**

To construct structures and/or conduct work in or affecting "navigable waters of the United States" pursuant to Section 10 of the Rivers and Harbors Act of 1899, and

To permanently discharge fill into 159.4 acres of waters of the U.S. pursuant to Section 404 of the Clean Water Act of 1972, in association with the Bonanza Channel Placer Project as shown on the attached drawings.

The proposed project consists of a multi-year phased dredging project associated with a placer gold mining operation within Bonanza Channel estuary. The proposed project would be implemented over a five-year period and involves dredging approximately 4.5 million cubic yards (CY) (estimated bulked volume of 4.9 million CY) based on 24-hour operations, processing the materials for gold extraction, concurrently reclaiming the dredged channel to its original bathymetry, and disposing of the excess processed materials at locations adjacent to the dredged area. No chemical processing of dredged materials would occur.

The activities requiring a permit consist of the total area affected by the dredging activity, reclamation of dredged materials, and disposal of excess dredged materials within jurisdictional waters. The total maximum area of affected jurisdictional waters is 159.4 acres.

The project includes establishment of a launch ramp, a man camp (temporary encampment for use by workers), and a staging area. The man camp and associated staging area would be sited in uplands above the High Tide Line (HTL). The launch

ramp consists of a triangular-shaped area approximately 0.87 acre in area. The ramp extends from the upland area into jurisdictional waters and is part of the dredging footprint. The ramp would be maintained in place during the entire project. The man camp and staging area would not be located within jurisdictional waters.

Table A summarizes the quantities of materials to be dredged, reclaimed, and disposed of. The dredging/mining phase would consist of dredging and processing materials for gold extraction from within a trapezoidal cross-section dredged channel and concurrently reclaiming the dredged channel. Excess materials would be disposed of in areas adjacent to the dredged channel. The mining channel would be dredged in five approximately equal-sized stages over a five-year period.

Table A. Summary of Proposed IPOP, LLC Operations at Bonanza Channel

Item Description	Acres	Storage Capacity (CY)	Dredged Volume (CY)	Bulked Dredged Volume* (CY)
Access trench	4.2	0	33,200	35,690
Year 1	21.7	957,346	900,000	964,404
Year 2	21.7	957,346	900,000	964,404
Year 3	21.7	957,346	900,000	964,404
Year 4	21.7	957,346	900,000	964,404
Year 5	21.7	957,346	900,000	964,404
Dredge Disposal Site A	14.6	13,666		
Dredge Disposal Site B	7.1	7,019		
Dredge Disposal Site C	18.7	23,008		
Dredge Disposal Site Years 2-5	6.3	7,356		
<b>Totals</b>	<b>159.4</b>	<b>4,837,779</b>	<b>4,533,200</b>	<b>4,857,710</b>
* Bulkled volume estimated based on bulking factor of 1.075 by the Applicant				

The project would be conducted during ice-free periods when the channel can be accessed by dredging equipment (approximately June 1st through November 1<sup>st</sup> depending on seasonal conditions each year). At the end of the operational season, the Applicant would cease operations and shut down and secure the man camp until the following operational season.

Two access channels would be constructed and maintained during dredging operations. One access channel would be constructed between the launch ramp and the edge of the full-scale mining channel to provide access for dredging equipment. The second

access channel would be created along the south side of the full-scale mining channel to provide access for dredging equipment. The two access channels would connect at the edge of the full-scale mining footprint. The depth of the access channels would be ten feet. The two access channels would be backfilled to pre-project bathymetry by the end of project operations.

The access channel between the launch ramp and the full-scale mining area would be maintained at ten feet deep and would be approximately 2,200 feet long and 85 feet wide. The full-scale trapezoidal mining channel would be 31 feet deep with a top width of about 360 to 365 feet and a bottom width of about 200 feet. The total length of this mining channel is approximately 13,000 feet. The access channel along the entire length of the full-scale mining channel would be maintained after initial reclamation to allow for access to the full-scale mining channel by dredging equipment.

Equipment proposed for the project includes a single engine dredge vessel (dimensions: 50 feet long x 24 feet wide) with a 36-inch diameter Vosta cutterhead, a 10-inch diameter dredge nozzle, two small tender boats (dimensions: 25 feet long x 12 feet wide) and a processing barge (dimensions: 64 feet long x 40 feet wide). The dredge vessel would be connected to the processing barge by a 300 to 600-foot-long floating pipe.

By the time the mining operation is complete, the Applicant would fully reclaim the dredged areas with processed dredged materials (after gold extraction). Dredged materials would be placed within shallow water areas approximately adjacent to the dredged areas up to the mean lower low water (MLLW) line. Four DMDSs have been proposed by the Applicant. By placing appropriate dredged materials up to the MLLW, the DMDSs are expected to function as mudflats along the edges of the Bonanza Channel. The designated DMDSs will be used for temporary storage of dredged materials to be used in final reclamation activities and for permanent storage of excess dredged materials.

**Project Location:** The project site is located approximately 25 miles east of Nome, Alaska within the Bonanza Channel estuary and at approximately Mile Post 28.5 along the Nome-Council Road, between approximately Latitude 64.5044°N., Longitude 164.6169°W., on the western limit and Latitude 64.52866°N., and Longitude 164.5447°W. on the eastern limit.

**Permit Conditions:**

**General Conditions:**

1. The time limit for completing the authorized activity ends on March 20, 2030. If you find that you need more time to complete the authorized activity, submit your request for a time extension to this office for consideration at least one month before the above date is reached.
2. You must maintain the activity authorized by this permit in good condition and in conformance with the terms and conditions of this permit. You are not relieved of this requirement if you abandon the permitted activity, although you may make a good faith transfer to a third party in compliance with General Condition 4 below. Should you wish to cease to maintain the authorized activity, or should you desire to abandon it without a good faith transfer, you must obtain a modification from this permit from this office, which may require restoration of the area.
3. If you discover any previously unknown historic or archeological remains while accomplishing the activity authorized by this permit, you must immediately notify this office of what you have found. We will initiate the Federal and state coordination required to determine if the remains warrant a recovery effort or if the site is eligible for listing in the National Register of Historic Places.
4. If you sell the property associated with this permit, you must obtain the signature of the new owner in the space provided and forward a copy of the permit to this office to validate the transfer of this authorization.
5. If a conditioned water quality certification has been issued for your project, you must comply with the conditions specified in the certification as special conditions to this permit. For your convenience, a copy of the certification is attached if it contains such conditions.
6. You must allow representatives from this office to inspect the authorized activity at any time deemed necessary to ensure that it is being or has been accomplished with the terms and conditions of your permit.
7. You must notify this office as to the dates of commencement (within 10 days prior to the start of construction) and completion of the activity (within 10 days following the end of construction) using the enclosed forms.

**Special Conditions:**

1. Within 60 days of permit issuance and prior to the start of the regulated activity, provide the Corps with a revised and updated Reclamation Plan that matches the On-Site Alternative 2a project description. This plan provides the basis for the monitoring and reporting activities that will be required of the Permittee. The revised Reclamation Plan will address completing harvesting, storage, and installment of SAV starting from Year One and continuing through Year 5 of full-scale mining.

2. The Permittee shall implement their April 18, 2022, narrative (previously provided to Alaska Department of Environmental Conservation) regarding prevention of unplanned releases in their work area to address contingent actions needed in the event of a silt curtain failure.
3. The Permittee shall only use dredged materials to cover the surface areas of restored DMSDs that are appropriate for mudflat creation (organic muds and fine-grained materials).
4. The Permittee shall comply with such terms and conditions of the Clean Water Act Section 401 Water Quality Certification (WQC) dated April 6, 2022, issued by the Alaska Department of Environmental Conservation as remain in force.
5. The permittee shall ensure that both access channels are fully reclaimed to pre-project bathymetry prior to the final shutdown of the project.
6. The Permittee shall comply with the following measures required by the U.S. Fish and Wildlife Service (USFWS) to minimize impacts to listed species and their critical habitat:
  - a. A type III Ruffwater Screen Turbidity Curtain, or its functional equivalent, shall be deployed at all times during dredging operations as described in the Permittee's Plan of Operations.
  - b. The Permittee shall have fuel spill and oil spill emergency response kits on hand and a self-certified Tier 1 Spill Prevention Control and Countermeasure Plan (SPCC) as required by 40 CFR Section 112.6. in place at all times during operations to minimize risks of petroleum spills that may impact marine mammals.
  - c. A Polar Bear Avoidance and Interaction Plan shall be available before project operations begin. The plan shall be followed by the Permittee and their contractors to protect workers from potentially dangerous wildlife that may be encountered in the Bonanza Channel area. The plan shall address applicable federal, state, and local regulations related to wildlife interactions associated the Endangered Species Act and the Marine Mammal Protection Act. The plan shall include discussion of field training requirements for project workers and their contractors, food and waste management, regulatory requirements, and species-specific avoidance and reporting procedures.
  - d. The project shall not generate hazardous waste during operations. A Waste Management Plan shall be developed and implemented to manage domestic waste generated by camp operations to minimize the potential for attracting wildlife, including marine mammals.

7. The Permittee shall comply with the following measures required by the National Marine Fisheries Service (NMFS) to minimize impacts to listed species and their critical habitat:

General Mitigation Measures

- a. The Permittee shall inform the Corps and NMFS of impending in-water activities a minimum of one week prior to the onset of those activities.
- b. If construction activities shall occur outside of the June 1<sup>st</sup> to November 1<sup>st</sup> time window specified in this permit, the Permittee shall provide prior notification to the Corps and NMFS to allow for re-initiation of consultation, if required.
- c. Project-associated staff shall cut all materials that form closed loops (e.g., plastic packing bands, rubber bands, and all other loops) prior to proper disposal in a closed and secured trash bin. Trash bins shall be properly secured with locked or secured lids that cannot blow open, preventing trash from entering the environment, thus reducing the risk of entanglement in the event that waste enters marine waters.
- d. Project-associated staff shall properly secure all ropes, nets, and other materials that could blow or wash overboard.
- e. All trash shall be immediately placed in trash bins and bins shall be properly secured with locked or secured lids that cannot blow open and disperse trash into the environment.

Protected Species Observer (PSO)-related Measures

- f. One or more PSOs shall perform PSO duties onsite throughout dredging operations.
- g. For all dredging activity, PSOs shall monitor all marine waters within a 300-meter shutdown zone radius.
- h. PSOs shall be positioned such that they shall collectively be able to monitor the entirety of each activity's shutdown zone, along with adjacent waters. The Permittee shall coordinate with NMFS on the placement of PSOs prior to commencing in-water work.
- i. Prior to commencing dredging, PSOs shall scan waters within the 300-meter shutdown zone and confirm no listed species are within the shutdown zone for at least 30 minutes immediately prior to initiation of the in-water activity. If one or more listed species are observed within the shutdown zone, the in-water activity shall not begin until the listed species exit the shutdown zone of their own accord,

or the shutdown zone has remained clear of listed species for 30 minutes immediately prior to dredging.

