



U.S. Department of the Interior
Bureau of Land Management

Ambler Road Environmental Impact Statement

Scoping Summary Report

April 2018



Background

- 2009-2010 - Initial Development of Transportation and Road Planning (IDRP) and Program Management and Monitoring (PMM) Plans for the Ambler Road Project
- 2011 - IDRP Development and Approval by the U.S. Department of the Interior

Proposed Road

Where would the proposed road be located?

- AIDEA's proposed alignment (Milepost 161) and extends to the Brooks Range to the south

What type of land would be crossed?

- State lands (61%)
- Federal land managed by BLM
- Lands associated with Two A

What would the road be like?

- 211 miles long
- All-season gravel two-lane road
- Industrial access only (not open to the public)
- Includes bridges, material site airstrips, and related infrastructure

What types of vehicles would use the road?

- Trucks hauling mineral exploration equipment, supplies, and fuel
- The road will be designed to accommodate trailer trucks (AASHTO WB-62)

CROSS SECTION

EXISTING ROAD

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Executive Summary

The US Bureau of Land Management (BLM), Central Yukon Field Office, Fairbanks, Alaska, is developing an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA) and Alaska National Interest Lands Conservation Act (ANILCA) for federal authorizations in response to a right-of-way (ROW) application from the Alaska Industrial Development and Export Authority (AIDEA) to construct and operate an all-season, industrial access road approximately 211 miles long in the southern Brooks Range foothills of Alaska. The road would provide access for exploration and development of the Ambler Mining District.

The BLM is the lead federal agency for preparing the EIS under NEPA. The BLM has authority to grant a ROW across BLM-managed lands. The BLM must also comply with Section 810 (subsistence evaluation) of ANILCA and Section 106 of the National Historic Preservation Act.

Other federal agencies are formal cooperating agencies because they have their own authorization decisions to make about the proposed road project that require compliance with NEPA, including the US Army Corps of Engineers (for permitting fill in wetlands and other waters of the US) and the US Coast Guard (for permitting bridges over navigable rivers).

Non-federal cooperating agencies with jurisdiction by law and/or special expertise include the State of Alaska and the Northwest Arctic Borough.

Allakaket Tribal Council, Alatna Traditional Council, and Hughes Village Traditional Council have verbally requested to participate as cooperating agencies, and Memoranda of Understanding are in development between BLM and these federally recognized tribes at the time of writing this report.

Additionally, the National Park Service and Federal Highway Administration are participating in the development of the EIS in order to coordinate it with the environmental and economic analysis the two agencies are developing pursuant to Section 201(4)(d) of ANILCA in lieu of an EIS (for purposes of determining the most desirable route and appropriate terms and conditions for the ROW through Gates of the Arctic National Preserve). Additional participating agencies include the US Fish and Wildlife Service and the Environmental Protection Agency, which have special expertise.

As required by NEPA, the BLM published a Notice of Intent to prepare an EIS in the *Federal Register* on February 28, 2017, and subsequently solicited initial comments in writing and at a series of public meetings. This part of the NEPA process, called “scoping,” is meant to help the BLM determine the scope of the analysis needed in the EIS. The scoping process solicits input on the issues, impacts, and potential alternatives that will be addressed.

BLM received oral testimony in 11 communities near the project area and in Anchorage and Fairbanks. In addition to the comments received at the meetings, a total of 7,225 written scoping communications were received. These included 6,343 form emails, 862 unique emails (93 of

which included attachments), and 20 letters and faxes. Appendix A provides additional detail from the comments, organized into broad issue categories that include The Project and Process, Physical Environment, Biological Environment, Social Environment, and Other Topics.

Some public comments received expressed concerns about the effects of a new road in a remote rural area. Impacts of greatest concern were those to subsistence resources, particularly caribou and fish, and to the subsistence and rural lifestyle in the area. Related concerns were about impacts to wildlands, designated federal wilderness and wild and scenic rivers, and the broader ecosystem, as well as social impacts within nearby communities. While AIDEA has proposed the road as industrial use only, the potential for public access on the road was frequently mentioned, both as a potential benefit to local residents and businesses and as a potential adverse effect by facilitating competition for subsistence resources by recreational hunters and fisherman. Many concerns were also expressed about the impacts of mining exploration and development in the Ambler Mining District that the industrial access road is intended to promote.

This report summarizes the scoping process and the issues raised during the process.

Acronym List

AIDEA	Alaska Industrial Development and Export Authority
AMDIAP	Ambler Mining District Industrial Access Project
ANILCA	Alaska National Interest Lands Conservation Act
BLM	US Bureau of Land Management
CEQ	Council on Environmental Quality
DMTS	Delong Mountain Transportation System
DNR	State of Alaska Department of Natural Resources
DOT&PF	Alaska Department of Transportation and Public Facilities
EEA	Environmental and Economic Impact Analysis
EIS	Environmental Impact Statement
EPA	US Environmental Protection Agency
FHWA	Federal Highway Administration
GAAR	Gates of the Arctic National Park and Preserve
MOUs	Memoranda of Understanding
NAB	Northwest Arctic Borough
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOI	Notice of Intent
NPS	National Park Service
PSA	Public Service Announcement
ROW	Right-of-Way
TCC	Tanana Chiefs Conference
USACE	US Army Corps of Engineers
USCG	US Coast Guard
USFWS	US Fish and Wildlife Service

1. Introduction

1.1. Overview

The Alaska Industrial Development and Export Authority (AIDEA), a public corporation¹ of the State of Alaska whose purpose is to promote, develop, and advance the general prosperity and economic welfare of the people of Alaska and to create additional employment, has proposed a road from the Dalton Highway in north-central Alaska approximately 211 miles westward to the Ambler Mining District. The US Bureau of Land Management (BLM), Central Yukon Field Office, Fairbanks, Alaska, is developing an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA) to support the issuance of federal authorizations to construct and operate the road. As proposed by AIDEA, the road would be an all-season, industrial access road. Its route would cross the southern Brooks Range foothills. It would originate at the Dalton Highway near highway mile 161, approximately 217 road miles north of Fairbanks (172 air miles). It would terminate near the Ambler Mining District. The road would cross State lands (61%), federal lands managed by BLM (12%) and the National Park Service (NPS) (12%), and lands owned by two Alaska Native Corporations² (15%).

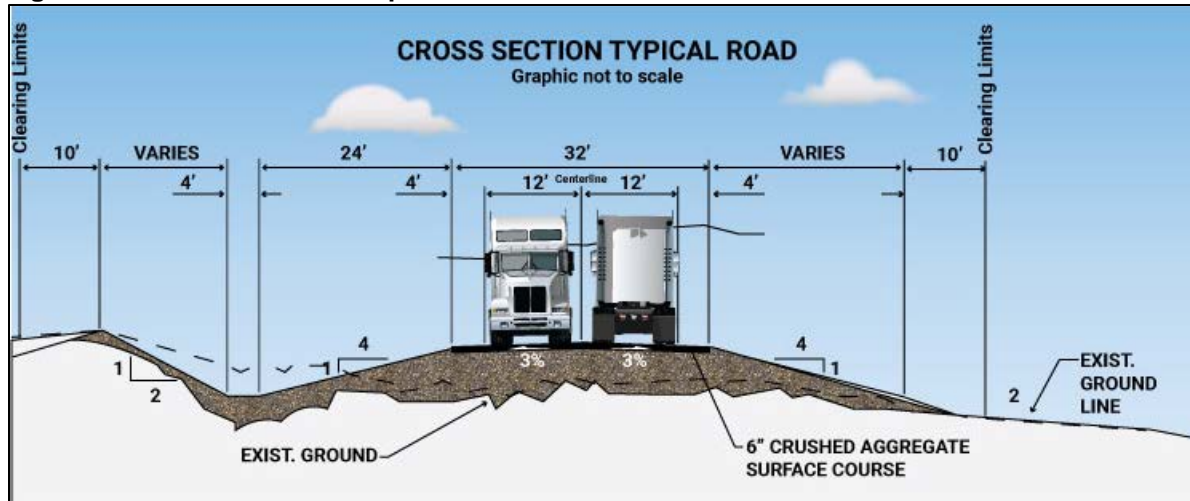
The proposed road would not be designed or open for public access, but would be limited to use as an industrial-access-only road. The project includes bridges, material sites, maintenance stations, airstrips, and related infrastructure and utilities. As proposed, the road is anticipated to have an approximately 50-year life, based on an estimate of when mineral exploration and development in the Ambler Mining District is likely to be completed. AIDEA's proposal calls for removal of the road and reclamation of the right-of-way upon cessation of mining activities in the District.

Trucks hauling mineral exploration and development equipment, supplies, and fuel, and ore concentrate would use the road. The road would be designed to accommodate large, semi-trailer trucks (American Association of State and Highway Transportation Officials WB-62). The road is proposed to be built in phases, beginning with a seasonal, single-lane, gravel pioneer road (Phase I). Phase II would upgrade the road to allow year-round industrial access. Phase III would construct a two-lane gravel industrial road, depicted in Figure 1. The EIS will focus its evaluation on the impacts of Phase III of the project.

¹ Per Alaska Statute 44.99.020

² Corporations established under the Alaska Native Land Claims Settlement Act, which transferred large tracts of land to the corporations.

Figure 1. Cross Section of Proposed Road.



1.1.1 Project Background

Mineral exploration efforts since the 1950s have identified significant resources of copper and base metals in the southern flanks of the Brooks Range.

