



# Ambler Road Environmental Impact Statement

Fairbanks Public Scoping Meeting

## MEETING NOTES

November 16, 2017

Fairbanks Wedgewood Resort, Borealis Room, Fairbanks, Alaska

## Project Team Participants

Bureau of Land Management (BLM): Laurie Thorpe, Tim La Marr; Crystal Glassburn, John Rappahn, Joe Crane, Erin Julianus

HDR: John McPherson, Katherine Wood, Mark Dalton, Dawn Ramsey

U.S. Army Corps of Engineers (USACE): Melissa Riordan

Alaska Department of Fish and Game (ADF&G): April Behr

National Park Service (NPS): Lois Dalle-Molle, Matt Cameron; Greg Dudgeon

## Public Participants

Approximately 93 people attended the meeting.

## Meeting Purpose

To share information about the BLM's Environmental Impact Statement (EIS) process, and to gather input from the public.

## Meeting Topics

### 1. Welcome by Laurie Thorpe (BLM)

Laurie Thorpe opened the meeting, and introduced the participants.

### 2. Presentation by Laurie Thorpe (BLM)

Today we will talk about the EIS process and the National Historic Preservation Act (NHPA) Section 106 process. We will talk about how we will address cultural resources and historic resources through the programmatic agreement and the Cultural Resources Management Plan that will also be part of the EIS process. Then we will talk a little bit more about the schedule and what's next. After the presentation, we will welcome your comments. I know many people signed up as they came in to

give some public comments. This isn't a testimony per se, this is more just scoping comments. We just want to hear from you, what your issues and concerns are.

### ***Project Background***

In the 1950s, mineral exploration efforts that identified significant resources of copper and other base metals in the southern grounds of the Brooks Range. A lot of folks are familiar with that area, referred to as the Ambler Mineral Belt or the Ambler Mining District. In the 1980s, Congress passed the Alaska National Interest Lands Conservation Act (ANILCA). In that law, it recognized the mineral potential in the Ambler Mining District, and the need for some type of surface transportation access to the area. In ANILCA, Section 201(4)(b) provides for surface transportation access through Gates of the Arctic National Park and Preserve. So there was language specific to the National Park Service there on the NPS lands, but there was no language specific to the BLM lands. That's why we are here tonight.

A little more on the background. In 2009-2010, the project started to formulate a little bit more. The Alaska Department of Transportation and Public Facilities (DOT&PF) began evaluating multiple road and rail routes that could access the Ambler Mining District. They looked at a lot of different alternatives. Some of you may have been involved in some of those meetings.

In 2013, project ownership was transferred from DOT&PF to Alaska Industrial Development and Export Authority (AIDEA). In 2015, AIDEA submitted an SF-299 application requesting right-of-way for the road. The application went to federal agencies that would need to issue permits for the project (BLM, NPS, U.S. Coast Guard [USCG], and the U.S. Army Corps of Engineer [USACE]).

The application was complete by June 30, 2016, which initiated the BLM action on the application. BLM filed a Notice of Intent on February 28, 2017, to prepare an EIS initiating a 90-day public scoping period. We knew that would not allow enough time for public scoping through all the affected communities. BLM did not want to interrupt the subsistence harvest activities during the summer months so extended the public scoping period through January 31, 2018. You can submit comments in a variety of ways. We will be taking comments here tonight.

In 2017, NPS began a separate but parallel Environmental and Economic Impact Analysis (EEA) for the portion of the road on NPS land, as directed by ANILCA.

### ***Proposed Project***

The right-of-way application from AIDEA proposes a road across public and private land to the Ambler Mining District to increase job opportunities, and otherwise encourage the economic growth of the state, including the development of its natural resources.

According to AIDEA, without that access the mineral assets associated with the Ambler Mining District would remain unused, and AIDEA would not be able to support economic development and increase job opportunities within a region known for high unemployment rates.

## ***Road Elements***

Maps are available to see the route. AIDEA's proposed alignment begins at the Dalton Highway Milepost 161, and extends westward along the south side of the Brooks Range to the south bank of the Ambler River.

The type of land crossed by the road includes State lands (61 percent), Federal land managed by BLM and NPS (24 percent), and lands associated with two Alaska Native Corporations (15 percent) Doyon and NANA.

The road would be 211 miles long, all-season, gravel two-lane road with industrial access only. It would not be open to the public. It includes bridges, material sites, maintenance stations, airstrips, and related infrastructure and utilities to support the mineral development in the Ambler Mining District.

Vehicles using the road would include trucks hauling mineral exploration and development equipment, supplies, fuel, and ore concentrate. The road would be designed to accommodate large semi-trailer trucks.

## ***Proposed Project Area***

The proposed project area begins at Milepost 161 of the Dalton Highway. It is 211 miles heading west crossing multiple land jurisdictions, and ends at the Ambler mineral belt area as shown on the Proposed Project Area Map.

## ***Agency Roles***

BLM is the lead federal agency under the National Environmental Policy Act (NEPA) for preparing the EIS. BLM is coordinating with all the other agencies. BLM has authority to grant a right-of-way across BLM-managed lands. BLM must also comply with ANILCA Section 810 and the NHPA Section 106. Just to clarify, BLM has the authority to grant right-of-way, but we are not required to. That is different than the NPS role. They must select a route, and issue permits for a route crossing NPS-managed land. BLM is not required to select an action alternative. We can select a no-action alternative, and not issue a right-of-way permit.

USACE is a Cooperating Agency, and would be responsible for the wetlands permits that would be required. The USACE would evaluate the project application under Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act, and would use the EIS as the basis for its permit decisions.

USCG is a Cooperating Agency, and would be responsible for bridge permits over navigable waters, and would also use the EIS as a basis for its decisions.

State of Alaska Department of Natural Resources (DNR) is a Cooperating Agency, and would be responsible for state permits. DNR would make land management decisions for right-of-way access across State-managed lands.

Northwest Arctic Borough (NAB) is a Cooperating Agency. NAB will provide traditional knowledge and input on subsistence, cultural resources, and coordination with Tribal members and affected communities. The NAB would also enforce local permitting requirements, and advise the BLM on NAB's responsibilities under State law and NAB regulations.

