



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

November 4, 2022

Wendy Huber
Bureau of Land Management
Alaska State Office
222 W 7th Avenue
Anchorage, AK 99501
Submitted via email

Re: Notice of Intent to Prepare a Supplemental Environmental Impact Statement for the Proposed Ambler Mining District Industrial Access Road

Dear Ms. Huber:

The Alaska Miners Association (AMA) is writing to submit comments on the Bureau of Land Management (BLM) Notice of Intent to prepare a Supplemental Environmental Impact Statement (SEIS) for the proposed Ambler Mining District Access Road (Project).

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. We are composed of more than 1,400 members that come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Our members include individual prospectors, geologists, engineers, suction dredge miners, small family mines, junior mining companies, and major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.

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. 2022 marks seven full years of federal regulatory review of the Project, now spanning three Federal Administrations. The Bureau of Land Management published a draft Environmental Impact Statement (EIS) on August 30, 2019 and held 22 public meetings in local communities, Anchorage, Fairbanks, and Washington, DC. In July 2020, a Joint Record of Decision (JROD) was issued by BLM and the National Park Service, approving the Right-of-Way and moving the project forward.

In September 2021, the United States Department of Justice requested a 60-day stay of the two related lawsuits challenging the JROD, and the United States Department of the Interior requested additional time to consult with the tribal and environmental organizations behind the two lawsuits. Unfortunately, the Stay Motion was granted on October 27, 2021. In May 2022, the U.S. District Court for Alaska remanded the project approval to the BLM to conduct additional analysis.



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.

According to the September 20 Notice of Intent (NOI), BLM 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.” This broad scope is inappropriate and inconsistent with previous decisions by the Department of the Interior.

Scope of the SEIS should be *limited* to the two areas as was represented to the court by the Department of Interior: consultation with tribes under the National Historic Preservation Act Section 106 and subsistence analysis of caribou vegetation and fish population under ANILCA Section 810.

Significant and extensive analysis by scientists and subject matter experts has already been undertaken for the Ambler Access Project, and additionally, the 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. The Project has also created a tribal liaison program, workforce development working group, and other committees to facilitate tribal consultation.

Opening the SEIS to a wider scope of issues will no doubt further delay development of the Ambler Access Project thus delay the development of critical and strategic mineral resources needed for national defense and a green economy. Having permitting certainty is essential for investment decisions needed to advance domestic critical mineral production. Changing or unclear permitting processes is counterproductive to our nation’s alternative renewable energy goals.

A timely Supplemental Environmental Impact Statement (SEIS) conclusion is imperative for the Native Alaskans communities and for working Alaskans who are dependent upon the Ambler Access Project and developing the Ambler Mining district. Therefore, we urge BLM to proceed with an SEIS focused on only the two areas of deficiency as was represented to the court by the Department of Interior and to conclude the SEIS process in a timely fashion, but no later than 2023.

Thank you for the opportunity to comment on behalf of over 1,400 members of the Alaska Miners Association.

A handwritten signature in blue ink, appearing to read "D. Skibinski".

Deantha Skibinski
Executive Director