

WRRDA 7001 Submissions Package
U.S. Army Corps of Engineers

Proposal Name: Alaska Deep-Draft Arctic Port System Study

Submission Date: 09/16/2016

Proposal ID Number: 28f3c285-51c6-4db7-a3f0-888345f0258f

Purpose of Proposal: A re-scoping of the Alaska Deep-Draft Arctic Port System Study is necessary to address the growing demand for expanded marine infrastructure to support the spike in Arctic traffic clearly evident at the Port of Nome and Arctic region. This project study meets the planning objectives identified by the Corps vertical team to support multiple maritime missions, holistic growth, protection of the local cultural, subsistence and natural resources of the region, uplands development, as well as the broader Arctic objectives outlined in federal and state Arctic strategies. The significant lack of Arctic marine infrastructure necessary to support the marine assets charged with protecting the environment, lives at sea, food security and our national security interests is clearly alarming, and warrants an immediate call to action for development to ensure America's maritime initiatives are not only secure in the lower 48, but across the Arctic coastline as well. This study was conducted under authority granted by Section 204 of the Flood Control Act of 1948 (P.L. 80-858) which states in part: "The Secretary of the Army is hereby authorized and directed to cause preliminary examinations and surveys for flood control and allied purposes. . . to be made under the direction of the Chief of Engineers, in drainage areas of the United States and Territorial possessions, which include the following named localities: . . . Harbors and Rivers in Alaska, with a view to determining the advisability of improvements in the interest of navigation, flood control, hydroelectric power, and related water uses." The re-scoping of this study is necessary to capture the existing non-oil benefits set aside during the initial part of the study, in order to obtain a signed Chief's Report and authorization for design. The City of Nome will remain the non-Federal cost-share sponsor for the re-scoping of the feasibility study, PED phase and Construction of the project.

1. Administrative Details

Proposal Name: Alaska Deep-Draft Arctic Port System Study

by Agency: City of Nome, Alaska

Locations: AK

Date Submitted: 09/16/2016

Confirmation Number: 28f3c285-51c6-4db7-a3f0-888345f0258f

Supporting Documents

File Name	Date Uploaded
CON 7001 Proposal - 09.16.16 FINAL.pdf	09/16/2016
Study Area - revised.pdf	09/16/2016
160713 City to USACE ASACW Darcy.pdf	09/16/2016

2. Provide the name of the primary sponsor and all non-Federal interests that have contributed or are expected to contribute toward the non-Federal share of the proposed feasibility study or modification.

Sponsor	Letter of Support
U.S. Army Corps of Engineers(Primary)	The City of Nome supports the action of taking the Alaska Deep-Draft Arctic Port System Study off of "pause", and recommends forward movement for re-scoping consideration to capture all non-oil benefits that exist but were set aside during the initial evaluation of the NED economic benefits.

3. State if this proposal is for a feasibility study, a modification to an authorized USACE feasibility study or a modification to an authorized USACE project. If it is a proposal for a modification, provide the authorized water resources development feasibility study or project name.

Feasibility Study

4. Clearly articulate the specific project purpose(s) of the proposed study or modification. Demonstrate that the proposal is related to USACE mission and authorities and specifically address why additional or new authorization is needed.