NPS, U.S. Fish and Wildlife Service (USFWS), and the Environmental Protection Agency (EPA) are all Participating Agencies.

We have also received requests from the communities of Allakaket and Alatna requesting Cooperating Agency status so we will proceed with that process.

### ***What is an EIS?***

This EIS is a site-specific EIS for the proposed Ambler Road. An EIS is a document required under the NEPA, which requires federal agencies to assess the environmental consequences of their decisions. An EIS is required for actions by federal agencies that significantly affect the quality of the human environment. Without your input, we cannot do a good EIS.

An EIS includes the following:

- Project Purpose and Need.
- Issues raised during scoping (internal/external).
- Project alternatives.
- Description of potentially affected environment covering resources like wildlife, vegetation, hydrology, fisheries, cultural resources, and the human environment. We determine what we know about those resources now, and look at how they would be impacted by this project.
- Environmental consequences of all the alternatives.
- Proposed mitigation, which can involve the design of the route, or best management practices that may be applied to minimize impacts.

### ***So where are we now?***

We published the Notice of Intent to produce an EIS in February 28, 2017, and are now in the Scoping Process requesting public participation. The scoping period ends January 31, 2018, then a Draft EIS will be developed with draft alternatives by March 2019. Public review would be held on that Draft EIS. Based on that feedback we would revise and issue a Final EIS. After that, the BLM would issue a Record of Decision on whether or not to grant the right-of-way.

### ***Draft Purpose and Need***

Project need is based on the requirement for the BLM to respond to a right-of-way application from AIDEA for surface transportation access to currently inaccessible, economically valuable mineral deposits in the Ambler Mining District.

Project purpose of the BLM action is to provide AIDEA with: (1) technically and economically practical and feasible surface transportation access across BLM-managed lands for mining exploration and

development in the Ambler Mining District, and (2) authorization to construct, operate, and maintain associated facilities for that access.

### ***BLM Decisions to be made***

The BLM must decide whether a right-of-way shall be granted, and if so, the terms and conditions that will be included in the right-of-way. We are not required to grant a right-of-way. We can issue a Record of Decision for a no-action alternative.

### ***What is Scoping?***

Scoping is the process used to get input on the issues, impacts, and potential alternatives that will be addressed in the EIS. The intent of scoping is to:

- Inform agencies and public about AIDEA's application and the proposed project.
- Identify resources, impacts, and issues of concern to be addressed in the EIS.
- Obtain input to help refine the purpose and need and the alternatives to study.
- Identify potential mitigation measures that may be needed to avoid, minimize, or mitigate for project impacts.
- Obtain information to help evaluate the project with applicable laws.

The EIS document will analyze these kinds of issues that were developed by BLM during our internal scoping:

- Air quality
- Special status species
- Subsistence use and access
- Climate change effects
- Fish and aquatic species
- Critical minerals
- Invasive Species
- Water
- Travel management
- Mining
- Wetlands and riparian
- Demand for gravel resources
- Recreational activities
- Wilderness characteristics
- Public access
- Social and economic impacts
- Cultural resources
- Wildlife and biological resources
- Impacts to rural and traditional lifestyles

- Geology and soils
- Reasonably foreseeable future activities

### ***ANILCA Section 810***

Under Section 810 of ANILCA, the BLM must determine whether the project “may significantly restrict subsistence uses.” This analysis will be included in the EIS.

If alternatives may significantly restrict subsistence uses (either abundance, access, or availability), then this will be identified in the analysis, and ANILCA Section 810 hearings will be held at the same time as public meetings upon release of the Draft EIS.

### ***National Historic Preservation Act Section 106***

Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties and places of religious and cultural significance.

Tribal entities, the State Historic Preservation Officer (Judy Bittner), and other interested parties are consulted to identify significant places and ways to reduce or mitigate potential effects.

The agency determines the undertaking, identifies the area of potential effect and the consulting parties. Many of the affected communities are the consulting parties as well as the Cooperating Agencies.

Historic properties are identified and evaluated as to how they would be affected. BLM would assess the adverse effects, and consult with the parties to resolve the adverse effects. At that point we develop a programmatic agreement with input from all the consulting parties. From that a Cultural Resources Management Plan can be developed to identify mitigation and to protect those cultural resources.

### ***NPS EEA Process***

NPS EEA process is happening at the same time as the BLM EIS process. The AIDEA proposal includes two alternative routes across NPS lands (North and South).

Under ANILCA, NPS is legally required to permit access across NPS lands, prepare an EEA to evaluate which route is preferable based on environmental, social, and economic effects, and develop permit terms and conditions.

### ***EEA Public Input***

NPS seeks comments on route selection and permit terms and conditions. The comment period is open through January 31, 2018. To comment go to <https://parkplanning.nps.gov/Ambler>.

### ***Schedule***

Scoping concludes January 31, 2018. A draft EIS will be developed by March 29, 2019, followed by public review. A Final EIS based on public and agency review of the draft will be produced by December 30, 2019, and the Record of Decision is targeted to be completed by January 30, 2020.

### **What's Next?**

BLM is collecting comments and feedback. We will consider input received to potentially refine the Purpose and Need, determine issues and impacts to be studied, determine alternatives to be studied, and potentially identify mitigation measures to apply to the project.

### **Substantive Comments**

Writing substantive comments assists BLM to make good decisions.

- “I don’t like this” or “I do like this” is not useful. Explain why.
- Be as specific as possible about what you are concerned about.
- Refer to a section or page number of a particular referenced document.
- Present new information.
- Share issues relevant to the environmental analysis.
- Suggest alternatives to the proposed project and the reason(s) why they should be considered.