- j. The on-duty PSOs shall continuously monitor the shutdown zone and adjacent waters during dredging operations for the presence of listed species.
- k. In-water activities shall take place only:
  - between civil dawn and civil dusk when PSOs can effectively monitor for the presence of marine mammals.
  - during conditions with a Beaufort Sea State of 4 or less within the Bonanza Channel, and
  - when the entire shutdown zone and adjacent waters are visible (e.g., monitoring effectiveness is not reduced due to rain, fog, snow, volcanic ash).
- l. If visibility degrades to where the PSO cannot ensure that the shutdown zone remains devoid of listed species during dredging, the crew shall cease in-water work until the entire shutdown zone is visible and the PSO has indicated that the zone has remained devoid of listed species for 30 minutes.
- m. The PSO shall order the dredging activities to immediately cease if one or more listed species has entered, or appears likely to enter, the associated shutdown zone.
- n. If dredging activities are shut down for less than 30 minutes due to the presence of listed species in the shutdown zone, dredging may commence when the PSO provides assurance that listed species were observed exiting the shutdown zone. Otherwise, the activities may only commence after the PSO provides assurance that listed species have not been seen in the shutdown zone for 30 minutes.
- o. Following a lapse of dredging activities of more than 30 minutes, the PSO shall authorize resumption of activities only after the PSO provides assurance that listed species have not been present in the shutdown zone for at least 30 minutes immediately prior to resumption of operations.
- p. If a listed species is observed within a shutdown zone or is otherwise harassed, harmed, injured, or disturbed, PSOs shall immediately report that occurrence to NMFS.

#### Protected Species Observer Requirements

- q. PSOs must be independent from dredging operations, have no other assigned tasks during monitoring periods, and meet the conditions listed below.

- r. The Permittee shall provide resumes of PSO candidates to the NMFS consultation biologist or Section 7 coordinator for approval at least one week prior to in-water work. NMFS will provide a brief explanation of lack of approval in instances where an individual is not approved.
- s. At least one PSO shall have prior experience performing the duties of a PSO during construction activity. Other PSOs may substitute other relevant experience, education (degree in biological science or related field), or training.
- t. At least one PSO shall complete PSO training prior to deployment. The training shall include:
- field identification of marine mammals and marine mammal behavior,
  - ecological information on Alaska's marine mammals and specifics on the ecology and management concerns of those marine mammals,
  - ESA and MMPA regulations,
  - mitigation measures outlined in the biological assessment and NMFS concurrence letter,
  - proper equipment use,
  - methodologies in marine mammal observation and data recording and proper reporting protocols, and
  - an overview of PSO roles and responsibilities.
- u. PSOs shall:
- have vision correctable to 20-20,
  - have the ability to effectively communicate orally, by radio and in person, with project personnel,
  - have prior experience collecting field observations and recording field data accurately and in accordance with project protocols,
  - be able to identify to species all marine mammals that are endemic to the action area,
  - be able to record marine mammal behavior, and
  - have technical writing skills sufficient to create understandable reports of observations.
- v. PSOs shall work in shifts lasting no longer than 4 hours with at least a 1-hour break from monitoring duties between shifts. PSOs shall not perform PSO duties for more than 12 hours in a 24-hour period.
- w. PSOs shall have the ability to effectively communicate orally, by radio and in person, with project personnel to provide real-time information on listed species.



- x. PSOs shall have the ability and authority to order appropriate mitigation response, including shutdowns, to avoid takes of all listed species.
- y. The PSOs shall have the following equipment to address their duties:
  - tools which enable them to accurately determine the position of a marine mammal in relationship to the shutdown zone,
  - two-way radio communication, or equivalent, with onsite project manager,
  - tide tables for the project area,
  - watch or chronometer,
  - binoculars (7x50 or higher magnification) with built-in rangefinder or reticles (rangefinder may be provided separately),
  - global positioning system,
  - a legible copy of this DA permit and all appendices, and
  - legible and fillable observation record form allowing for required PSO data entry.
- z. Prior to commencing in-water work or at changes in watch, PSOs shall establish a point of contact with the construction crew. The PSO shall brief the point of contact as to the shutdown procedures if listed species are observed likely to enter or within the shutdown zone and shall request that the point of contact instruct the crew to notify the PSO when a marine mammal is observed. If the point of contact goes "off shift" and delegates his duties, the PSO must be informed and brief the new point of contact.

#### General Data Collection and Reporting

- aa. PSOs shall record observations on data forms or into electronic data sheets.
- bb. The Permittee shall ensure that PSO data will be submitted electronically in a format that can be queried such as a spreadsheet or database (i.e. digital images of data sheets are not sufficient).
- cc. PSOs shall record the following:
  - the date, shift start time, shift stop time, and PSO identifier,
  - date and time of each reportable event (e.g., a marine mammal observation, operation shutdown, reason for operation shutdown, change in weather),
  - weather parameters (e.g., percent cloud cover, percent glare, visibility) and sea state of the Bonanza Channel where the Beaufort Scale wave characteristics shall be used to determine sea-state (<https://www.weather.gov/mfl/beaufort>),
  - species, numbers, and, if possible, sex and age class of observed marine mammals, along with the date, time, and location of the observation,

- the predominant sound-producing activities occurring during each marine mammal observation,
- marine mammal behavior patterns observed, including bearing and direction of travel,
- behavioral reactions of marine mammals just prior to, or during sound producing activities,
- initial, closest, and last location of marine mammals, including distance from observer to the marine mammal, and minimum distance from the predominant sound-producing activity or activities to marine mammals,
- whether the presence of marine mammals necessitated the implementation of mitigation measures to avoid acoustic impact, and the duration of time that normal operations were affected by the presence of marine mammals, and
- geographic coordinates for the observed animals, with the position recorded by using the most precise coordinates practicable (coordinates shall be recorded in decimal degrees, or similar standard and defined coordinate system).

#### Unauthorized Take

dd. If a listed marine mammal is determined by the PSO to have been disturbed, harassed, harmed, injured, or killed (e.g., a listed marine mammal(s) is observed entering a shutdown zone before operations can be shut down, or is injured or killed as a direct or indirect result of this action), the PSO shall report the incident to NMFS within one business day, with information submitted to [akr.section7@noaa.gov](mailto:akr.section7@noaa.gov). These PSO records shall include all information to be provided in the final report (see measures under Final Report heading below):

- number of animals of each threatened and endangered species affected,
- the date, time, and location of each event (provide geographic coordinates),
- description of the event,
- the time the animal(s) was first observed or entered the shutdown zone, and, if known, the time the animal was last seen or exited the zone, and the fate of the animal,
- mitigation measures implemented prior to and after the animal was taken; and if a vessel struck a marine mammal, the contact information for the PSO on duty, or the contact information for the individual piloting the vessel if there was no PSO on duty, and
- Photographs or video footage of the animal(s) (if available).

#### Stranded, Injured, Sick or Dead Marine Mammal (not associated with the project)

ee. If PSOs observe an injured, sick, or dead marine mammal (i.e., stranded marine mammal), they shall notify the Alaska Marine Mammal Stranding Hotline at 877-925- 7773. The PSOs shall submit photos and available data to aid NMFS in

determining how to respond to the stranded animal. If possible, data submitted to NMFS in response to stranded marine mammals shall include date/time, location of stranded marine mammal, species and number of stranded marine mammals, description of the stranded marine mammal's condition, event type (e.g., entanglement, dead, floating), and behavior of live- stranded marine mammals.

### Illegal Activities

- ff. If PSOs observe marine mammals being disturbed, harassed, harmed, injured, or killed (e.g., feeding or unauthorized harassment), these activities shall be reported to NMFS Alaska Region Office of Law Enforcement at (1-800-853-1964).
- gg. Data submitted to NMFS shall include date/time, location, description of the event, and any photos or videos taken.

### Monthly Report

- hh. Submit interim monthly PSO monitoring reports, including data sheets. These reports shall include a summary of marine mammal species and behavioral observations, shutdowns or delays, and work completed.
- ii. Monthly reports shall be submitted to AKR.section7@noaa.gov by the 15<sup>th</sup> day of the month following the reporting period. For example, the report for activities conducted in June 2023 shall be submitted by July 15<sup>th</sup>, 2023.

### Final Report

- jj. A final report shall be submitted to NMFS within 90 calendar days of the completion of the project summarizing the data recorded and submitted to AKR.section7@noaa.gov. The report shall summarize all in-water activities associated with the proposed action, and results of PSO monitoring conducted during the in-water project activities.
- kk. The final report shall include:
  - summaries of monitoring efforts including total hours, and marine mammal distribution through the study period, accounting for sea state and other factors that affect visibility and detectability of marine mammals;
  - analyses on the effects from various factors that may have influenced detectability of marine mammals (e.g., sea state, number of observers, fog, glare, and other factors as determined by the PSOs);
  - species composition, occurrence, and distribution of marine mammal observations, including date, water depth, numbers, age/size/gender categories (if determinable), group sizes, and ice cover;

- number of marine mammals observed (by species) during periods with and without project activities (and other variables that could affect detectability);
  - initial, closest, and last marine mammal observation distances versus project activity at time of observation;
  - observed marine mammal behaviors and movement types versus project activity at time of observation;
  - numbers of marine mammal observations/individuals seen versus project activity at time of observation
  - distribution of marine mammals around the action area versus project activity at time of observation.
  - digital, query-able documents containing PSO observations and records, and digital, query-able reports.
8. To ensure safety for trail users along the Iditarod National Historic Trail, at the end of each mining season and prior to shutdown of the man camp for the winter, the Permittee shall contact the Iditarod National Historic Trail Coordinator ((b) (6)), BLM Anchorage Field Office, ((b) (6)) to provide location and overwintered equipment information for the man camp and coordinate on ways to maximize safety for trail users during the winter months.
9. The Permittee shall comply with the following measures required by the National Marine Fisheries Service to minimize impacts to Essential Fish Habitat:
- a. Maintain drainage patterns of the surrounding wetlands and mud flats in their natural state.
  - b. The dredge material should be graded each work shift to prevent the creation of pools on the fill surface that could trap out-migrating salmon and other marine fishes between high tides.
  - c. Maintain the sediment curtains in place until the suspended sediment concentrations within the sediment curtain are within 5% or less of the suspended sediment outside of the sediment curtain.
10. At the completion of the project, the Permittee shall restore the man camp area to its original condition. No unsecured trash or equipment shall be left onsite within the man camp or in any part of the project vicinity at the end of each mining season. No trash or equipment will be left on the site at the end of the final mining season. The permittee shall provide the Corps with notification in writing or via email when the project has been completed. Photo documentation of post-project site conditions shall be provided with this notification.
11. No trespassing is permitted on AMNWR lands, Indian allotments, private lands, or any other properties not included within the Permittee's mining claims. The boundaries of

the State-owned parcel used for access by the Permittee shall be clearly marked to prevent accidental intrusion by the Permittee's personnel or equipment.