A re-scoping of the Alaska Deep-Draft Arctic Port System Study is necessary to address the growing demand for expanded marine infrastructure to support the spike in Arctic traffic clearly evident at the Port of Nome and Arctic region. This project study meets the planning objectives identified by the Corps vertical team to support multiple maritime missions, holistic growth, protection of the local cultural, subsistence and natural resources of the region, uplands development, as well as the broader Arctic objectives outlined in federal and state Arctic strategies. The significant lack of Arctic marine infrastructure necessary to support the marine assets charged with protecting the environment, lives at sea, food security and our national security interests is clearly alarming, and warrants an immediate call to action for development to ensure America's maritime initiatives are not only secure in the lower 48, but across the Arctic coastline as well. This study was conducted under authority granted by Section 204 of the Flood Control Act of 1948 (P.L. 80-858) which states in part: "The Secretary of the Army is hereby authorized and directed to cause preliminary examinations and surveys for flood control and allied purposes. . . to be made under the direction of the Chief of Engineers, in drainage areas of the United States and Territorial possessions, which include the following named localities:. . . Harbors and Rivers in Alaska, with a view to determining the advisability of improvements in the interest of navigation, flood control, hydroelectric power, and related water uses." The re-scoping of this study is necessary to capture the existing non-oil benefits set aside during the initial part of the study, in order to obtain a signed Chief's Report and authorization for design. The City of Nome will remain the non-Federal cost-share sponsor for the re-scoping of the feasibility study, PED phase and Construction of the project.

5. To the extent practicable, provide an estimate of the total cost, and the Federal and non-Federal share of those costs, of the proposed study and, separately, an estimate of the cost of construction or modification.

	Federal	Non-Federal	Total
Study	\$1,500,000	\$1,500,000	\$3,000,000
Construction	\$98,000,000	\$114,000,000	\$212,000,000

Explanation (if necessary)

These are preliminary numbers calculated during the initial part of the Feasibility Study, with adjustments anticipated when non-oil benefits are captured during re-scoping. The Alaska Department of Transportation has been the non-Federal cost-share partner for the initial part of the feasibility study, however, the City of Nome is poised to become the non-Federal cost-share partner for the completion of the Feasibility Study, PED and Construction phases upon forward movement by the Corps to bring the project study off pause status.

6. To the extent practicable, describe the anticipated monetary and nonmonetary benefits of the proposal including benefits to the protection of human life and property; improvement to transportation; the national economy; the environment; or the national security interests of the United States.

The Alaska Deep-Draft Arctic Port project will provide critical infrastructure to support the staging of assets and resources necessary to respond to the protection of human life and the marine environment in the Arctic region. Presently, these resources must travel great distances via water and air, significantly reducing the effectiveness of the response, and resulting in negative impacts to the environment and risking potential loss of life. The Nome Port facility is an existing marine hub for the region that, with expanded protective infrastructure, would greatly improve the overall inter-modal transportation system in the region, reduce operating costs for maritime commerce, generate a clear economic impact to the state and the nation, as well as provide a strategic location for maritime defense assets to support and protect the national security interests of the United States. The need for Arctic marine infrastructure is abundantly clear, and the time is now to design, fund and build a deep draft port facility to ensure the protection of life safety, the environment, national security and the natural resources of this country. An Arctic Deep- Draft Port at Nome will prove to effectively meet each of the nation's Arctic strategy priorities, and provide a location of strategic importance for national defense assets to protect the sovereignty of the United States.

7. Does local support exist? If 'Yes', describe the local support for the proposal.

Yes

Local Support Description

Local support for the Arctic Deep-Draft Port at Nome clearly exists at the municipal, industry and public levels, as well as within the Alaska Native Corporations that realize the far-reaching economic benefits, and significant environmental and marine resource protections for this culturally sensitive region.

8. Does the primary sponsor named in (2.) above have the financial ability to provide for the required cost share?

Yes

Additional Proposal Information

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CON 7001 Proposal - 09.16.16 FINAL.pdf



September 16, 2016

U.S. Army Corps of Engineers
Attention: CECW-CE (Lisa Kiefel)
441 G Street NW
Washington, DC 20314-1000

Subject: Resubmittal for Alaska Deep-Draft Arctic Port System Study in Conformance
with Section 7001 of the Water Resources Reform and Development Act of 2014

Dear Ms. Kiefel:

The attached proposal to support the ongoing and what we hope to ultimately be a revised feasibility study and signing of the Chief's Report for the Alaska Deep-Draft Arctic Port System is hereby submitted in conformance with the requirements of Section 7001 of the Water Resources Reform and Development Act of 2014 as specified in the Federal Register Article 2015-12626, published May 26, 2015.