You are welcome to comment on the proposed project. You can submit comments in the following ways:

- Submit a comment form in the box
- Submit comments via the website: <http://www.blm.gov/AmblerRoadEIS>
- Fax to: (907) 271-5479
- Email to: [blm\\_ak\\_akso\\_amblerroad\\_comments@blm.gov](mailto:blm_ak_akso_amblerroad_comments@blm.gov)
- Mail to: 222 West 7th Avenue, Stop #13, Anchorage, Alaska 99513

## **3. Comments**

***Below are a compilation of verbal comments received at this meeting.***

### **Comment and Question from Tammie Wilson**

I’m excited about the opening up of the road. [There will be] more opportunity not just for mining but to access in Alaska. I am concerned because you are talking about commercial trucking. What would happen if a smaller mining group might want to come in that wouldn’t be all commercial trucking? Maybe a family operation. Would that be allowed? It didn’t sound like it in the information that I read. I hope the public-private financing works, because I think we can open up other areas of Alaska with AIDEA versus the State doing it. Are there other opportunities besides mining in this area? We want jobs here. We want jobs for our kids. Also, you might just want commercial access for a local mine. We don’t have as much access that I think Alaskans hope to have. So maybe we can learn a lot and have public access so all Alaskans can benefit from the resources that now will be made available. I know it’s a long process, but if you could make it happen before 2020 that would be awesome.

### **Comment from Terry Taylor**

It's exciting to see development for an area that has been heavily explored, and we know there's potential for a lot of mines. There's a lot of opportunity for job creation and revenue. Mining is all about economics. We look at the cost to get into remote sites, and the costs. This will give access to expand new industry and give good paying jobs to Alaskans. I'm concerned with the process, making it more streamlined. Everybody has concerns. At this point, I'm glad to see it going forward, and I'd like to learn more about it.

### **Comment and Question from PJ Simon**

I'm from Allakaket, and I live here in Fairbanks. I'm a plumber by trade. I believe in the job creation, but I don't think this road pencils out. You're looking at 211 miles to the Haul Road, 212 miles to Fairbanks, and then 350 to a port that we don't know. So if you bring ore that far it's not going to pencil out. You're better to go south or west. There's a deep water port that's more feasible and more economical, and you could just go across the ocean to wherever it's getting smelted. And I'd like to see a board member of Alaska Natives from the northern region on the AIDEA board. If it's rural development, Alaska Natives were about 25 percent of the State economy. Why not have an AIDEA board member? We're good business people. Just the bridges alone. Fifteen major bridges, that's going to cost over a billion dollars. If you look right up here past Eielson that 2,200 foot bridge cost \$180 million for the railroad. Fifteen major bridges that's going to pencil out to \$750 million. You're looking at \$2 billion project. It would be better to build a railroad instead of a road. You can haul more tonnage with rail. We say create jobs. Our lawmakers in Juneau allowed \$2.9 billion in out-of-state compensation to leave the State every year. You read in the newspaper the State of Alaska is talking about giving the airports to the tribes and the schools. We're with the Native corporations. There are 7,000 to 10,000 sheep in the Brooks Range, Gates of the Arctic. The four herds of caribou that live up there, there's a lot of big moose. There's white fish. Three-hundred sixty thousand chums spawn right about Allakaket. About 30 percent of the whole Yukon River chum run spawn in the Koyukuk River. Those are valuable resources, but I think you can go west. We're not isolationists. We're for development. We're just not for this road. It doesn't pencil out.

### **Comment from John Gaedeke**

My folks started a wilderness lodge over 40 years ago just north of where this road is proposed to go so I've lived in the area my whole life. I urge the scoping process to look at the cumulative impacts. AIDEA has always pitched this to the villages as a small pioneer road, and then it becomes two lanes. Each time it gets bigger, but the cost somehow stays small. They said initially just 40 trucks a day. Now it has turned into 80. The design says it will be able to hold 400 trucks a day. The numbers are all over the place. It's very difficult for people to give substantive remarks to that. AIDEA has also said it would take all mining companies coming online at once to pay for this road. For those of us going to these meetings, we've only seen Trilogy moving on this, and they're the ones claiming 40 trucks a day by themselves. They represent less than 25 percent of the investment needed to make this work. They are proposing a 25 megawatt facility. That's large enough to power Barrow. That's a lot of fuel. And this is going to be a road passing by villages that can barely fund schools, and do not have

funding for troopers or law enforcement. Alaska is covered with projects that cost twice as much and go half the distance they are supposed to. I'm worried that this is another project like that. I'm concerned that this culture of state handouts so that foreign companies can profit from Alaska's resources will also overtake this project. It forces the State to go with the lowest bidder and then backtrack on promises. I'm concerned that there will be armed combat between security forces and local villagers. Times are tough out there. Their salmon is their savings account. When everything else fails that's what they go to. The early meetings promised lower costs for goods and services in the villages, but as proposed, no child would go to school on this road. No elder would be taken to any clinic on this road. It will not connect to a single village. That was a carrot that was held out in all the early meetings. The biggest concern for me is that this road seeks to provide unrealistic economic opportunity for stranded resources. It creates a valley of 10,000 gravel pits with no federal backing. If it's inundated with overflow overtaken by permafrost lost, this is 100 percent up to the State to take care of. The Haul Road has already required emergency federal funding. This would be a state road. I'd like to remind the agencies that this is the cheapest option designed by the lowest bidder. That has never worked in Alaska. The second we look at another option. According to AIDEA, there's no chance for success here.

#### **Comment from Anna Plager**

I feel like I'm here to comment not on the Ambler Road EIS but on the Ambler Road EEO because I've been to this rodeo before in the 70s. The DOT&PF came to our town in Ambler with a proposed road to go out to Bornite mining. I was living just up north on the Ambler River. We would walk from our cabin to the village at Kobuk, and we would get our mail and groceries and do our fishing for sheefish and salmon from the Kobuk River. At that time the project was shut down. It did not pencil out. I don't live up there anymore. I've been in Fairbanks since the early 80s. I have great empathy for the people who are up there. I want to echo their voice of concerns about the subsistence opportunities that are being diminished if the road should come in. I was here when the Haul Road went through, the Dalton Highway. It was not going to be a public road. Promises are made but are not kept. I also see this road going from east to west rather than north to south, and I see it crossing all those fish streams and all those caribou migration corridors. I just can't imagine the acid rock drainage that could end up in the Kobuk River and affect the grocery store for all those villages up there. It would really be devastating. I'm also concerned as a State resident that the outfall of the maintenance of the road will fall on the State residents to maintain it if the industry ever backs out. I haven't heard any mention of rehabilitation or reclamation, and I'm interested to go to the SF-299 to see what other details are there and submit some more comments about it.

