



Ambler Road Environmental Impact Statement

Anchorage Public Scoping Meeting

MEETING NOTES

November 20, 2017

Anchorage Dena'ina Civic and Convention Center, K'enakatnu 6, Anchorage, Alaska

Project Team Participants

Bureau of Land Management (BLM): Laurie Thorpe, Tim La Marr, Tina McMaster-Goering

HDR: Mark Dalton, Katherine Wood

Alaska Department of Natural Resources (DNR): Marie Steele

Northwest Arctic Borough (NAB): Patrick Savok

National Park Service (NPS): Greg Dudgeon

Public Participants

Approximately 54 people attended the meeting.

Meeting Purpose

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

Meeting Topics

1. Welcome and Introductions, Katherine Wood (HDR)

The meeting will be opened up for a Question and Answer session, and a Public Comment Listening session after the presentation.

2. Presentation by Laurie Thorpe (BLM)

The purpose of this meeting is to present the project and get ideas, information, and input from you. It's really important for you to share any issues, concerns, information about the area, and the communities involved that we may not know about. We are here to gather input from you. We are going to talk about the background of the project and the proposed project (refers to posters setup around the conference room). We'll talk about the road elements, the process, the study area, agency roles, what is an EIS—probably most of you are familiar with that so we won't have to spend a lot of

time on that. We will talk about the BLM's draft purpose and need for the EIS, what is scoping – most of you here are probably pretty familiar with that. We will also talk about the process required under the National Historic Preservation Act (NHPA), Section 106, and what happens next after these public scoping meetings. Then we'll have a question and answer session and take your comments. All of this is being recorded just so you know your comments will be collected verbatim.

Background

In the 1950s, mineral exploration efforts were undertaken in what is referred to as the Ambler Mining District. Significant resources of copper and other base metals were identified on the south flanks of the Brooks Range.

In the 1980s, The Alaska National Interest Lands Conservation Act (ANILCA) was established. Congress and the law recognized the mineral potential in the Ambler Mining District and the need for transportation to it. They specifically wrote that ANILCA Section 204(b) provides for surface transportation access through Gates of the Arctic National Park and Preserve, but no such specific decision is made in ANILCA that directs the BLM on this project for access across BLM lands.

In 2009-2010, many of you may have been involved with some of the preliminary alternatives that were being look at by the Alaska Department of Transportation and Public Facilities (DOT&PF) on different modes and access routes to access the Ambler Mining District area. They looked at rail and different road access routes from various directions (north, south, and east). Several alternatives were examined that culminated into the proposal we have today.

In 2013, the project was transferred from the Alaska Department of Transportation & Public Facilities (DOT&PF) to Alaska Industrial Development and Export Authority (AIDEA). In 2015, AIDEA submitted an application Standard Form (SF)-299 to federal agencies for a right-of-way permit to cross federal lands as well as to the U.S. Coast Guard (USCG) and the U.S. Army Corps of Engineers (USACE) because they also have a role in this process. They requested the right-of-way to cross federal lands, permits to build bridges over navigable waterways, and other proposed construction that is related with the proposal to construct and operate a 211-mile long, all season industrial access road.

In 2016, after that application was submitted, the federal agencies requested additional information to consider the application complete. In June 2016, once the federal agencies received the additional information from AIDEA, we considered the application complete enough that we could the EIS process. BLM filed a Notice of Intent in the Federal Register on February 28, 2017, to produce an EIS. That kicked off the formal public involvement period. It runs through January 31, 2018. Normally it would be a 90-day public scoping period, but given the timing and the nature of the project and several rural communities BLM decided it would be better to not impose by asking residents in rural communities to participate in these public scoping meetings during their subsistence harvest seasons. That is why BLM extended the public scoping period through the end of January 2018.

At the same time, the NPS is also conducting a separate Environmental and Economic Assessment (EEA) for this proposal per ANILCA. That is why NPS is involved. BLM's EIS covers the entire project while National Park Service (NPS) EEA covers just the NPS lands.

Proposed Project – Who proposed the road?

AIDEA is the proponent requesting the right-of-way (ROW). They are proposing it because they are interested in developing the Ambler Road as part of their mission 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.

Proposed Road Elements

The proposed road would start at Milepost 161 of the Dalton Highway corridor, and runs westerly across the foothills of the Brooks Range to the south bank of the Ambler River.

The road would cross about 61 percent of lands managed by the State of Alaska (typically shown in blue on the maps), 24 percent of federally managed lands, which is a combination of the NPS lands and BLM lands (split about half and half between the two). About 15 percent of the 211 miles are lands associated with two Alaska Native Corporations, NANA and Doyon.

The proposal is for a 211-mile long road, all-season gravel two-lane road. It is proposed right now to not be open to the public. It would be for industrial access only. The industry is for the development of mine exploration and necessary infrastructure, including bridges, material sites, maintenance stations, airstrips, and other infrastructure facilities to support that level of road activity and the mine development.

The vehicles that are proposed that the road would be designed to accommodate are trucks hauling mineral exploration and development equipment as well as supplies, fuel, and then haul the ore concentrate out of the area. It would be designed to accommodate both large semitrailer trucks (refers to picture of trucks and a sectional cut-through of a typical road that is proposed to be constructed to accommodate two-way traffic with semitrailers).

Proposed Project Area

Here we are with a map showing the project area. You can see on the right side of the map at about Milepost 161 of the Dalton Highway, the road would cross a large chunk of BLM lands probably about 18 miles. It would cross into Native corporation land, across State lands, across NPS lands, back onto State lands, and then another mix of BLM and Native corporation lands. Quite a diversity of land ownership.

The NPS is looking at two additional alternative routes: a northern route and a longer southern route that minimizes the number of miles that the road would be on NPS-managed lands.

Agency Roles and Responsibilities

BLM is the federal lead agency for preparing the EIS. We've got Cooperating Agencies signed on so far and will be getting a few more. Right now we have USACE, USCG, Northwest Arctic Borough (NAB), and the State of Alaska.

We also expect to be developing Memorandums of Understanding (MOUs) with the communities of Alatna and Allakaket. They have requested to be Cooperating Agencies. Because they are a government we can accept them as Cooperating Agencies, so we'll have MOUs.

Participating Agencies that are involved at a little less detailed level include the NPS, the Environmental Protection Agency (EPA), and the U.S. Fish and Wildlife Services (USFWS).

BLM as the lead agency for preparing the EIS under National Environmental Policy Act (NEPA) has authority to grant a right-of-way across BLM lands. So that is what we are doing, responding to that application for right-of-way across BLM lands. That is why we are involved. BLM must also comply with ANILCA Section 810 and NHPA Section 106. We'll talk more about those two processes.

USACE is involved because they will rely on the EIS to make their decisions. They have to evaluate the application under Section 10 of the Rivers and Harbors Act as well as Section 404 of the Clean Water Act. They will use this EIS for their permit decisions. That is why they are a Cooperating Agency. They are giving us input and feedback on what they need included in this EIS.

USCG is involved because there are several bridges involved and they would be issuing the permits for the bridge construction across navigable waterways.

The Alaska DNR is a cooperator as well (they own 61 percent of lands that the proposed road would cross). They will be making their land management decisions for the right-of-way, using what they can of our EIS, for the permits they would issue.

The NAB is involved because they are providing traditional knowledge and input on subsistence and cultural resources and coordination with the Tribes, Tribal members, and affected communities in their area. They also will enforce local permitting requirements, and advise the BLM on the Borough's responsibilities under State law and NAB regulations.

What is an EIS?