As the local municipal authority, the City of Nome serves as owner and operator of the Port & Harbor facility, which functions as a major hub for maritime commerce in this remote region. Statistical data recorded at the Port of Nome clearly shows an increasing spike in vessel traffic that can be directly attributed to increased commodity distribution and infrastructure development in the region, as well as additional research and ongoing maritime activity in the northern reaches of the Arctic waters that have a defined impact on the Alaska coastline and ultimately, the residential communities.

Although the economic benefits of infrastructure development in our region is strongly supported by the residents and leaders of these communities, the call for responsible stewardship is resounding throughout the coastline for the nation to protect the environment and reduce the risks to loss of life that exists due to the lack of a deep water port anywhere north of Dutch Harbor, Alaska. The significant lack of adequate infrastructure necessary to support the marine assets charged with protecting the environment, lives at sea and our national security interests is clearly alarming, and warrants immediate action for development.

Port of Nome statistics show a substantial 261% increase in dock traffic from 2011 to 2015, with a 543% growth in the number of vessels required to anchor offshore due to port congestion or draft beyond the Port's capacity. Data for 2016 shows through 8/31/16, we have reached 77% of our 2015 docked traffic and 157% of anchored traffic – vessels traversing the region in support of commodity distribution, fishing industry support and Arctic research. Much of the anchored traffic are foreign oil tankers providing a local resupply option offshore by conducting numerous ship-to-ship transfers that would be better performed in a protected and secure location at a dock but draft capacity is the limiting factor.



In pursuit of this critical development, various definitions have surfaced regarding what constitutes a “Deep-Draft Port”, several of which are identified below. These definitions clearly show a contrast between what most maritime users and technical experts interpret a deep harbor to be, and what the Arctic Deep Draft Port Study currently demonstrates as economically justified.

- *Cited in Title 33 – Navigation and Navigable Waters, Chapter 36, Subchapter II-Harbor Development Section 2241 – Definitions:*
 - (1) *The term "deep-draft harbor" means a harbor which is authorized to be constructed to a depth of more than 45 feet (other than project authorized by section 202 this title).*

- *The USACE's Initial Study Report identifies a deep-draft harbor depth at -35' which conflicts with the current Tentatively Selected Plan of -28' MLLW for the Port of Nome. Specifically the USACE's "Alaska Deep Draft Arctic Ports Study" March 2013, under "Definitions and Acronyms" cites the following:*
 1. *The term “**deep-draft**” is a term to describe **ports** that can accommodate large vessels such as big cargo ships. In this report, the Study Team defines “**deep-draft**” as a **depth** greater than 35 feet water **depth** (or -35).*

The City of Nome has identified a gap between U.S. Arctic Policy and USACE procedures, in that the state and federal Arctic Policy calls for infrastructure development, specifically to construct an Arctic Deep Draft Port at -36’ MLLW, but under the USACE’s cost benefit ratio (CBR) analysis conducted as part of the currently “paused” feasibility study, the identified benefits only justified a depth of -28 feet, which does not meet the U.S. Arctic Policy call of -36 to -40 feet. Clearly this initial result represented a narrow focus which failed to capture the more profound regional benefits of a deep draft port at Nome that could be achieved through a rescoping of the draft feasibility study that would serve to support the needs of the Arctic communities and protect the cultural lifestyles and growing economic opportunities. Our country must be a global leader in the Arctic, which requires immediate action for investment in adequate Arctic infrastructure to support National Security, National Defense and life safety.

Additional support factors:

- The Alaska Arctic Policy Commission’s “Implementation Plan for Alaska's Arctic Policy”, January 30, 2015 states on page 6:
 - Strategic Line of Effort #1-The State of Alaska will promote economic and resource development
 - 1A-Facilitate the development of Arctic port system in the Bering Strait Region to support export, response and regional development.
 - Strategic Line of Effort #2-The state of Alaska will address the response capacity gap in Alaska's Arctic:
 - 2B-Support Efforts to improve and complete communications, mapping, nautical charting, navigational infrastructure, hydrography and bathymetry in the Arctic Region.