#### **Comment and Question from Ron Yarnell**

I'm a wilderness guide and business owner who has been leading trips in the central Brooks Range since 1971. I have led hundreds of trips down these wild and scenic rivers, the Koyukuk, the Alatna, the John, and the Kobuk for over 46 years. The proposed road will change the character of this area forever. I have already submitted my written specific comments about the potential impacts future and present, but I have a few other concerns I would like to state. First of all, the road will impact me

financially. For 46 years now I have made a living guiding these trips throughout the Brooks Range and Alaska's Arctic. This area, the central Brooks Range brought to me over 50 percent of my business, and therefore, 50 percent of my income. The road will make all these rivers far less attractive for my clients. More specifically, I have questions about the economics of this road since it is proposed to be privately funded. How do you expect to pay the bonds off for this road when the tolls charged do not even cover the maintenance costs on the road let alone the costs of construction? Who will be liable for this debt when AIDEA can't pay back these bonds? AIDEA, a State corporation will be responsible. The State in other words. As an investor who wouldn't invest in this project when basically it's guaranteed by the State? The State is guaranteeing it will be paid back so they will find investors. The State of Alaska has already poured way too much money into this road that nobody else wants. Benefits to the local people. This road benefits no one but Trilogy Metals, NANA, and a little bit the Northwest Arctic Borough for the taxes they get from the minerals. As with most other projects, the State will continue to spend money on this road far more than it brings in. They've already spent practically \$30 million. The minimum mineral taxes won't make up the difference. This road does not access any of the local villages. It does pass through country these folks use for subsistence. It does not make it any cheaper for their goods and services. In fact, local villages will not be able to use this road even if it were to connect to their villages. It will bring in more drugs and alcohol. More problems not less. It will impact the subsistence resources specifically the caribou and fish. Solutions if anything is built at all, it should be a railroad. One train can haul hundreds of cars or ore concentrate for a fraction of the cost and damage that 20-ton trucks will have on existing roads and that road itself. Are these trucks going to come down to Fairbanks? Are they going to transfer the ore concentrate onto trains or continue down the Parks Highway? Hundreds of trucks per day these big 20-ton trucks.

#### **Comment from Julia Mickley**

I'm the Clean Water and Mining Coordinator of the Northern Alaska Environmental Center, which has over 900 members, and is based here in Fairbanks. We, along with united communities and organizations, have passed formal resolutions opposing this road. Numerous other communities have spoken out against this project. It's time for AIDEA and the State to listen to the people of the region, and stop the project. People are very concerned about impacts to subsistence and their way of life. The road will run near but not directly through communities so those communities will shoulder all the burden of development without reaping the benefits. BLM needs to do a full study in each of the impacted communities to fully assess the subsistence, socioeconomic, cultural, and other impacts of the region. The road will cause significant harm to fish, wildlife, water, subsistence resources, and other values of the southern Brooks Range, and will have far reaching cumulative impacts well beyond the footprint of the road. BLM needs to fully consider all these impacts and more in an EIS. The purpose of this industrial road is to build a road to mines. BLM is required to fully consider the impacts and infrastructure associated with the mine as part of its environmental review. The road will cross 2,900 streams, 11 major rivers, and 1,700 acres of wetlands that provide vital habitat for subsistence resources in the region. Yet AIDEA has provided almost zero information about the aquatic resources in the region and how a project of this scale is likely to change the

hydrology and habitat of the region. BLM needs to conduct far more studies and collect far more information about the aquatic resources in the region and the potential impacts of the road and mine before preparing an EIS. The road will but through the migratory route of four caribou herds, including the Western Arctic Caribou Herd. There can and will be serious impacts to caribou. Despite the fact that this will be a massive infrastructure project, AIDEA has provided only barebones information in their permit application about the design of this project and its potential impacts. It provides only high level statements that it will be a one-lane pioneer road that will ultimately become a two-lane gravel road. This is unacceptable. The State and BLM need to provide far more information about the design of this project. BLM needs to fully analyze the full-scale, two-lane road and its potential impacts in depth. This region is already under stress from climate change. BLM needs to fully assess the impact of climate change, including things like melting permafrost. This is an irresponsible project.

### **Comment from Ronald Brooks**

I favor the issuance of the right-of-way access [for] the northern route with some restrictions. The issuance of right-of-way across BLM lands, exploration, and use of construction materials on BLM land, and authorization of construction and maintenance and management of the Ambler Road for mining purposes. The Ambler Road would open up a significant base metal resource, which would open up the economy from Ambler all the way through Fairbanks and port facilities in Seward and perhaps Port MacKenzie. It is of critical importance to the economy of Alaska. I have walked all the way from the Ambler Mining District to Shandler Lake during exploration with the Anaconda Company. I've spent up to 11 months up there in the Brooks Range back in the 80s. It is a rugged region, and it's brutal. I don't believe that road could be opened for anything but subsistence and cultural activities of the communities along that route because you're going to kill people if you open it up for public access or recreational access. That area is too brutal. I would restrict recreational activities, public access, and all non-mine related activity. There have been comments about drugs. There are no drugs associated with mining activities or commercial trucking. The State is very strict about that. These trucks are carrying 40 tons, \$2,000 from Ambler to Fairbanks or to the Alaska Railroad. Two thousand dollars is reasonable. That can be financed. This road can be paid for. I think it's very important to maintain the subsistence resources out there. I've seen these herds. In the last twelve years, the population of the caribou has doubled.

### **Comment from Paul Manuel**

I'm a placer miner, and I've done a lot in the resource industry. I love the idea of these mining projects, but they have to have access. I don't care if it's a road or a railroad. I love the idea that it comes to the interior because it anchors the mining to the interior as opposed to Red Dog. They're anchored to wherever the ship stops. If you want to be a contractor and do something in Anchorage and get it to Red Dog it's really hard. So I love that it comes to the interior. This will be lots of jobs, employment opportunities, mining opportunities, small-scale mining opportunities that will be allowed by having access to this area.