NEPA requires federal agencies to assess the environmental consequences of their decisions. It informs and discloses, i.e., what are we proposing, what would it look like, what conditions would be put along with it, and what would it mean to the public. An EIS is a document required under NEPA for actions that significantly affect the quality of the human environment. It includes purpose and need and issues being raised. That is what we are doing right now - looking for issues from you. We look at alternatives to the proposal. Could it (need) be met on non-BLM lands? Is there a different route? Is

there a different way this need could be met? We describe what the potentially affected environment is, what's out there, what do we already know about the project area for the uses, the resources, and the values. Then we look at what would the environmental consequences would be of proposal as well as any of the alternatives. Lastly, we would propose mitigation to avoid, minimize, and reduce impacts.

The Notice of Intent kicks off public scoping, which is where we are right now. (Refers to a project flowchart that describes the EIS process.) We would use the issues and concerns brought up during scoping to develop a draft EIS. The draft EIS goes to the public for more comment and review. Then we would publish a final EIS and then a Record of Decision. It wouldn't just be BLM issuing decisions, it would be USCG and USACE.

Draft Purpose and Need

BLM has a draft purpose and need, and is looking for input from you on how we can make this better, to be as clear and concise and concise in our message to the public.

The project need is based on the requirement for the BLM to respond to the right-of-way application for surface transportation across the currently inaccessible, economically valuable mineral deposits in the Ambler Mining District.

The purpose of the BLM action is 1) to provide AIDEA with 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 the associated facilities with that access. Our decision to be made is whether or not to issue a right-of-way permit, and if so, what conditions and terms would be with that authorization.

One important point - a lot of people think that the BLM has to select one of the action alternatives to issue a permit to the applicant. We are not required to issue a permit, to select an action alternative. We can select a no action alternative, and not issue a permit. The no action alternative is a good baseline that we use to compare with the other alternatives in the EIS. It's very important for people to understand that because there was some misunderstandings where people thought BLM had to issue the permit. That is not so. It is at our discretion.

What is Scoping?

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

- Inform agencies and the public about AIDEA's application.
- 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 for comparison.
- Identify potential mitigation measures that may be needed to avoid, minimize, or mitigate for project impacts.
- Obtain any additional information about laws that might apply to the project.

When BLM issued the Notice of Intent in the Federal Register, we identified these 21 issues (referring to the Power Point presentation for issues list) that were contained in the Notice of Intent to produce an EIS. These issues were determined through the BLM's interdisciplinary group. If you have any additional issues and concerns or resources that we should consider, any different aspects to look at – these are the types of information we are looking for from you. I'm not going to go through all of those, you can see them up there and they are posted on our website.

ANILCA Section 810

ANILCA is a big part of BLM's public involvement process specific to subsistence. The EIS contains a section that addresses subsistence resources and uses. At the same time the EIS is looking at all the subsistence uses and resources, BLM is also performing an ANILCA Section 810 Analysis, which is a different aspect of looking at subsistence resources. Under ANILCA Section 810:

BLM must determine whether the project may significantly restrict subsistence uses. That analysis is included in the EIS. It is usually an appendix to the EIS, because there is subsistence analysis in the EIS, but it is a little different than the criteria used for the ANILCA Section 810 analysis.

If the alternatives may significantly restrict subsistence uses through either abundance, access, or availability, this will be identified in the analysis. The ANILCA Section 810 hearings will be held in concert with public meetings upon the release of the draft EIS. When the draft EIS is issued and we have a meeting discussing the draft EIS, (here is the proposed action, here's the alternatives, here's what we think the environmental consequences would be, etc.) when we end the meeting presentation we typically start the ANILCA Section 810 hearings. This is where people have the opportunity to provide testimony on how they think the proposal will affect (either positively or negatively) their resource or their issue of concern for their communities, their business, etc. It's directly related to subsistence.

National Historic Preservation Act Section 106

Section 106 process of the NHPA runs concurrently to the EIS.

It requires federal agencies to take into account the effects of their undertakings on historic properties and places of religious and cultural significance. Tribal entities and the State Historic Preservation Officer (SHPO), right now that's Judy Bittner (she is the SHPO for Alaska), and other interested parties are consulted to identify significant places and ways to reduce or mitigate potential effects.

We will be initiating the Section 106 process soon by sending letters to Tribal entities, communities, and others who may potentially be effected or have resources in their area.

Laurie referred to the Power Point presentation slide that outlines the Section 106 process. The slide also contains a website link where attendees can find *Protecting Historic Properties: A Citizen's Guide to Section 106 Citizen Guide Review*, which explains the process. It explains how the lead agency determines the undertaking or the proposed action/proposal for the ROW application.

The Section 106 process identifies:

- Historic properties and evaluates their significance.
- Affected historical properties and possible properties that may be affected.
- Adverse impacts are assessed.

The lead agency would work with the consulting parties to resolve any adverse effects. When the final EIS is released, a Memorandum of Agreement or a Programmatic Agreement is developed. These outline how cultural resources will be managed throughout the project and what mitigations and avoidance will be undertaken. The Section 106 process is separate, but concurrent to the EIS.

NPS EEA Process

Concurrent with the BLM EIS process. Laurie referred to the map in the back of the room and on the meeting handouts. It shows the two alternative routes (North and South) across NPS lands being considered.

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

NPS is seeking comments on their EEA. They are here (at the meeting) not as a cooperator but as a participating agency so they are hearing the same issues and concerns we are. Their comment period also closes on January 31, 2018. For those wishing to comment on the NPS EEA, Laurie referred to the PowerPoint presentation for the NPS website address, which is also included in some of the meeting handouts.

Question

Must permit access to who, whom? **Response from Laurie Thorpe, BLM:** To the applicant.

Question

Any public or private applicant has to be granted access across the Park Service lands?

Response from Laurie Thorpe, BLM

This is specific access to be granted from the Park Service to the applicant. This is Alaska Industrial Development and Export Authority that is requesting that. And I don't want.

Question

The only qualified applicant, I mean any public or private entity can, must have a permit approved to access the Park Service lands?

Response from Laurie Thorpe, BLM

I'm going to let the Park Service answer that question because they know their policies better than I do. So when we finish this presentation, which we are almost done. Hang onto that question, and we'll have the Park Service folks answer that. I hope that is okay.

Project Schedule

Laurie referred to the PowerPoint presentation slide. The EIS was initiated February 28, 2017, with the Notice of Intent. We are in the scoping phase right now, and that ends January 31, 2018. A Draft EIS is expected in March 2019, a final EIS in December 2019, and a Record of Decision in early 2020.

What's Next?

BLM is collecting scoping comments and feedback. There are a lot of questions, and we hope to answer those in the EIS. We might not have answers for you here tonight. That is the purpose of this meeting is to get you to ask those questions so they can be answered in the EIS. We want to listen to what you have to say.

BLM would potentially refine its purpose and need, determine issues and impacts to be studied, and determine alternatives to be studied as well as potentially identified mitigation measures that apply to the project.

When writing substantive comments:

- Remember, it's not a vote. It's not "I want to see the project, I think the road is a great idea, build it" or I don't like the project don't give the authorization to the applicant."
- Be specific. Explain why you don't like it or why you do like it.
- Provide new information we may not have or that you think needs to be covered in the analysis.
- Share the issues relevant to the environmental analysis.
- Suggest alternatives to the proposed project, and the reasons why they should be considered.

The public involvement process is very important to producing a sound EIS so that BLM can make a decision whether or not to issue a right-of-way permit. We need your input so that we do a thorough job and cover all the areas that need to be addressed.

Comments

There are several ways to provide comments:

- We have a recorder tonight to record your comments.
- 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
- Mail a completed comment form to 222 West 7th Avenue, Stop #13, Anchorage, Alaska 99513

Your input is important. We really want to hear from you tonight. We want to hear from you through written comments, the website, and email. You can submit in all the ways listed here, and not just tonight, but anyway possible through the end of January.

3. Comments

Below are verbal comments received after the presentation concluded.

Katherine Wood, HDR provided instructions for the question and answer session, which included keeping questions separate from comments.

Comment from Katherine Wood, BLM

The first question was for Greg who is our Park Service representative. I believe I understood the question to be for the Park Service, "Can anybody submit that permit?"