In 1980, the Alaska National Interest Lands Conservation Act (ANILCA) was enacted. Congress and the law recognized the mineral potential in the Ambler Mining District and the need for transportation access. Section 201(4)(b) of ANILCA provides for surface transportation access through Gates of the Arctic National Preserve. While no specific decision regarding Ambler access across BLM lands is called out in ANILCA, Section 1323(b) generally provides for access across federal lands.

In 2009–2010, the Alaska Department of Transportation and Public Facilities (DOT&PF) evaluated multiple road and rail routes that could provide surface transportation access to the Ambler Mining District. In 2013, the project was transferred from DOT&PF to AIDEA. AIDEA is the project applicant.

In November 2015, AIDEA submitted a consolidated SF-299 Right-of-Way (ROW) Application for Transportation and Utility Systems and Facilities on Federal Lands to the BLM, NPS, US Coast Guard (USCG), and US Army Corps of Engineers (USACE). The application requested the issuance of ROW grants, permits for constructing bridges over navigable waters and for filling waters of the US, and related authorizations associated with the proposed construction and operation of the road.

During 2016, the application was updated in response to agency questions. By June 30, 2016, AIDEA completed its application. The SF-299 application is available on the BLM's ePlanning website for the Ambler Road EIS.

1.1.2 Lead Federal Agency, Participating Agencies, and Cooperating Agencies

On February 28, 2017, the BLM filed a Notice of Intent (NOI) to prepare an EIS, initiating a 90-day scoping period, which was later extended to run through January 31, 2018. The EIS will analyze the entire 211-mile project, including the portion that passes through Gates of the Arctic National Preserve (see details below). The agencies involved in the development of the EIS include:

- The BLM is the lead federal agency for preparing the EIS under NEPA. The BLM has authority to grant a ROW across BLM-managed lands. The BLM must also comply with ANILCA Section 810 and Section 106 of the National Historic Preservation Act (NHPA). Section 106 applies to the entire route, regardless of land status. Section 810 of ANILCA requires evaluation of the effects of the project on subsistence uses and needs where federal land will be used for the project.
- The USACE is a cooperating agency³ and will evaluate the project application under Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act, and will use the EIS as the basis for its permit decisions.
- The USCG is a cooperating agency and has authority under Section 10 of the Rivers and Harbors Act for permitting bridges over navigable waters and will also use the EIS as a basis for its decisions.
- The State of Alaska Department of Natural Resources (DNR) is a cooperating agency, with the DNR Office of Project Management and Permitting acting as the lead State agency in coordinating the input of other State agencies.
- The Northwest Arctic Borough (NAB) is a cooperating agency and will provide traditional knowledge and input on subsistence and cultural resources, and coordination with tribal members and affected communities. The NAB will also enforce local permitting requirements and advise the BLM on NAB's responsibilities under State law and NAB regulations.
- The NPS is a participating agency that, together with the Federal Highway Administration (FHWA), will develop an environmental and economic analysis (EEA) pursuant to Section 201(4)(d) of ANILCA in lieu of an EIS (for the purposes of determining the most desirable route and appropriate terms and conditions for the ROW through Gates of the Arctic National Preserve). As a federal land manager that must issue a land use authorization for the project, the NPS must also comply with Section 810 of ANILCA and Section 106 of the NHPA. NPS is coordinating EEA information with BLM and other federal agencies.
- The FWHA is a participating agency that, together with the NPS, will coordinate development of an EEA (see above bullet).

³ 40 CFR 1508.5: **Cooperating agency** means any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact...A State or local agency of similar qualifications or, when the effects are on a reservation, an Indian Tribe, may by agreement with the lead agency become a cooperating agency.

- The US Fish and Wildlife Service (USFWS) is a participating agency with special expertise.
- The US Environmental Protection Agency (EPA) is a participating agency with special expertise.

At the time of writing this report, Allakaket Tribal Council, Alatna Traditional Council, and Hughes Village Traditional Council had verbally requested to participate as cooperating agencies, and Memoranda of Understanding (MOUs) are in development between BLM and these federally recognized Tribes.

Under Section 810 of ANILCA, the BLM must determine whether the project “may significantly restrict subsistence uses.” This analysis will be included in the EIS. If alternatives may significantly restrict subsistence uses (either abundance, access, or availability)⁴, this will be identified in the analysis, and ANILCA Section 810 hearings will be held in concert with public meetings upon release of the Draft EIS.

Section 106 requires federal agencies to take into account the effects of their undertakings on historic properties and places of religious and cultural significance. Tribal entities, the State Historic Preservation Officer, State of Alaska, and other interested parties will be consulted to identify significant places and ways to reduce or mitigate potential effects.

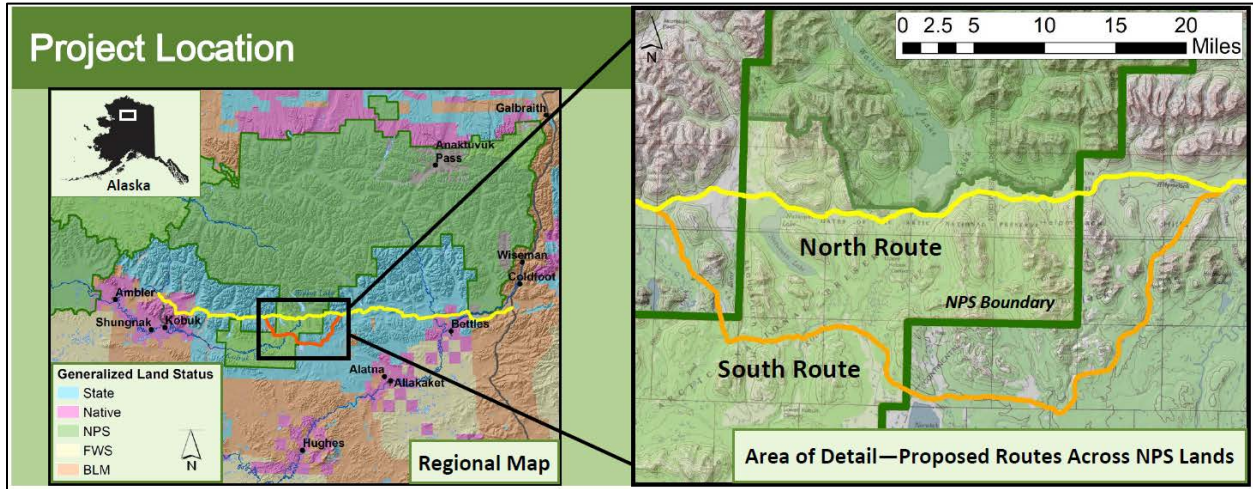
⁴ Specifically, ANILCA Section 810 requires that the analysis must determine whether, for each alternative, there is likely to be:

- A reduction in the abundance of harvestable resources used for subsistence purposes. This, for example, may include fish, wildlife, edible flora, house logs, fuel wood, drinking water, etc. Forces that might cause a reduction include adverse impacts on habitat, direct impacts on the resource, increased harvest and increased competition from non-subsistence harvesters.
- A reduction in the availability of resources caused by an alteration in their distribution, migration, or location.
- A limitation on the access of subsistence users to harvestable resources. Such an evaluation includes only physical and legal barriers.

1.1.3 NPS EEA

In 2017, NPS and FHWA began developing their separate but parallel EEA as directed by ANILCA Section 201(4)(d), for the road route through the Gates of the Arctic National Preserve. Two alternative routes across the Preserve were identified in the project application materials: a north route and a south route. The EEA will identify a preferred alignment for the ROW across NPS lands, and the Secretary of Interior and Transportation will determine the actual ROW alignment across NPS lands.

Figure 2. Two Routes Across NPS Lands That Will Be Evaluated in the EEA.



The EEA will examine each of these routes and consider which route would generate fewer adverse impacts, and will assess potential environmental, social, and economic impacts upon wildlife, fish, and their habitat, and rural and traditional lifestyles, including subsistence activities. Furthermore, the BLM and the NPS intend to jointly conduct a Section 810 analysis.

1.1.4 Ambler EIS, NPS EEA, and AIDEA Project Websites

For more information on the Ambler Road EIS, visit www.blm.gov/AmblerRoadEIS.

For more information on the EEA, visit www.nps.gov/gaar/learn/management/ambler-row.htm.

For more information on the Ambler Mining District Industrial Access Project, visit the project website at www.ambleraccess.org.

This Scoping Summary Report provides a summary of:

- outreach during the scoping period, including how meetings were advertised and the level of participation in those meetings;
- comments provided by the public, other agencies, and tribal governments;
- issues that are relevant for evaluation in the EIS; and
- potential alternatives that were raised during scoping.

