



121 W. FIREWEED SUITE 120 | ANCHORAGE, ALASKA | 99503 | 907.563.9229 | ALASKAMINERS.ORG

**Action Alert: Ambler Access Project SEIS
Comment deadline November 4, 2022**

On Tuesday, September 20, 2022, the Bureau of Land Management published a 45-day public scoping period to guide its supplemental EIS (SEIS) of the proposed Ambler Mining District access road.

In late 2015, the Alaska Industrial Development and Export Authority (AIDEA) began formal pursuit of an industrial access road connecting the Dalton Highway to the Ambler Mining District. The project was originally approved in 2020; in May 2022 the U.S. District Court for Alaska remanded the project approval to the BLM to conduct additional analysis.

Please submit your comments on the SEIS as soon as possible and before the November 4 deadline. Given the extensive analysis that has already been undertaken for this Project, and BLM's representation that the remand was a limited one that was specifically targeted at certain identified deficiencies, this Supplemental Environmental Impact Statement (SEIS) should remain focused on:

- 1) analysis of subsistence impacts under ANILCA Section 810; and
- 2) consultation with tribes under National Historic Preservation Act (NHPA) Section 106.

A timely Supplemental Environmental Impact Statement (SEIS) conclusion is imperative for businesses and working Alaskans who are dependent upon the process.

Specific talking points are available below.

Written comment deadline: November 4, 2022

How to comment:

Website: <https://eplanning.blm.gov/eplanning-ui/project/57323/510>.

Email: BLM_AK_AKSO_AmblerRoad_Comments@blm.gov.

Fax: (907) 271-5479

Mail:

Ambler Road Scoping Comments, 222 West 7th Avenue, Stop #13, Anchorage, Alaska 99513.

Questions on submitting a comment: Wendy Huber, Planning and Environmental Specialist, telephone 907-271-3137; address 222 W 7th Ave. Stop #13, Anchorage, AK 99513; email whuber@blm.gov

Background:

AIDEA initially submitted its application to develop the Ambler Road project in November 2015, making this the seventh full year of federal regulatory review. The Bureau of Land Management published a draft EIS on August 30, 2019 and held 22 public meetings in local communities, Anchorage, Fairbanks, and Washington, DC prior to issuing a favorable ROD in July 2020. After review of litigation, the federal agencies identified two items with desired corrections prior to further court review. The SEIS should be constrained to those two areas: consultation with tribes under the National Historic Preservation Act Section 106 and subsistence analysis of caribou vegetation and fish population under ANILCA Section 810.

Under the Notice of Intent (NOI) filed by BLM on September 20, the agency is soliciting input from the public and requests the public to submit comments “concerning the scope of the analysis, potential alternatives, and the identification of relevant information, and studies by November 4, 2022.” Conducting a full scoping and re-opening of the entire EIS for this SEIS is misleading to the public and a waste of taxpayer resources.

This SEIS should solely focus on the two identified areas of the EIS that the Department of Justice (DOJ) and Department of Interior (DOI) found to be deficient to address the pending lawsuits filed by the plaintiffs and the DOI requested and the court approved remand back to the federal agencies to address.

Talking Points:

1. Scope of the SEIS should be **limited** to the two areas of deficiency as was represented to the court by the Department of Interior.
 - a. Analysis of subsistence impacts under ANILCA Section 810; and
 - b. Consultation with tribes under National Historic Preservation Act (NHPA) Section 106.
2. Significant and extensive analysis has already been undertaken for the Ambler Access Project Environmental Impact Statement (EIS) and was accepted by the Department of Interior.
3. Analyzing impacts already fully addressed in the Final EIS and Joint Record of Decision is a waste of resources and will further delay development of critical and strategic mineral resources needed for national defense and a green economy.
4. Subsistence analysis is being addressed by the project team. The Ambler Access Project has formed a Subsistence Advisory Committee (SAC) to address any concerns of subsistence and to mitigate potential subsistence impacts. The SAC is comprised of 10 villages near the project.
5. Significant subsistence and tribal consultation is already happening. The Ambler Access Project is consulting with tribes and consulting parties as part of the review process for Annual Work Plans, Annual Field Reports, and Annual Programmatic Agreement Reports, which are submitted to BLM for approval.
6. The Ambler Access Project has created a tribal liaison program, workforce development working group, and a subsistence advisory committee to facilitate tribal consultation.
7. The public deserves a speedy and timely resolution on the SEIS and decision document.



8. Having permitting certainty is essential for a thriving economy. Changing and unclear permitting processes affects millions of people across the country.
9. The Ambler Access Project is critical infrastructure for western Alaska, the entire State of Alaska, and the nation.

Comment deadline: November 4, 2022