### **Comment from David Prusak**

From Fairbanks. I'm very confident in the NEPA process and through the EIS. A lot of the concerns that folks are worried about will be addressed. The economic development and the resources it provides for this state are vital and important. That's why I support this project. When I look at the proposal that was put out by AIDEA and the presentation were right on. It explains why it is a great value to the State of Alaska. I'm confident that the concerns that we have for the environment and for the subsistence components will be addressed. In looking at the routes, I'm in favor of the northern route over the southern route. The only reason for the southern route was that it had fewer miles through the Park Service lands. It created an additional length of roadway. It didn't make sense.

### **Comment and Question from Michelle Moses**

I'm from the village of Alatna. I was born there on the edge of the river. I'm worried that this road will pollute our food as mining has consistently done across the nation. Ultimately this comes down to a process that is flawed. All of us sit here with our opinions for and against, but funds have not been appropriated to go past scoping. That is not fair to anyone here. The State spends just enough money to fire everyone up, and then does not follow through. This happens while my village has no law enforcement. Why hasn't the funding of this basic permitting process been discussed by the governor? That should change immediately. My village counts every dollar. Why doesn't the State?

### **Comment from Pamela Miller**

I'm a small business owner, part of the great northern tourism and visitor sector. Also a long-time resident who cares very much about our wild lands, national parks, refuges, wilderness areas along scenic rivers as well as subsistence resources. I'm very concerned about the Western Arctic Caribou Herd and migratory route and the fact that this is an east-west road. Mitigation is extremely difficult in that situation. I believe you need to look at the cumulative impacts to the Western Arctic Caribou Herd, wild salmon, white fish, and the integrity of the intact ecosystem in this area. I'm concerned. There are remote lodges that have been around for a very long time, and they are a unique resource that we have in northern Alaska to appreciate the wilderness. People come and spend a lot of money to see the northern lights. It is a growing sector of our economy. Cumulative impacts on our tourism economy should be done. Mostly, I'm very concerned about AIDEA, and the cost to the State for this road in maintenance that we will be holding the bag, and that you look at the long-term costs of constructing the road, maintaining the road, restoring the road. Also all the aspects of operating that road, troopers, aircraft. There are expenses all throughout the way by the government that should be looked at. We have seen with the Dalton Highway how the restricted access industrial road became unrestricted, and is open to public travel. This EIS needs to look at the cost if this becomes a public road and the impacts to subsistence and to other aspects of the environment. I note the risks from permafrost are very intense, and this is one of the most quickly warming regions in the state. The Dalton Highway in 2005 shut down because of major flooding of the river. The three-year reconstruction project alone was projected to cost \$114 million. When the funds were appropriated in 1966, they considered an appropriation of \$500,000. There is a lot of inflation since then. The Dalton Highway is one way you might get a realistic estimate of what might be involved.

### **Comment from Jim Magdanz**

I'm a graduate student at the university here in Fairbanks. But I've also been for 30 years a resident of Kotzebue, and my family has a remote camp on the Mauneluk River not far from the proposed route of this road. My testimony today is personal. I'm not speaking for any agency or the university. I'm retired from ADF&G. It's not a position statement from me. It is an informational statement. In my graduate work at UAF I've been exploring rural Alaska economies with economists at the university. In one of our analyses, we took data from 18,000 household surveys and 354 different survey projects in 179 rural communities. It's a big data set. It covers from 1983 to 2013. We scored two basic questions: 1) Changes. Are community populations, subsistence harvest, or personal incomes changing over time? 2) Can we explain differences that we see in harvests among communities or over time? You can Google, "Persistence of Subsistence in Alaska." I want to make two points. First, with time as the only factor, community populations and wild food harvests are not changing over that 30-year period. Personal incomes, inflation adjusted are declining slightly over that time. There are regional differences. In some areas incomes and harvests are going one way and in another area the other. In the balance, harvests are stable. That take-home message is that families in rural Alaska continue to depend heavily on wild foods, and over the last 30 years families have had less money to spend for expensive goods. So that sets up the second point I want to make about the effect of roads in rural Alaska. Roads were one of the significant factors when we did a multiple regression model with factors that affect harvest. We don't have any natural experiments of a community that was surveyed before and after a road, but we do have methods for studying those kind of situations. Here's what we found. Roads have significant and substantial negative effects on subsistence harvest. The estimates of their effect range from 31 to 39 percent depending on the method that we use. You can expect about a one-third decline in subsistence harvest if you're connected to a road in rural Alaska. In contrast, the estimate of roads effects on income were not significant in any of the four models. So it's true that development benefits governments and corporations with tax revenues but with families in individuals in communities, the effects were negative on subsistence and neutral on income.

### **Comment from Karl Gohlke**

By the development of the Alaska Haul Road to the North Slope and the transportation system to support the Red Dog Mine, this project is one of many other phases to develop Alaska's resources and carry Alaska into the future. Today, Alaska is known for its high unemployment, and we Alaskans have a hard time wondering what we're doing wrong especially when we're sitting on all these resources the world needs. In 1980, Congress recognized the mineral potential of and the specific need for access to the Ambler Mining District to assure the economic and social needs for the people of Alaska are met. Today, it is Alaska's opportunity to seize the moment Congress saw in 1980 and for us Alaskans to develop our future. The estimated economic benefits of building the Ambler Road based on the 2014 Cardno Study, road construction, and operation would supply 486 jobs to build and 68 full-time to maintain. Mine constructions over 5,900 direct jobs, over two years of mine construction with \$457 million in wages and 9,200 direct, indirect, and induced jobs with \$643 million in wages. Mining operations 1,500 direct jobs with \$164 million in wages and almost 3,200 direct,

indirect, and induced jobs with \$325 million annual wages. State revenue is around a half a billion dollars over the life of the mines. Today, the state is battling over cutting the deficit and reducing the budget. Developing the Ambler Road project may help relieve some of their future burden. Alaska has its share of bad reputation with high unemployment and high medical costs. The Pebble Project's reduced credit rating, low oil production, not filling oil credits, etc. Don't let this project be added to Alaska's bad reputation. Let it be the start of Alaska's good reputation and into the future.

#### **Comment from Steve Springer**

I am a part-time wilderness guide. One of my biggest concerns is the national wild and scenic rivers this proposed road crosses. It literally strips by definition "wild and scenic" from those names. (He asked for a show of hands for those for and against the project.)