1.2. Study Area

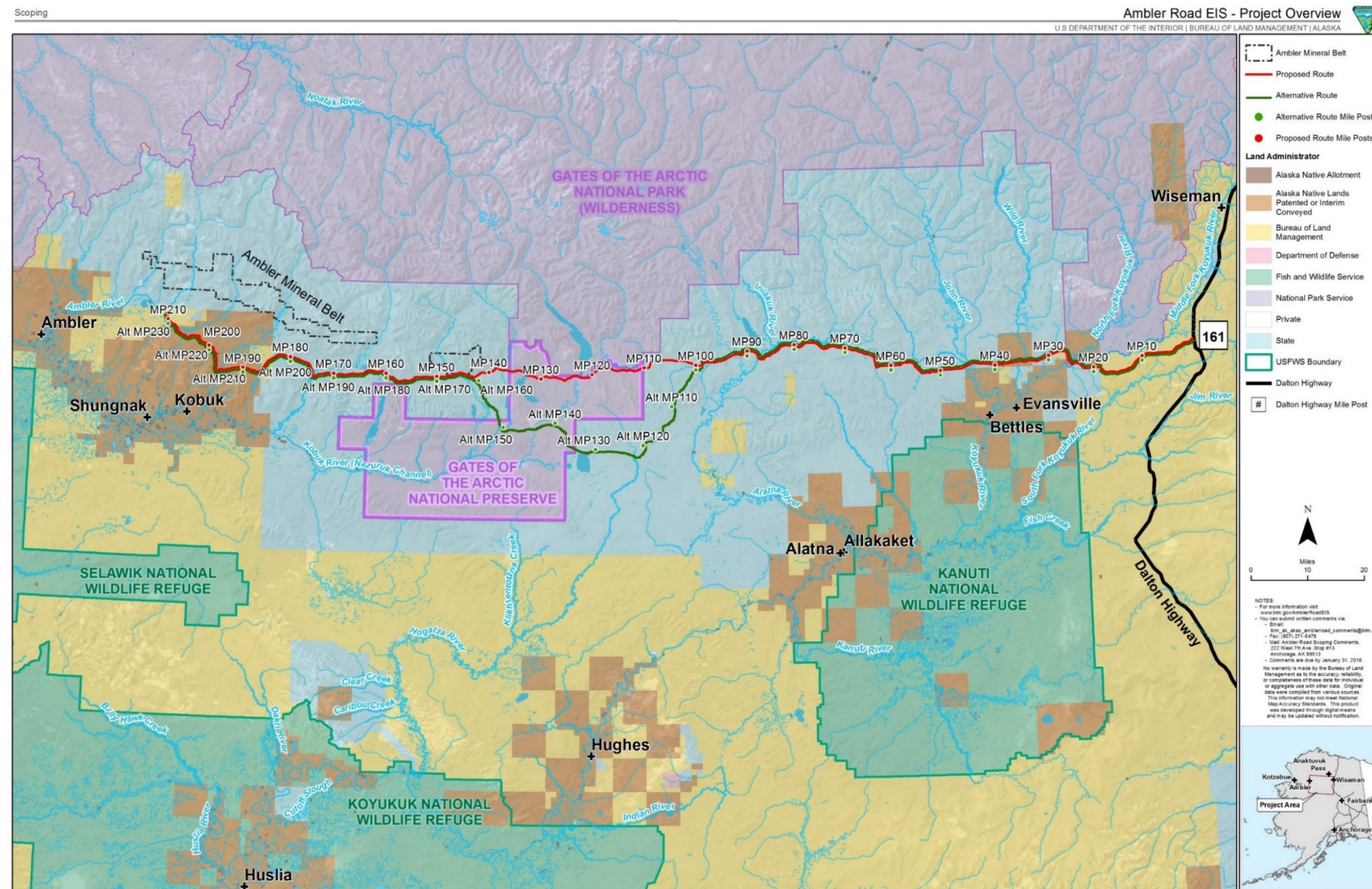
The proposed project is located along the south flanks of the Brooks Range in north-central Alaska. The road would depart the Dalton Highway near Milepost 161, 172 air miles north of Fairbanks. The road would terminate near the Ambler Mining District, on the south bank of the Ambler River. The terrain is mountainous, and the land is primarily undeveloped, with no existing road connections to the State highway system. Large lakes near the road corridor include Avaraart, Iniakuk, Kollioksak, Narvak, Nutukvukti, and Walker lakes. Major rivers in the area include the Alatna, Ambler, John, Kobuk, and Koyukuk rivers.

The road would cross State lands (61%), federal lands managed by the BLM (12%) and NPS (12%), and lands owned by Alaska Native Corporations (15%). The study area includes the Gates of the Arctic National Preserve, which would be crossed by the road, as well as Gates of the Arctic National Park, which is adjacent to the Preserve along the Preserve's northern boundary. State lands include State-patented, tentatively approved, or other State-acquired lands. Three National Wildlife Refuges within the region that are not directly affected by the road include the Selawik National Wildlife Refuge to the southwest, the Koyukuk National Wildlife Refuge to the south, and the Kanuti National Wildlife Refuge to the southeast.

Current access to the area is primarily by air, boat, or snowmachine. Communities within 35 miles of the proposed road include:

- Bettles/Evansville, 8 miles
- Kobuk, 9 miles
- Shungnak, 15 miles
- Ambler, 22 miles
- Wiseman, 24 miles
- Alatna / Allakaket, 33 miles

Figure 3. Project Area Map Showing Land Administrators, Communities, and Proposed Routes, including Mileposts (MP).



NOTE: For the purposes of this document, this figure depicts the project area containing the Applicant's proposed route. The BLM EIS may consider a broader project area or impacts beyond what is depicted on this figure related to connected actions and cumulative effects.

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1.3. Scoping Process

Scoping is the process by which the BLM solicits internal and external input on the issues, impacts, and potential alternatives that will be addressed in the EIS. Scoping occurs early in the NEPA process and generally extends through the development of alternatives. The intent of scoping is to:

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

1.3.1 Description

Public, agency, and tribal outreach is a key component of the EIS development process, and is required under NEPA and by the Council on Environmental Quality (CEQ; 40 Code of Federal Regulations Section 1506.6). The *BLM National Environmental Policy Act Handbook H-1790-1 (BLM NEPA Handbook)* provides guidance for public involvement during scoping. This Scoping Summary Report describes the outreach conducted for the scoping phase of the EIS. The two components of the BLM's scoping process are "internal scoping" and "external scoping."

Internal scoping is when an agency or cooperating agency solicits comments and issues internally within the agency to determine preliminary and anticipated issues and concerns. Internal scoping began with a kickoff meeting on October 6, 2017. An interdisciplinary team of BLM Central Yukon Field Office staff discussed the proposed scoping plan, anticipated issues, study area, existing sources of information, and data gaps. Ongoing monthly cooperating agency meetings provided an opportunity for input and engagement by the cooperating agencies. Additionally, cooperating agencies submitted specific scoping comments to the BLM during the scoping period.

External scoping is a public process to reach beyond the BLM and identify concerns of importance to the public. External scoping helps ensure that problems are identified early and properly studied; that issues of no concern do not consume time and effort; and that the proposed action and alternatives are balanced, thorough, and able to be implemented.

1.3.2 Outreach

The following paragraphs summarize the outreach efforts for the Ambler Road EIS during scoping.

Notice of Intent

The NOI was published in the *Federal Register* on February 28, 2017, initiating the EIS process. The NOI announced the BLM's intent to prepare an EIS, initiated the scoping process, and

extended the periods to complete the Draft and Final EISs. It also announced the BLM's intent to hold public scoping meetings and how those meetings would be advertised; requested scoping comments; and described the ANILCA Section 810 subsistence hearings process. Also, the supplemental information provided with the NOI identified cooperating agencies; described the land ownership; identified preliminary issues; and described concurrent processes including the NHPA, the EEA, consultation with affected tribes and Alaska Native Corporations, and ANILCA. The full text of the NOI is available on the BLM's ePlanning website⁵.

The formal scoping period began on February 28, 2017, and concluded on January 31, 2018. Scoping comments submitted during the scoping period are summarized in broad issue categories in Section 2.2 of this report and included in Appendix A. Comments received after January 31, 2018, will be reviewed, shared with the EIS team, and become part of the project record, but the issues may not be summarized in this report.

Website

The BLM's Ambler Road EIS ePlanning website (<https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage¤tPageId=111129>) was launched on January 21, 2016. The ePlanning website provides a project description, contact information, meeting dates, and copies of relevant documents. In addition, an Ambler Road EIS page (www.blm.gov/AmblerRoadEIS) was added to the BLM's website in October 2017 to better enable visitors and search engines to find EIS information. The Ambler Road EIS page (www.blm.gov/AmblerRoadEIS) also provides a link to the BLM's ePlanning website. These websites provide background information; announcements of meeting dates, times, and locations; copies of relevant documents; Frequently Asked Questions; ways to make comments; project staff contact information; and the opportunity to sign up for email updates.

Mailings and Email

A dedicated email address for submitting comments was established on May 5, 2016 (blm_ak_akso_amblerroad_comments@blm.gov). A stakeholder email list was developed based on research of known stakeholders, including State and federal agencies, local governments, boroughs, tribal entities (regional corporations, village corporations, federally recognized tribes), business entities, elected officials, and non-governmental organizations. Other people and entities were added to the email list if they requested to join, or if they provided an email address at a public scoping meeting. At the time of the writing of this report, 496 recipients were on the email list.

The following emails were sent out to the email list:

- November 6, 2017, Notice of Public Scoping Meetings
- December 5, 2017, Public scoping meeting in Kobuk rescheduled to December 8, 2017

⁵ The BLM ePlanning portal provides public access to ongoing EIS development information and NEPA documents.

- December 6, 2017, Public scoping meeting in Shungnak rescheduled to December 8, 2017

Media

A variety of outreach techniques were used to inform the public about the BLM's EIS and the public scoping meetings.

The BLM published three press releases about the project that can be viewed on the ePlanning website "Links" page:

- February 28, 2017, "BLM Alaska to Analyze Proposed All-Season Industrial Access Road to Mineral Resources in the Ambler Mining District in Kobuk Valley"
- April 7, 2017, "BLM extends public scoping period for Ambler Road Project"
- October 30, 2017, "BLM to Hold Public Scoping Meetings on Proposed Ambler Road"

In November 2017, a radio story on the project developed by Alaska's Energy Desk of Alaska Public Media, and featuring BLM characterization of the project, aired multiple times on KUAC (Fairbanks) and possibly other National Public Radio stations in Alaska. On November 6, 2017, a radio story summarizing the project description and advertising upcoming meetings based on an interview with the BLM authorized officer aired on KUAC. On December 7, 2017, BLM made a KOTZ radio show appearance. The EIS and the BLM's role was described, public meetings announced, and comments requested. KOTZ's broadcast range has been known to reach the following communities: Ambler, Buckland, Deering, Kiana, Kivalina, Kobuk, Kotzebue, Noorvik, Noatak, Pt. Hope, Selawik, Shishmaref, and Shungnak.