12. The Permittee shall maintain a copy of the Department of the Army permit on-site at times.
13. Within 60 days from the end of each mining season, the Permittee shall submit an annual report to the Corps, with copies to NMFS, USFWS, Alaska Department of Environmental Conservation, and ADF&G that provides documentation of all dredging operations completed from the preceding mining season and all monitoring data collected under the Permittee's Reclamation Plan relevant to the dredged/mined areas. This includes the following components:
  - Summary of dredging actions completed during the mining season just completed, including any variances from the operations plan and any noteworthy events or difficulties that occurred
  - Confirmation of operations scheduled for the next mining season
  - Bathymetric Surveying and Monitoring
  - SAV and Benthic Macroinvertebrate Monitoring
  - Water Quality, Meteorology, and Visual Monitoring
  - Bird Monitoring
  - Fish Monitoring
  - Wildlife Monitoring
  - Sediment Testing
  - Recommended adaptive management measures to address any performance standards that indicate additional actions are needed.

A typical monitoring cycle each season shall consist of recording baseline conditions for referencing purposes prior to the start of dredging and collection of data during, and at the end of, the dredging season as appropriate for the mining footprint to be dredged. During successive mining seasons, the Permittee shall also review site conditions for the previously dredged operational footprint along with the footprint for the current season. Thus, each mining season will require monitoring on successively larger areas as the mined footprint cumulatively increases each year. The final monitoring report will be submitted in the Fall of Year seven, two years after the fifth

mining season for the full-scale mining channel, to document conditions at the end of the second summer season after project completion.

14. The Permittee shall contact the Village of Solomon Tribal Council prior to the start of dredging activities each year and provide them with a point of contact (name, email address, and phone number) that can be contacted as needed to resolve any issues affecting tribal activities that may occur during operations. The Permittee shall notify the Corps regarding any contacts with the Council.

15. To minimize noise levels from powered equipment used on-site, the Permittee shall ensure that all equipment that is designed for the use of a noise muffler by the equipment's manufacturer is equipped with a muffling device during use on-site.

**Further Information:**

1. Congressional Authorities. You have been authorized to undertake the activity described above pursuant to:

(X) Section 10 of the River and Harbor Act of 1899 (33 U.S.C. 403).

(X) Section 404 of the Clean Water Act (33 U.S.C. 1344).

( ) Section 103 of the Marine Protection, Research and Sanctuaries Act of 1972 (33 U.S.C. 1413).

2. Limits of this authorization.

a. This permit does not obviate the need to obtain other Federal, state, or local authorizations required by law.

b. This permit does not grant any property rights or exclusive privileges.

c. This permit does not authorize any injury to the property or rights of others.

d. This permit does not authorize interference with any existing or proposed Federal project.

3. Limits of Federal Liability. In issuing this permit, the Federal Government does not assume any liability for the following:

a. Damages to the permitted project or uses thereof as a result of other permitted or unpermitted activities or from natural causes.

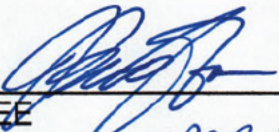
b. Damages to the permitted project or uses thereof as a result of current or future activities undertaken by or on behalf of the United States in the public interest.

- c. Damages to persons, property, or to other permitted or unpermitted activities or structures caused by the activity authorized by this permit.
  - d. Design or construction deficiencies associated with the permitted work.
  - e. Damage claims associated with any future modification, suspension, or revocation of this permit.
4. **Reliance on Applicant's Data.** The determination of this office that issuance of this permit is not contrary to the public interest was made in reliance on the information you provided.
5. **Reevaluation of Permit Decision.** This office may reevaluate its decision on this permit at any time the circumstances warrant. Circumstances that could require a reevaluation include, but are not limited to, the following:
- a. You fail to comply with the terms and conditions of this permit.
  - b. The information provided by you in support of your permit application proves to have been false, incomplete, or inaccurate (See 4 above).
  - c. Significant new information surfaces which this office did not consider in reaching the original public interest decision.

Such a reevaluation may result in a determination that it is appropriate to use the suspension, modification, and revocation procedures contained in 33 CFR 325.7 or enforcement procedures such as those contained in 33 CFR 326.4 and 326.5. The referenced enforcement procedures provide for the issuance of an administrative order requiring you to comply with the terms and conditions of your permit and for the initiation of legal action where appropriate. You will be required to pay for any corrective measure ordered by this office, and if you fail to comply with such directive, this office may in certain situations (such as those specified in 33 CFR 209.170) accomplish the corrective measures by contract or otherwise and bill you for the cost.

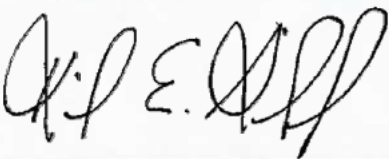
6. **Extensions.** General condition 1 establishes a time limit for the completion of the activity authorized by this permit. Unless there are circumstances requiring either a prompt completion of the authorized activity or a reevaluation of the public interest decision, the Corps will normally give you favorable consideration to a request for an extension of this time limit.

Your signature below, as permittee, indicates that you accept and agree to comply with the terms and conditions of this permit.

  
\_\_\_\_\_  
PERMITTEE  
PRESIDENT, IPOD LLC  
BEAU EPSTEIN

03-20-2024  
\_\_\_\_\_  
DATE

This permit becomes effective when the Federal official, designated to act for the Secretary of the Army, has signed below.

  
\_\_\_\_\_  
Kirk E. Gibbs  
Brigadier General, USA  
Commander, Pacific Ocean Division  
U.S. Army Corps of Engineers

20 March 2024  
\_\_\_\_\_  
DATE

When the structures or work authorized by this permit are still in existence at the time the property is transferred, the terms and conditions of this permit will continue to be binding on the new owner(s) of the property. To validate the transfer of this permit and the associated liabilities associated with compliance with its terms and conditions, have the transferee sign and date below.



\_\_\_\_\_  
DATE  
  
ALASKA DISTRICT



U.S. ARMY CORPS OF ENGINEERS

**NOTIFICATION OF COMMENCEMENT OF WORK  
DEPARTMENT OF THE ARMY PERMIT**

**Permit Number:** *POA-2018-00123*  
**Name of Permittee:** *Beau Epstein, IPOP LLC*  
**Date of Issuance:** *March 20, 2024*

**Date work in waters of the U.S. will commence:** \_\_\_\_\_

**Estimated construction period (in weeks):** \_\_\_\_\_

**Name & phone of contractor (if any):** \_\_\_\_\_

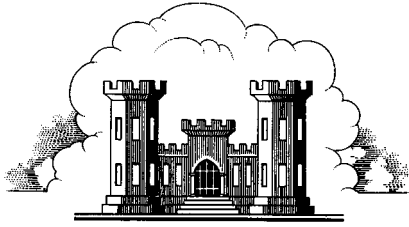
Please note that your permitted activity is subject to a compliance inspection by an Army Corps of Engineers representative. If you fail to comply with this permit you may be subject to permit suspension, modification, or revocation.

I hereby certify that I, and the contractor (if applicable), have read and agree to comply with the terms and conditions of the above referenced permit.

\_\_\_\_\_  
Signature of Permittee

\_\_\_\_\_  
Date

At least ten (10) days prior to the commencement of the activity authorized by this permit, sign this certification and email it to [regpagemaster@usace.army.mil](mailto:regpagemaster@usace.army.mil).



ALASKA DISTRICT  
U.S. ARMY CORPS OF ENGINEERS

**NOTIFICATION OF COMPLETION OF WORK AND  
CERTIFICATION OF COMPLIANCE WITH  
DEPARTMENT OF THE ARMY PERMIT**

**Permit Number:** *POA-2018-00123*  
**Name of Permittee:** *Beau Epstein, IPOP LLC*  
**Date of Issuance:** *March 20, 2024*

**Date work in waters of the U.S. completed:** \_\_\_\_\_

**Construction period (in weeks):** \_\_\_\_\_

**Name & phone of contractor (if any):** \_\_\_\_\_

Please note that your permitted activity is subject to a compliance inspection by an Army Corps of Engineers representative. If you fail to comply with this permit you may be subject to permit suspension, modification, or revocation.

I hereby certify that the work authorized by the above referenced permit has been completed in accordance with the terms and conditions of said permit.

