

Alaska Chapter Wilderness Watch  
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January 31, 2018

Bureau of Land Management  
Ambler Road Scoping Comments/Attn: Tim LaMarr  
222 W. 7<sup>th</sup> Ave. Stop #13  
Anchorage, AK 99513

The following comments are offered on behalf of Wilderness Watch as well as its Alaska Chapter. Wilderness Watch is a non-profit conservation organization dedicated to education and advocacy for protection and proper stewardship of our Nation's National Wilderness Preservation System and the National Wild and Scenic Rivers System.

### Overview

We recognize that the routes for the proposed road to the so-called Ambler mining district do not cross lands that are currently designated as Wilderness, however, we are very concerned about the effects this road would have on adjacent designated Wilderness in Gates of the Arctic National Park as well as wilderness eligible lands within Gates of the Arctic National Preserve that the road would cross.. We also have concerns regarding impacts that the proposed road will have on the Kobuk National Wild River. Furthermore, this proposed road will have profound adverse effects on “de-facto” wilderness lands covering a vast region of northwestern Alaska. It also poses serious problems for local residents dependent on subsistence resources throughout the region.

The proposed road to the Ambler mining district would penetrate deeply into the largest block of road-less lands in the United States. The consequences of this proposed road are enormous and will affect a vast region that extends far beyond the road itself. We recommend that this greater regional context be incorporated in the EIS process. The enormous magnitude of negative consequences that this project entails must be presented so that people are informed of what is at stake.

### Mining Impacts

Pre-scoping information fails to even mention that this road will likely lead to massive mining activities in the upper reaches of the Kobuk watershed. This deficiency represents a serious flaw because it comes at the very beginning of the EIS process and fails to inform the public so that they can provide important scoping comments early in the process.

Mineralization in Ambler mining district is of the type conducive to creating acid mine drainage which poses great risk of contaminating waters down stream of these mines that will last in perpetuity. The Kobuk River has a rich diversity of highly productive fish populations that will be threatened. These abundant fish resources have sustained local people who have been living in the area for many thousands of years. Kobuk river fish remain very important for subsistence and will continue to be used in the future. This critical water quality issue must be addressed in accordance with NEPA regulations requiring consideration of cumulative impacts. We

recommend that these deficiencies be corrected in all of the remaining steps of this NEPA process.

### Alternatives

Pre-scoping information does not provide any indication of the range of alternatives that may be considered in the EIS. Only two alternate routes are identified on the accompanying map, both of which cross National Preserve lands. We recommend that a full range of alternatives be presented in the draft EIS. For example, a route down the Kobuk River to tidewater should be analyzed because it would not connect with the Dalton Highway, and thus reduce or eliminate impacts by urban hunters and other public activities coming in from the existing road system. A railroad alternative, with various routes, should also be included because it too would likely reduce impacts associated with road access to this remote area.

### Public Access

We disagree with the claim that this proposed road will remain closed to the public. Similar assurances were made that the TAPS haul road would remain closed to public use. A review of haul road history clearly shows that the initial closure was not adequately enforced by the State Department of Transportation. Prohibited travel soon increased as word got out that enforcement was lax. Also, violators were not prosecuted, and this led to greater illegal travel on the haul road. A lack of commitment to enforcing the closure ultimately led to opening of the road to public travel.

The opening the haul road resulted in far ranging impacts over a vast area of the North Slope and northern Brooks Range. For example, hunting guides and resident hunters using airplanes were now able to greatly extend their activities by trucking aviation fuel up the haul road where logistical operations were established at airports that had been previously constructed for pipeline and road construction. This has greatly expanded hunting pressure for vulnerable wildlife in this open landscape where such pressure did not exist previously. In turn, adequate enforcement of hunting rules have fallen short of what is necessary. We seriously doubt that the proposed Ambler road will remain closed to the public. Therefore, we recommend that the impacts of public access be fully described and analyzed in the NEPA process.

The proposed Ambler road will also provide greatly improved access to existing mining claims and related activities on State lands located north of the road and south of the Gates of the Arctic National Park boundary. Because of access advantages created by the road in this region, more trails and mining activity can be expected in the future. When the Ambler road is opened to public travel, it will also allow for greatly increased ATV and snow machine travel up existing and future mining trails. It should be anticipated that there will be increased incursions of motorized hunters and recreationists the state lands and extend into the Gates of the Arctic Wilderness to the north. Such incursions will likely increase over time, and result in significant negative impacts to wilderness character, vegetation, visual aesthetics, wildlife and subsistence uses. We recommend that the draft EIS address this issue because it will affect Park and Wilderness lands as well as State lands.

Public access on the proposed Ambler road will create significant conflicts between subsistence users and urban based sport hunters. It will also focus increased harvest mortality on caribou,

moose, bears, wolves and fur bearer species. Such changes caused by the road will greatly disrupt traditional subsistence practices and create hardship for local residents. This fact is a major reason why all of the communities in the region have voiced strong opposition to this proposed road. The socio-economic aspects of increased public access for hunting and fishing must be thoroughly reported and accurately assessed the draft EIS.

### Impacts to Fish and Wildlife

Numerous studies have documented impacts of roads and vehicle traffic on wildlife. Mortality due to vehicle collisions, disruption of wildlife migration patterns, increased hunting and trapping pressure, contamination of fish habitat from chemical and fuel spills, and increased stream sedimentation are all likely to occur from the proposed road. Since this road may be used to haul mineral ore concentrates, there is a risk of harmful heavy metal accumulation in fish and wildlife, especially for species at the top of the food chain. The draft EIS must address this in describing impacts and identifying mitigation measures.

A major concern is that the proposed road lies perpendicular to seasonal caribou migrations. The potential for disruption of normal migratory movements must be addressed in the analysis. The hunting of migrating caribou along the Steese and Taylor highways (40-Mile herd), Richardson highway (Nelchina herd), for example, have contributed to population declines in the past. Concentrations of hunters along the proposed road may have similar effects that could impact caribou populations and conflict with local subsistence hunting.

A recent analysis the Red Dog mine road shows that some caribou of the Western Arctic herd are deflected or delayed during their seasonal migrations. The consequences of such interactions are not entirely understood, however, similar reactions can be expected to occur if this road is built. The draft EIS must address the caribou migration issue that is specific to this road proposal. The analysis must also consider the cumulative effects of other proposed roads within the range of the Western Arctic herd. For example, the Arctic Strategic Transportation Resource Project (ASTAR) proposes an extensive network of roads across the National Petroleum Reserve – Alaska which would further fragment the range of the Western Arctic caribou herd. Residents of some forty villages rely on these caribou for subsistence, and thus a broad consideration of cumulative effects of roads is warranted in the draft EIS.

### Impacts to Subsistence and Human Health

The proposed Ambler road will introduce enormous challenges for those people living in rural communities of the Kobuk and Koyukuk river valleys that rely on fish, wildlife, plants, berries and wood for their subsistence way of live. Many of the challenges have already been mentioned: contamination of fish and wildlife habitat as well as the creatures themselves that are harvested for food. Disturbance of migrating caribou, collisions with vehicles traveling on the road will work to reduce or impede local hunters ability to harvest food. A major impact will occur as a result of competition for limited game stocks caused by influx of hunters from outside the region. Such competition will be greatly enhanced by the convenient access provided by the proposed road. Studies have found that a relatively high amount of asbestos occurs in source material for road construction in the area of the proposed road. The draft EIS must address this issue and the associated health risks that may be created by building and operating the Ambler road.

Thank you for the opportunity to provide these comments.

Sincerely,

Fran Mauer  
Alaska Chapter Wilderness Watch