1.3.3 Meetings

Public Meetings

Public scoping meetings were held across the study area and in major population centers in the state, including Anchorage and Fairbanks.

Advertisements to announce the public scoping meetings in November and December 2017 included:

- *Fairbanks Daily News-Miner* (display ad, legal ad, online ad, and community calendar)
- *Anchorage Daily News* (display ad, legal ad, online ad, and community calendar)
- *Nome Nugget* (display ad and community calendar)
- *Arctic Sounder* (display ad)
- Paid radio advertisements on KSKA
- Public Service Announcement (PSA) distributed to KOTZ
- What's Up Listserv (scheduled private/nonprofit established statewide email list containing list of events related to environmental concerns)
- Fliers posted in local communities
- Facebook notifications posted to the BLM Facebook page

- Postcard mailings (1,522 postcards mailed to residents in Alatna, Allakaket, Anaktuvuk Pass, Ambler, Bettles, Evansville, Kobuk, Kotzebue, Shungnak, and Wiseman)
- BLM Ambler EIS ePlanning website

The original scoping meetings plan did not include Hughes and Huslia, but at the Fairbanks public meeting, these communities requested that the BLM present in their communities, so additional meetings were held. These meetings, along with any meeting change dates, were advertised by email to the email list, Facebook notifications, and updates on the BLM Ambler EIS ePlanning website.

See Table 1 for details regarding each public scoping meeting. Meeting minutes and lists of attendees are available on BLM’s Ambler Road EIS ePlanning web site on the Documents page.

Table 1. Public Scoping Meeting Locations, Dates, and Attendance

Meeting Location	Date	Attendance
Allakaket	11/13/2017	28
Anaktuvuk Pass	11/14/2017	16
Alatna	11/15/2017	19
Fairbanks	11/16/2017	90
Wiseman	11/20/2017	5
Anchorage	11/20/2017	41
Ambler	12/5/2017	14
Kotzebue	12/6/2017	10
Shungnak*	12/8/2017	18
Kobuk*	12/8/2017	20
Hughes**	12/11/2017	19
Huslia**	12/12/2017	29
Evansville/Bettles	12/12/2017	8

* Rescheduled to accommodate community events or weather. ** Added at the request of the community.

Agency Meetings

Cooperating agency meetings are held on a monthly basis and often include the BLM, USACE, USCG, State of Alaska, NPS, NAB, and Allakaket Tribal Council. The cooperating agency meetings held during the scoping period included:

- November 2, 2016 (Kickoff, prior to NOI)
- February 14, 2017
- April 11, 2017
- May 9, 2017
- June 13, 2017

- July 11, 2017
- August 8, 2017
- September 12, 2017
- October 17, 2017
- December 19, 2017
- January 9, 2018

An agency scoping meeting was held in Fairbanks on November 16, 2017. In addition to the BLM, the following agencies participated in the meeting, with a total of 47 people:

- Alaska Division of Geological and Geophysical Surveys
- Alaska Department of Environmental Conservation
- Alaska Department of Fish and Game
- DNR
- EPA
- NPS
- NAB
- USFWS
- USACE

Other Meetings

Upon request, the BLM made presentations to additional organizations at their regularly scheduled meetings to provide information to the public (note: oral testimony was not taken at these meetings). These included:

- May 17, 2017, Maniilaq Association Tribal Government Services Committee Meeting
- November 28, 2017, NPS Subsistence Resource Commission All Chairs Annual Workshop
- December 14, 2017, Western Arctic Caribou Herd Working Group
- January 12, 2018, Alaska Miners Association (in Fairbanks)

At the December 12 meeting of the Western Arctic Caribou Herd Working Group, some members suggested that Working Group communities that did not have a public meeting may also have information and/or comments to share with the BLM because of the proposed road's potential to affect caribou. As a result, the BLM held two teleconference meetings for the following communities: Buckland, Deering, Selawik, Nuiqsut, Elim, Golovin, White Mountain, Kivalina, Noatak, Noorvik, Kiana, Galena, Koyukuk, Nulato, Kaltag, Nome, Teller, Brevig Mission, Wales, Shishmaref, Koyuk, Shaktoolik, Unalakleet, Stebbins, St. Michael, Kotlik, Atkasuk, Utqiagvik, and Wainwright.

Prior to the teleconferences, the BLM sent an invitation letter and materials to the local and tribal governments in each of the communities listed above. Emails were sent and phone calls were made to each of the communities, as well, to inform them of the opportunity.

Advertisements were placed in the *Nome Nugget* (print edition) and *Arctic Sounder* (online edition). The BLM website was updated with the teleconference information, and a copy of the materials was posted to the website. A posting to the BLM Facebook account announced the meetings, and a PSA was provided to KOTZ radio. Table 2 provides details on the meetings.

Table 2. Western Arctic Caribou Herd Communities Teleconference Meeting Dates, Locations, and Attendance

Meeting Location	Date	Attendance
Teleconference, 2-4pm	1/16/18	14
Teleconference, 5-7pm	1/18/18	9

1.3.4 Consultation

National Historic Preservation Act Section 106 Consultation⁶

The BLM initiated Section 106 consultation in a letter dated April 20, 2017, with 84 entities. In a December 12, 2017 letter, a total of 109 tribes, agencies, and other interested parties were contacted to re-solicit interest in Section 106 consultation. The letter described the project and invited recipients to participate in a Section 106 meeting to be held on January 17, 2018, in Anchorage. Prior to the meeting, the BLM contacted Section 106 letter recipients for whom no return receipt had been received. Twenty-eight (28) recipients were contacted by either phone, email, or both. The BLM held the Section 106 meeting in Anchorage on January 17, 2018. The BLM gave a presentation providing information on the project, the Section 106 process, the types of cultural resources, and a summary of the cultural resources studies that have been conducted in the project area. The meeting was then opened up for discussion and comments between attendees and the BLM. Meeting notes were emailed to all meeting attendees. The following consulting parties attended the Section 106 meeting in person:

- BLM and its Contractor (HDR)
- Allakaket
- DNR
- AIDEA
- Bureau of Indian Affairs
- Doyon, Limited
- NPS
- Office of History and Archaeology / SHPO
- Tanana Chiefs Conference (TCC)

The following consulting parties attended the meeting via conference call:

- Allakaket
- DOT&PF

⁶ Comments discussed during the Section 106 meeting are not specifically included in this Scoping Summary Report, as they can contain information related to protected sites.

- City of Ambler
- City of Kotzebue
- City of Shungnak
- Doyon, Limited
- Evansville, Inc.
- TCC

Government-to-Government Consultation

The BLM conducted an internal review of potentially affected tribes along the proposed road corridor and also identified those tribes that could be indirectly affected by mining activity in the Ambler Mining District, or who depend on caribou or fish resources that could be directly or indirectly affected by the project. Based on this review, on April 20, 2017, the BLM sent letters to 42 federally recognized Alaska tribes presenting the opportunity for government-to-government consultation on the Ambler project.

On December 8, 2017, the BLM had a government-to-government meeting with the Ambler Tribal Council in Ambler to discuss various issues and concerns regarding the project.

Government-to-government consultation meetings will be conducted moving forward as they are requested.

Alaska Native Corporations Consultation

Department of Interior policy⁷ requires the BLM to consult with Native Corporations. BLM conducted an internal review of Regional and Village Native Corporations that could potentially be affected by the project. On April 20, 2017, the BLM sent letters to 4 Native Regional Corporations and 18 Native Village Corporations initiating Alaska Native Corporation consultation for the Ambler project. Because Alaska Native Corporations are not government entities, they cannot participate in the NEPA process as cooperating or participating agencies, nor are they considered federally recognized tribes. However, Native Corporations are afforded status as Indian tribes under Section 106. Also, they own property in the project area and represent shareholders who are members of tribes. As such, BLM actively engaged Native Corporations during scoping.

Doyon Limited and NANA Regional Corporation were the only two Native Corporations that expressed interest in consultation, and the BLM met with them on the following dates during the scoping period:

- September 19, 2017, Doyon, Limited
- October 13, 2017, NANA Regional Corporation
- November 20, 2017, NANA Regional Corporation

⁷ 512 DM 4, Department of Interior Policy on Consultation with Indian Tribes and Alaska Native Corporations, 12/02/14. <https://elips.doi.gov/elips/0/doc/4061/Page1.aspx>

2. Issues Summary

2.1. Comment Collection and Analysis

Public and agency comments are essential to shaping the EIS and gathering feedback on the project purpose and need, alternatives to be studied, definition of the study area, issues to be analyzed, impacts to be considered, methodologies to be used, and mitigation measures for consideration. At each public outreach opportunity and advertisement, comments were solicited to help scope these aspects of the EIS.

The public provided oral comments at the public meetings described. At many of the rural community meetings, tribal members and tribal government representatives were present. Notes from these meetings are available on the BLM ePlanning web site for the Road to Ambler project.

In addition to the comments received at the meetings, a total of 7,225 written scoping communications were received. These included 6,343 form emails,⁸ 862 unique emails (93 of which included attachments), and 20 letters and faxes.

The project team reviewed and catalogued the communications and analyzed them to identify significant issues to be considered in the EIS. The *BLM NEPA Handbook*, citing the Council on Environmental Quality's NEPA regulations, states the following:

...issues may be identified through scoping and...only significant issues must be the focus of the environmental document. Significant issues are those related to significant or potentially significant effects.