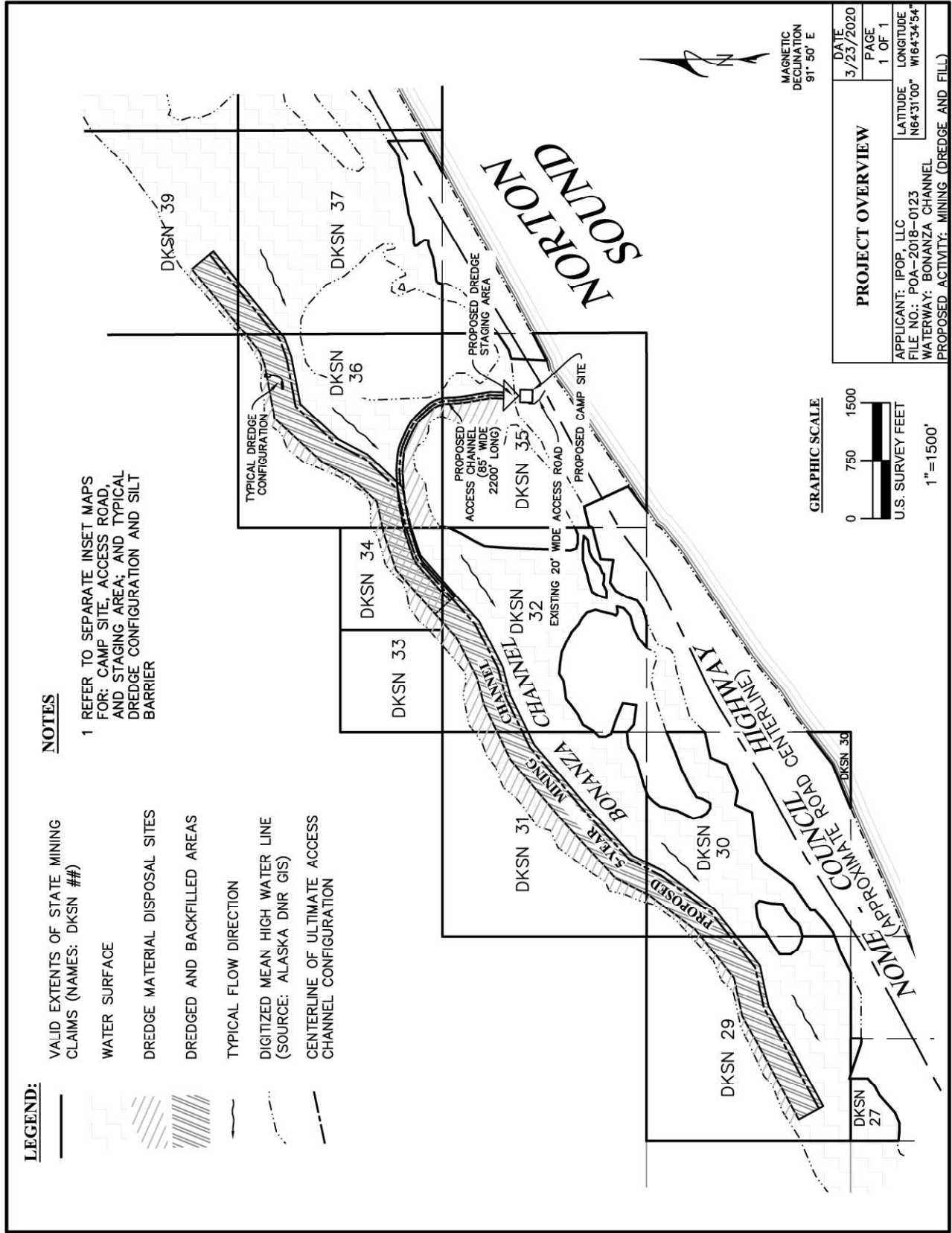
---

Signature of Permittee

Date

Upon completion of the activity authorized by this permit, sign this certification and email it to [regpagemaster@usace.army.mil](mailto:regpagemaster@usace.army.mil).

Figure 5-1. Bonanza Channel Placer Project overview map (graphic scale is accurate, verbal scale refers to full size printed map)



NOTE: Any DMDS locations shown have been revised and are shown in revised figures at the end of the permit figures.

Figure 5-2. Camp Location (graphic scale is accurate, verbal scale refers to full size printed map)

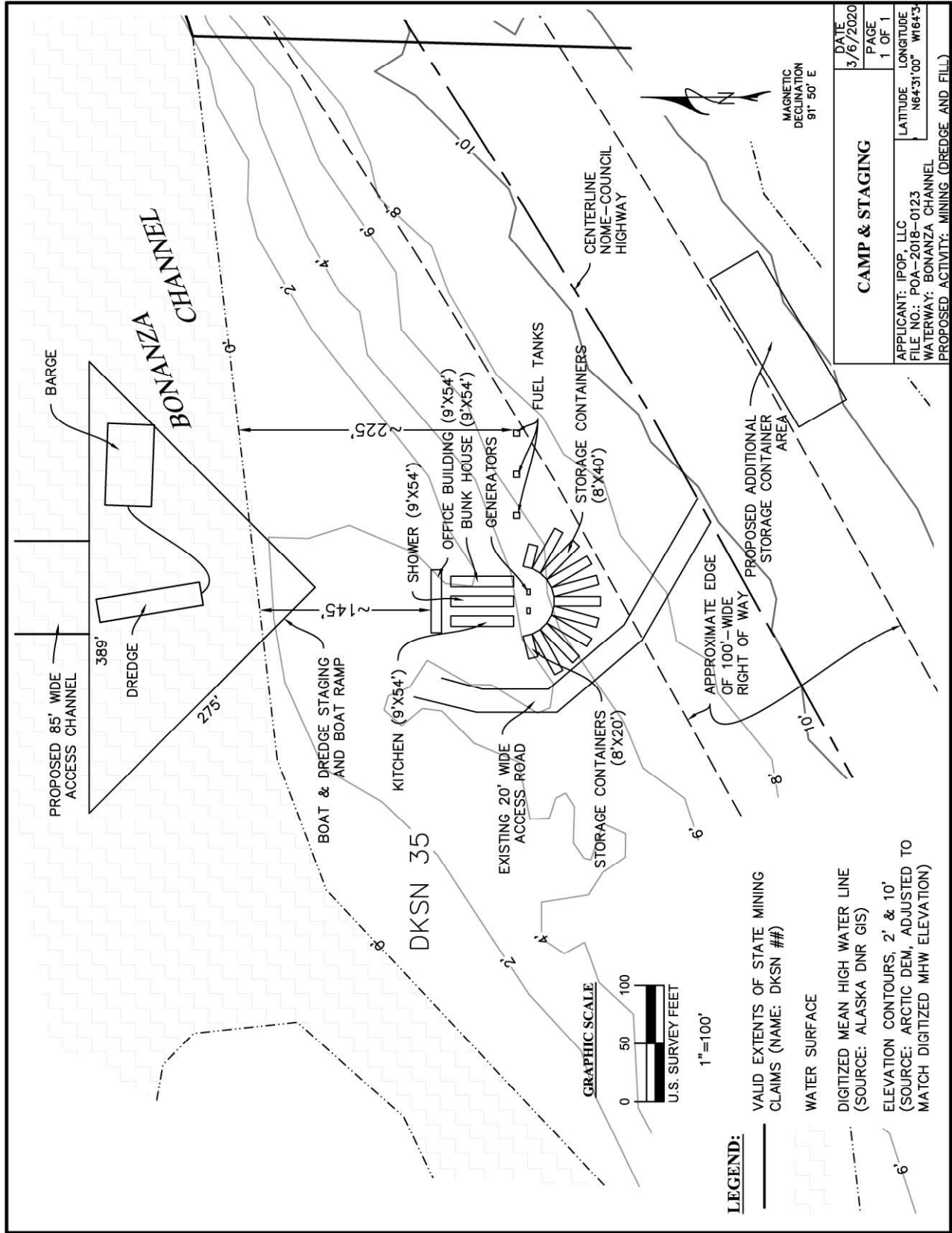
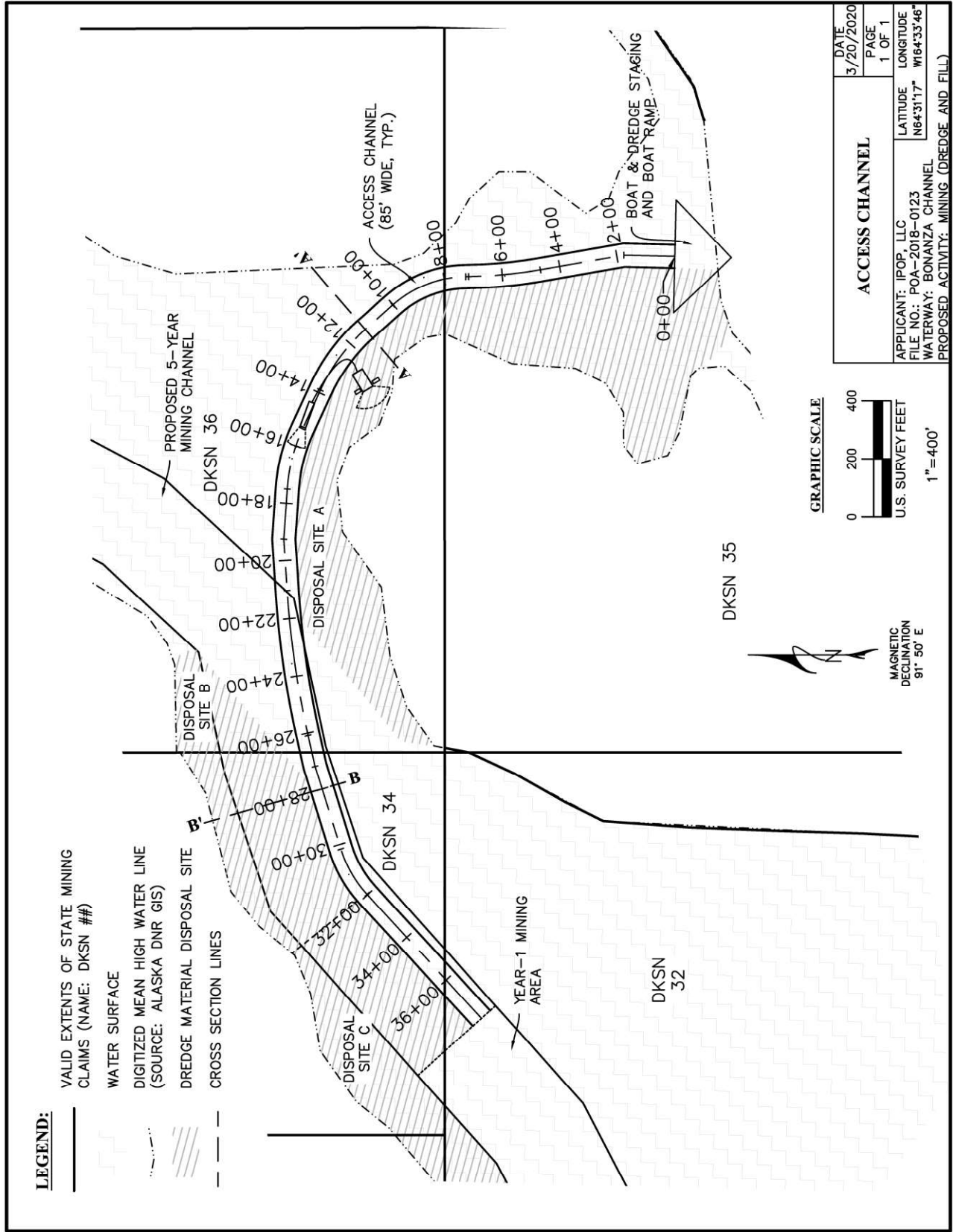
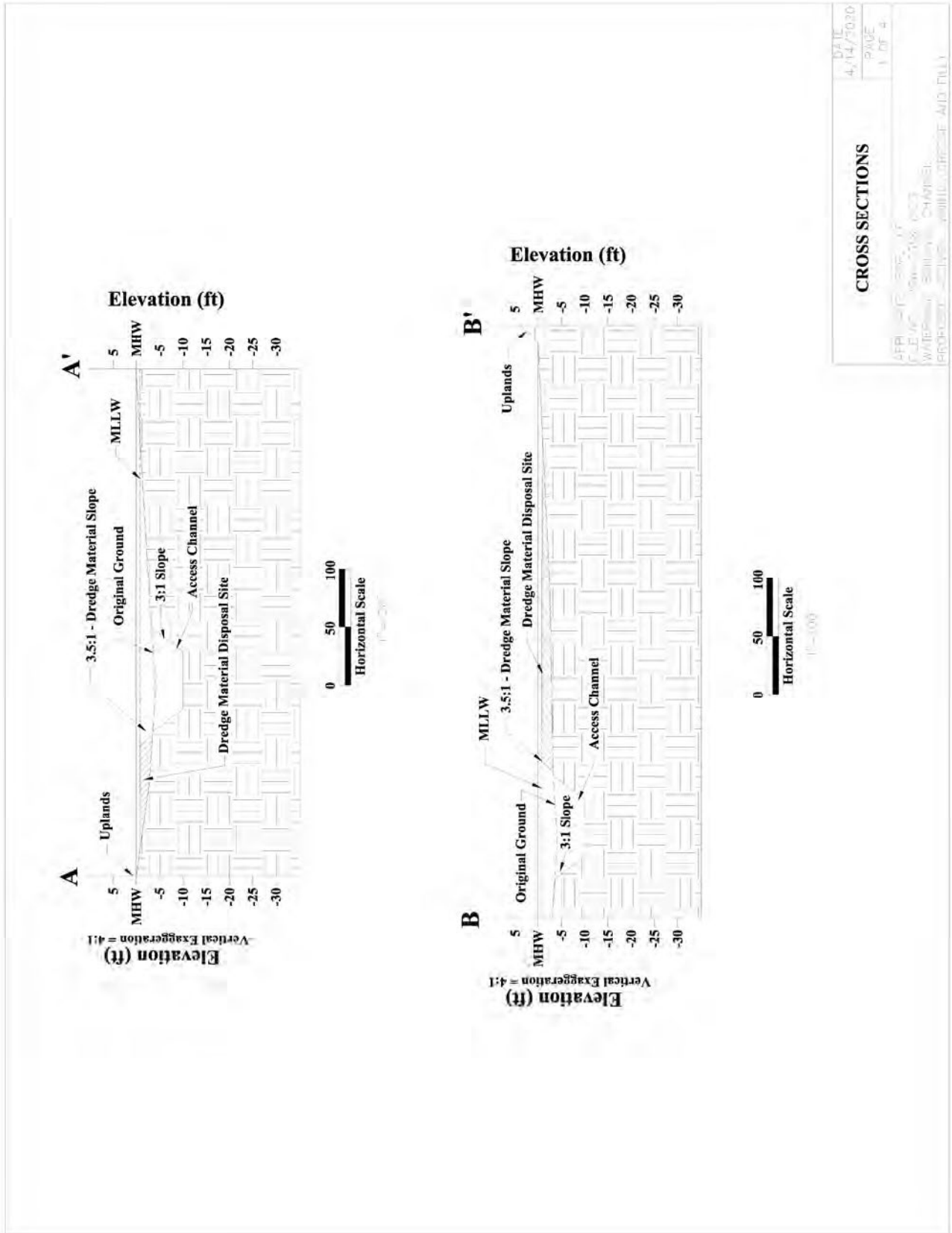