Question

No, the statement was on the slide. The statement was the Park Service must issue access, and that was unqualified. I imagine that you don't have to allow access to everywhere across your Park Service lands. Who is entitled to unlocking the land?

Response from Greg Dudgeon, NPS

I'll do my best to. If I answer the question, great. If not you can help me clarify your question, and I can sharpen my answer. I'm Greg Dudgeon the superintendent for the Gates of the Arctic National Park and Preserve. I think the short answer to your question is the applicant AIDEA has applied for a private, industrial access along the route here (referring to a map of the proposed road where it intersects with NPS lands), and when Congress established Gates of the Arctic, the language in the enabling legislation was very clear that if and when a responsible, complete application was received, Congress recognizing that access to the Ambler Mining District was necessary from the haul road that we, the National Park Service would allow for that. So in short, the National Park service couldn't say no for that portion within the Bright Light boundaries of the Preserve.

Question

Couldn't say no to whom?

Response from Greg Dudgeon, NPS

Couldn't say no to the applicant.

Question

So can anybody apply or does this have to be one of the Native corporations owning land? Does it have to be the State? Is it a, is a single hunter capable of, or a miner say "I want to go placer mining out there?" Can I build a haul road through your National Park Service?

Response from Greg Dudgeon, NPS

So the question is can anybody, you know some of those things are going to have to be sorted out, but I think the easiest, shortest answer for your question is the recipe for this was pretty well built into the legislation, and that was when the Park Service, the National Park service received a complete application there was then a...

Question

From whom? From whom?

Response from Katherine Wood, HDR

The legislation doesn't say, is this clear, the legislation does not say from whom. It says the Park Service will grant access for the Ambler, to access to the Ambler Mining District.

Response from Greg Dudgeon, NPS

Over the access...

Question

Private or public?

Response from Katherine Wood, HDR

It does not say.

Comment:

Okay.

Question from Katherine Wood, HDR

Is that correct?

Response from Greg Dudgeon, NPS

But there was. But if you read that section of ANILCA that established Gates of the Arctic specific to this process, there was then a 30-day window for anybody else who had similar interests to apply for similar access. And we did not, in spite of a public period where we made that clear, we did not receive any applications. So this is the one and only application we have for access through the Bright Light boundaries of the Preserve, which is roughly a 20, depending on which of the two routes you're looking at, 20 to 24 miles across the Preserve. And unlike, as we heard a few minutes ago, unlike the BLM, Congress didn't give the National Park Service the opportunity to say yes or no. The answer was yes with the caveat that National Park Service was responsible for deciding what route was least impactful in terms of negative consequences and provided the most benefits, and in addition to that, the terms and conditions for its use. So that's where we are and that's where we are hoping we are able to determine from the Environmental and Economic Analysis. It's ongoing in concert with the EIS.

Response from Katherine Wood, HDR

Thanks, Greg.

Question

Can I follow up on while I have the Park Service?

Response from Katherine Wood, HDR

You know what... let's... what I would like to do is to get questions from a whole bunch of folks so what I think we'll do is we'll do one question around for everybody, and if we can get through that and

we still want to do questions, as opposed to comments, we can do that too okay? The goal here is to hear from as many people as possible in the time that we have. Does that sound acceptable to everybody? Okay, I'm going to come over here. I saw two hands back here. We've got someone there, someone there, someone there, and over here. We've got lots of questions.

Question

So we have questions, and hopefully have an opportunity for statements as well?

Response from Katherine Wood, HDR

That's my plan.

Question

Okay, I have a quick question. I may have missed this but did anyone, is there anyone here from AIDEA?

Response from Katherine Wood, HDR

Yes.

Question

And who is that just so we know who it is to speak to?

Response from Katherine Wood, HDR

Let's see. We have Jeff San Juan is here from AIDEA today, and is here in a listening role.

Question

Thank you. I was just curious whether there will be a health impact assessment process going on in parallel with the EIS process?

Response from Laurie Thorpe, BLM

The answer is yes there will be. That is a great question to ask so that is addressed in the EIS.

Question

I have two quick questions. The first one I noticed on the maps it looks like the road goes through about 25 miles of BLM-managed land. How come BLM was chosen as the lead federal agency when the Army Corps of Engineers would be responsible for studies, wetland studies along that 211-mile proposed road?

Response from Laurie Thorpe, BLM

That is another great question. There's two answers to that that support the BLM being the lead federal agency. The decision was made before I took the project on; however, because the BLM manages the first 18 miles of it that is essential to the project so without a permit from the BLM they can't get past. They need that section to meet their, the need with their proposal if it crosses BLM lands. The Corps of Engineers could have been the lead federal agency with any proposal they have to access the impacts to wetlands or waters of the U.S. whether or not there is BLM land involved. It just happens to be there is BLM land involved with this, and the officials in the positions at the time

that the proposal was accepted complete made the decision that the BLM would be the lead federal agency.

Question

Okay. That kind of leads to my second question. Why was there so much time between when the agencies accepted the application by AIDEA as complete and compliant and then when the BLM filed the Notice of Intent? It's like eight, eight months.

Response from Laurie Thorpe, BLM

Great question. Why did it take so long? Well, there is a lot more that goes on behind the scenes than just saying oh yeah, we've got this. We have to setup cost recovery agreements, we do MOUs. Just understanding the application, which is a pretty thick document that we need to get very familiar with in order to be able to be engaged with this process. So we also wanted to make sure that we had enough time to involve all the potentially affected communities. I don't know if that answers your question? We can talk some more.

Question

Hi. My understanding is the state has agreed to fund this process through scoping, and so my question is what officially constitutes the end of scoping? And then will there be a process by the State to decide whether to move forward or not at that point?

Response from Laurie Thorpe, BLM

Great question. Yes, and that is something I did not mention in my presentation because we are moving along with the NEPA process and scoping assuming that there will be subsequent funding from AIDEA to complete the EIS. Right now it is currently funded through the scoping and preliminary alternatives analysis and data gap analysis. Once we have gone through that there may be information that hasn't been gathered yet as far a data on any routes that may be considered - if there are different routes that were not looked at early on by DOT and AIDEA. There may be significant data that would need to be collected, which might put the costs up higher than anticipated. AIDEA would have to find funding for that. It's an awkward situation at best, but that's as much funding as AIDEA has right now; through scoping. They'll consider whether or not they're going to choose to further fund the process after we complete scoping and comment analysis and the data gap analysis.

Question

So through scoping, preliminary alternatives, and data gap analysis?

Response from Laurie Thorpe, BLM

Yes, through data gap analysis. So is there information out there that we don't have now that we should have to be able to answer the questions.

Question

I have two quick questions if that's okay? I noticed on the Cooperating Agencies that the Northwest Arctic Borough will be speaking to Tribes. Are any of the tribes that would be impacted, have any of them officially become Cooperating Agencies in and of themselves?

Response from Laurie Thorpe, BLM

Great question. None of them have become Cooperating Agencies yet, but because of the scoping process here we have heard from Allakaket and Alatna that they would like to be Cooperating Agencies. So when we finish some of these scoping meetings we will be taking actions to take them on board as Cooperating Agencies. And if there are other communities that choose to be involved at that level, we will entertain that request as well.

Question

Thank you. My second question is does the application from AIDEA as it stands now, does it allow for uses in addition to industrial mining, such as if communities were to build spur roads to connect would community travel be allowed as well or would a new application be required?

Response from Laurie Thorpe, BLM

Great question. A lot of folks are wondering that. Right now the proposal is for industrial access only. That's what the proposal is. That's what we're responding to so there may be issues and concerns about that brought up that public access, other uses of the road. It's a great question. We hope to be able to provide enough information in the analysis of what any of the potential effects could be.

Question

I was just wondering if the road is intended to be permanent.