For the purpose of BLM NEPA analysis, an "issue" is a point of disagreement, debate, or dispute with a proposed action based on some anticipated environmental effect. An issue is more than just a position statement, such as disagreement with grazing on public lands. An issue:

- has a cause and effect relationship with the proposed action or alternatives;*
- is within the scope of the analysis;*
- has not be [sic] decided by law, regulation, or previous decision; and*
- is amenable to scientific analysis rather than conjecture.*

Issues point to environmental effects; as such, issues can help shape the proposal and alternatives.

– BLM NEPA Handbook, Section 6.4

⁸ These were emails sent by multiple people that contained the same content, sometimes with a unique comment included as well.

In accordance with regulations and BLM guidance, this document compiles those issues that seem most likely to have potential significant adverse or beneficial impacts, or that appear to be based on an anticipated environmental effect and to be more than position statements.

Each letter, email, fax, and oral statement was considered a comment submission. Many comment submissions were form letters that essentially repeated the same information and concerns. Many communications expressed opinions for or against the road project, or for or against mining, without identifying unique or significant issues. Many comment submissions raised specific issues that could shape the scope of the EIS analysis. Some comments provided substantive detail (e.g., suggesting study methodologies or citing data) or presented new alternatives. Non-substantive comments are not included in this Scoping Summary Report, though they have been reviewed by the BLM, are part of the project record, and will reside in the Administrative Record.

Potentially significant issues are summarized in Section 2.2, which provides a high-level overview of issues in broad groupings (i.e., issues related to the biological environment and issues related to the social environment) and a list of specific (paraphrased) questions raised by the scoping comments. Appendix A provides additional detail from the comments, organized by the same broad heading and then by the issue; these comments are presented verbatim. Analysts assigned to write the EIS will delve further into the detailed comments related to each issue and use those comments to shape the analysis in the EIS.

The issue categories used are as follows:

- The Project and Process
 1. Access
 2. Alternatives/Project Description
 3. EIS and EEA Process
 4. Maintenance and Operations
 5. Mining Impact
 6. Purpose and Need
- Physical Environment
 7. Geology/Topography/Soils
 8. Land Use/Land Management
 9. Noise and Air Quality
 10. Water (Waterways/Rivers/Tributaries/Watershed)
- Biological Environment
 11. Wetlands and Vegetation⁹
 12. Wildlife and Fish

⁹ Comments on streams and other waters also occur under the “Physical Environment” heading.

- Social Environment
 - 13. Cultural/Historic Resources
 - 14. Economics
 - 15. Recreation and Tourism
 - 16. Social Impact
 - 17. Socioeconomics
 - 18. Subsistence
 - 19. Wilderness
- Other Topics
 - 20. Other Impact Topics
 - 21. Mitigation (or Conditions of Permit)

2.2. Issues Identified During Scoping

2.2.1 Project and Process Issues

Issue 1: Access

A common topic was who would have access to use the proposed road. The permit application is for a non-public industrial road, with access limited to commercial transportation and drivers with commercial licenses. Commenters questioned AIDEA's ability to close the road to the public, particularly over the long term. Many recalled the Dalton Highway being promised/proposed as an industrial road that was later opened to the public; others wondered whether AIDEA would be able to prohibit public access, if public funding has been used. A variety of concerns were expressed about the impacts of granting public access via a new road system connected to the Dalton Highway in a region that has previously been unconnected via surface transportation. Access impacts are expressed in many of the other issues below—including impacts to wildlife and wilderness values, conflicts with subsistence hunting and fishing, and use of boats and all-terrain vehicles to access areas distant from the road. Despite the fact that AIDEA's proposal is for a private road, some commenters expressed a desire for personal, community, or Alaska Native Corporation access to the road. Concerns were expressed about enforcement of any limitation on use and security in general for whomever was ultimately granted access on the road.

Scoping issues related to access included:

- Please analyze the potential impacts of general or public access on this road.
- If federal or State dollars (or land) are involved, will it be possible to keep the road from becoming public or open to other uses? How could this be achieved?
- How would the project be financed and what are the implications of the proposed financing? Does the proposed financing keep it from becoming a public road?
- Can DNR restrict public access on their portion of the land (61%) since it is owned by the State? What if any State monies are used? Could there be legal action that might open the road to the public?

- How will the BLM or State limit access in the future if politics change?
- Does the BLM have authority to restrict access?
- Would hunters be able to stake small mining claims to get "industrial" access to the road and then use it for hunting?
- Will the road allow recreational or other small commercial miners to access lands in the area? What would be the indirect and cumulative effects of that scenario?
- Will recreational or other users be able to access rivers where they can launch their boats to gain access across the area?
- What types of restrictions would be implemented to prevent people from coming in to take subsistence resources? Would there be a toll station?
- How would the road be managed if public access was granted? How could the impacts be mitigated to allow greater benefit to affected communities?
- Who will have access to the airstrips? Will the airstrips remain in place after the road is built?
- Will community members be able to use the road as they use the DeLong Mountain Transportation System (DMTS, commonly referred to as the Red Dog Road) or the oilfield roads near Nuiqsut?
- Will the communities near the road be allowed to use it or build connecting roads to it? Who would pay for that, and who would manage those permissions? What kind of permit or permitting system will be in place to allow access to the road?
- Could the road be built with private money or privately owned? Could NANA participate in such an arrangement? Would those involved be able to decide who has access?
- What preventive measures could keep the public off the road?
- Will the road have gated access?
- How can it be guaranteed that the road will never be opened for public use? Will there be road blocks, bridge removal, or other means of restricting access?

Issue 2: Alternatives/Project Description

Commenters addressed road design, road routes, and alternative modes of transportation and asked questions about project components. Modes identified besides road access included rail (both freight and narrow-gauge), blimp or dirigible, barge, aircraft, ice roads, and enclosed conveyor belt. Suggestions for road routes, and to a lesser extent, rail routes, included north-south routes to the Ambler Mining District and routes from Alaska's west coast (to existing ports or communities) to the Ambler Mining District. Project design elements included concerns about soils and permafrost, designing for safety, minimizing maintenance needs, fish passage and wildlife crossing structures, and bridges.

Scoping issues related to alternatives and design features included:

- Is a route to the west (to the coast) practicable/reasonable?

- There are concerns about design issues such as steep grades, road width, culvert size (and how to keep them open), potential pull-out or staging areas, sufficiency of available gravel, and erosion prevention.
- Consider a route from Kobuk to Tanana to avoid salmon spawning headwaters. Additional road routes raised included a road from the south through Tanana, Hughes, Hagozta and Kobuk and a road on State land south of Gates of the Arctic Park.
- The road should go south or west to a deep water port to be closer to the markets.
- Could an alternative connect to Dall Creek from the west since there is already a road from Dall Creek to Bornite?
- What is being done about the proposed corridor that was studied in the early 1970s through Kobuk Valley National Park and Noatak Preserve to the port?
- Could you build a road that travels west from the Ambler Mining District to the Red Dog Port to the Orient, to more directly follow the route that ore exports are taking? Such a route might be faster than connecting to the Dalton Highway and trucking ore to tidewater in Southcentral Alaska. The analysis should look at the route of the ore to a port, not just the length of the new road.
- Could you build a road from Ambler to Kotzebue, stockpile the material, and use Kotzebue's deep sea port to ship out ore?
- Is a railroad feasible? That would eliminate many concerns about public access.
- Does the industry prefer a railroad as opposed to a road?
- Can you consider a railroad to a deep-water port at Port Darby (deep-water on Norton Sound)?
- Would it be possible to transport the ore by railroad to a port on the lower Kobuk or Hotham Inlet and stockpile it there for transport in the summer?
- Could the ore be transported by barge down the Kobuk River?
- Could you build ice roads to the Kobuk River and barge the ore from there?
- Are freighting blimps (produced by Lockheed Martin) feasible?
- Is it cost-effective to fly out the concentrate?
- Is an enclosed conveyor belt feasible?
- Is the cost estimate accurate? How does it compare to the actual cost of the recently completed road to Tanana? Have permafrost and deep foundations for bridges been adequately considered in the cost?
- Will the EIS provide more detailed information about the design of this project beyond the level of detail given in AIDEA's application? The BLM needs to fully analyze the full-scale, two-lane road design in depth.
- What are the economic implications of connecting to the road system, as opposed to connecting to the coast (in terms of businesses and contractors from Alaska being able to provide supplies and services)?
- During development of alternatives, consider the size of the things that would have to be transported for the development of the mine. Will the road or railroad be able to handle some of the large equipment or modules that would be needed?

- Railroads plow their own snow. How does the cost of maintenance for a railroad differ from a road? Did DOT&PF screening adequately consider maintenance costs?
- Have river training devices been engineered into the design?
- Is the road intended to be permanent?
- Will the road be maintained while the mine is being developed?
- What will happen to the road after it reaches its 50-year design life?

Issue 3: EIS and EEA Processes

Comments about the process were wide-ranging. Included were comments about the scoping process itself and which communities were included for scoping meetings. More broadly, there were comments about ANILCA and its provisions. Comments also included issues associated with timing, particularly related to evaluating a road, as well as its use and impacts, before there is a mining plan. Commenters addressed the definition of the project area, the roles of the various agencies involved in the EIS and the EEA processes, and whether various local organizations could or should be cooperating agencies. Requests were made to incorporate traditional knowledge in the process.