- Presidential Announcement September 1 2015 in Seward Alaska called for:
 - Accelerated icebreaker construction to 2020



- Support for construction of a deep water port north of Dutch Harbor
- The National Petroleum Council 2015 (March) "Arctic Potential, Realizing the Promise of the US Arctic Oil & Gas Resources":
 - Lease length maybe longer due to the opening of the Arctic possibly requiring more trips from the lease site to the port of Nome for crew change, resupply, and place of refuge. (page 30 in executive summary increasing from 140 to 161 days)
- The USACE's Fleet Characteristics made "a risk-informed decision on its assumptions and received vertical team buy-in on the assumptions prior to achieving the TSP milestone". The NPC report address some of the floating structures which should be reviewed. We appreciate the work the USACE has done in interview with two or three companies, that gives a broader context of what is out there for vessels.

As every mariner knows, the availability of emergency response services in proximity to their area of operation can be crucial to surviving an incident on the water. *Title 33 CFR 2240 – Emergency Response Services* describes options for assisting a non-Federal interest with funding the infrastructure and components necessary to provide such services, specifically:

(a) Grants.

The Secretary is authorized to make grants to any non-Federal interest operating a project for a harbor for provisions of emergency response services in such harbor (including contingency planning, necessary personnel training, and the procurement of equipment and facilities either by the non-Federal interest, by a local agency or municipality or by a combination of local agencies or municipalities on a cost-reimbursable basis, either by cooperative agreement, mutual aid plan, or mutual assistance plan entered into between one or more non-Federal interest, public agencies, or local municipalities).

Although the City strongly supports efforts by the USACE Alaska District for the ongoing study, design and construction of an Arctic Deep-Draft Port at Nome, further investigation is warranted in the upcoming study rescoping and design phase to determine the appropriate design depth needed for this facility to be in the -36' to -40' MLLW range.

Sincerely

CITY OF NOME

Richard Beneville
Mayor

cc: USACE/POA

Enclosures



ATTACHMENT

ALASKA DEEP-DRAFT ARCTIC PORT SYSTEM STUDY – NOME, ALASKA

The information below is submitted by the City of Nome, Alaska (non-federal sponsor) in compliance with the Water Resources Reform and Development Act of 2014 Section 7001, and as noted in the Federal Register on May 26, 2015, Document Number FR 2015-12626.

- 1. Provide the name of all non-Federal interests planning to act as the sponsor, including any non-Federal interest that has contributed or is expected to contribute toward the non-Federal share of the proposed feasibility study or modification.**

City of Nome
P.O. Box 281
102 Division St.
Nome, AK 99762-0281

- 2. State if this proposal is for a feasibility study or a modification to an authorized USACE project or feasibility study and, if a modification, specify the authorized project or study.**

This proposal is for rescoping of an authorized Feasibility Study for a Deep-Draft Arctic Port facility in Alaska.

The Alaska Deep-Draft Arctic Port System Study is being conducted under authority granted by Section 204 of the Flood Control Act of 1948 (P.L. 80-858) which states in part:

“The Secretary of the Army is hereby authorized and directed to cause preliminary examinations and surveys for flood control and allied purposes...to be made under the direction of the Chief of Engineers, in drainage areas of the United States and Territorial possessions, which include the following named localities:...Harbors and Rivers in Alaska, with a view to determining the advisability of improvements in the interest of navigation, flood control, hydroelectric power, and related water uses.”

The Report of the Chief of Engineers on Rivers and Harbors in Alaska, published as House Document Numbered 414, 83d Congress, 2d Session provided an interim response to the authority granted by Section 204 of the Flood Control Act of 1948 including specific recommendations for construction of improvements at Sitka, Dry Pass, and Neva and Olga Straits as well as construction of various previously-authorized projects that had not been completed.

