

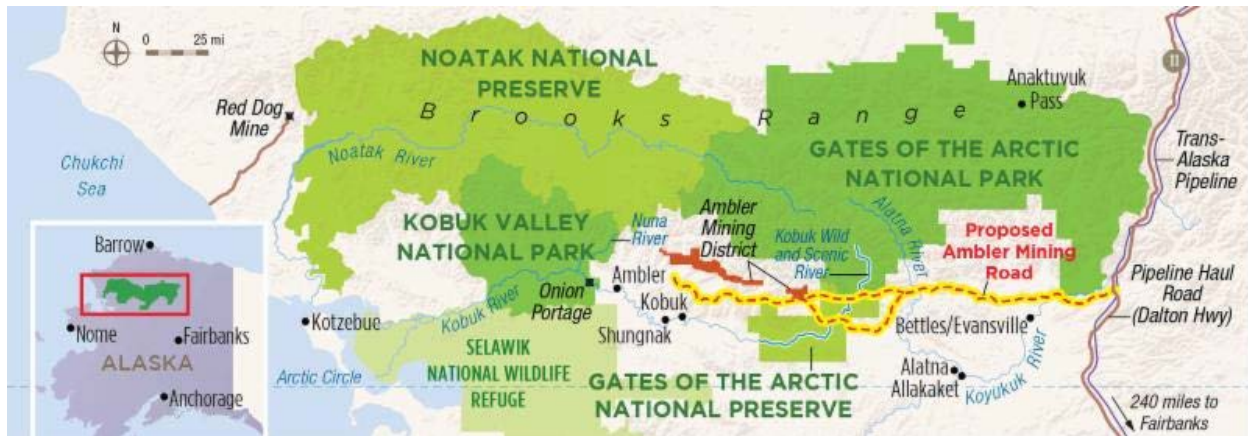
Bureau of Land Management
Ambler Road Scoping Comments
222 West 7th Avenue
Stop #13,
Anchorage, Alaska 99513
email: BLM_AK_AKSO_AmblerRoad_Comments@blm.gov
cc: Tim LaMarr
Central Yukon Field Office Manager
907-474-2356,
tlamarr@blm.gov

RE: BLM 90-day scoping 211 mile Alaska Road EIS - Notice of Intent and Extension of Time To Prepare an Environmental Impact Statement for the Proposed Ambler Mining District Industrial Access Road, Alaska - Federal Register Notice [Land Management Bureau PDF](#)

Sequoia ForestKeeper thanks you for the opportunity to comment on this project/plan.

The Alaska Industrial Development and Export Authority (AIDEA), a state agency, has proposed building a road through Arctic wilderness to the Ambler Mining District in order to facilitate hard rock mining. The road would benefit a private Canadian company - at the expense of wildlife and miles of wilderness habitat across public and Alaska Native-owned private lands in northwestern Alaska.

The proposed 211-mile road would stretch west from the Dalton Highway (aka the Haul Road to the North Slope) to the mining district. Along the way it would cross Gates of the Arctic National Preserve and the Kobuk Wild and Scenic River, both ecologically significant public lands. The road would bisect a wide swath of the Southern Brooks Range, which is home to grizzly bears, wolves, Dall sheep, moose, wolverines, and three different caribou herds.



The route would cross nearly 3,000 streams, 11 major rivers, and 1,700 acres of wetlands, impacting habitat that is vital to the health of whitefish, sheefish, salmon and other species - which are in turn vital subsistence and cultural resources for local communities.

AIDEA estimates the total cost of building, operating and maintaining the proposed road will be \$844 to \$906 million, though the actual cost will likely be much higher. Although the plan designates it as a private toll road, after it is built pressure would surely mount to open it to the public, compounding the negative impacts on the environment.

Analysis of the road project's environmental impact is just beginning. The National Environmental Policy Act (NEPA) requires federal agencies to consider all the environmental and social impacts of a proposal before issuing a permit. The Bureau of Land Management is now in the process of preparing an Environmental Impact Statement analyzing the proposed road. Currently the project is in the "scoping" stage, the first step in the NEPA process, in which BLM will collect information to analyze in its environmental impact statement.

- The road would intersect the migratory routes of three caribou herds, including the Western Arctic Caribou Herd. It could have significant negative impacts on the health of these animals, leading to a population decline that would disrupt the entire ecosystem.
- Once bisected by an industrial-use road, wilderness is no longer true wilderness. The Gates of the Arctic and Kobuk River areas were set aside as wilderness, and should remain so. The country's remaining tracts of wilderness need to be preserved intact for future generations, not sacrificed for private financial gain.
- Facilitating more mining in this area could have a devastating effect on rivers and streams, and the wildlife that depend on them. Many of the rock formations in the area are part of a sulfide deposit, and are highly likely to form acid mine drainage. This drainage can cause serious contamination in waterways that lasts hundreds - perhaps thousands - of years and can harm or kill fish and wildlife.
- Many of the mining claims in the Ambler area drain into the Kobuk River, which is home to fish species that are crucial to locals' subsistence. Rivers, streams and entire watersheds in the region will be at high risk for disastrous contamination.

Sequoia ForestKeeper is opposed to this potentially destructive and unnecessary road.

Respectfully submitted,

A handwritten signature in black ink that reads "Ara Marderosian". The signature is written in a cursive, flowing style.

Mr. Ara Marderosian,
Executive Director
Sequoia ForestKeeper®
P.O. Box 2134
Kernville, CA 93238
(760) 376-4434
ara@sequoiaforestkeeper.org