Scoping issues related to the process included:

- In the EIS, how does the permit process identify acceptable environmental degradation? What is the threshold? What is acceptable damage to the land and what is not acceptable?
- Who makes the determination of whether the project will significantly restrict subsistence access? What does “significantly restrict” mean?
- Does the Legislature need to approve AIDEA’s funding or project decisions?
- Why does AIDEA have the authority to pursue this project? Who generated the idea for this project?
- Why was the BLM chosen as the lead federal agency if the USACE would be responsible for studies along the proposed road?
- Since the State has agreed to fund the NEPA process through the end of scoping, what officially constitutes the end of the scoping period? After this period, is there a process from the State to decide to move forward or not?
- Have multiple cooperating agencies had different decisions regarding whether or not to approve the ROW?
- Why was there so much time between the date AIDEA's application was accepted and the date the BLM filed the NOI?
- Does the EIS take into consideration the connecting actions of the road and its use?
- Will the EEA provide information that is not in the EIS? Will the cooperating agencies use the EEA?
- What are the trade-offs between the northern and southern routes through the Gates of the Arctic Preserve (impacts versus less distance through the park, versus other impacts, versus cost of the routes, etc.)?

- Is it possible to use or cite public records of previous subsistence-related meetings in the EIS analysis?
- Is this process simply a formality? Is the EIS a formality that all land owners have to complete? At the end of the process, is it assumed that there will be access?
- Can villages use the Alatna or Allakaket Cooperating Agency MOU as a template?
- Are the agency MOUs available to the public?
- What happens if the decision is made to not build the road? What is the likelihood of this outcome?
- Will any tribes become cooperating agencies? What input will the tribes have in the process?
- Can any tribal government apply to be a cooperating agency?
- What is the deadline for a tribe to request to become a cooperating agency?
- What steps could a tribe take to work together with K Corp or Doyon to become more involved?
- Are the indigenous people of the area “principal dialog partners?”
- What role will the NAB have as a cooperating agency? Will the NAB consult with municipalities and tribes throughout the process?
- Why was NANA denied to be a cooperating agency?
- Will there be scoping meetings in Hughes and Huslia?
- When will Doyon and NANA have a say? What if the private land owners say no?
- How can NANA play a larger role in the monitoring and mitigation of these roads and mining-related activities?
- What is AIDEA and who owns it?
- Does AIDEA need a binding contract from the companies to move forward?

Issue 4: Maintenance and Operations

Commenters raised issues of contamination related to use of the road—from dust associated with the road bed and from dust associated with loads of ore being transported—and contamination from spills. Similar issues (i.e., dust, spills) were raised related to road maintenance and maintenance camps. The cost of ongoing maintenance and who would pay for it for was another issue. Long-term road maintenance problems such as Aufeis and the interrelated effects of climate change, permafrost melting, and flooding were mentioned.

Scoping issues related to maintenance and operations included:

- How will permafrost, overflow, and flooding be addressed? What will be the effects of these natural forces on road maintenance and operations?
- If there is a major maintenance issue (like the recent flooding on the Dalton Highway), who is responsible for addressing that issue? How much would it cost, and who would pay for it? What are the potential impacts? In particular, consider major maintenance events and how they are affected by climate change.

- How much will it cost to maintain the road? How does the Ambler Road maintenance cost compare to the maintenance costs of the Dalton Highway or the DMTS?
- Will Aufeis be a problem? How will it be addressed? Is that calculated in the costs? Is the proposed roadbed depth high enough to mitigate the Aufeis concern?
- Is there a maintenance plan included in the analysis? Will that include an analysis of the impacts of dust and sedimentation on spawning areas?
- If the tolls do not cover the operations and maintenance costs, or industry decides not to go forward, who will pay for the road? Will the residents of Alaska be responsible?
- Will there be a guard shack? Who will fund it?
- How would communications in the area function for accidents or other public safety needs, given the remote nature of the area?
- Would the road be too dangerous for public use, given the area's rugged terrain and weather? Will people from more urban areas get into trouble?
- Who will police the road or provide emergency services? Will local communities be involved?
- How will security be enforced and will it be effective? Will private security forces be used, and if so, could this lead to conflicts?
- What will security do to keep non-Natives off Native-owned lands? Who will pay for security?
- Will there be a gas station? Fuel storage? What would be the impacts of such facilities?

Issue 5: Mining Impact

Many commenters stated that it was necessary to evaluate the impacts of mining in the Ambler Mining District to fully evaluate the impacts of the road. Many suggested these were “connected actions” or “cumulative impacts.” Questions about mining included effects of traffic on the proposed road as well as on connected highways, potentially to a southern tidewater port (e.g., Seward or Valdez), and effects at such a port. Some comments inquired about the power source for mining operations, the source and quantity of fuel, and related concerns about leaks and spills. Issues about air quality and noise impacts associated with the mines were raised. Mining impact topics overlap with other impact topics, including the Water, Subsistence, and Wildlife and Fish topics.

Scoping issues related to mining impacts included:

- What are the impacts of mining the huge quantities of gravel that will be needed for the road?
- Is it economically feasible to truck ore to a port in Valdez or Nikiski (or Seward or Port MacKenzie)? Why would a mining company transport it that distance?
- How many trucks would be used per day, and how much ore would they haul?
- Has the mine decision been made?
- How will mine runoff affect the rivers?
- Will there be hazardous waste left behind by mining development?

- How much of the money from the mining activity will go overseas? How much will go to the State of Alaska?
- What would be the effects of spills at the mines? Can they be effectively cleaned up?
- Will the cumulative effects of the mine, such as power production and fuel for power production, be considered?
- How many mines will there be?
- What would the tax rate be on the mining companies?
- If the Ambler Mining District is opened, would that contribute to our Permanent Fund Dividend, like the oil pipeline?
- Will the ore trucks come down to Fairbanks? Will they transfer the ore concentrate onto trains or continue down the Parks Highway?
- The BLM should fully consider the impacts associated with mine infrastructure as part of its environmental review.
- How many direct and indirect jobs would result from mine construction and operation?
- What will be the greenhouse gas emissions coming from these large-scale mines?
- Will the public have to clean up after the mines if they pull out or declare bankruptcy?
- What job impacts are associated with the no action alternative (the opportunity cost), especially for young people entering the work force? What are the impacts for those trying to get into the mining industry?
- Who are the entities behind the project? What mining companies or land owners, both American and foreign, will benefit? Will the workforce at the mines come from outside Alaska? Will they take the jobs, revenues, and wages and then leave the state?
- How will the mines get gas and power, and what will be the effects of the utilities that support the mines?
- What will happen after the ore is delivered to Fairbanks, and after it is delivered from Fairbanks to Seward?
- What is the likelihood a mine will be developed? Why would the road be built if there might not be a mine, and what are the chances of this scenario happening?
- How would Trilogy Metals fit into the Ambler Road Project? What is their operation history and what do they bring to the developmental arena?
- What are the plans for materials spills on the road? If there is a lead, zinc, or copper spill, what is the cleanup plan?
- Can regulations be established before mining occurs to prevent mining of hazardous materials?
- Related to the economic effects, consider not only the management and the resources needed to sustain any large-scale mines in the region, but also the resources needed to develop the mines. They require a huge amount of infrastructure at the mine site, the plant, the haul vehicles, and also man-camps.
- Are the minerals worth the impacts? How much value is in the ore deposits?
- What minerals have the mining claimants filed with the Securities and Exchange Commission?

Issue 6: Purpose and Need

The draft purpose and need that was shared during scoping was as follows:

- Project Need
 - The need is based on the requirement for the BLM to respond to a ROW application for surface transportation access to currently inaccessible, economically valuable mineral deposits in the Ambler Mining District.
- Project Purpose
 - The purpose of the BLM action is to provide AIDEA with (1) technically and economically practical and feasible surface transportation access across BLM-managed lands for mining exploration and development in the Ambler Mining District, and (2) authorization to construct, operate, and maintain associated facilities for that access.
- BLM Decisions to be Made
 - The BLM must decide whether a ROW shall be granted, and, if so, the terms and conditions that will be included in the ROW authorization.

There were relatively few comments related directly to the BLM's draft purpose and need, but those that were received suggested the purpose and need should include bolstering the statewide economy or providing local socioeconomic benefits. There were multiple questions about the purpose and need for, or feasibility of, mining in the area. Many of these issues are captured above under the Mining Impact topic. Some commenters felt that the purpose and need for the road should be linked to the purpose and need for mining. Some noted that the Ambler Mining District would provide the types of minerals needed to transition to cleaner energy infrastructure and reduce carbon dioxide emissions, and indicated this as a purpose for the road. Some commenters questioned the need for the assessment process, suggesting that the road project was inevitable, and that the road would be built regardless of comment.

Commenters raised issues related to the purpose and need that included:

- The purpose of this industrial road is to build a road to mines, not just for exploration. BLM is required to fully consider the impacts and infrastructure associated with the mine as part of its environmental review.
- If this was a viable project, the private companies that want it would fund it. Why are the companies that want the road not funding the road?

2.2.2 Physical Environment Issues

Issue 7: Geology/Topography/Soils

Concerns were expressed about earthquake, landslide, and permafrost effects on road construction and maintenance. Also, questions were asked about where to get the material

needed for road construction and whether road construction would release naturally occurring asbestos (common in the Ambler area) and other minerals. Impact concerns included how the road would impact the landscape, as well as how the landscape would impact the road (resulting in indirect impacts) due to changing climate conditions that are affecting soils, erosion, and permafrost.

Scoping issues raised included:

- Does the road cross acid rock? Will there be acid rock drainage issues, and would those affect fish and subsistence?
- Is there enough gravel that does not contain asbestos that can be safely used? If not, how will the asbestos affect the environment?
- Have permafrost and deep foundations for bridges been adequately considered?
- What pollutants will be generated by construction and use of the gravel surface of the road? Will it exacerbate thawing permafrost?
- Will melting permafrost affect the road or vice versa, and what effects would that have on other resources?