Response from Laurie Thorpe, BLM

Another great question. This is why scoping is great. You ask all the really excellent questions. The proposal right now is not for a permanent road. It is for the industrial access only to develop the Ambler Mining District. Once they have fully developed that and the potential mining operations have completed their operations, the proposal is to reclaim the road and put it back into a natural state.

Question

My question has to do with AIDEA, and I understand that they're the ones that are applying for access. But are their other primary investors, international or out of state, who are also involved in this project?

Response from Laurie Thorpe, BLM

That's a great, great question that I don't have the answer to, but somebody else here might. Someone from AIDEA, Jeff can you...

Response from Jeff San Juan, AIDEA

Well AIDEA is really here to listen to the concerns and comments. Right now that's what we're here for. We do have information on our website in regards to how we plan on funding. So that website is AmblerAccess.org. If you want to provide, if you want to see the information that AIDEA has for funding the process.

Question

But is that a yes or no?

Response from Jeff San Juan, AIDEA

At this time, no.

Question

My question regards need for the road. What proven, proven mineral resources have the mining claimants filed with the Securities and Exchange Commission?

Response from Laurie Thorpe, BLM

That's a great question. I don't have the answer to that, but that is another question that we would hope to answer in the EIS. I don't know if there is anybody here that can answer that question? To the best of my knowledge there's been exploration done, both the drilling exploration as well as surface exploration as people going out there and saying wow there's mineral deposits that could be developed. And the exploration has apparently revealed significant copper resources. The, financial situation there, we don't have that information.

Question

Hi. I have a question. Would the EIS consider connected actions? In other words, we're just talking about the road access from the Dalton to the Ambler Mining District, but you wouldn't have this road unless you have the mines so that would involve tailings, pilings. You know they're probably going to have to have a big power source to concentrate the ore for trucking and shipping. And then you have connected actions where the ore trucks traveling across the Ambler Road. That's not the end of it. The work trucks then have to go at least to Fairbanks and maybe all the way down to a port or maybe they offload into a railroad and there's that effect. But I think the, I was just wondering if the EIS going to consider connected actions and those impacts as well?

Response from Laurie Thorpe, BLM

That's another great question. Thank you for asking that. Yes, the EIS will to some extent analyze connected actions, but it is just for the road, the proposed road. The full analysis will be done. Connected actions are considered to some degree, but they're not, we're not doing an EIS for the mining development - that is not on the BLM lands, and Tim can talk a little more on that.

Response from Tim La Marr, BLM

So my name is Tim La Marr and I'm the field manager for the Central Yukon Field Office for the BLM out of Fairbanks. And the question about connected actions is one that we're continuously working through with our solicitor because we recognize that the project, you point out, the project wouldn't happen but for the mining, and so we recognize the need to include a description of a reasonably foreseeable development scenario associated with the mineral belt in part as a connected action with this EIS. You know we've also talked about what you're talking about with regards to additional traffic down the Dalton, and so we'll be in ongoing consultation with our solicitor to identify to what degree we need to go into those things. That's our strategy. Always have a good lawyer in your back pocket.

Response from Laurie Thorpe, BLM

Thanks, Tim.

Question

Thank you. I'm wondering if the idea of financing - is that going to be addressed in the EIS? You know, is the State going to be on the hook if the mining doesn't happen as expected, -- or the road if they're not using it for a year, and we don't get tolls. All of those kinds of questions, is that going to be part of the EIS?

Response from Laurie Thorpe, BLM

To some degree. We won't have all the answers because a lot of that is specific to the applicant and what their resources are, financial resources and what comes out of the mining development. There's a lot of questions being asked just like that, that we don't have the answers to. We will do the best we can to address it in the EIS.

Question

Okay, and then you mentioned a couple times this is a public-private partnership. Well since AIDEA is using public funds won't the road have to be at some point open to the public?

Response from Laurie Thorpe, BLM

That's another great question, and I'm going to ask AIDEA to respond to that because I can't really speak on their behalf. They can explain it better than I can. It's a great question.

Response from Jeff San Juan, AIDEA

I'm sorry could you clarify, the question was since it's a private-public partnership would it be open for public access? Is that the...

Comment/Clarification: That we are using State funds and at some point it has to be open to the public?

Response from Jeff San Juan, AIDEA

Okay so from AIDEA's perspective what we are applying for through this process is a non-public industrial limited access route. We're not requesting a public right-of-way, and so that is the purpose of our road. The financing piece is not going to be tax exempt bonding, so we're not planning on issuing taxes and bonds. Okay so if not public funds that we're using - it's going to be private investors.

Comment from Katherine Wood, HDR

Okay, thank you. We've got a couple more questions here, and then I want to, I want to keep us going so that we can get to comments because that's a good part too. So here, and here, and we have a gentleman in the back, then in the front row, and there, and then we are going to try to get to comments.

Question

Just to understand the Park Service's position/role a little better - you can't say "no," you can only say "yes," and what the best or worst options are as it relates to the park lands. So is part of your study to capture the potential impacts on use of the Gates of the Arctic for other activities such as camping, hiking, rafting, kayaking, and all of the associated things the public is expecting to use their national park for?

Response from Greg Dudgeon, NPS

That's correct. The Congress is very specific that this was a NEPA-free process, if you will, but that we would do an Environmental and Economic Analysis. And so we are looking at both the environmental and the economic benefits as well as impacts. I was asked a question, or actually I wasn't asked a question specifically in Fairbanks but I'm going to anticipate the question is you saw a map a little while ago with two potential routes across the park lands. And I just wanted to make sure that folks in the room understood that when we first received information from the State at that time, it was DOT that they were interested in pursuing an application for this right-of-way. We, the National Park Service, asked them as they were starting, to put viable lines across the map to give us at least one alternative that did three things: one was to avoid large water bodies because of the environmental and the historical, pre-historical and the subsistence significance of water bodies within the preserve. And also thinking about the large water body - Walker Lake just on the other side of the boundary between the preserve and national park there in Gates. Walker Lake is a congressionally-designated national landmark. And then the third thing was, in one of those lines, to utilize as little federal public land as possible for an industrial right-of-way. And so the Southern Route, if you will, combines those three elements. And so we received two, if you will, viable lines across the preserve from the perspective of DOT (later AIDEA), and that's where these two lines are, the origins from. And so what our EEA, the Environmental and Economic Analysis, is doing is we are looking at both of those routes and trying to get a sense of benefits versus impacts. That's probably more than you were asking, but I wanted to make sure that we had context for those lines.

Question

And the dark green, darker green is different from the lighter green, how?

Response from Greg Dudgeon, NPS

The question is why the darker green from the lighter green?

Comment

Yes.

Response from Greg Dudgeon, NPS

The darker green is national park and the lighter green, to the south, is national preserve. And so the dark line is not only the park boundary but a Congressionally-designated wilderness.

Question

So if you were traveling across the road are you prohibited from doing that because it's a private road?

Response from Greg Dudgeon, NPS

I'm sorry I didn't quite hear that.

Question

If I was walking north to south out of the park into the federal preserve am I prohibited from crossing the private road?

Response from Greg Dudgeon, NPS

Oh, would you be prohibited from crossing the private road?

Comment: It's not a public road.

Response from Greg Dudgeon, NPS

My understanding is you would be prohibited using the road since its industrial access only. But no, we would look at that as a, as federal public lands and though the right-of-way [agreement] would be again designated for industrial access we would ensure or want to make sure that people on foot would have the ability to traverse federal public lands.

Response from Katherine Wood, HDR

Thanks, Greg. So we have here and then in the back.

Question

Thank you. I just want to not be dense about this. So there is the preserve and there's the park and they're connected and there's a big piece of the proposed road that goes through one or both, you know even with the alternative. I'm trying to understand, BLM has to take the lead on the EIS process? Because legislatively, NPS is not um...

Response from Greg Dudgeon, NPS

This is NEPA-free project. EIS does not apply.

Question

Okay, and that's congressional, that comes...

