



**BACKCOUNTRY
HUNTERS & ANGLERS
ALASKA**

October 27, 2019

To: BLM_AK_AKSO_AmblerRoad_Comments@blm.gov
Subject: Ambler Road draft EIS Comments

On behalf of the Alaska Chapter of Backcountry Hunters and Anglers (BHA) I would like to thank you for the opportunity to comment on the BLM's Ambler Road draft EIS (DEIS). This wild landscape is treasured by hunters, anglers and other traditional public land users for the rich fish and wildlife resources and untrammled nature of the area. We have concerns that the proposed construction of the road under all of the action alternatives laid out in the DEIS would permanently degrade the values for which the area is known and exacerbate environmental impacts to the region. **Thus, we urge the BLM to adopt the No Action Alternative.**

To support this action, we would ask the BLM to consider the following:

- The cumulative impacts of the road construction are underestimated, especially with “unfavorable soil and subsurface conditions” (3-5) and fail to account for items such as: offsite materials/gravel collection to meet the initial demand for the estimated 15-22 million cubic yards of material for road construction, plus an annual 2 inches (2-6) of road material for maintenance and road repairs (Page 3-6, 3-11) and associated infrastructure are not accurately accounted for. Also cumulative impacts from associated mining actions (Page 3-9 alludes to mining spurring additional access roads and facilities causing additional impacts); roads to local villages (3-90), and increased impacts and costs to the Alaska State highway system from the proposed Ambler Road connection with the Dalton Highway to the rail yard in Fairbanks (3-79) need to be addressed.
- While the road is described as a temporary fixture with a 50-year lifespan the DEIS continually alludes to a more permanent nature (3-95, 3-103), plus neglects to include any meaningful evaluation and/or requirements for road and mine site reclamation. The DEIS does note that once disturbed, permafrost-supported wetlands are unable to be rehabilitated to their original condition (3-43). Thus, while the impacts of road development are described throughout as temporary, this assumption is only described generally through a hypothetical scenario outlined in Appendix H. For impacts evaluated through the plan to be considered temporary, a full discussion of reclamation must be described and accounted for.
- Impacts on water quality, wetland function (3-43), and fisheries within the region are largely unevaluated within the plan due to a lack of data. It is acknowledged throughout the DEIS discussion of impacts (3-17) that this necessary evaluation was not possible. We strongly disagree with this statement “the BLM determined the lack of data was not relevant to understanding reasonably foreseeable significant adverse impacts and this data was not essential to making a reasoned choice among alternatives” (3-19). In addition, the comment was made (3-27) that toxic mine water may need treatment into perpetuity but with no further in-depth discussion to address this. No action should be taken until this baseline data can be collected and fully accounted for in the EIS.
- As described in the DEIS, the proposed Ambler Road project area is surrounded by approximately 60 percent wetlands and waterbodies (3-13). Compounding impacts on water quality and fisheries habitat in the region will be caused through this proposed road by altering



surface and subsurface flows (3-19, 3-20, 3-21), accelerating permafrost loss (3-22, 3-40, 3-43), construction of bridges (3-22) and culverts, use of dust control measures (2-6, 3-57) that are toxic when washed into the aquatic environment, use of local rock material for road construction that has measurable naturally occurring asbestos and acid rock (3-7/8), and increased sedimentation within the watershed (3-54) will have cascading negative impacts on fisheries in the region. Included would be population level impacts to a world class sheefish fishery (3-52, 3-54, 3-61, 3-111). These impacts can/should be avoided through the no action alternative. While the impacts on the fisheries in the region are clearly acknowledged, limited/no survey data currently exists on status of the fisheries (3-61). No action should be taken until this information is available as baseline data.