#### **Comment and Question from Cathy Walling**

As I heard the number of villages expressing concerns—Evansville, Bettles, Allakaket, Huslia, Galena, Kobuk, Tanana Chiefs Council, Brooks Range Council—all having resolutions about position recorded in the Western Interior Subsistence Regional Advisory Council, the Northwest Arctic Subsistence Regional Advisory Council, Alatna, Koyukuk, Kaltag, Nulato. All publicly stating opposition, there went my concern. What all is happening as far as impact and listening to local communities concerned about the long term sustainability of the area and thinking of our common home and care of our planet, I came across item 146 from Pope Francis' "On Care for our Common Home." I couldn't say it better than this, "It is essential to show special care for indigenous communities and their cultural traditions. They are not merely one minority among others, but should be the principle dialog partners, especially when large projects affecting their land are proposed. For them, land is not a commodity, but rather a gift from God, and from their ancestors who rest there. A sacred space with which they need to interact if they are to retain their identity and values. When they remain on their land, they themselves care for it best. Nevertheless in various parts of the world, pressure is being put on them to abandon their homeland to make room for agriculture or mining projects which are undertaken without regard for the denigration of nature and culture." So my question is, are they principle dialog partners? And if not, who else needs to be called in from these and other villages so that they become principle dialog partners.

#### **Comment and Question from Odin Miller**

I strongly urge the BLM to adopt the no-action alternative to this project for several reasons. Past road building and infrastructure projects in northern Alaska have already had significant impacts on caribou migration routes. I don't believe the experience of road and infrastructure building throughout the circumpolar north shows it's compatible with long-distance caribou migration like those of the Western Arctic Herd (kushniruk), Central Arctic herd, and the Porcupine herd. More than 40 communities in northwest Alaska and the Arctic region depend on these herds. Evidence has suggested in some cases the impacts of climate change, which is already stressing the caribou due to things like icing events and shrubification will likely further aggravate these impacts of infrastructure on caribou. For instance, migrating caribou from the Western Arctic Herd are sometimes waiting to cross the Red Dog Mine Road until after the first snowfall, which is coming later

and later in recent years. I urge the BLM to consider the impacts of the Red Dog Mine Road on caribou migration, because it seems like a pretty good analog to this proposed road. The BLM must also carefully consider the climate change impacts resulting from this project. What will be the greenhouse gas emissions coming from these large scale mines? Alaska and rural Alaskan communities are already suffering severe consequences from climate change. And climate science clearly indicates the urgency of transitioning away from high emission extractive projects wherever possible. Finally, the gravel surface of the road on other roads in Alaska like the Dalton Highway have caused some serious pollution problems. Thawing permafrost, polluting natural resources like blueberries. And the last thing I'd like to say is there is a long history throughout the U.S. of mining companies shifting their assets around and then declaring bankruptcy leaving the public to bear the cleanup costs. Given the financial situation we're in, I don't think we can afford that right now.

### **Comment from Fred Bifelt**

I'm from Huslia. I want to invite this scoping process to Huslia and Hughes. It cost me \$400 roundtrip to come here to testify plus I'm staying in a hotel. I feel it's important to hear from everybody. I live on the Koyukuk River, and our people are really having a hard time with the decline in federal and state transfer funding. Our people are really suffering. We are very worried. Not all the people in Huslia are opposed to the Ambler Road or the Ambler Mining District. We feel it is something that can establish an economic base for our future generations so we want to be at the table. We want to be there, and we want to do this to our specifications so that we account for subsistence people, but we can also go toward Western civilization, and take advantage of economic development and have jobs for our people, and we won't have to wait for welfare. We need infrastructure in Huslia, Hughes, and Allakaket and all along the Koyukuk River. We need to fund our schools. We need to fix-up our schools. We have no way to do that whatsoever. We go to Juneau and beg, and we come back with nothing. I respect people. After they get out of this meeting, they're going to go home to wherever. They're going to have their cake and eat it too. There's a mine north of here, there's roads right there, there's everything there. They're burning coal right here in Fairbanks. They tell me we can't do things, and you're enjoying the benefits of it. Tell me about that. I'm tired of waiting. I want my people to be able have a job just like your folks. I want them to be able to have retirement. We don't have that. Our kids' future in the villages is in jeopardy. We don't know what we're going to do. We can't have our hand out all the time. We want to be like you folks and have a job, and we feel we can do it responsibly. We want to be at the table as an indigenous people on the Koyukuk River. I don't want to live two months in a village and then come live in Fairbanks or anything like that. I live out there, and I suffered out there, and I want you guys to know that. You're all more than welcome to move this show to Huslia, and bring it to Hughes. We want our people to see, and they'll tell you guys how they feel. We can't wait. We gotta do something. We need to be at the table, and we can do something together. Do it right for the State of Alaska and all the villages on the Koyukuk River.

### **Comment from Jenna Jonas**

I work as a guide at the northwest and central Arctic. I work for Arctic Wilds in the summer, and I own and operate a dog sledding business in the winter. So we get the privilege of taking people from all over the world up in the arctic. The wilderness is really what Alaska is known for. This region is already a source of countless riches and resources that are readily available. I don't know how many of you have eaten Kobuk River sheefish. It's really good. The magnificent Western Arctic Caribou Herd as well as the sense of solitude and unparalleled beauty. I've also spent a good amount of time up on the Haul Road on recreational trips. I was thinking about a time a couple of years ago right up near the top in April or May. That was the year that the Sag River was eating the Haul Road. We wanted to go to the park there for a couple of weeks and go dog sledding. We tried to find somebody to ask if we could park there and if they thought it was going to overflow. There was so much energy. There were generators all around. Everybody we talked to was a recent hire. That one instance alone must have cost the State millions of dollars. So I think we really need to think about the cost of maintenance, which would be an exorbitant expense especially in light of climate change and melting permafrost. It's not going to get easier. It's going to get more and more difficult to build and maintain roads in the Arctic. On the Haul Road, dust and chemicals from vehicles spread for miles on each side, and they are blown by the wind. So if you're winter camping within two miles of either side it's almost impossible to find water you can melt from snow. You can't really drink the water. It also causes early melting on the whole road corridor. It's a good example of how this road would cause habitat fragmentation. I'm really concerned about the effect of stream and river crossings, dust, chemicals, and acid mine drainage on juvenile fish. You should put rivers on the maps that you hand out. I think you should consider cumulative impacts. Climate change is already threatening the Arctic. It is warming twice as fast as the rest of the world. Oil and gas development in NPRA [National Petroleum Reserve–Alaska] is going to be allowed in unprecedented levels this year, and the road could really be a tipping point leading to diminishment of subsistence that is so important to all of us. The crash of wild fish runs and caribou population and just a really fundamental change to the character of this big, rich, wild place.