A U.S. House of Representatives Public Works Committee Resolution for Rivers and Harbors in Alaska, adopted December 2, 1970 authorized additional reviews of the recommendations contained within the report *“and other pertinent reports, which a view to determine whether any modifications of the recommendations contained therein are advisable at the present time.”*



3. State the project purpose of the proposed study or modification.

The project purpose is to rescope the Feasibility Study for the Alaska Deep-Draft Arctic Port System Study currently on track for submission for authorization of a Chief's Report. The Chief's Report is anticipated for completion in 2017.

4. Provide an estimate, to the extent practicable, of the total cost of the proposed study or modification.

Total study cost to date is approximately \$3,000,000.00 (Federal and Non-Federal). The anticipated costs for rescoping the feasibility study have not yet been determined as the rescoping decision is underway at the USACE Headquarter level. Design costs are estimated at \$3,000,000 (Federal and Non-Federal), and construction costs are estimated to be in the \$215M range.

5. Describe, to the extent practicable, the anticipated monetary and nonmonetary benefits of the proposal including benefits to the protection of human life and property; improvement to transportation; the national economy; the environment; or the national security interests of the United States.

The Alaska Deep-Draft Arctic Port System Study will provide critical infrastructure to support the staging of assets and resources necessary to respond to the protection of human life and the marine environment in the Arctic region. Presently, these resources must travel great distances via water and air, significantly reducing the effectiveness of the response, and resulting in negative impacts to the environment and potential loss of life. The Nome Port facility is an existing marine hub for the region that, with expanded protective infrastructure, would greatly improve the overall intermodal transportation system in the region, reduce operating costs for maritime commerce, generate a clear economic impact to the state and the nation, as well as provide a strategic location for maritime defense assets to support and protect the national security interests of the United States.

Clearly, Russia is expanding their Arctic marine facilities. Other nations traversing the Northern Sea Route are utilizing this service and becoming dependent on Russia's infrastructure. The U.S. must reciprocate with an Arctic Deep Draft Port to facilitate a strong American presence in the Arctic, placing sanctions on Russia is difficult because our allies rely on their facilities to move waterborne commerce through the Northern Sea Route.

Nome is the only recognized port of call for U.S. Customs & Border Protection services north of Dutch Harbor. The nation is clearly at risk for infiltration of international smuggling and terrorist activities due to the limited national security assets on patrol in Alaskan waters. Vessels are able to disembark passengers at any small community along the coastline North of Nome, without fear of being noticed. This includes adventurers on sailboats, yachts, kite boards, jet skis, track vehicles, and international swimmers.



The need for Arctic marine infrastructure is abundantly clear, and the time is now to design, fund and build a deep draft port facility to ensure the protection of life safety, the environment, national security and the natural resources of this country. An Arctic Deep-Draft Port at Nome will prove to effectively meet each of the nation's Arctic strategy priorities, and provide a location of strategic importance for national defense assets to protect the sovereignty of the United States.

6. Describe if local support exists for the proposal.

Local support for the Arctic Deep-Draft Port at Nome clearly exists at the municipal, industry, Alaska Native Corporation and public levels.

7. State if the non-federal interest has the financial ability to provide for the required cost share.

The State of Alaska, Department of Transportation has been the non-federal cost-share partner on the ongoing Feasibility Study. It is the intention of the City of Nome to become the non-federal cost-share partner for completion of the feasibility study, the Preconstruction, Engineering & Design, as well as the Construction phases of the project, once the draft feasibility study is authorized to resume under a rescoping effort intended to capture benefits that were set aside during the economic focus with the NED. The City of Nome has on-hand, the necessary 50% cost share or \$1,600,000 to fund the non-federal portion of the study rescoping and PED phase, and holding discussions with various organizations and agencies to in an effort to secure the necessary cost-share funds for the construction phase.