Issue 8: Land Use/Land Management

The region's land and how it is managed (or should be managed) once a road is in place were discussed by multiple commenters. Compatibility of a road with State and federal land use plans and with Native Corporation lands was a concern. Commenters noted that land selections were, at least in part, premised on the access provisions of ANILCA.

Scoping issues related to land use and land management included:

- How will land management be affected if a new borough is formed in the area?
- Is the proposed ROW consistent with State transportation plans and DOT&PF's previous analysis?
- What private property trespass issues could occur?
- Will the road allow others to settle on the land? Would there be indirect growth?
- Is there a difference in the land management requirements on the two Gates of the Arctic National Preserve routes?
- Does AIDEA have agreements in place with Native Corporations to cross their land?
- How will land managers provide enforcement on their lands, given State and federal budget cuts?
- Can anyone submit a permit application to gain access across National Park lands under ANILCA?

Issue 9: Noise and Air Quality

A few commenters wanted to know more about noise impacts or asserted that noise impacts would occur, both to wildlife and to humans. Air quality concerns were related to fugitive dust

from vehicles driving on the road (especially given the presence of naturally occurring asbestos in the soils in the project area) and climate change.

Scoping issues raised included:

- What will be the effects from air and noise pollution?
- What will be the construction noise effects versus the long-term and cumulative noise effects of the road?
- How will climate change affect the project and the environment, and vice versa?

Issue 10: Water (Waterways/Rivers/Tributaries/Watershed)

Water quality and rivers as avenues of access were issues raised by multiple people. This topic overlaps heavily with commenters' interests in fish and fishing. Concerns were generally that streams remain free-flowing and that watersheds not be polluted. The region was repeatedly noted as important spawning ground for fish harvested far downstream and along the coast. Commenters expressed concerns about the road changing access to the rivers, and therefore enabling greater access to the region's waterways, all the way to the western coast. Concerns were expressed about changing the current undisturbed wild nature of the area's rivers, including those managed as Wild and Scenic Rivers.

Scoping issues raised included:

- What kind of pollution will be in the rivers?
- How would spills travel through and affect the river system?
- Will fugitive dust and chemicals from vehicles affect the ability to drink snowmelt along the road?
- How would rivers and waterways be impacted?
- How will rivers, lakes, and tributaries in the delta be monitored after construction?
- What will be the effects on water quality and drinkability for rivers and other waters?

2.2.3 Biological Environment Issues

Issue 11: Wetlands and Vegetation

Commenters expressed concerns about the vegetation and aquatic resources (wetlands, waterways, and forest/upland areas) as habitat. There was concern about a road bringing invasive plant species to the region. Concerns ranged from contamination due to potential dust and spills along the road, to wetland permitting.

Scoping issues related to wetlands and vegetation included:

- The road will cross 2,900 streams, 11 major rivers, and 1,700 acres of wetlands that provide vital habitat for subsistence resources in the region. What will be the impacts to the hydrology and habitat of the region?
- What will be the effects from fugitive dust pollution? How will chemicals from vehicles on the road affect vegetation and wetlands?

- What will be the effects from invasive species? What efforts will be made to reduce the spread of invasive species? How will this be monitored?
- What kind of pollution will be caused by the gravel surface of the road? Will there be contamination? Will it affect subsistence areas (e.g., for berry picking)?

Issue 12: Wildlife and Fish

Many commenters indicated concerns about wildlife and fish, and this interest overlapped heavily with subsistence concerns. Impacts to the Western Arctic Caribou Herd were the most frequently discussed. Concerns included habitat fragmentation, particularly as it applies to caribou migration patterns, and the potential for caribou to avoid or not cross the road.

Cumulative impacts of the road with other projects were a common theme, including distant projects and activities that are within the migration range of caribou or fish. These ranged from the North Slope to coastal western Alaska and to areas along the Dalton Highway. Moose, salmon species, sheefish, whitefish, and birds also were addressed in comments.

Scoping issues related to wildlife and fish included:

- How will the road affect the caribou and their migration? What are the caribou migratory patterns, and how many caribou are there? How many communities and people rely on these herds?
- How will the trucks affect the caribou and their migration?
- Should the alternatives contain mitigation measures similar to those of the Red Dog Mine Road regarding caribou migration, mitigation effectiveness, and other issues? Will the outcomes be similar to those at the Red Dog Mine?
- What will be the cumulative effects to caribou migration when coupled with the Dalton Highway and Trans-Alaska Pipeline? Have these projects changed migration? How have past actions physically affected caribou migration and subsistence access/abundance? What were the historic migration routes? Does the pipeline create an east-west barrier and the proposed project create a north-south barrier – effectively restricting migration routes?
- What are the cumulative impacts to the Western Arctic Caribou Herd, wild salmon, whitefish, and the integrity of the intact ecosystem in this area?
- Will road noise affect wildlife?
- What is the likelihood that the road will provide more access to game poachers? How will that be controlled? There is only one wildlife officer on the Dalton Highway; how will the State ensure enforcement given that the State budget is undecided?
- Caribou hunting is already at maximum sustained yield; how will additional hunting pressure caused by the road cumulatively affect caribou? Will bag limits change?
- How would future growth affect hunting pressures (especially the F35 program at Eielson Air Force Base)?

- What would be the effects of the road and potential contamination on spawning areas, particularly related to subsistence? In particular, chum spawning at Henshaw; and sheefish and whitefish in the Alatna River, the Koyukuk River, and the South Fork River.
- What kind of pollution will be in the rivers? How will it affect fish, and how far downstream will it extend?
- Will fiber be used in road construction to prevent erosion? How would that affect fish if it enters the streams or rivers?
- Can the road be routed to avoid any salmon spawning areas?
- What would be the effects of stream and river crossings, dust, chemicals, and acid mine drainage on fish?
- What would be the impacts of dust and sedimentation on spawning areas?
- Would wildlife overpasses be built?
- How will the area's fish and wildlife be monitored after construction? Will there be ongoing studies to monitor effects to moose or other resources once the road is built?

2.2.4 Social Environment Issues

Issue 13: Cultural/Historic Resources

Commenters noted that the region is a “cultural landscape” and that traditional cultural practices are a part of modern life for Alaska Natives in the region. These topics are related to the Subsistence and Social Impact topics. There was relatively little specific comment regarding historic or archaeological sites, buildings, or objects.

Scoping issues related to cultural and historic resources included:

- What will be the road effects on cultural and historic sites?
- How is the cultural landscape defined, and how would it be affected?

Issue 14: Economics

Comments addressed the economics of the project and the impacts or benefits to the economy. Comments questioned the costs of the road, economic feasibility of the road, and costs versus benefits, including calls for formal studies and more broadly qualitative discussions of costs and benefits. Some commenters highlighted the need for economic study, assuming it would show either benefits to the State economy from eventual mining activity or that the State would not be able to recoup the costs of road construction. Some commenters questioned whether the State/AIDEA should be spending public funds to study the road, considering the State's fiscal status. (Note: See the Socioeconomics topic for comments on the intertwined social and economic impacts to local communities.)

Scoping issues related to economics included:

- What is the relationship of the proposed road (and the costs of such a road) to the development of mines and to the regional or statewide economy? How does this relate to the project purpose and need?

- How will the road affect the market for wilderness lodge owners or remote hunting and recreational guides? What are the economic effects?
- What are the economic implications of connecting to the road system, as opposed to connecting to the coast (in terms of businesses and contractors from Alaska being able to provide supplies and services)?
- Will there be a long-term (200 years) cost/benefit analysis that compares the benefits that come from the land (e.g., subsistence and tourism) versus the costs, benefits, and impacts that come with the road and other development?
- How would the bonds for this road be paid off when the tolls charged do not cover the maintenance costs on the road or the costs of construction? Who will be liable for this debt if AIDEA cannot repay these bonds?
- Would the bonds be backed by the State?
- What is the funding source and cost of the permitting/environmental process? Why is the State pursuing this when funding is tight?
- Will the companies be able to afford the tolls and shipment costs per truck? (Use the Dalton Highway as an example of the costs per truck.)
- Why are there significant projected per-mile cost differences between this road and similar roads proposed? Why is the projected cost significantly lower than the estimated cost for the Nome Road?
- How will the project affect State revenues/deficits? How does it change our fiscal situation?
- Where does AIDEA get its money for investment? What does it do with the profits? Who benefits from the profits?
- Are there investors in addition to AIDEA? If so, are they international or out-of-state?
- Who will pay for the road, and will federal, public money be used?
- How much of the money from the mining activity goes overseas? How much goes to the State of Alaska?

Issue 15: Recreation and Tourism

The most common recreation comments were concerns about outside sport hunters and sport anglers using the proposed road and competing with local subsistence hunting and fishing. Another common theme was the wilderness quality of the region for recreation, in designated federal Wilderness areas and National Wild and Scenic Rivers, and in non-designated but equally wild areas. These concerns encompassed global tourism and the long-term attraction of large areas of wild land, because, globally, such areas have been shrinking or are otherwise impacted. Concern was expressed about increased recreational access to the region's land and waters by off-road vehicles and boats, and aircraft on airstrips along the road. Several commenters mentioned specific concerns about Gates of the Arctic National Preserve or about specific rivers.

Scoping issues related to recreation and tourism included:

- Would increased access be characterized as a benefit or an impact on NPS lands and recreational activities in the Gates of the Arctic Preserve and Park?
- How will the road affect visitors and the visitor economy?
- What are the impacts on other recreational businesses in addition to lodge owners (i.e., guides)?
- What is the impact to the present scenic values in the area?