Response from Greg Dudgeon, NPS

That's correct. That would be with the establishment of the park and preserve.

Question

That's interesting. And then the other thing I wanted to ask, is the MOU the Memorandum of Understanding between AIDEA and BLM available to the public somewhere?

Response from Greg Dudgeon, NPS

I'll let BLM answer that.

Response from Laurie Thorpe, BLM

Not yet. We haven't finished it yet.

Comment

Okay.

Response from Laurie Thorpe, BLM

We're working on it.

Question

Will it become available?

Response from Laurie Thorpe, BLM

Certainly, when it's done.

Question

Okay, and that will be available?

Response from Laurie Thorpe, BLM

It will on our project website.

Comment: Okay, terrific thank you.

Question

Not to put BLM on the spot, but if BLM makes a decision to grant the right-of-way across the public lands does the BLM have authority to restrict access?

Response from Tim La Marr, BLM

Technically, yes I have seen it done in other places. It is difficult. It's rarely done. I have seen it in other places. I haven't seen it in Alaska, but I have seen it in the Lower 48 at times but it's an uncommon practice.

Question

But you have a legal opinion that supports that?

Response from Tim La Marr, BLM

Yeah, that's one of the things we would continue to consult with our solicitor on.

Comment

Thanks.

Response from Katherine Wood, HDR

Okay, I think we've got two more questions up here. Oh, the questions abound.

Question

Thank you. I'd like to piggyback on Bud's question. You know, I may have missed it but have I seen anywhere a description of the mine per se - what it will entail? Will it be open pit? Will it be chemical refining? If so, will there be liquid waste? What will the disposal be? Can you advise me please?

Response from Tim La Marr, BLM

Yeah, I guess I would just clarify that the BLM is not specifically involved the mining—the potential mining activity. There's no exploration or development proposed to occur on any BLM-managed lands, so our role is to either grant the right-of-way for the access or not and if so, under what terms and conditions that would apply to the right-of-way.

Question

That makes it rather difficult for the public to comment, not knowing exactly what will ensue. Second question is also related to Bud's is that insurance, bonding, mitigation, restoration - what are the plans?, and will we be looking at a mine which will exist in perpetuity and as we know from Jared Dimond (his excellent book) those things never, never are fully mitigated - in fact become environmental catastrophes. Just a comment.

Response from Tim La Marr, BLM

That's a good comment. Thank you.

Question

But no, so answer my question. Will there be insurance, will there be bonding, will there be sufficient in perpetuity to cover any environmental disaster which might ensue?

Response from Tim La Marr, BLM

All I can tell is that when we, which we do we permit mining on BLM lands, we do ensure the bonding is in place and we do hold operators accountable for those - you know to make sure that things are reclaimed and that their bonds are covered. And again, I don't know what to tell you other than at this point none of the mining activity would occur on any BLM-managed lands. So the BLM would not be involved with the permitting of any mining that might occur. I think that would fall, I think a lot of there is some Native corporation lands potentially involved as well as state lands.

Response from Katherine Wood, HDR

And those I think would be good questions to go to the AIDEA website and take a look at that and see if there is information in there about more specifics on the mine.

Question

Just a quick question on the utility corridor that was included in AIDEA's application. You don't mention it here and I think along with that was high-speed optic cable and things like that - so there seems to be something missing from here.

Response from Tim La Marr, BLM

Yeah, that portion of the proposal was eliminated from the final application. It was pulled out.

Response from Katherine Wood, HDR

There is a brief mention of utilities on the one slide with the project description.

Comment

Okay, thank you.

Response from Katherine Wood, HDR

Yep.

Comment from Katherine Wood, HDR

Okay I would like to take about a five-minute break so we can break down some of the computer equipment stuff here, and then we're going to move into public comment period. The way that we're going to, well I'll explain that when we come back. If you want to use some of your time during the public comment period to ask more questions that's absolutely fine. When we get done with public comment we'll be here for a while tonight so we can hopefully get all of those answered. So let's take five, and we'll start again at 7:26. Thank you.

>> Break <<

Comment from Katherine Wood, HDR

Folks, if you can find a seat we'll move onto the public comment portion.

Comment from Katherine Wood, HDR

Okay, so a couple guiding principles for us as we get started with public comments. We do have the agency folks up here at the front table to listen to you. We have about 13 people signed up, and when I call your name I'll say who's up and then who's next so that you can be ready. If you can come on up and take a seat, the microphone here is for you to provide your comments. Let me check and make sure it is on here.

So as Laurie mentioned we are recording. If you can please state and spell your name that would be great so we can get it entered in correctly. A couple guidelines for you. Our goal here is to hear from as many people as possible, and to do it in a setting that allows for a wide variety of opinions. We know a lot of people feel really strongly about this project on both sides of the question. So we ask you to be courteous and to share the air with your fellow attendees here tonight and to be tough on ideas but soft on people. So those are my guidelines for you. I think that shouldn't be a problem at all.

We are going to do a three-minute time limit to get started so I have my iPhone all set with three minutes, and I've got a couple color cards here. When you have one minute left, I'll show you the green one and it goes to yellow for 30 and then when you hit the red that means stop. If we get through everybody and folks want to stay longer and go around a second time that's absolutely fine, but if we can get through the list first on a three-minute timeframe that's great.

Another thing to consider too is all comments that we receive regardless of whether they are verbal or in writing or in email they all receive the same weight. So if you run out of time and you want to submit the rest of your comments in writing, that's great. If you're not comfortable speaking in front of people and you want to submit them in writing that's also perfectly acceptable, and it holds the same weight. So with that, I think we'll get started. I think we have first on the list is Steve Borrell, and then following Steve we have Rick Steiner.

Comment from Steve Borrell

My name is Steve Borell, 6420 Rockridge Drive, Anchorage, Alaska. Thank you for the opportunity to comment on the scoping. It is very encouraging to see this road moving forward. Transportation to the Ambler Mining District has been studied and evaluated by numerous companies and the State for more than 50 years. The need for this road has been well understood, and if mineral deposits in this district were on the road system they would be in operation today providing jobs and economic opportunities for Alaskans. This road has been approved by the U.S. Congress. A road from the Ambler district to the Dalton Highway was approved on December 2, 1980, as a part of ANILCA; therefore, the only issue to be considered in this EIS, of course the environmental factors, but is the alignment of the road. It is not common for a purpose and focus of an EIS to be so clear. I commend the authors of ANILCA for making this issue so abundantly clear for the current EIS; however, ANILCA specified that the EIS shall be completed under Title 2 not Title 11. The agencies must therefore follow that requirement. There is no justification whatsoever for the agencies to deviate from this requirement specified in the law. Title 11 has no relevance for this road. When ANILCA became law, 104 million acres of Alaska were closed to all development. That is an area the size of the entire State of California. When one combines this area with the other closed areas to mineral development, the total is 165 million acres. To put that in perspective, Alaska now has closed off and off limits, the area in Alaska is closing off limits, is equal to the combined total acreage of States of New York, New Jersey, Pennsylvania, West Virginia, Ohio, Indiana, and Illinois. That's 165 million acres. Although the promises and a nickel to the min... ANILCA to the mineral industry were very few they must be followed, including the use of Title 2 in this EIS. Thank you.

Response from Katherine Wood, HDR

Thank you. Following Steve we have Rick Steiner, and then following Rick we're going to move Lois Epstein up so she can catch her airplane tonight.

Question from Rick Steiner

Do I need to speak into this?

Response by Katherine Wood, HDR

If you could that would be great. Everybody can hear you that way.