8. Submit a letter or statement of support from each associated non-Federal interest.

As stated in the cover letter to this submittal, the City of Nome is one of the local non-federal sponsors of the study, and plans to continue in this role through this and future phases of the project. See attached City support letter, provided to the USACE.

Map Document

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Study Area - revised.pdf



Beaufort Sea

RUSSIA

Chukchi Sea

BARROW

POINT FRANKLIN
WAINWRIGHT

PRUDHOE BAY
MARY SACHS ENTRANCE

CAPE THOMPSON

RED DOG PORT

KOTZEBUE

PORT CLARENCE

NOME

CAPE DARBY

SAINT MICHAEL

ST LAWRENCE ISLAND

ST MATTHEW ISLAND

NUNIVAK ISLAND

BETHEL

MEKORYUK

CANADA

Bering Sea

ST PAUL

ST GEORGE

Bristol Bay

Gulf of Alaska

Primary Sponsor Letter of Support

(As uploaded)

160713 City to USACE ASACW Darcy.pdf



July 13, 2016

The Honorable Jo-Ellen Darcy
Assistant Secretary of the Army – Civil Works
108 Army Pentagon
Washington, DC 20310-0108

RE: Arctic Deep Draft Port in Nome, Alaska – Program Authority

Dear Secretary Darcy,

The City of Nome has recently learned of the USACE's belief that sufficient statutory and regulatory authority does not exist within the Water Resources Development Act (WRDA) 2014 to continue its evaluation of the Arctic Deep Draft Port ("ADDP") project in Nome. While I understand the change in circumstances when Shell announced its withdrawal of near-term offshore oil and gas activities which led to the "pause" of the USACE's analysis of the project, the importance of such a port to the community, the region, and the nation supports a restart of active work by the agency. It is with this in mind, that the City strongly encourages the USACE to consider the following supporting statements as more than sufficient justification to move the project out of the "pause" state and re-scope it within existing WRDA 2014 authority, which is consistent with the President's National Strategy for the Arctic and with Congressional intent.

When Congress passed the Water Resources Development Act in 2014, P.L. 113-121, it included two provisions relevant to the development of an ADDP. The first, Section 2104, expanded the Corps authority under the existing Remote and Subsistence Harbor provision included in the 2007 Water Resources Development Act (33 U.S.C 2242). The second, Section 2105, created new authority to allow the Corps to accept and expend funds from non-federal public entities for "the development, construction, operation, and maintenance of channels, harbors, and related infrastructure associated with deep draft ports for purposes of dealing with Arctic development and security needs." Combined, these provisions represent clear Congressional intent for the USACE to continue progress toward development of an ADDP.

The USACE has promulgated Implementation Guidance for both provisions, and this letter will focus on the application of the Implementation Guidance for Remote and Subsistence Harbors to the ADDP project in Nome (Implementation Guidance for Section 2104 of the Water Resources Reform and Development Act of 2014 – Remote and Subsistence Harbors, April 6, 2016). Section 2104 included two key changes to the Corps' authority under the Remote and Subsistence Harbor provision.

- It stipulated that projects within the State of Alaska are eligible; and
- It broadened the scope of consideration of the impact of the project to include consumption of goods and services within the region in addition to the community in which the port is located.

The USACE Remote and Subsistence Harbor Implementation Guidance document sets forth criteria for evaluating the benefits of a project:



- Public health and safety of the local community, including access to facilities designed to protect public health and safety;
- Access to natural resources for subsistence purposes;
- Local and regional economic opportunities;
- Welfare of the local population; and
- Social and cultural value to the community.

When applied to the ADDP project in Nome, it is clear that it is consistent with Congressional intent and the USACE's own Guidance document. The following highlights the consistency of the proposed ADDP in Nome with the USACE criteria.