Figure 5-20. Access channel with cross section locations (graphic scale is accurate, verbal scale refers to full size printed map)



NOTE: Any DMDS locations shown have been revised and are shown in revised figures at the end of the permit figures.

Figure 5-21. Typical cross sections of access channel dredge and fill: A-A' and B-B'



NOTE: Any DMDS locations shown have been revised and are shown in revised figures at the end of the permit figures.

Figure 5-22. Access channel development stages (graphic scale is accurate, verbal scale re. printed map)

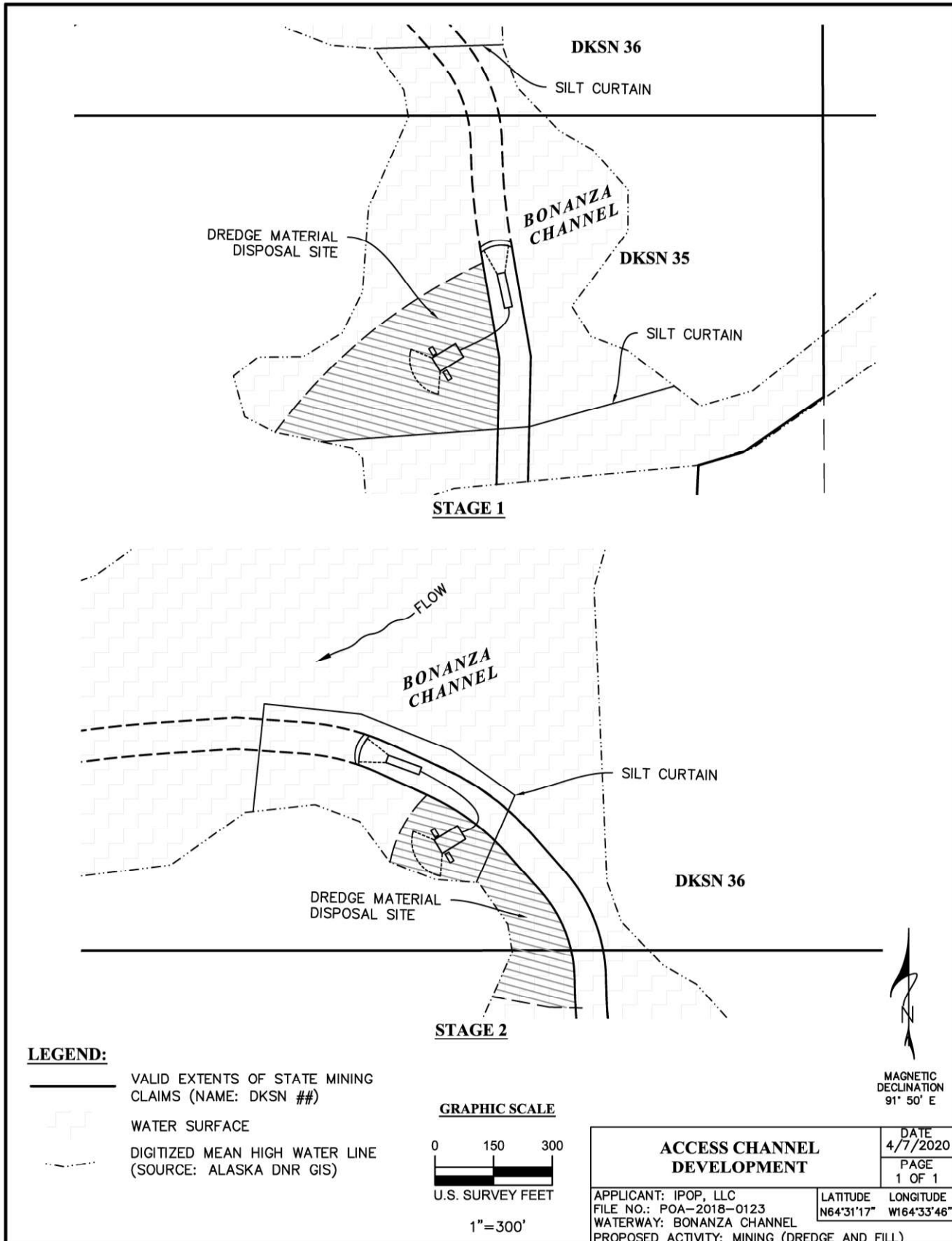
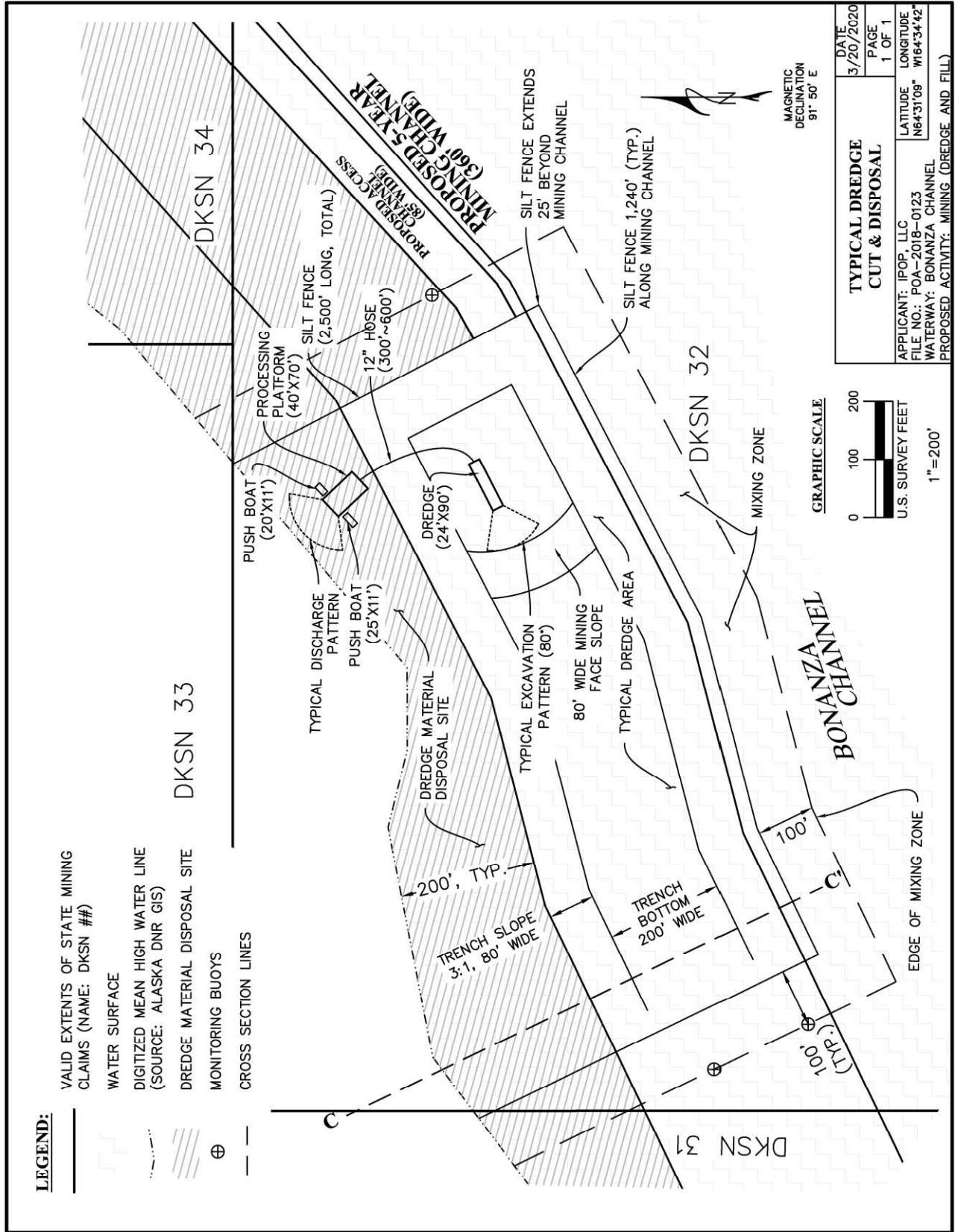


Figure 5-23. Typical dredging layout map showing typical BMP layouts, cut and disposal (graphic scale is accurate)



NOTE: Any DMDS locations shown have been revised and are shown in revised figures at the end of the permit figures.