Comment from Rick Steiner

Rick Steiner, resident of Anchorage. I'm a conservation biologist. I was a professor with the University of Alaska for 30 years, first stationed in Kotzebue, where I spent a lot of time in the villages doing science education. I was a wilderness user in the area and a subsistence user in the upper Kobuk in

the early 1980s. First, I'd like to just underscore that I think this project should not be built. It's a spectacularly bad idea. I will diverge from my previous colleague here who had the other perspective. This would represent a gash in the heart of the central Brooks Range, which is one of the most pristine parts of the planet left. There is absolutely no excuse for even considering this, and I would suggest that Secretary Zinke should be suggested to simply drop the EIS process if that were legally permissible. If you go ahead with an EIS, a few things that I think are important to be in there. First of all, a comprehensive economic assessment, and that would compare the two very different futures you are looking at for this region. One, mining 2 to 3 maybe 4 million tons of mineral product out of the region. Not a very big prospect compared to Red Dog or other prospects throughout the world, and there you need to analyze alternative sources for these minerals, and the actual need and look at close loop metal sourcing and the economy and efficiencies and such. Secondly, the comparison of the wilderness, the existing developed wilderness value of this region. And for that you'll need to do a methodical contingent valuation assessment looking at willingness to pay, willingness to accept, looking at the existing wilderness value. This is your no-action alternative over a hundred years. The mineral resource 30 or 40 years maybe. The wilderness value sustainable for centuries. If you do a legitimate no-action alternative evaluation of the existing economic value of the wilderness in this region, which is going to increase, there will be no comparison. The benefit and cost will be leave it as it is, choose the no-action alternative. Finally, a couple other quick things that I will do these in written comments as well. The EIS must evaluate if the road were opened to public access, which of course it would be. That's what happened to the Dalton Highway. We all know this. It was built as an industrial road and then opened. And what this would mean to subsistence use in this region would be extremely important. Cumulative impacts, including additional mines, Point Lay coal, ANWR, National Petroleum Reserve, Red Dog, ice roads. Ice roads turn to permanent roads. And climate change. Again, I would simply respectfully suggest that this is a spectacularly bad idea so thank you.

Response from Katherine Wood, HDR

Thank you. Lois Epstein is next followed by Suzanne Bostrom.

Comment from Lois Epstein

Thank you. Thank you for holding this scoping meeting in Anchorage, and also thank you for moving up the time for my statement. My name is Lois Epstein, and I am an Alaska-licensed engineer and Arctic Program Director for the Wilderness Society. As background, I have developed reports, testimony, and comments previously that are opposed to, for financial and other reasons the now cancelled Juneau and Gravina Access projects, the Knik Arm Bridge project, the Road to Nome, and the Road to Umiat. I have a strong understanding of road costs and financing issues, including the tens of millions of dollars the State has, in many respects, wasted on each of these projects before they were cancelled. While others will be commenting on the environmental, subsistence way of life, and legal concerns with the proposed Ambler Road, I will focus tonight only on road costs and financing and will provide additional written comments on other issues. Road costs and financing are critical and should be part of the draft EIS, as has been the case for other projects, which include cost in their purpose and need statements. In this case, The Wilderness Society recommends that the

purpose and need specify that the road will proceed only with a clear commitment by mine operators to repay the State all the construction, operations, maintenance, and financing costs of the project, and it also sounds like from what we've heard tonight, that reclamation costs will need to be included as well. To begin, this is a very expensive project easily over one billion dollars when all costs are included, and I'll elaborate on that. It is similar to the cancelled Road to Nome project in terms of remoteness and probably costs per mile. In 2011, DOWL HKM issued a report for Alaska DOT on the Nome road that looked at ways to minimize road construction costs, excluding the portion where a primitive road already exists to the costs, for the Nome road - including a 20 percent contingency would be \$1.66 million per mile - plus the cost of major bridges, that the report says add an additional \$221 million. That's the comparison. For no apparent reason, AIDEA, in its 2015 Economic Impact Report by CARDNO, included estimates that are significantly lower than the already low Nome road costs per mile. AIDEA shows an 18 percent lower cost of 136 million per mile using the same contingency for total costs. I'm going to skip down because I only have a minute. Using the price per mile for the Nome road in 2011, and adding one-third for water crossings, as was done in the report for Alaska DOT. My calculation shows the total for construction of the Ambler Road would be \$467.1 million or 35 percent higher than estimated by AIDEA/CARDNO in 2015. Why is AIDEA lowballing the cost? These cost differences need to be explained, and that's especially important since all the estimates were done by DOWL, so the numbers should be relatively consistent and realistic not lowballed—and the Nome road construction costs were minimized, yet they still are substantially higher than the cost numbers AIDEA was using. I unfortunately won't go into the financial implications for the State, but I will urge the State to get a letter of credit, as was the case for the Red Dog Mine road, before taking on the risk of paying for this expensive road's cost at a time when the State cannot balance its annual budget. Thank you.

Response from Katherine Wood, HDR

Thank you. Okay, we have Suzanne Bostrom followed by Bonnie Broman.

Comment from Suzanne Bostrom

Good Evening. My name is Suzanne Bostrom, and I am a staff attorney with Trustees for Alaska, a nonprofit environmental law firm based in Anchorage. This road will cause significant harm to fish, wildlife, water, and other resources across the Brooks Range, and will have significant impacts that extend well beyond the footprint of the road. BLM needs to fully consider all these impacts and more in the EIS. This is a massive infrastructure project, yet the State has provided only vague information about the design of this project. It's unclear how this project will be morphed over time into a two-lane routed road capable of supporting access to the entire mining district. The State's half-baked application does not provide sufficient information about the design and the plans for this project. Far more information is needed about the project design and its various phases before BLM can move forward with analyzing, let alone permitting this project. The purpose of this road is access to a mining district. BLM needs to fully assess the infrastructure and activities related to both the mines and the road. This includes impacts from processing facilities, tailings disposal facilities, gas lines or other energy sources, ore transport and export facilities, including the potential impacts from fugitive

dust, airstrips and more. BLM needs to fully consider the impacts of both the mines currently being considered in the region, as well as any future mines that could be enabled by this project. To build a road of this length will require an enormous amount of gravel. BLM must fully consider the impacts from gravel mines for road construction and provide more information on where this amount of gravel could feasibly be mined. The State claims this road will be private, but has provided no indication how the road will be kept private, especially over the long term. BLM needs to assume this road will ultimately be open to the public when considering the potential impacts, including impacts to subsistence. The State's application provides a biased and one-sided perspective about the potential economic benefits of the project, and fails to acknowledge the potential negative impacts. The State also fails to acknowledge the widespread opposition to this project by communities and other entities in the region. BLM needs to conduct a comprehensive study in each of the impacted communities to be able to fully assess the subsistence, socio-economic, cultural, recreational, and other negative impacts of this project. This road will also cross 2,900 streams, 11 major rivers, and 1,700 acres of wetlands. A project of this scale will have serious negative impacts to water and fish. The construction, maintenance, and use of this road will cause serious negative impacts to vegetation, permafrost conditions, and waterways in an area already under stress from climate change. BLM and the other agencies should not move forward with review of this project without obtaining significantly more information about the project and the potential environmental and social impacts to the region. It's premature and irresponsible for the State to be moving forward with permitting this project without fully understanding what it will look like, and how it will negatively impact the region. Thank you for the opportunity to comment.

Response from Katherine Wood, HDR

Thank you. Bonnie Broman followed by Joan Frankevich.

