

Ambler Access Project Draft SEIS Comment Submission Highlights

Key Message

The Ambler Road or Ambler Access Project (AAP) is a crucial project for the future of Alaska. AAP will provide much-needed jobs and enable the production of critical minerals to reduce our country's dependence on China and other foreign countries. These critical minerals are needed for renewable energy and a green economy.

Access to critical minerals is authorized under the Alaska National Interest Lands Conservation Act (ANILCA). The future success of Northwest Alaska is relying on this project for jobs and economic opportunities.

The Draft SEIS as prepared by the BLM should be based on accurate, researched, substantiated information and not speculative content, unfounded assumptions, or unlikely, worst-case scenarios. AIDEA is committed to this project and its mission of addressing unemployment. The Ambler Road project, like the Red Dog Mine and Road, will make a difference for generations.

ACTION: We need everyone to show their support for the project during the Draft Supplemental Environmental Impact Statement (SEIS) comment period.

How to Make a Comment

Please submit a comment on or **before December 22, 2023.**

Visit: www.pathtoopportunity.org

You can also make a verbal comment during a public meeting. Public meetings are listed here: <https://eplanning.blm.gov/eplanning-ui/project/57323/570>

Information on the Draft SEIS

The AAP Draft SEIS is available at: <https://eplanning.blm.gov/eplanning-ui/project/57323/570>

Ambler Access Project Questions?

Questions on the Ambler Access Project or the AAP Draft SEIS Comment Period, email the project at info@ambleraccess.org or call (907) 519-7782. You can also visit the project website at: www.ambleraccess.org.

Join us on social media by visiting <https://bit.ly/AIDEAAK>.



**We need the voice of responsible development to participate in the upcoming comment period!
The actions taken by BLM for this project set a precedence that will impact Alaska & the U.S.
for generations.**

Comment Highlights

- **The BLM's Draft SEIS should only be evaluating the areas of federal land where BLM has jurisdiction.** BLM's decision-making authority is limited to areas of federal land where the BLM has jurisdiction regarding the project. A road is guaranteed in ANILCA Section 201(4)(b) and other laws for access.
- **There is speculative and editorial content in the Draft SEIS that should be removed.** For example, the SEIS states there is a possibility the road could become public. The road will be a private, controlled industrial-access road. The permits are all based on a private, controlled industrial access road. No federal public funds will be used on the road with strings that mandate public access, like what occurred with the Dalton Highway. The ANCSA corporations, whose land the road must cross, do not support public access. The federal government, whose land the road must cross, does not support a public road. The State of Alaska has the authority to grant a road with limited access.

- **There are unfounded opinions, speculations, and worst-case scenarios that will likely never occur but are stated as fact.** One example is the assumption that the road would experience numerous unauthorized users or trespassers that would result in significant catastrophic scenarios. In Alaska, there are industrial-private access roads that have existed for decades with little to no impacts of this nature like the Pogo Mine Road.
- **The Draft SEIS must acknowledge the road can coexist with the environment.** The Red Dog Mine shows industry can enhance the environment and provide economic opportunities, leading to improved quality of life for residents near the road.
- **The positive impacts of the project, such as job creation, are not given due consideration.** Jobs are crucial for sustaining a subsistence lifestyle and have been linked to increased lifespan and better living standards in rural communities. For example, the Red Dog Mine and Infrastructure have positively improved the communities of Noatak and Kivalina. These communities have almost doubled the average income compared to other rural communities in the borough. And these communities are growing!
- **Alternatives being reconsidered again (“resurrected”) in the Draft SEIS are inappropriate because the alternative already selected in the JROD has been determined to be the least environmentally damaging practicable alternative. The route in the JROD that crosses the Gated of the Arctic is not subject to judicial review.**
- **Mineral resources were guaranteed at statehood and access to the Ambler Mining District is clearly stated in ANILCA Section 201(4)(b).** The Draft SEIS needs to take that into consideration.
- **The Draft SEIS needs to accurately reflect that AIDEA has committed to working with the local communities and others for the use of the road while it is in operation and after its useful life.**
- **The expansion of impacted communities to 66 is unfounded since that number encompasses all potential alternatives.** The impacted communities should remain on the communities closest to the route that is environmentally preferable and economically feasible.
- **The Draft SEIS provides a worst-case scenario of potential spills of fuel.** Catastrophic scenario analysis is not standard practice for NEPA documents and should be removed or qualified with its low likelihood.
- **The dust impacts on vegetation have been over-emphasized and should be qualified by the low probability of being an impact.** Speculative impacts, like dust on vegetation, need to be qualified to reflect the ability to mitigate just like at Red Dog Mine.
- **The Draft SEIS has an underrepresentation of unemployment in the area by using 9% as its basis since that number inaccurately represents unemployment.** The Workforce Development Working Group is highly concerned about the high rate of unemployment in the region.
- **Potential impacts resulting from the road are not placed in an appropriate context with current climate change trends.** The road hasn’t been built yet and the caribou population varies. The Western Arctic Caribou Herd actually increased after the Red Dog Mine and Infrastructure was built.
- **The Draft SEIS sites caribou behavior as definitive. Caribou research is ongoing and inconclusive at its current stage.** For example, select data states caribou won’t cross a road whereas other data demonstrates caribou will cross linear features.
- **Suggesting this project will damage fish habitat is unfounded based on permitting requirements and mitigation measures.** This is exemplified by the Red Dog Mine and Infrastructure. AIDEA has been working closely with the Subsistence Advisory Committee made up of Alaska Native leaders from the area to address potential concerns.
- **The Draft SEIS infers the road will cut off hydrology and ignores the fact that AIDEA has committed a significant number of bridges and culverts to maintain hydrologic connectivity.**
- **The document assumes that all of the foreseeable mines will be built at the same time and will become a reality. Mines take years to develop.** The position in the Draft Supplemental EIS is not factual and therefore the impacts need to be reconsidered.
- **Form letters and non-substantive comments should not be considered in the decision-making process.**
- **The Ambler Road or Ambler Access Project (AAP) is a crucial project for the future of Alaska.** AAP will provide much-needed jobs and revenue. It will enable the production of critical minerals to reduce our country’s dependence on foreign countries. These critical minerals are needed for renewable energy and a green economy.
- **The future success of Northwest Alaska is relying on this project for jobs and economic opportunities.**