1. *Public health and safety of the local community, including access to facilities designed to protect public health and safety.*

Search and rescue response is a critical component of Arctic operations and the current lack of an ADDP endangers lives, the ecosystem, and 10,000 years of cultural activities and civilization. The ADDP would allow the USCG to maintain a more pronounced and material presence in the region. USCG vessels would be able to fuel, provision, and rotate training crew through Nome, resulting in cost and time efficiencies realized by not having to travel south to other deep draft ports. This is vital for commercial and subsistence fishermen, hunters, and the many other residents in the communities that rely of waterborne transportation.

2. *Access to natural resources for subsistence purposes.*

While no large-scale environmental disaster has occurred in the region, increased industrial activity and maritime transits have the potential to result in the release of petroleum or other chemical products that would be devastating to the region. The availability of OSR assets stationed within the Arctic is paramount to timely response and critical to protecting Arctic waters and coastlines, migrating game, local economies, and other cultural resources relied upon by rural Alaskans. The Nome ADDP would play an important role in allowing private and public response organizations to maintain a presence in a region currently lacking the ability to respond to accidents.

The Port of Nome has been identified as a Potential Place of Refuge (PPOR) by the Alaska Department of Environmental Conservation for medium-draft vessels in distress to seek shelter from storm conditions or when in a damaged or non-functional state. Until the USACE can complete an expansion of the Port of Nome, the port's current depth limits the vessel size and number of ships that can safely be accommodated. An expanded Port of Nome facility will accommodate larger vessels in distress and minimize negative impacts to the environment and marine resources by providing protected moorage and access to repair vessels and equipment.

3. *Local and regional economic opportunities.*

The Port of Nome currently supports the complete scope of commercial activities in the city, and more broadly within the region. Activities supported by the Port include commercial fishing and seafood transportation, freight, cargo (heating oil, gasoline, construction supplies, non-perishable food, and gravel), tourism, scientific research, technology development, and maritime safety and support.



4. *Welfare of the local population.*

A depth-limited Port of Nome results in reduced fuel and food security for the region, with more than 50 communities in the region relying on Nome as a transshipment hub. Development of the Nome DDP would increase the resiliency of northern supply chains and reduce potential harm to Nome and regional communities.

5. *Social and cultural value to the community.*

Nome is a port-dependent community and as such, much of its identity is invested in the success of the Port. Beginning with the cultural nexus for subsistence hunting and fishing, and extending to the importance of lowering the costs of goods and services within the community, the Port represents the key to Nome's future. The changing region, including loss of sea ice and increased international maritime traffic, all support the need to expand the current Port and establish it as a true Arctic Deep Draft Port.

The Implementation Guidance provides for approval of a project on a basis other than the NED Plan, and includes the issue areas outlined above as the key criteria for inclusion in a decision document recommending that a plan move forward. Section 2104 also authorizes the USACE to consider "information provided by the non-federal interest" when evaluating a proposed project. The City and Port of Nome have been solid partners in working with the Corps throughout the ADDP process, and stand ready to continue to provide the information and resources necessary to move forward under the Remote and Subsistence Harbor authority.

Finally, as the USACE is aware, Congress is continuing to pursue legislative provisions in the Water Resources Development Act of 2016, the FY17 Energy and Water Development Appropriations Act, and the National Defense Authorization Act to advance the timely development of an Arctic Deep Draft Port. The provisions in these bills and accompanying reports represent ongoing support consistent with prior statutory language enacted by Congress, and should in no way have an inhibiting effect on the USACE's ability to move forward now. Additional statutory authority and policy guidance from Congress will strengthen the case above, and underscore Congressional intent to support development of an ADDP.

I look forward to finding a path forward that allows us to re-start the Army Corps' evaluation of the Arctic Deep Draft Port project in Nome.

Sincerely,

CITY OF NOME

Richard Beneville
Mayor

Cc: Alaska Corps District
Alaska Congressional Delegation