Comment from Bonnie Broman

Hello, my name is Bonnie Broman, and I live in Fairbanks. Unfortunately, I was not able to make it to the Fairbanks scoping meetings. I wanted to make sure I made it down here for this one. I think these meetings are really important for everyone to have the opportunity to voice their opinion; share their views from their own perspectives. I've always wanted to become a geologist. It's been a lifelong dream. So when I was a little child I decided that is what I would do. I found a lot of interest in economic geology. Economic geology is one of the only fields as a professional geologist that allows geologists to be geologists and to study and to understand and to explore Earth's processes. I was living in Oregon; recently laid off as an environmental geologist during the housing and development crash of 2007; so I thought it might be a good time to go and get a master's degree. So, I started doing extensive research on the best universities for economic geology, and UAF was always at the top of the list. I made the move to Alaska 10 years ago, and successfully completed my master's thesis in geology and geochemistry of ore deposits. There are about 10 of us total through that, in that program through the duration of my studies, and it's sad to say that I'm one of the remaining grad students amongst my peers left in Alaska with a job in the mineral exploration industry. Most of my peers had to move to the lower 48 for jobs, or have become baristas, or real estate agents, or

teachers because there aren't enough jobs here - mining jobs, mineral exploration jobs in Alaska to keep them employed throughout the year. There have been some amazingly smart and talented geos who have had to leave or give up their careers because the mining industry cannot provide the jobs; the need here in Alaska. I support the road project, because I know this will open a district that will provide jobs for lots of professions for people from all over the State, including local communities. My peers keep reaching out to me asking about the progress and the road because they know the opportunities and benefits that this district will bring to State and local communities. And I'm proud to say that I know many of the local people in the communities and they're very supportive of this project because they know the benefits that will be brought to the region from their experience with Red Dog being developed 30 years ago, and that's becoming more and more important to them to see their children having the opportunity to achieve higher levels education and job opportunities. Most of the mineral deposits in the Ambler Mining District were discovered in the 1960s and 70s, and it's about time the State and region benefitted from their land selections. Thank you.

Response from Katherine Wood, HDR

Thank you. Joan Frankevich followed by Elizabeth Cravallo.

Comment from Joan Frankevich

Hi. My name is Joan Frankevich, and I work with the National Parks Conservation Association. It's easy for us to think of roads as harmless because they are so common, but roads create a lot of changes. So I thank you for conducting this scoping meeting to get the input from the public and I look forward to a careful and informative review of the changes that this road will bring. Here's some of the items I suggest you include in your review regarding caribou, climate change, invasive species, and contaminants. Caribou. What are the impacts to caribou, and how can they be minimized? And I think it would be instructive to look at other roads in Alaska as you evaluate this. I sometimes hear it said that the Dalton Highway did not impact caribou, and yet the residents of Anaktuvuk and other residents of that area say there was a big change. I don't know if the changes are known, but if you could evaluate that and put that information in this report I would find it very useful. Similarly, the Alaska Department of Fish and Game did a study of caribou crossing the Red Dog road, and found that migration was effected, I think the average was 32 days it slowed migration. So that would be instructive to have that information in this report. I'm also curious about wildlife overpasses to assist caribou and other wildlife crossing the road as has been successfully used in other places. Climate change. Climate change is... Alaska is warming twice as fast as the lower 48 and even more so in the Arctic, and so something to look at is how well permafrost, melting permafrost, extreme weather events, and other effects of climate change affect the road, and how could it be built to best avoid future problems. Again, I think it's helpful to look at other roads in Alaska and what's happening there. For instance, in the Dalton Highway there's recently been two episodes of ice and flooding and that were very dramatic and cost a lot of money to repair, and closed down the road for nearly a month. Was this related to climate change, and is it likely to happen again? Similarly, the Denali Park Road has experienced a tremendous landslide from melting permafrost and a huge mudslide from an extreme weather event. So that information would be helpful. Invasive species. What efforts are going

to be made to reduce, to prevent the spread of invasive species? They can really change the habitat, waterway, and ecosystems - and roads are a big vector of invasive species. And will there be any monitoring to prevent and take care of anything that does spread? And then finally, contamination. Much of the gravel in the area contains asbestos - a carcinogen. Is there enough gravel without this that can be safely used? If not, how will that asbestos effect the environment? And also you can look at the fugitive dust and the heavy toxic metals like contaminated area around the Red Dog Mine? Thank you very much.

Response from Katherine Wood, HDR

Thank you. Elizabeth Cravalho followed by Jill Yordy.

Comment from Elizabeth Cravalho

[Speaking in Iñupiaq? and then translating into English]. My name is Liz Cravalho. [Speaking in Iñupiaq? and then translating into English] I am from Kotzebue, Alaska. That is where I reside today, and I work for NANA Regional Corporation as the vice president of external and government affairs. I want to thank you for the opportunity today to provide a brief comment on behalf of NANA. I think as many of you know NANA is a for-profit corporation with a social responsibility to our 14,300 Alaska Native shareholders. We are fortunate to be the owner of the resource at the Red Dog Mine, and our region encompasses an area the size of Indiana. One of the things that I think I wanted to do today was take a quick moment to reiterate NANA's position on the road. NANA had the opportunity to consult with our 11 communities a few years ago when DOT was going through the villages. I was fortunate enough to participate in many of those conversations, and NANA's position on the road is neutral. We don't support or oppose the road. What we do support is the opportunity for our communities to consider the options directly. I think it's really important, and I know that BLM is traveling to our villages. That you are there, and you hear their concerns and their interests. Subsistence is the highest and best use of NANA lands. It's a priority for how we manage our lands and how we engage with our people. We also have to consider potential economic opportunities that will improve the quality of life for our shareholders, and we heard that pretty loud and clear in our villages. And I just wanted to thank you for your time today, and as the EIS process moves forward we'll look forward to being engaged with you but also be engaged with our communities and also to hear directly from our communities what their views are on the road. Thank you.

Response from Katherine Wood, HDR

Thank you. Jill Yordy followed by Marleanna Hall.

Comment from Jill Yordy

I'm Jill Yordy commenting on behalf of myself today. I'd like to echo what several other people have already mentioned in that this EIS needs to consider all reasonably foreseeable connected actions. And since this road is meant to be a mining access road that needs to include any potential mining development - whether that's the large open-pit copper mines that we already know are being considered, or whether that's smaller scale placer mining in the Ambler region or other areas of state land. On consideration of the large-scale mining, I would ask that you look at potential impacts to

wildlife, wetlands, waterways, cultural resources, and particularly subsistence activities. I also ask that you consider the reclamation of both the road and the mines, since that would all fall under connected actions, and we often know that mines are not.., they often have problems with reclamation and a lack of funding to get all the way through that process - especially with water quality. I would also ask that you consider any impacts the Dalton Highway, all the way to any ports that are used for ore export or impacts to the railroad if it does connect to the railroad. Under other issues I would ask that you evaluate not only job creation but also the economic impact of loss of subsistence activities or changing subsistence activities because what we're talking about here is a cash economy versus a subsistence economy and those are very different things but both valuable. I would ask that you, in considering this, look to comparable existing mines to evaluate whether local hire has been followed or nonlocal hire - for both mines maybe here in Alaska, but also ones being developed in Canada - to look at whether or not locals are hired in common or in similar projects. I would also ask you look to any comparable roads. We don't have any in Alaska that are this far north, that are this long east-west oriented, so maybe look to Canada and other areas of the far north, where they have east-west roads, to look to the wildlife impacts. I haven't heard asbestos mentioned yet, but in the consideration of gravel, we do know that there is asbestos in the gravel in the region, and look specifically to laws relating to responsibility for asbestos-related disease. I would also ask that you take a close look at public access, and the likelihood of that, due to the use of public funds in the planning process and EIS process of this road - even if the construction funds come from other sources - there still have been public funds already put towards this project and that needs to be considered in looking at the likelihood of whether or not there would eventually be public access along this road.

Response from Katherine Wood, HDR

Thank you. Marleanna Hall followed by Roy Corral.