### **Comment from Sydney Deering**

I am a student at the university. I study mining engineering and petroleum engineering, a double major. I'm also the president of the UAF [University of Alaska Fairbanks] Society of Petroleum Engineers, and I am the youngest board member of the Alaska Miners Association. Today I speak for myself. I am a member of the youngest group of people trying to enter the workforce. In the last couple of years we've seen a huge change in the economic climate of Alaska. The people who are feeling it the most are people who were hoping to have a job, and now we have none. When considering the no-action alternative, please consider that there are a lot of youth population who are hoping to enter the industry. Having advanced development and different economic opportunities not only affects the groups that have been mentioned already. There are people trying to enter the industry and should have consideration. In your Environmental Impact Statement you will possibly pursue the option of a railroad. With that please consider not only the management and the resources needed to sustain any large scale mines in the region, but also the resources needed to develop the

mines. They require a huge amount of infrastructure at the mine site, the plant, the haul vehicles, also man-camps. So in looking at the rail transportation route, please take into consideration the size of the things that would have to be transported for the development of the mine in the first place. It's going to be difficult to fit some of the large haul trucks. Please take into account the size of the mining equipment needed for the mine itself.

#### **Comment and Question from David Wiswar**

From Fairbanks. I want to echo what has already been said about AIDEA being remiss in considering a new proposal to get access to this area from the west side. Six times I counted "not significantly restrict subsistence access." What does that mean "significantly?" Who makes that determination? AIDEA? Fish and Game? The Park Service? Or how about turning it over to the users out there? They would be more significantly impacted by this.

#### **Comment and Question from Martha Reynolds**

I mostly have questions. My question is about alternatives. Does the EIS only consider a road? Or does it consider alternative options?

#### **Response from Tim La Marr, BLM**

We're interested in input from you on potential alternatives for us to consider in the analysis, and the reasons why we should consider those. At this point in the scoping process we're receptive to suggestions and input on that.

#### **Comment and Question from Martha Reynolds**

So it's not just comments on the road itself. I would be very interested to see the alternatives and the reasons pro and con for western access and railroad, because those seem like reasonable alternatives that should be compared. I also wanted to support Cathy Walling's comment. In the various things that are listed and the things you would consider, spiritual doesn't show anywhere, but when you're considering a road in wilderness areas there is a spiritual component that's very deep that's not addressed in any of those economic and social impacts directly. My final question is about the economic analysis. It's very difficult for us as the public to understand the impacts of this proposal. I don't know who does this economic analysis. Do you guys do the economic analysis as part of the EIS?

#### **Response from Tim La Marr, BLM**

Yes. There will be an economic analysis associated with this as part of the EIS that will draw from some of the work that has previously been done, some prior studies, but it will also have to be done in the context of the information that we got through scoping, and how it will shape the alternatives. It will have to incorporate up-to-date content of the alternatives that we're actually analyzing in the EIS.

#### **Comment and Question from Martha Reynolds**

Okay, because I think the economic issues are very important in terms of what the State would be committing to, where the money is coming from for building, for maintenance, and that feeds directly into the comments about how stressed our communities are these days, and the lack of funding

coming from the State. Would this stress them even more? Would it make less income coming to rural or even Fairbanks? We're just not getting the funding from the State that we have in the past, and it's a real economic stressor.

**Comment from Tim La Marr, BLM**

Regarding ANILCA Section 810 Analysis, the BLM will be leading that process. There is guidance in ANILCA on what we need to do, and we have internal policy guidance for BLM that directs us how to do those analyses. We have staff who do those analyses who have experience with that. BLM will take the lead working with Cooperating Agencies. If we find there will be significant restrictions on subsistence uses, we will have the 810 hearings. They are distinct hearings in concert with public meetings associated with the release of the Draft EIS. There will be opportunities for the public to testify at the ANILCA Section 810 hearings, and provide input on impacts to subsistence uses.

**Comment from Barry Donnellan**

I've lived in Alaska since 1970. I've been a member of the Alaska Miners Association ever since, and I have been trying to raise money for development, mineral exploration. When I talk to financiers outside they all have a standard answer, "You people in Alaska don't have enough infrastructure to develop anything." Infrastructure starts with roads. I don't care if the road comes from the left or the right, the south or the north. We need more roads in Alaska. The Brooks Range is noted as a very highly mineralized area. We need a road to the, we need a road to the North Slope as a start of mineral exploration and development there.

**Comment from Harold Davis Sr.**

I'm from Allakaket. That's one of the reasons I oppose the road. It's going right through Allakaket. Maybe 40 miles above, up the Alatna River where my grandfather showed me to hunt 100 miles away, and we could come home safely. That's a legacy for me. He told me we don't need a welfare check, we don't need nothing that comes from the State to help us grow. My parents get to be 85 years old right now. They live off the land 99 percent of the time. The reason I say 99 percent of the time, my father did mining out at Hopp River Mining. The wages was maybe \$2.10 an hour. He started cutting brush and worked up to an oiler with a third grade scholarship. Now I have a twelfth grade education, and I live off the land all my life. If this road goes through above Allakaket, all my food sources will be gone. That's a legacy for us, for me. I show a lot of young hunters how to get there and back, because my grandfather showed me the route when I was a young man. We have got more Allakaket folks in the crowd here. They all wanted to write down their comments or express my concern about them not talking. So just a challenge to all the Allakaket folks out there living in Fairbanks to come out and comment to these folks right here. These are good folks they will listen to us. I opposed the road, and I just came from a meeting in Allakaket and met these young ladies here. I am the Second Chief of Allakaket so all Allakaket people come up after me. Thank you very much.