Figure 5-24. Five-year mine layout for IPA (graphic scale is accurate, verbal scale refers to full size printed map)

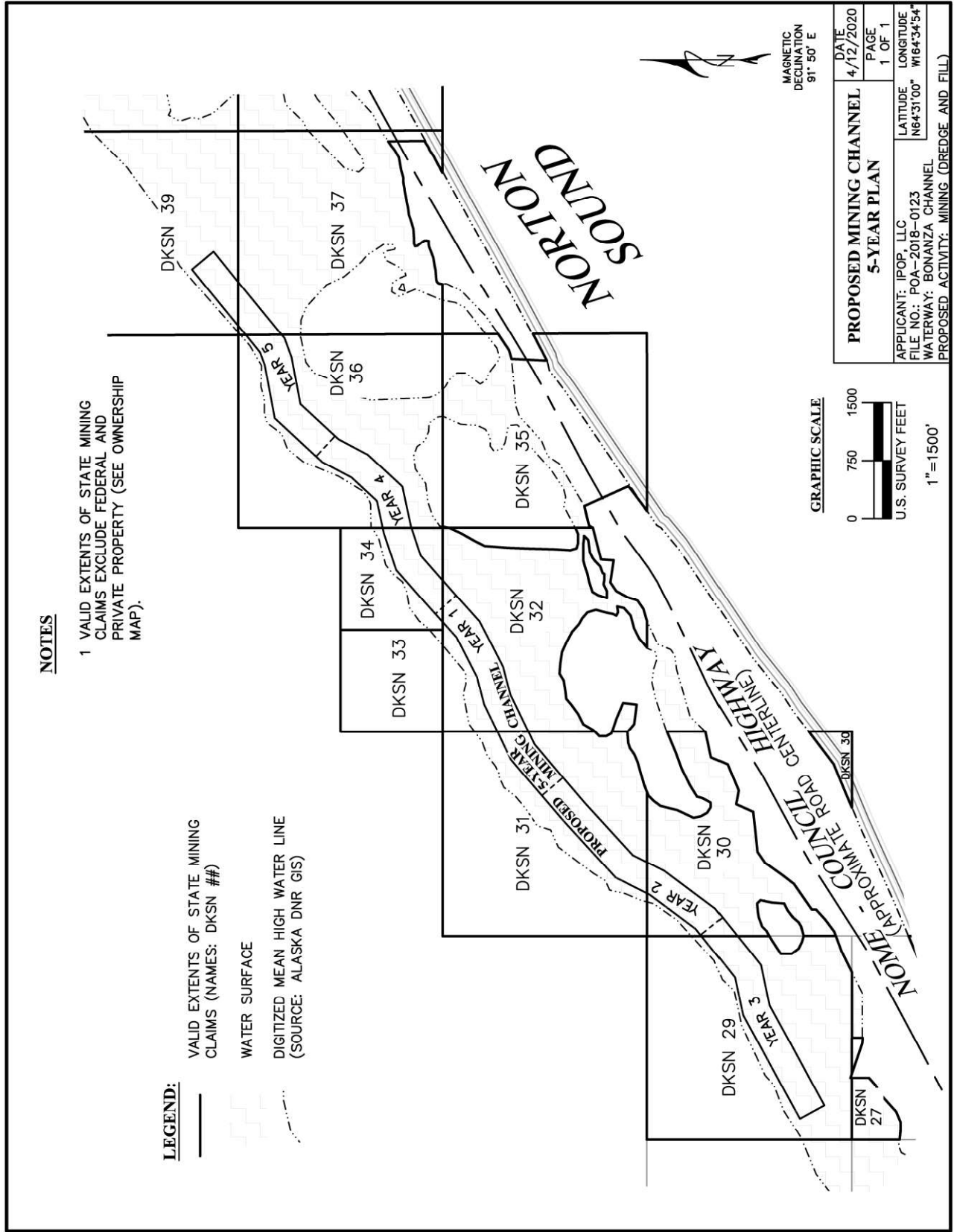


Figure 5-26. Typical dredging and filling stages (part 1) (graphic scale accurate)

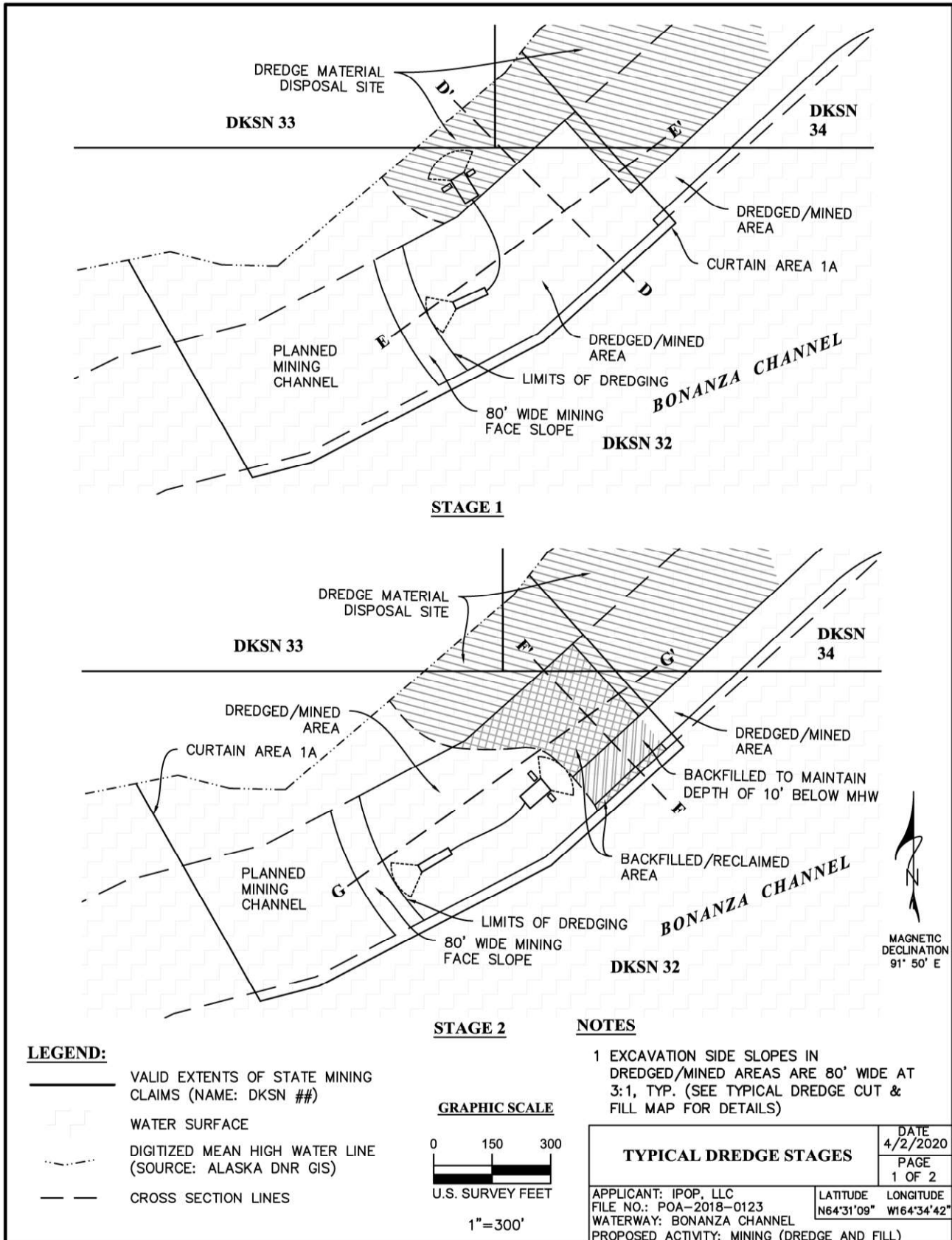
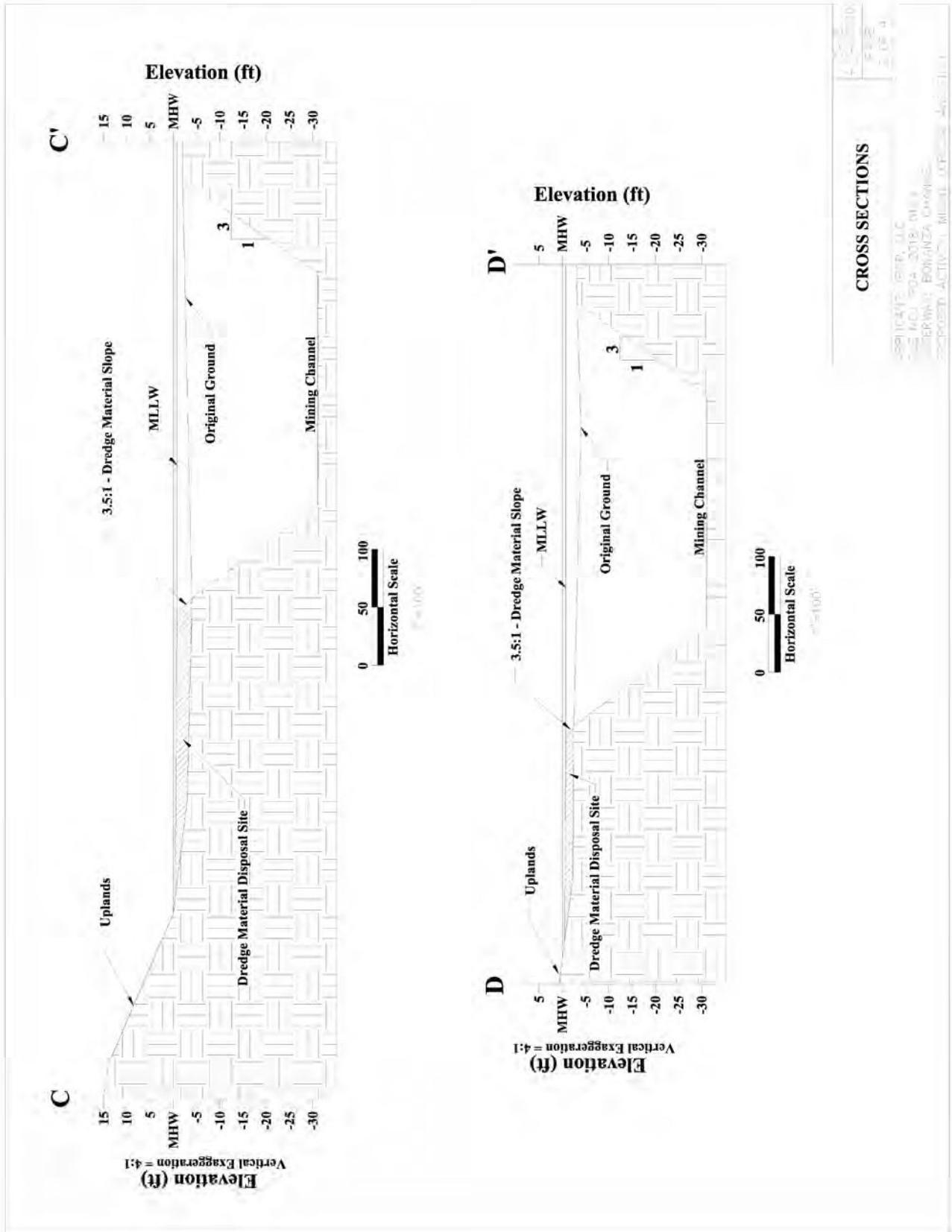
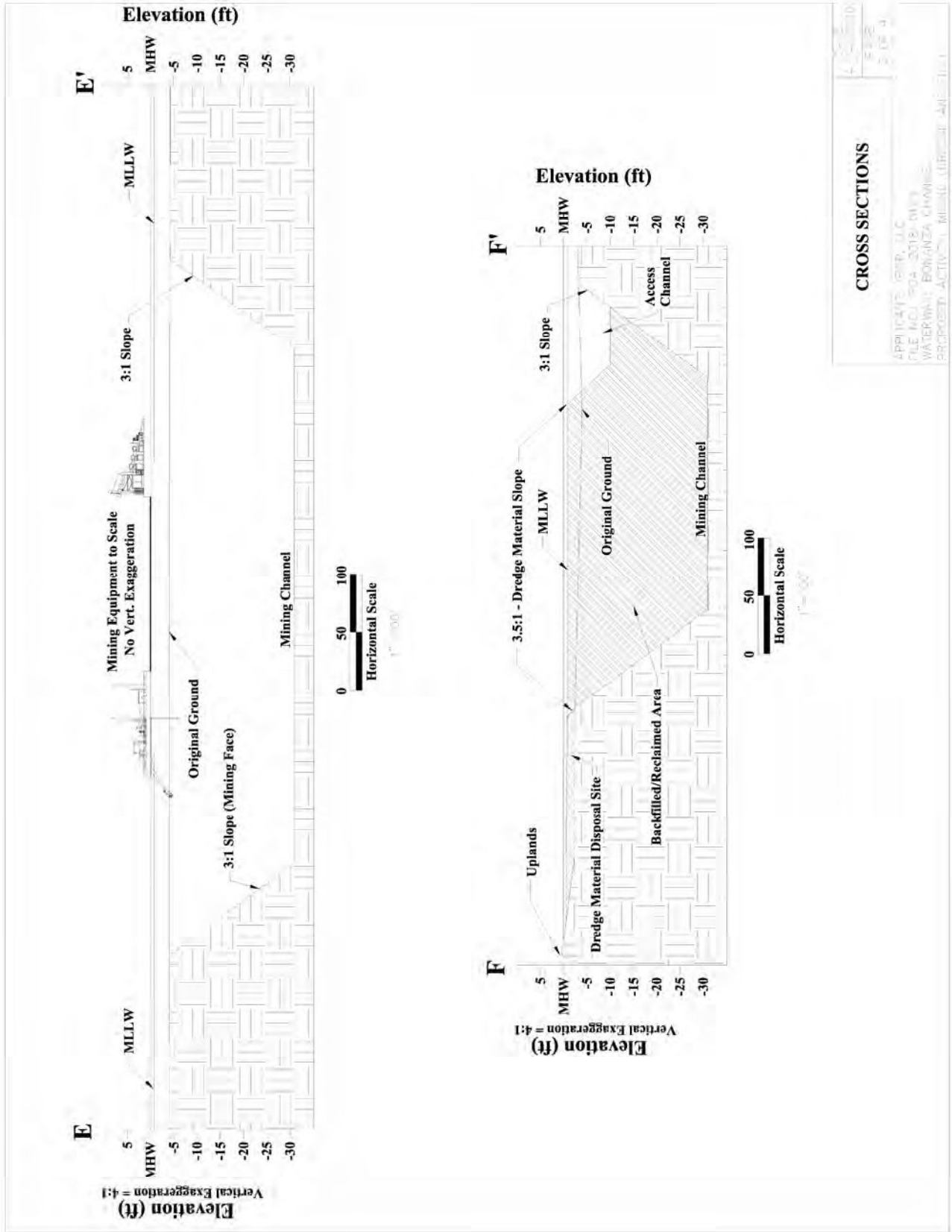


