

December 13, 2023

Docket DOI-BLM-AK-F030-2016-0008-EIS

Dear Director Stone-Manning,

On behalf of the Alaska Wildlife Alliance staff, board and members, we urge you to select the "No Action Alternative" for the Ambler road.

The Alaska Wildlife Alliance is a non-profit organization based in Anchorage, founded more than 45 years ago, and speaks for more than 2,400 supporters of Alaska's wildlife. We advocate for healthy ecosystems which are ethically and scientifically managed to protect our wildlife for present and future generations. The Alaska Wildlife Alliance has members and alliances across the spectrum of wildlife users, from hunters, who like us support ethical hunting and fair chase concepts, to recreationalists, who cherish wildlife solely for their intrinsic value, and Alaska Natives who rely on intact ecosystems for cultural, spiritual, and physical health. The adverse impacts to wildlife and the ecosystem from the proposed project have the potential to affect users across our base of supporters, and are not limited to just one user group. As such, we fundamentally do not support the development of an industrial road to the Ambler Mining District. We have submitted comments and testimony on this project since 2019, and find no evidence that the concerns raised years ago have been resolved in this SEIS.

The road, as planned and described in this SEIS, will have lasting negative impacts on wildlife, ecosystems, and subsistence communities. The proposed road would cross 2,900 streams, 11 major rivers, and fill over 2,000 acres of wetlands. The Kobuk, Alatna, and Koyukuk Rivers are important spawning grounds for sheefish, and there is a real possibility for future mines to release copper sulfide and other toxic chemicals into these critical watersheds.

Hotham Inlet and Kotzebue Sound are extremely important estuaries for tom cod, smelt, herring and other small fish. If this biomass is polluted, it is not just fish who suffer. Humans, sheefish, arctic char, and salmon rely on these rivers, and marine mammals such as seals and beluga whales subsist on fish from these watersheds. In short, the entire food chain would be in jeopardy if toxic mining waste were spilled into the Kobuk River watershed, where the annual subsistence fish harvest is hundreds of tons. The Koyukuk River Drainage is in similar jeopardy. The king salmon spawning grounds on the South Fork Koyukuk River and on Henshaw Creek are of utmost concern to our members and local communities.

The road will also intersect the migratory routes of two caribou herds, including the Western Arctic Caribou herd, and increased traffic on the Dalton Highway would affect a third herd. Fragmenting the migration routes of the already declining Western Arctic Caribou Herd is both irresponsible and unethical. Aside from the fragmentation and mine traffic disturbance, there is a strong possibility, unsatisfactorily unaddressed in this SEIS, that road will become public and allow hunters to usurp the

Western Arctic Caribou herd allocation to an entirely new road-access user group. Road access would also allow large boats to be launched in the Kobuk drainages, opening hunting to all Kobuk drainages and the Chukchi coast. Moose populations are also predicted to be affected up and down the Koyukuk, Wild, Alatna, John, and Kobuk Rivers by boat and all-terrain vehicles, accessing from the inevitably public Ambler Road.

Further, the construction, maintenance, and use of the road will bring invasive plant species, and impact permafrost conditions and waterways already under stress from climate change. And these concerns are based only on the limited information we know. We have serious concerns about the limitations the agency has in assessing the impacts of the proposed Ambler Road project.

The purpose of this road is to access a mining district, but the BLM has failed to fully consider the impacts of future mines, and the roads they need for development and operation, in this SEIS. Harmful acid rock drainage, tailings, and contamination must all be fully considered.

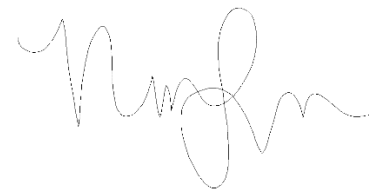
The Alaska Wildlife Alliance does not find the SEIS for this project acceptable, especially when we consider the scale of the project and potential impacts on wildlife and subsistence communities. We ask that you consider the environmental and social risks associated with this project, and then fully weigh the prospective gains. Alaska is the last great American wilderness, the last of our country's intact ecosystems.

The Alaska Wildlife Alliance believes in sustainable development, and has supported projects that have adequate risk assessment, mitigation, and an environmental ethos that considers the health of future generations. This is not one of those projects. This road will fragment ecosystems, remove mountain tops, and expose wild and scenic rivers to exploitation, pollution, and potentially excessive harvest.

We, on behalf of our membership, urge you accept that this road just simply does not make sense. As Alaskans, we urge you to understand that this road does not make environmental sense or financial sense, and does not regard the traditions, values, livelihoods, and futures of Alaskans.

Please select the "No Action Alternative" for the Ambler road.


Sincerely,





Nicole Schmitt  
Executive Director



**ALASKA  
WILDLIFE  
ALLIANCE**

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