

Alaska Chapter Wilderness Watch
791 Redpoll Ln
Fairbanks, Ak 99712
January 31, 2018

Mr. Greg Dudgeon
Gates of the Arctic National Park and Preserve
4175 Geist Rd
Fairbanks, AK 99709

Re; Proposed Ambler Road Environment and Economic Analysis

Dear Mr. Dudgeon,

The following scoping 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 Ambler do not cross lands that are currently designated as Wilderness, however, we are very concerned about the effects this road would have on the adjacent designated Wilderness in Gates of the Arctic Park, as well as wilderness eligible lands within Gates of the Arctic National Preserve, which both proposed routes would cross. We also have concerns regarding impacts that the proposed road will have on the Kobuk National Wild and Scenic River. Furthermore, Wilderness Watch has profound concerns regarding adverse effects this proposed road will have on “de-facto” wilderness lands covering a vast region of northwestern Alaska.

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 Environmental and Economic analysis process. The magnitude of negative consequences that this project entails must be presented so that people are informed of what is at stake.

Proposed Routes Across Preserve Lands

Wilderness Watch is opposed to the granting of a right-of way for the northern alternative route of the proposed Ambler road because it is located very close to the boundary of the Gates of the Arctic Wilderness and National Park. Due to such close proximity, harmful influences such as road noise, dust, vehicle lights and the visual impacts of road embankments and vegetation changes will impair the wilderness character of adjacent designated Wilderness. In addition, issues related to public access such as ATV trespass, and greatly increased number of visitors entering the Wilderness, especially at Walker Lake, will also impair Park resources and wilderness character.

Section 4(b) of the Wilderness Act directs that: “...each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character.” Because of this legally binding directive, the National Park Service must not grant a right of way for the northern alternative route.

We are also very concerned that both of the proposed routes across the Gates of the Arctic National Preserve would also cross the Kobuk National Wild and Scenic River and would have profound negative influences on the public’s enjoyment of this river. To reduce further impacts to waterways crossed by this road, especially the Kobuk National Wild and Scenic River, we recommend any right of way that may be granted, prohibit facilities or structures that would enable the launching of motor boats or air boats into streams and rivers that are crossed by the road. This provision would assist in reducing the negative influences of noise and wake damage to river banks which can lead to siltation of fish habitat. It would also help to reduce impacts to traditional subsistence activities caused by increased access for hunters from outside the region entering via the proposed road.

The entire National Preserve in the vicinity of this proposed road has been classified as wilderness eligible. National Park policy requires that these lands be administered to preserve their wilderness character until such time as these lands may be designated by Congress according to the Wilderness Act of 1964. Therefore, we recommend that the Environmental analysis clearly reflect this requirement, and prescribe appropriate policies and management actions that are necessary to protect both designated Wilderness as well as wilderness eligible lands. For example, the use of all-terrain vehicles should be prohibited on designated Wilderness and wilderness eligible lands adjacent to the proposed road. Specific provisions to accomplish this must be incorporated in any right of way grant that is issued by the National Park Service.

Public Access

We disagree with the claim that this proposed road will remain closed to the public. Similar assurances were made decades ago that the TAPS haul road would be closed to public use. A review of haul road history clearly shows that the initial closure was not adequately enforced by the Alaska Department of Transportation. Prohibited travel soon increased as word got out that enforcement was lax. Also, violators who were given citations were not prosecuted, and this led to greater illegal travel on the haul road. A lack of commitment to enforce the closure ultimately prompted the Legislature to open the road to public travel. A similar scenario is very likely for the Ambler road as well. The draft EIS should clearly recognize this possibility so that it can be openly considered by the public.

The opening of 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 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, enforcement of hunting rules has

been far from adequate. Similar impacts and enforcement difficulties will be repeated due to the Ambler road. We recommend that the impacts of public access be fully described and analyzed in the Environmental analysis and that measures be identified that will reduce the impacts of public travel through the Gates of the Arctic National Preserve.

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 into the Gates of the Arctic Wilderness to the north of the road. 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 Environmental analysis address this issue as well because it will affect Park and Wilderness lands that are not directly associated with the proposed right of way across the National Preserve lands.

Mining and Water Quality Issues

The purpose of the proposed road to the Ambler mining district is to facilitate the development and operation of several mines. Mineralization in Ambler mining district is of the type conducive of 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 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. The Kobuk Valley National Park straddles the Kobuk River downstream of the proposed Ambler mines and is also at risk of contamination of its waters. The NPS Environmental analysis should at the very minimum, describe the downstream water quality issues that will be activated by the proposed road. Most Americans love our National Parks and the Service has a responsibility to inform the people of the consequences of an action that is being proposed for one Park that will likely impact another Park as well.

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 in species at the top of the food chain. The Environmental analysis 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) 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 practices.

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 by the road. The consequences of such interactions are not entirely understood, however, similar reactions can be expected to occur if this road is built. The Environmental analysis 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 Environmental analysis.

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 Environmental analysis 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