Figure 5-28. Cross sections of typical dredge and fill: C-C' and D-D'

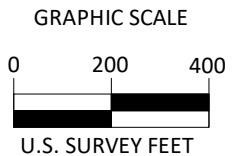
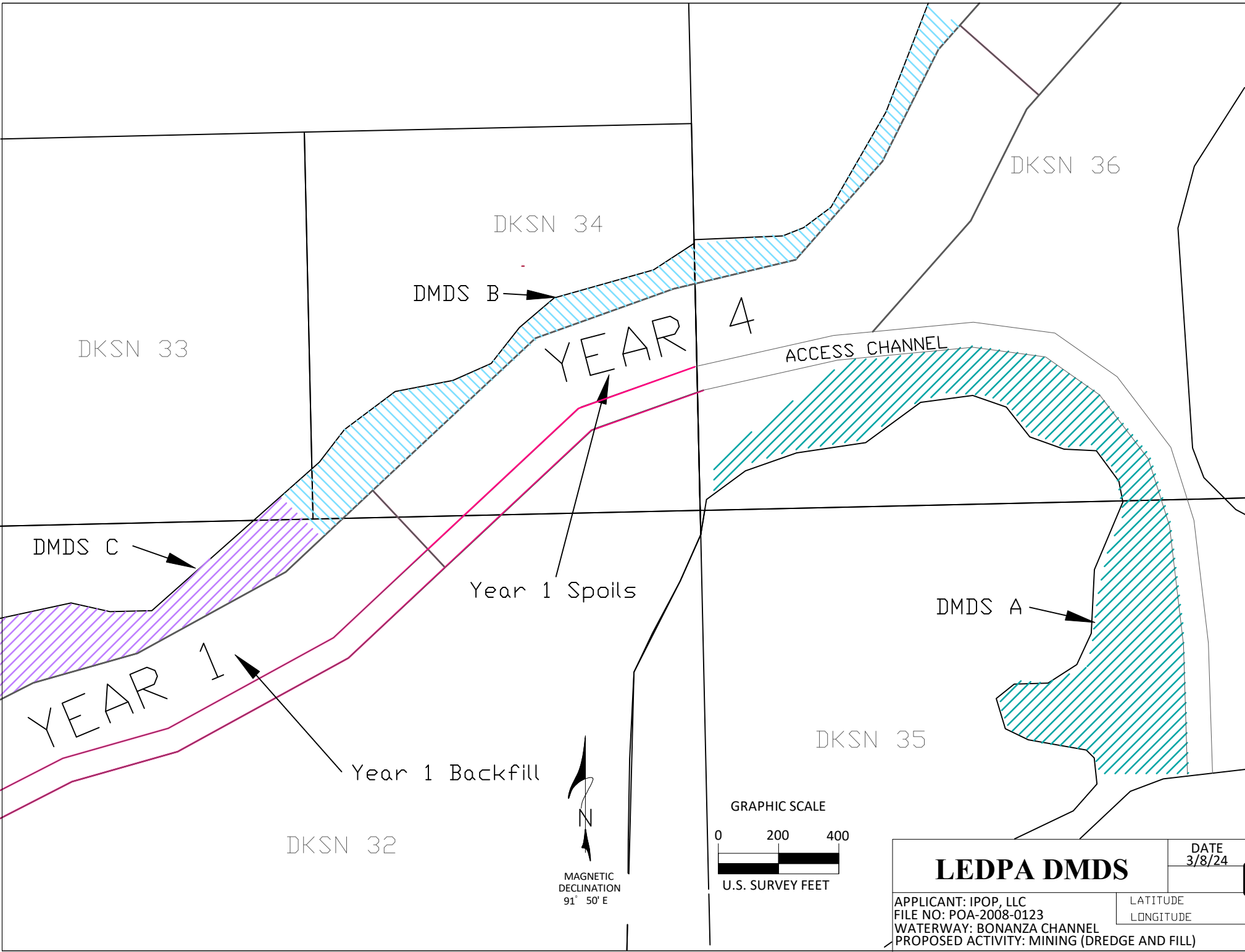


NOTE: Any DMDS locations shown have been revised and are shown in revised figures at the end of the permit figures.

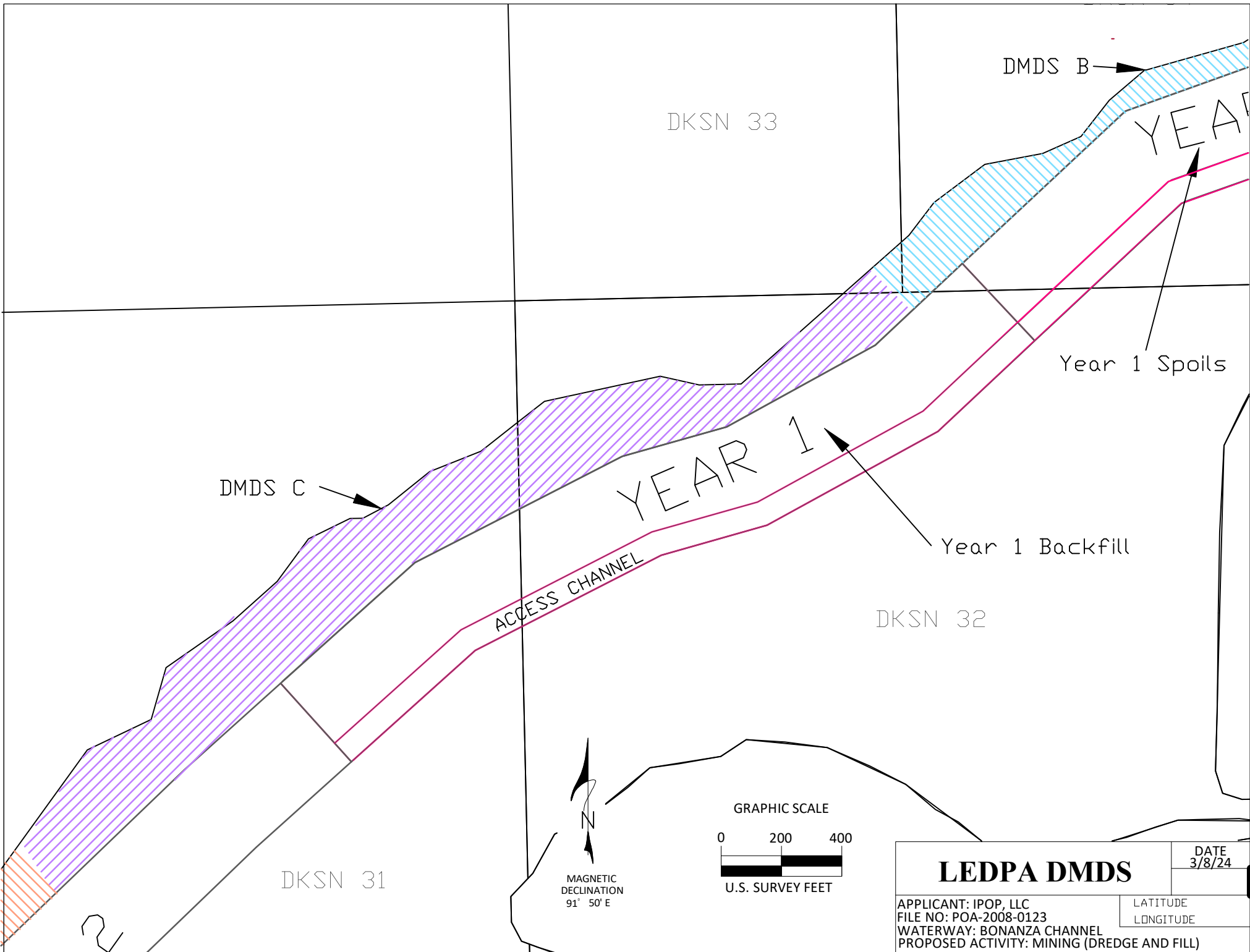
Figure 5-29. Cross sections of typical dredge and fill: E-E' and F-F'