Comment from Marleanna Hall

Good evening, my name is Marleanna Hall. I'm the executive director for the Resource Development Council for Alaska. RDC is a statewide trade association with members in tourism, oil and gas, forestry, fishing, and mining, as well as the 12 regional Native corporations, labor, individuals, and others supporting the responsible development of Alaska's natural resources. RDC supports permitting process for projects in and around Alaska, and today wishes to express support for the Ambler Mining District industrial access project to go through the environmental and economic impact analysis. This process gives Alaskan's time to review the project's documents and to provide input on the plans. While this road has not been formally proposed and no mine plan has been submitted for permitting, RDC urges stakeholders to allow this and any potential project to go through the process. In addition, we urge the BLM to apply the proper Section (Title 2) of ANILCA the Alaska National Interest Lands Conservation Act to this project; and allow it to go through the permitting process. In addition, the EEA through ANILCA will determine the best route as well as the best terms for the permit. My understanding too is that this road will be similar and modeled after the DeLong Mountain Transportation System, a successful example of a private-public partnership. Lastly, I would

be remiss to not point out the potential benefits that could come from this project: jobs, including training and lifelong skills economic diversification and other opportunities in the region and across the state. We look forward to participating in the public process for this potential project and look forward to a timely, thorough analysis and EIS. I will submit formal comments before the January 31st deadline, and I thank you for the opportunity to comment today.

Response from Katherine Wood, HDR

Thank you. Roy Corral followed by Peter Myos.

Comment from Roy Corral

Thank you for the opportunity to talk to you. My name is Roy Corral, and I wasn't prepared to do this because I just found out about the meeting about an hour before it started so I would like to follow this up with a written statement to send to you. However, I would like to say that I am not in favor of this road. I homesteaded a 40-acre parcel right smack in the middle of this, the Ambler Mining District. I proved up on it. It took me 13 years to do that. And what I'm here to say is this is the last best place on Earth. The last best place, and I would echo everybody here who, I'm not going to redundant and talk about everything that everybody has already talked about, but I'm here to say, I think what's important is to look at what history has done in the state. That history seems to be repeating itself again and we have so many roads that have been short-sighted in their building. The Nabesna Road that is built for mining. The McCarthy Road. Take a look at those roads. What about the "road to nowhere" out of Cordova? Those are, those roads dilapidated, and now we're looking at another road, which is going to be temporary - with no plans for any kind of reclamation that I've heard about and maybe there is. I just don't know. I'm not going to assume that. However, I think when we look at history, I think what I keep seeing is that there is always a cost to the public. The cost is going to be a fiscal cost, and I'm afraid that this project is going to have a multinational corporation, that is based elsewhere, and I cannot imagine that won't happen. I'll eat this hat if it's otherwise. So I also think there's a cultural cost here, because as you just heard NANA, just a little while ago, said that subsistence is the first priority. This road is going to have an impact on that. Every road in this state has had an impact, and so I'm here to speak for future generations of our children for this very last and best place. Jobs, versus cultural, versus spiritual connections. I don't think there is a value you can put on this. I really don't. So with that I hope that you will consider or not consider the building of this road. I thank you.

Response from Katherine Wood, HDR

Thank you. Peter Myos followed by Rick Van Nieuwenhuyse.

Comment from Peter Myos

Good evening. Thank you for the opportunity. I'm Peter Myos. I've been a physician in Alaska for over four decades, about three decades of that with the Indian Health Service. As a result, I've visited many Native villages in the northwest, in the north, and I consider the Native peoples my very valued friends. I've also been blessed to have several excellent trips in Gates and hope to continue that. Despite the ANILCA provision for NPS, BLM and NPS lands are the legacy and the inheritance of every American.

This mine will not, cannot, benefit the American public - the people who increasingly see wilderness as priceless. I previously asked a question about insuring and bonding in perpetuity. This went unanswered. There are no guarantees. Jared Diamond has demonstrated that virtually every mine in history has failed, and the public has been stuck with the bill and environmental catastrophes. In order to guarantee that this mine would be maintained, the road would have to be maintained forever. As I asked previously, also I have seen no description of the mine, and it's very difficult for me, and I presume for others, to comment really without knowing what the end game is - whether it's an open-pit, chemical mining, liquid waste disposable - what are we speaking about? They mentioned in the scoping - no historic properties. Well I would disagree. Consider natural, historic values, features, and wildlife. Culture is historic property. The Western caribou herd is declining. We know that roads do in fact impact migration and calving. Finally, I would say it is unconscionable to commit any state revenues, which are declining. We're in a severe recession with no evidence that it is abating. We cannot commit these valued resources to this very, very, very uncertain project. I would strongly recommend that the State bow out of this project. Thank you.

Response from Katherine Wood, HDR

Thank you Rick.

Comment from Rick Van Nieuwenhuysse

Good evening. Thanks again for the opportunity to comment. A lot of people have spoke here so I won't repeat a lot of things that have been commented on. My name is Rick Van Nieuwenhuysse. I'm the president of Trilogy Metals. We are one of the companies that hopes to use this road if it were to be built. I grew up in Alaska. I went to West High. I graduated from West High in 1972. We were the ones who put the eagle on the building. I worked in the Ambler Mining District back in the 1970s for about three to four years, and that was during the time of ANILCA when all this land claim stuff was going on - who was going to end up owning what. ANILCA settled the question as to what was legally wilderness and what was not. This discussion about building a road here is not about building a road across the wilderness. None of it is wilderness legally. I want to make a comment on climate change because I've heard that a lot. There is a lot of concern about climate change. I'm concerned as well. One of the things that I think people who are concerned about... generally about climate change and that argument, need to understand - that in order to address climate change, we need alternate forms of energy. We need to get off the internal combustion engine and onto electric vehicles and both of those things are probably the only things that we have access to now in our bag of tricks to address climate change. Both of those things require huge amounts of copper. Now you can choose to get your copper from the Congo, where they still use child labor, or you can choose to get it in a state that has probably the best permitting track record in the United States. I can't think of one mine that has created any significant negative impacts to either wildlife, fish. In fact, I think there is ample evidence that both Fort Knox and the Red Dog Mine have actually improved fish habitat. I would just like to address, have that addressed in the climate change portion of your analysis. Finally, Alaska does need to diversify its economy. If we're going to transition on a worldwide basis away from a carbon economy, which I believe is happening and I believe is a good thing to happen, then Alaska needs to

start now to diversify its economy away from oil because right now it's the only thing that really drives this state. Thank you.

Response from Katherine Wood, HDR

Thank you. Okay, well we're at the end of the list. If we still have time, is there anybody else who would like to come up and make a public comment?

Comment from Cal Craig

Sure.

Response from Katherine Wood, HDR

Okay, come on up. Thank you.

Comment Cal Craig

Good Evening and thank you guys for being here. I really appreciate you guys doing these scoping meetings throughout the region and also down here in Fairbanks and Anchorage. Thank you for being here. My name is Cal Craig. I'm a lifelong Alaskan from Juneau, but living in Anchorage now. I'm also a small business owner. I do environmental management. I've worked with Trilogy Metals for seven years now. This project has helped me grow my career and grow my business. I did a masters at UAA primarily so I would have the skills to work in the mining industry. And I'm not alone. Many small and large businesses all across Alaska depend on this project for sources of revenue, and they would be negatively impacted if the road did not receive the development permits. I started in the industry about 10 years ago, and I can tell you almost everyone my age has left, left the industry, left the state. Mining has gone through a fairly hard time recently and oil as well. That double whammy has really, we've lost a lot of talent, and we're going to keep hemorrhaging talent from really good universities, from people that want to stay here, that are from here, that can't, so keep that in mind. You can't just look at the direct mine jobs. You must consider all of the economic impacts of this project, large, and in my sense, small. With the oil industry in a downturn, we need economic drivers to maintain a skilled workforce - on the ground prosperity. Development of the Ambler Mining District, and I'll stress district mining district - not mine, would bring jobs for generations to a region that really needs it so thank you.

Response from Katherine Wood, HDR

Thank you. Is there anybody else here tonight who has not yet had a chance to speak who would like to do so? Okay. Thank you very much. We are over our time for the meeting so I'm gonna just thank you very much for coming tonight, and I'm going to close out the public comment portion. We will still be here so if you want to chat with anybody from any of the agencies, we're all ears. Thanks so much for coming. Good night.

4. Closing

The meeting was adjourned.