Issue 16: Social Impact

Commenters expressed concern that the road could negatively affect Native and rural culture and communities in the region, especially related to subsistence. Other negative impacts mentioned included easier access to drugs and alcohol and bringing more outsiders and non-Natives into communities. Others saw potential benefits to rural communities, including increased access to high-paying local/regional jobs, lower cost of living if goods and services could be brought in along the road, and potential revenue to tribal and local governments. Issues of environmental justice and health impacts (including human health impact assessment) were also included. Several commenters had questions about public safety, which is addressed largely under the Access topic as enforcement issues.

Scoping issues related to social impact issues included:

- What will be the social impact to suicides and alcohol use?
- What will happen to the culture, language, and way of life for residents if the road is built?
- Will the road bring drugs and alcohol to the villages? How would you keep them out? What would be the impacts?
- How will the villages benefit from the road since they are not connected to or allowed to use it?
- How would emergency medical services be provided? How would they be provided if the road were open to the public?
- Will there be a health impact assessment process conducted in parallel with the EIS process?
- How large is the area that will be addressed in the study on impacts to social and traditional lifestyles? Is it regional, borough, statewide, or a combination?
- Will communities be able to bring in heavy equipment to help with community development? What will be the cost of bringing in equipment?
- The BLM needs to do a full study in each of the impacted communities to fully assess the subsistence, socioeconomic, cultural, and other impacts of the region. Is there a data gap? What is an appropriate methodology/level of study for the community impacts?
- How could communities affected by the road benefit from it? What benefits can villages expect besides jobs, when the cost of living is increasing?

- What kind of safeguards would be established to allow for affected communities to be benefactors of development in the area? How could development in communities as a result of the mining and road be managed to benefit Native people?
- How can communities be educated to help foster their own growth and development, as opposed to growth coming in from the outside?
- Consider inequities, especially relative to the agency's mandates. Evaluate and disclose the inequities presented by the impacts that are borne by the rural residents, while the money goes to the urban areas.
- Construction of the road will likely bring in a large influx of people, which can cause social issues, including a quick influx of cash, temporary residents, and public health impacts. How will the social impacts of construction and the construction workforce be considered?

Issue 17: Socioeconomics

This topic is related to both the Economics and Social Impacts topics, but focuses on local financial and community issues. Jobs, local hire, and impacts to local or regional businesses, including wilderness-based businesses, were the primary issues, as were impacts related to the cost of living—potential for lower costs for fuel or groceries, for example. Other economic benefits to local communities also were of concern to commenters.

Scoping issues related to socioeconomics included:

- How do cuts in State subsidies/funding cumulatively affect the rural communities when combined with subsistence impacts of the road?
- What kind of jobs would be available to community members during construction, during operation, and at the mines?
- How can communities help their people prepare for those jobs? Will there be job training? Local hire or Native hire preference?
- Will community members be able to get road construction or maintenance jobs?
- Would communities affected by the road receive the tax benefits?
- How many jobs will there be? The region should be prioritized for jobs. We need to ensure, in writing, that communities receive job preference.
- Would groceries be transported in on the road? How would that affect the prices? How long would it take? Will the groceries be damaged by the time they are available?
- Will fuel be transported in on the road? How would that affect the price?
- What will be the impacts on provision of State services (e.g., troopers)?
- What will be the future of the villages with the no build alternative? Will there be jobs?
- Would the jobs benefit people in the villages? Would the income keep them from having to move out of the villages?
- Will the TERO (Tribal Employment Rights Ordinance) Act apply?
- Who receives the monetary gain? How does that monetary gain compare to the monetary value of the subsistence resources?

- How many direct and indirect jobs would result from road construction and operation?
- Will Native Corporations be able to sell gravel needed for the project? If there are villages nearby, will those villages get to sell gravel to the project or provide equipment rental?

Issue 18: Subsistence

Subsistence hunting, fishing, and gathering was a theme in many comments and is related to topics of Social Impact, Socioeconomics, Wildlife and Fish, and others. Concerns over lack of access to traditional hunting grounds, changes in caribou migration, and competition with road users for finite subsistence resources overlap with lifestyle and cultural identity issues. Some commenters mentioned that an ANILCA Section 810 subsistence evaluation would be required. Some commenters cited additional subsistence reports previously prepared, while others requested the need for more data.

Scoping issues related to subsistence included:

- How have past actions physically affected caribou migration and subsistence access/abundance? What were the historic migration routes? Will the project change migration routes and impact communities' access to caribou?
- What would be the effects of contamination to spawning areas, particularly related to subsistence?
- How will the project change competition from sport hunters and anglers in regard to subsistence?
- Will fishing guides be allowed to set up camps and access them via the road? How would that affect subsistence sheefishing?
- How will traditional hunting grounds be affected?
- How will traditional hunting grounds be protected from public use, damage, and mining impacts?
- How will the road affect moose populations? Caribou populations? Will hunters be allowed to come in and take more game?
- How will the road affect subsistence access to sheep?
- How will the road affect subsistence berry areas? Will there be contamination?
- Will the road restrict subsistence access? Will the bridges restrict access to subsistence areas? How high will the bridges be? How will community members have access to traditional hunting grounds? Will they be able to cross the road?
- How will the road affect subsistence use/harvest?
- Climate change is affecting subsistence (caribou); how does that cumulatively combine with the road to affect subsistence resources?
- What are the cumulative effects of oil and gas development in the National Petroleum Reserve-Alaska and climate change, coupled with the project, on subsistence use of fish and caribou?

- Is there likely to be more federal or State regulation that would affect subsistence or hunting rights as a result of the road?

Issue 19: Wilderness and Wild and Scenic Rivers

Commenters noted the value of the region as one of the world's last remaining large wild areas. Some indicated that there would be greater value in the long term from keeping such landscapes intact, rather than from mineral extraction. Some indicated there was value in wild landscapes for wilderness-based businesses. Comments expressed an intrinsic value of wilderness areas. Commenters had concern for impacts to designated Wild and Scenic Rivers in the region and to nearby designated Wilderness, as well as to non-designated wild areas. They indicated that such areas should be assessed as part of the EIS. Also, visual impacts (listed under "Other") were identified as an element related to the Wilderness topic.

Scoping issues related to wilderness and Wild and Scenic Rivers included:

- What will be the effects on the Wild and Scenic Rivers?
- What are the cumulative effects to the character of this big, rich, wild place? Consider the spiritual component of the landscape.
- How will the road impact wilderness-based recreation and wilderness-based businesses?
- How will the values associated with wilderness qualities be compared with traditional economic values (such as value of minerals, or reduced costs to communities for delivered goods)?

2.2.5 Other Topics

Issue 20: Other Impact Topics

"Other" impact topics are those that were less frequently mentioned in comments, including wildfire risk, air quality and dust, visual impacts, and impacts related to specific components of the project, such as airstrips, construction camps, and gravel pits. This category also includes general comments on the "content of the EIS," typically expressed as lists of items that should be addressed without a great deal of explanation of each topic or why it was important. Commenters expressed the need for additional baseline studies to be conducted and included in the analysis in the EIS.

Other scoping issues included:

- What will be the effects of the proposed gravel mines?
- What will be the effects of the proposed airstrips?
- How does past industrial/hazardous waste cumulatively impact the area when combined with the road impacts?
- Will fugitive dust cause dirt and pollutants on the snow, which would cause snow to melt earlier?
- Will there be hazardous waste left behind by the road?

- Will airplane or helicopter operators use the road to cache fuel, and then use it to access more of the wilderness? What would those effects be?
- What would be the effects of the Ambler Road on the Dalton Highway during construction and during mine operations?
- Who will be responsible for monitoring oil spills? How fast would a fuel spill response be?
- Will more data be obtained about the region to feed into the NEPA analysis?

Issue 21: Mitigation

Comments about mitigation included both specific suggestions for ways to reduce impacts, and questions or comments about how to reduce impacts. These comments applied to a variety of impact topics. Some commenters suggested conditions that the BLM or other agencies should include in their permits or ROW authorizations for the road. Comments included support for reclamation at the end of the road's useful life/when no longer needed to support the Ambler Mining District. Specific suggestions included compensating for impacts by including local hire, ensuring public safety, accommodating wildlife, ensuring fish passage and free flow of water, and monitoring effects over time.

Scoping issues related to mitigation included:

- Are there ways to mitigate water quality impacts? How effective are they?
- Would there be impact funding, as has been done on the North Slope for villages like Barrow and Wainwright?
- Will the road be reclaimed or rehabilitated when the mining is done? Who will pay for that and can it be guaranteed?
- What is the plan to monitor environmental impacts to the area?
- Will the assessment include how mitigation measures will be adopted and implemented over time? Will continued funding be available for monitoring the effectiveness of project designs and any mitigation measures protecting resources?
- If there are negative impacts on land and animals, how will they be fixed?
- Would wildlife overpasses would be built?
- Mitigation measures that should be considered include temporary closure of the road for animal passage, aircraft limits, speed limits, road cover to reduce dust, restrictions on transport of toxic materials, use of local subsistence guides, and use of an annual performance plan.
- Proper bonding and other monetary instruments could be used to ensure restoration.

3. Future Steps

A Draft EIS and Final EIS are expected in 2019, with the Record of Decision expected in early 2020. The schedule is dependent on future funding and a decision by the State of Alaska to proceed through the full NEPA process. Additional public meetings and opportunities for public comment will be provided after release of the Draft EIS, as well as upon completion of the Final EIS.

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