- The DEIS mentions (3-45) that mitigation for controlling non-native invasive plant species will be provided on BLM-managed lands, which is approximately only 25 miles (1-1) of the proposed route. The same mitigation measures need to be guaranteed and addressed for non-native invasive plant species control on the remainder of the project area.
- As with fish, there was no baseline data available to adequately evaluate the impact on bird and waterfowl species in the region (3-64). No action should be taken until a comprehensive evaluation of impacts is available.
- The caribou herds (WAH, RMH) have never experienced human development of this scale within their range. The road would create unprecedented human disturbance to otherwise uniquely intact and isolated caribou herds, especially to critical winter range. As acknowledged in the plan, more data is needed to adequately evaluate the impacts on these caribou herds. Related studies referenced in the plan (3-75) clearly show that the impacts could be devastating to herds that have not experienced such human disturbance. The no action alternative is the only acceptable solution.
- The loss of caribou habitat caused by construction of the road (3-73) fails to account for the habitat lost created by human disturbance from road use and industrial mining activity (3-74). A more thorough evaluation of habitat loss should be accounted for.
- Changes to wildfire suppression will likely involve changing the current “Limited” suppression to a “Full” suppression designation along the length of the proposed road and associated infrastructure. The DEIS (3-73) alludes to increased suppression capability due to a road but likely an increase in human-started fires as well. However, without engine crews assigned to the area, a costly measure for taxpayers, timely response is a remote possibility. At best, suppression activities would create a situation where forest fuels are built-up over time before future wildfires ultimately burn hotter and with more devastation. Especially vulnerable is critical caribou wintering lichen habitat. The no action alternative would allow the natural boreal forest fire regime to continue.
- The DEIS acknowledges that most of the alternatives would negatively impact the Kobuk Wild & Scenic River (WSR) (3-86). ANILCA 1107(b) allows for the crossing of the Kobuk River where it is designated but “subject to such conditions as may be necessary to assure that the stream flow of, and transportation on, such river are not interfered with or impeded”. However, the DEIS (3-89) and the NPS EEA shows that transportation will be interfered with through the construction of a multi-span bridge with piers and abutments in the river (3-22), plus access roads to the river for obtaining water for road construction and ice road development (3-22 calls for 1 million gallons of water/mile for a 25’ wide ice road and 250,000 gallons/acre of ice pad) will surely interfere with the Kobuk River flow. In addition, under Alternative B, a permanent camp and



associated infrastructure is being called for within the designated .25 mile Kobuk WSR, likely just to force the Gates of the Arctic National Park to choose Alternative A. The development of roads and bridges through this landscape designated to maintain the areas wild character would have serious impacts on the values that this landscape was set aside to protect. We take exception with the “moderate” impacts described in the analysis and believe the no action alternative is the only option for maintaining the unique sense of solitude and freedom that this stretch of river provides.

- Additionally, several other visitor destination rivers are identified to be impacted but no in-depth analysis is provided or than stating that impacts will take place outside of designated NPS managed WSR areas. It is acknowledgement that most river trips on WSR portions do continue to pick-up points past where the proposed Ambler Road is to cross. These include the: Alatna, John, Tinyaguk, North Fork of the Koyukuk, and Middle Fork of the Koyukuk Rivers (3-92) and should be more thoroughly analyzed as to subsistence and recreational users.
- The impacts on wilderness quality lands (3-85) are acknowledged but not evaluated in the plan. Alternative A seems to a direct snubbing of NPS concerns to protect their wilderness character and the key destination points and areas of concern, including Walker Lake, Nutuvukti Lake, and the sensitive Nutuvukti Fen (3-38 which was not included in the rare ecosystem discussion) area. Also, developing permanent camps and infrastructure in the Kobuk WSR corridor is directly . This needs to be addressed to more fully include an evaluation of how wilderness quality lands in the region will be impacted, better protected, and mitigated.
- The negative impact on subsistence hunters incurred in all alternatives is accurately described in the DEIS (3-106) as a significant environmental injustice issue whereby the negative impacts of the projects will be incurred by low-income residents who rely on healthy populations of wildlife like caribou to survive; whereas the benefits of the project will largely be reaped by individuals outside of the planning area since AIDEA cannot offer a hiring preference to residents of the region (3-100). We believe this is a significant issue than can be best/only addressed through the no action alternative.
- The DEIS indicated (3-114) that crossing ramps for subsistence and recreational users will not be put into place until Phase 2 or 3. This effectively creates a 211+ mile barrier to all users for 2-10 years at best. This is unacceptable. In addition to subsistence users, dispersed recreational users need to have a say in the placement of these crossing ramps. Who enforces this use off of the BLM lands? Is the enforcement adequate along the entire extent of the proposed road with various land ownerships?
- Climate change models in the NPS EEA are calling for increased precipitation in the future. The EIS is calling for culverts and bridges (3-22) to accommodate 100-year floods. This will probably not be enough in light of accelerating changes to the climate. Especially for fisheries, the unobstructed flow is critical as to timing for spawning and for juvenile fish. Basically assurances of clearing obstructions as soon as possible is not adequate.

The proposed road will cross one of the largest intact public land wild areas left in the United States. We believe the concerns outlined above regarding the impacts on the pristine natural environment, including to the fish and wildlife resources, our hunting and fishing traditions, and the unique wild characteristics that the area provides, should be cause for pause. Especially when the proposed road will traverse perpendicular to the terrain for over 200 miles, likely causing negative impacts to thousands of water drainages and to areas well outside of the project footprint.



As climate change increases stresses on Alaska’s landscapes and intact ecosystems continue to dwindle world-wide, the value of having a large intact public land wild area will only increase “in value” to future generations. Only one option – the “**no action alternative**” should be chosen. We stand by ready to work towards that goal and appreciate you considering our comments.

Submitted on behalf of the Alaska Chapter of Backcountry Hunters by:

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