### **Comment and Question from Wilmer Beetus, First Chief of Hughes**

I have a question for BLM. Why isn't Hughes involved in this scoping process? I have to speak on behalf of Hughes. Hughes has always been for the road. We just had village council and city council. We are still for the road. We are for economic development. We have high unemployment rate. Our village is growing. We had a hard time for about 15 years just keeping our school open. Today we have 17 kids and 15 pre-kids so in about 5 years we'll have over 30 kids in our school, and just 100 people live there. Right now we're just getting state funding. I haven't asked but I'm sure a lot of people live on welfare there. I just don't want to see that. I want to see our people have jobs without moving out of the village. I think this Ambler Road would do that and probably even the mine.

### **Response by Tim La Marr, BLM**

I want to respond. There is still a possibility if folks in Hughes and Huslia want us to have public meetings there we can look into that, and try and add those to our schedule. We do have a fairly short time between now and the end of January, the end of our scoping period. But we can talk to you, and see if we can make that work. It's a possibility.

### **Comment from Herbie Moses**

I am from Allakaket. I was at the first meeting 30 years ago. We were all together that time. Everybody was opposed to the road. What concerns me is about the subsistence. On the history of subsistence, in 1970 they built the Dalton Highway. Before that Dalton Highway there was actually caribou migration through Allakaket. I worked a lot of construction statewide as a 302 operator, and I see roads built. Three years later it eroded. Global warming. I'm speaking on behalf of the feeling of the village of Allakaket. For example, Northwest Borough I'm sure they already got their jobs lined up. My friend here mentioned about economic opportunity. I doubt it will ever happen. You see Red Dog by us and we don't get employed. So I pretty much am very concerned, making it look like it's good opportunity for the state, which is hardly not going. Who is going to maintain the roads? I work a lot of maintenance for the roads and everything. Almost retired now. Fortunate. Speaking on behalf of the Allakaket people, I'm very concerned. Not for it, not oppose it. I'm very concerned about the permit process plan because the planning looks too soon. Like 2020, it looks like it the process of looking at the focus of developing it. It's way too soon to even view it like that so quickly.

### **Comment from Mark Neuroth**

I've been a mineral exploration geologist in the State for the last 10 years. I've worked up at Red Dog and actually driven the DeLong Highway, which is very similar in scope and design and also was funded by AIDEA. From a practicality standpoint, I think that the road itself would be more practical in the sense of infrastructure development, getting the infrastructure out there than a railroad. And from a sustainability standpoint as well. I think a road. Even though it may be slightly more economically challenging for the mine itself rather than the efficiency of a train. The trucks have the ability to actually stop for migrations for caribou, things like that. I've seen that on the DeLong Highway where there is radio communication, and if there is a single animal sighted then that is conveyed the whole way through the road system. They have, I think a 1,000-foot sighting stance where you cannot approach beyond 1,000 feet. You have to wait for the animal to pass on its own. And so that may be

hours, but that's the policy and that's how it's enforced. From an economic standpoint, I think it's absolutely critical to have not only the village council's involvement in the whole process, but also try to get as much local employment as possible into the potential development of the road. They're the ones who are being affected most, and so they should also be the ones who are benefiting most. Red Dog uses a NANA preference for hire, and I'm not sure exactly what the number was, but I believe it was 75 to 78 percent of all employees at Red Dog last year were NANA shareholders. So that's phenomenal. That greatly impacts the economic area of the northwest. I think this could as well. Sensing it might change slightly if they can see a direct positive impact for all their communities. It's been said time and time again that all that they're seeing is a potential negative impact to their sustainability but no direct economic impact for them. So if there is a local preference for hire then that might help everyone.

**Question from [unknown]**

How much of it is on BLM land? How many miles?

**Response from Tim La Marr, BLM**

It's about 24 miles on BLM land. The first 18 miles is coming off the Dalton. Then you go almost to the end where to get in and out of scattered parcels that are BLM cumulatively for about another six miles.

**Question from Steve Springer**

In your memory, how many times in a NEPA process has the no-action Alternative been selected? Rough percent maybe.

**Response from Tim La Marr, BLM**

In my personal experience, what I've seen happen is not necessarily a decision, get to the Record of Decision stage where the no-action Alternative is selected. But I have seen projects where, for whatever reason, the NEPA process is halted on the project, and it doesn't proceed. I have seen that.

**Comment from Randy Mayo**

Charter member of Stevens Village. Currently a tax-paying resident of Fairbanks right down the street. I have a great many concerns about this project and all other projects. Stevens Village is located about 20 miles east of the Trans-Alaska Pipeline. So our community, valuable lessons learned go back to when the Hickel Highway ran right through our community, pre-NEPA process. Over the years, we had come to learn the process here. And it took us quite a while to understand that half of the comments that don't plug in to what you're looking for get thrown out. But the one thing that I have concerns about is the inequity. I urge the agency to really look at some of its mandates. Namely, the tribal consultation, which affords tribes Cooperating Agency status to address some of the inequity that has created a lot of harm to the communities. The socioeconomic impacts, which include inequities in funding that go right to the effected communities to build capacity to mitigate a great many of the impacts. The current situation here is in the outlying areas where all the resources are located, but they flow right past our communities, and the lion's share of the revenue goes to the

populated areas and also the multinational corporations. Yes, it will create some economic spin-off but the inequity in a lot of money flowing out of the state to pay back investors in other countries and other big areas. You look at the Trans-Alaska oil pipeline. We're paying the highest fuel prices in the nation, and we've got a pipeline running right through our borough here. I'm also paying some borough taxes through my mortgage here. Even Fairbanks suffers socioeconomic impacts with little return coming back to provide for health, public safety, and education. Those are some of my concerns, and they need to be plugged in to your mandated law.

**Response from Tim La Marr, BLM**

To comment about the project only being funded through the scoping process. We may learn more later this winter or spring whether there is additional funding from the proponent of the project to engage further and continue on with the NEPA process. That is yet to be determined. BLM doesn't control the abilities of the proponent to pay for cost recovery for funding associated with an Environmental Impact Statement. So, if they choose to not proceed and not fund the project or not be able to fund the project, then the process won't continue. Right now the project is funded through scoping, development of the scoping report and some initial screening into alternatives but not full development of alternatives.

**4. Closing**

The meeting was adjourned.