



## ALASKA MINERS ASSOCIATION

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**Action Alert: Ambler Access Project Draft SEIS  
Comment deadline December 22, 2023  
Anchorage public meeting December 13, 4:30 pm**

The Ambler Access Project (AAP) is a proposed industrial access road connecting the Dalton Highway to the Ambler Mining District, along a right of way that is provided in the Alaska National Interest Lands Conservation Act (ANILCA). The AAP was analyzed in an environmental impact statement (EIS) and received a favorable Joint Record of Decision (ROD) in August 2020. A subsequent lawsuit was filed and the Department of the Interior (DOI) requested a voluntary remand in February 2022, necessitating the creation of a Supplemental EIS.

The agency alleges “*deficiencies in the analysis of impacts to subsistence uses under ANILCA Section 810 and consultation with Tribes pursuant to NHPA Section 106.*” – AAP DSEIS Vol. 1 DOI submitted court filings stating that a ROD for the supplemental EIS would be signed in 2023; after multiple missed deadlines, the Bureau of Land Management published a draft supplemental EIS (DSEIS) on October 13, 2023.

**It is critical to provide comments in support of access to the Ambler Mining District. Please consider submitting written comments by December 22, 2023.**

**Please consider attending one of several [public meetings](#), including in Anchorage this Wednesday, December 13. Doors open at 4:30 pm, meeting begins at 5:00.**

**Submit online comments, and see all project information [here](#).**

### **Points to consider in your comments:**

#### **Scope**

- The AAP DSEIS totals 1,283 pages and four volumes and includes an analysis of: “*water resources, air quality and climate, vegetation and wetlands, fish and aquatics, birds, mammals, transportation and access, environmental justice, subsistence, and cultural resources.*” – AAP DSEIS Vol. 1
- The voluntary remand that DOI submitted identified two issues to be addressed: subsistence uses in ANILCA and tribal consultation under the National Historic Preservation Act. However, the DSEIS included expanded and additional analyses on issues beyond the remand, including a new phasing option for the road. The scope of the DSEIS should be constrained to the two issues identified in the remand.
- In general, the DSEIS significantly expands the mandated analysis and scope of the project. It identifies multiple potential issues, but doesn’t put them into context or identify the severity of those impacts. Possible negative impacts appear to be amplified and treated as inevitable. Analyzing potential negative impacts and risks are important, but Alaska has a number of examples where development and protection of values like environment and subsistence are done successfully, and this has been done through following our prescribed regulatory processes in an objective manner. The right management

can be done by the agency, developers, and land owners to ensure continued successful coexistence happens at the Ambler road project too.

### **Alternatives**

- We question why additional alternatives are included in the DSEIS. In 2020, the National Park Service (NPS) and the U.S. Army Corps of Engineers (USACE) selected alternative A as the preferred route and those decisions still stand today. The alternative selected in the 2020 JROD was not subject to judicial review and was determined by the U.S. Army Corps of Engineers to be the alternative with the least environmental impact.
- Alternatives must take into account that access to our mineral resources were granted at Statehood and access to the Ambler Mining District was expressly provided for in ANILCA.

### **Subsistence Impacts**

- The DSEIS expands the ANILCA Section 810 analysis from 27 to 66 communities. This is overreach at its strongest: some of these communities are hundreds of miles away from the road area being proposed. It also assumes without scientific evaluation that subsistence uses for these communities will be “significantly restricted.” This is inappropriate and alarming. The focus of the SEIS should remain on the 10 villages closest to the road, and BLM should take into consideration that decades of successful coexistence of other private industrial roads in Alaska like the Delong Mountain Transportation System (DMTS) at Red Dog Mine and the road to Pogo Mine.
- The DSEIS cites data about caribou population that is not actually definitive and ignores that post-DMTS construction and operation, the Western Arctic Herd population actually increased in the region.
- The DSEIS failed to acknowledge current successful structures of Subsistence Advisory Committees, particularly at the Red Dog Mine, in which communities have management authority in issues impacting subsistence uses. This is irresponsible and must be taken into consideration moving forward.

### **Environmental Analysis**

- In no place does the DSEIS acknowledge that Alaska has a history of roads coexisting with the environment, wildlife, and human health. If the agency is going to amplify concerns such as suggesting the road project would damage fish habitat, then it must also outline permitting requirements and mitigation measures required by the Alaska Department of Fish and Game that has successfully regulated projects near fish habitat for decades.
- The SEIS infers the road will sever hydrology in some areas and ignores that the applicant has proposed a significant number of bridges and culverts to maintain connectivity. The objective balance of both must be considered.

### **Access and Trespass**

- The DSEIS supposes that trespass and authorized use by the public is inevitable. It is important to consider the possibility of trespass, and consider and implement all possible measures to prevent it. This can be done by reviewing the track record of DMTS and the Pogo Mine road, and also by working with the communities in the region. Simply stating “trespass” will happen without including objective evaluation of the reality of the environment and mitigation possibilities is unfair to everyone.

### **Economic and Community Benefits**

- The DSEIS significantly downplays the economic benefits and opportunities if development were to take place: in the 1,200+ page document, the term is only mentioned 11 times!
- This project holds the potential for the creation of thousands of direct AND indirect, quality jobs, especially for those living closest to the project through construction and operation phases. Alaska's mining industry provided for 11,400 direct and indirect jobs in 2022, with an average annual wage of over \$130,000.
- The DSEIS does not take into account concerns about production of minerals and oil and gas in the region to begin winding down. Should this happen, jobs and economic benefits will decrease, elevating the importance of replicating the successes of projects like Red Dog. According to the Northwest Arctic Borough's (NWAB) [Comprehensive Plan Update for 2030](#), 83% of the borough's operating funds came from Red Dog in 2020. That is why the NAWB and North Slope Borough assemblies passed a joint resolution in April of 2023 in support of the AAP and development of the Ambler Mining District in recognition of the jobs, revenue, and good stewards mining companies can be.
- To avoid a gap in local jobs and other economic benefits, new opportunities need to be explored in the region – and the AAP is a must.
- Beyond local jobs, the AAP will also bring immense economic benefits state-wide. Mining license tax revenues to the state, along with corporate income taxes, production royalties and rent claims are anticipated to reach over \$1 billion over the life of all four mines that will be made accessible by the AAP. An additional \$193 million is anticipated to be paid out to local governments ([source](#)).

### **Critical minerals and national security**

- The United States is currently heavily dependent upon adversarial nations like China for critical minerals.
- The Ambler Metals Arctic Deposit is one of the highest-grade copper deposits known in the world. We must consider building a road to access the area, to supply our nation with the copper, cobalt, and other minerals we need.
- In contrast to where the majority of society's needed minerals are currently being sourced, mining in Alaska ensures the highest labor, safety, and environmental standards will be adhered to.

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