ALASKA MINERS ASSOCIATION

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October 30, 2026

U.S. Army Corps of Engineers, Alaska District
Submitted via email at ArcticMineEIS_scoping@arcadis.com

Re: Comments on the Notice of Intent to Prepare an Environmental Impact Statement for Ambler Metals' Arctic Project

To Whom It May Concern:

The Alaska Miners Association (AMA) writes in strong support of Ambler Metals Corporation's (AMC) Arctic Project (Project) and to provide comments on the scope of the Environmental Impact Statement (EIS) the U.S. Army Corps of Engineers (USACE) is preparing under the *National Environmental Policy Act* (NEPA).

AMA is a statewide trade association whose mission is to advocate for and promote responsible mineral development in Alaska. AMA members include large and small mining companies, individual miners, contractors, suppliers, professional service providers, and Alaskans who support a strong, responsible mining industry.

The Project ranks among the highest-grade undeveloped polymetallic deposits in the world, and the Project is exactly the kind of responsible, well-planned development Alaska's mining industry exists for. Mining is Alaska's second largest industry, with seven large-scale producing mines, hundreds of placer mines, and numerous exploration projects around the state. Our mines provide approximately 12,400 jobs, with an average wage of approximately $122,500, in communities across Alaska. Mining pays millions in revenues to local governments, to the State through rents, royalties, and taxes, and to Alaska Native Corporations. Those are the kinds of jobs and revenues that Northwest Alaska, where good opportunities are scarce, stands to gain from Arctic.

Arctic would also strengthen the nation's supply of copper and other critical minerals. The nation remains heavily dependent on foreign sources for minerals essential to national defense, energy infrastructure, and everyday technology. Alaska's miners work under some of the strictest environmental and safety oversight in the world, and our industry has a proven record of reclaiming the land and protecting fish, wildlife, and water. Projects like Arctic let Alaska contribute to America's mineral security without relying on supply chains in countries with weaker standards.

In addition, all of AMC's work on Upper Kobuk Mineral Projects like Arctic is done under agreement with NANA Regional Corporation (NANA). To date, NANA shareholders have realized significant benefits from AMC's work at Arctic, and these will increase significantly when the Project is

constructed and operated. Working with NANA also helps to ensure that responsible development can be achieved while protecting the lands and waters of the region.

AMA encourages the USACE to evaluate all of the above benefits in the EIS, especially considering the *Fiscal Responsibility Act* requirements for evaluating the no action alternative, including an analysis of the negative environmental impacts of not implementing the proposed agency action.

AMA was pleased to see Arctic accepted as a FAST-41 Covered Project in May 2026 and appreciates the coordinated federal and State permitting plan now posted on the Federal Permitting Dashboard. This Project – and others like it – need defined, predictable timetables that let project sponsors plan long-term investment.

To keep the review focused, timely, and defensible, AMA requests that USACE consider the following in scoping and in preparing the EIS:

- Define the scope around the proposed action as described in AMC's permit application. Only consider affects of and analyze reasonable alternatives to that action within USACE's authorities. Avoid speculative analysis of hypothetical future development beyond the Project.
- Make full use of the extensive site-specific baseline data and engineering work AMC has developed for the Project area, and rely on the best available science.
- Work closely with State of Alaska agencies, including the Departments of Natural Resources, Environmental Conservation, and Fish and Game, as cooperating agencies, and align the federal review with State permitting to avoid duplication of existing State and federal laws and regulations and benefit from the significant expertise the State provides.
- Adhere to the FAST-41 schedule and the schedule and page limits that apply to NEPA reviews, and avoid unnecessary delays that do not improve the quality of the analysis.
- Seek meaningful input from local residents, Tribes, regional organizations, and Alaska Native shareholders, and incorporate Traditional Knowledge, so that effective measures to avoid, minimize, and mitigate potential impacts to land, water, wildlife, and subsistence resources are identified early.
- Rely on review staff who understand Alaska's unique environment, land management framework, and logistics, and build an administrative record grounded in sound science that can stand up to scrutiny.

The Northwest Arctic Borough is home to the Red Dog Mine, which shows that Alaska Native partnerships and responsible mining can deliver lasting benefits for a region. AMA believes Arctic can follow the same path, and that a transparent NEPA process will help ensure regional communities have a meaningful role in shaping the project.

Thank you for the opportunity to comment on the Arctic Project. AMA and its members stand ready to work with USACE, the State of Alaska, AMC, and all stakeholders throughout this review.

Thank you for the opportunity to submit these comments.

Sincerely,



Deantha Skibinski
Executive Director
Alaska Miners Association