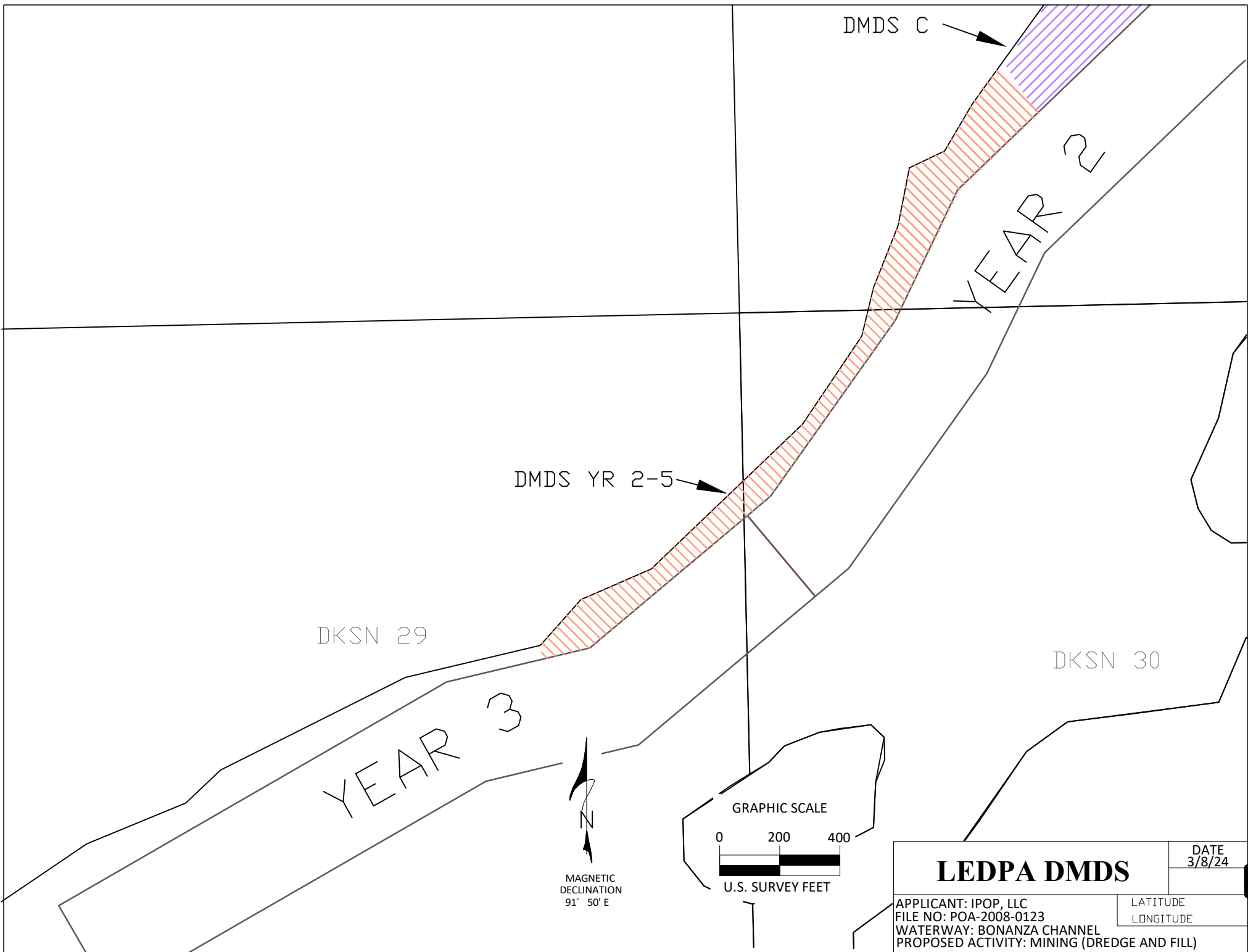
NOTE: Any DMDS locations shown have been revised and are shown in revised figures at the end of the permit figures.



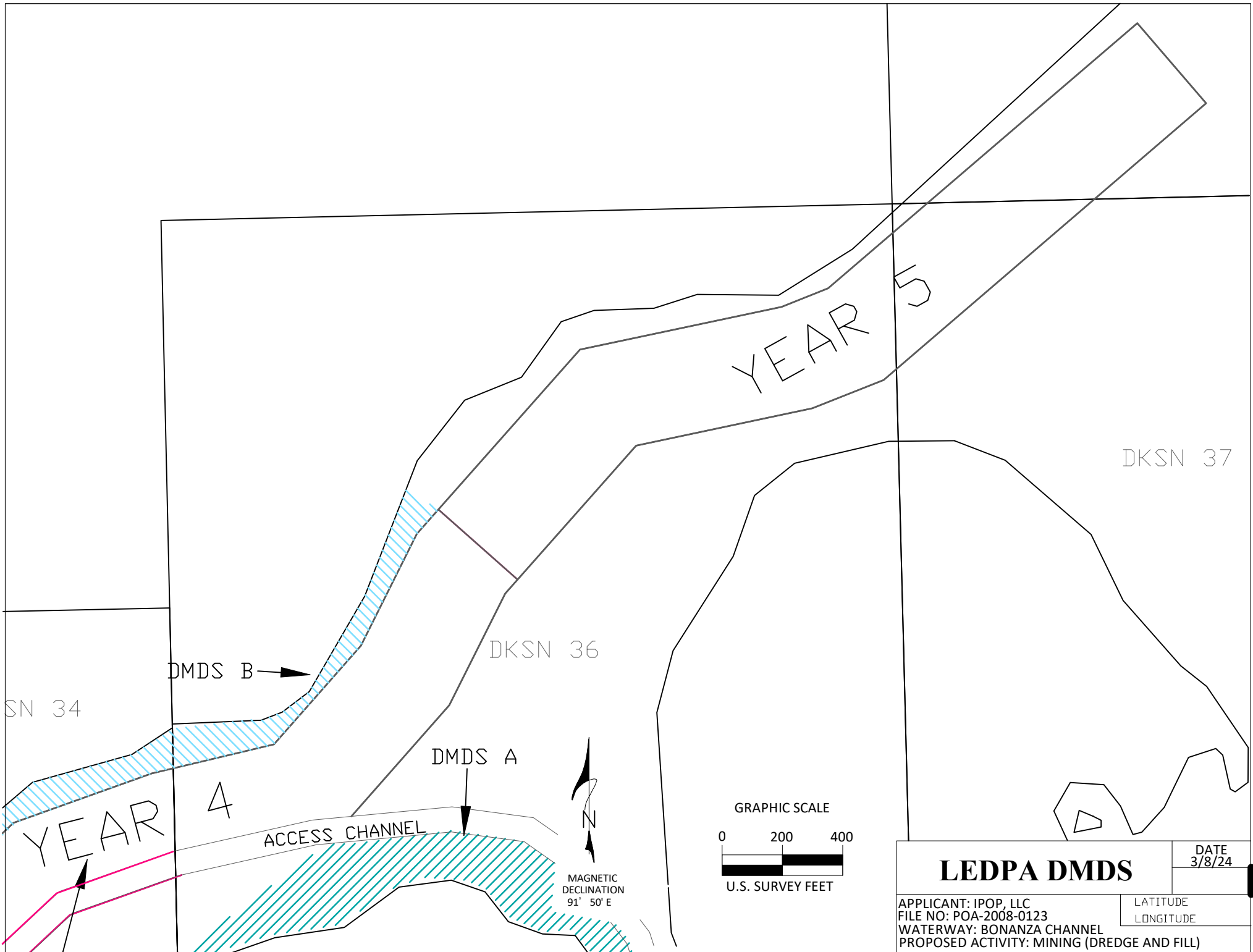
<b>LEDPA DMDS</b>		DATE 3/8/24
		LATITUDE
APPLICANT: IPOP, LLC FILE NO: POA-2008-0123 WATERWAY: BONANZA CHANNEL PROPOSED ACTIVITY: MINING (DREDGE AND FILL)		LONGITUDE



<b>LEDPA DMDS</b>		DATE 3/8/24
		LATITUDE
APPLICANT: IPOP, LLC FILE NO: POA-2008-0123 WATERWAY: BONANZA CHANNEL PROPOSED ACTIVITY: MINING (DREDGE AND FILL)		LONGITUDE



<b>LEDPA DMDS</b>		DATE 3/8/24
APPLICANT: IPOP, LLC		LATITUDE
FILE NO: POA-2008-0123		LONGITUDE
WATERWAY: BONANZA CHANNEL		
PROPOSED ACTIVITY: MINING (DREDGE AND FILL)		



SN 34

DMDS B

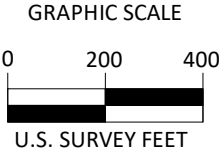
DKSN 36

DKSN 37

DMDS A

ACCESS CHANNEL

MAGNETIC DECLINATION  
91° 50' E



<b>LEDPA DMDS</b>		DATE 3/8/24
APPLICANT: IPOP, LLC		LATITUDE
FILE NO: POA-2008-0123		LONGITUDE
WATERWAY: BONANZA CHANNEL		
PROPOSED ACTIVITY: MINING (DREDGE AND FILL)		