

**Gates Subsistence Resource Commission comments on the Ambler Industrial Access Road regarding the NPS Gates of the Arctic Environmental and Economic Analysis (EAA)**

The Gates of the Arctic Subsistence Recourse Commission last met on November 14-15, 2017 in Fairbanks. The Gates SRC has been discussing the impacts the Ambler Road would have on the resources and subsistence users of the affected area at several meetings also.

**The Gates of the Arctic Subsistence Resource Commission is opposed to the Ambler Industrial Access Road for the following reasons:**

**The commission finds the Road is not proven to be economically viable. Application for the Ambler Access Road is premature. There is no agreement with AIDEA with any company to assure that the tariffs will pay for the Road.**

**There has not been a comprehensive analysis of the real cost of the Ambler Access Road. The State Department of Transportation (DOT) Planning Division chronically underestimates new road construction to get initial funding. Alaska Industrial Development and Export Authority (AIDEA) has not actually had an independent cost analysis made as to real roadbed and bridge construction as well as the true annual maintenance costs.**

**There is no realistic idea what the tariff rate would be for mining companies. Without a real idea what the tariff rate will be, there will be no signed agreement by any company to use the Ambler Access Road.**

**The Commission has serious concern for detrimental long term affects to both fish and wildlife and people in the Koyukuk and Kobuk River watersheds by non-subsistence users. Detrimental impacts to the local resident subsistence users, wildlife, and fishery resources are unwarranted.**

**If the Ambler Access Road continues to the next phase, the Gates SRC would seriously consider the Northern route through the Gates of the Arctic Kobuk Preserve. Crossing smaller streams would have less impact with smaller bridges. There would be more limited boat launch access by sport users higher in the drainage, lessening the competition impacts to communities of the Kobuk River watershed and customary and traditional harvest areas.**

**The National Park Service should seriously consider methods and means restrictions that are in place for the Dalton Highway. The Dalton Highway (Haul Road) was built into wilderness. The closure to all-terrain vehicles and firearms has helped reduce high harvest of low-density game populations and damage to surface terrain. Management methods of the Dalton Highway Corridor would need to be applied to the Ambler Access Road if built.**

## **Discussion and justification for the SRC position on the Ambler Access Road**

The oil industry built the Haul Road in 1974 eventually it was named the Dalton Highway. The Road was conveyed to the State after completion of the Trans-Alaska Pipeline in 1978. State of Alaska Legislature in 1974 closed the area five miles on either side of the Haul Road to hunting and the use of firearms or use of all-terrain vehicles during construction of the road and pipeline. This was to protect low-density game populations and arctic tundra. If an endeavor is economical the industry will pay for its construction and maintenance.

The State received the Haul Road in October 1978. They scrambled to set up temporary maintenance camps and shops. The Haul Road was and is the lifeblood of the oil development that has highly benefited the State of Alaska.

The road was maintained for the industrial traffic, with permits to go north of the Yukon check point. Permits were issued to people who actually lived or had property associated to the road north of the Yukon and industrial users, including hunting guides, miners, and utility personnel.

The hunters in Fairbanks figured out right away they could stake a mining claim on the North Slope for \$12 and get a permit to go North of the checkpoint as industrial users. There were eventually hundreds of hunters hunting the North Slope after 1981, when the BOG opened the 10-mile wide corridor to archery hunting.

The Ambler road will see the same thing except on a faster time scale. There are no restrictions outside of the 5 mile wide Dalton Highway Corridor Management Area (DHCMA), nor have any been proposed. The hunters will now pay a \$35.00 mining claim fee in the Ambler area for an access permit. The "miners" will bring airboats, jet boats, powerful ATVs and snow machines to hunt all the way to the coast. The big boats the hunters have now and are using to hunt the Yukon and other rivers will be able to access wildlife and fisheries down the Kobuk River and along the coast north of Kotzebue, as well as the Koyukuk River drainages.

This "Road to Resources" has been talked about in the Alaska Outdoor Council, (AOC) and Sportsman for Wildlife groups for years. The Ambler Road will expand the terrain devastation and high competition combat hunting seen on the Denali, Steese, Taylor, Glenn and other roads in Alaska.

The Dalton Highway has ATV and firearm restrictions, except for very limited firearm and snowmobile uses on Federal lands, by a small number of eligible rural residents, within the Dalton Highway Corridor Management Area. The political push for the Ambler Road is the affluent and politically powerful urban sport hunters of Alaska.

The Dalton Highway maintenance is a State expenditure. There are seven maintenance camps from Livengood to Deadhorse. There is tremendous cost to the

State for wages, insurance, and retirement for the crews. For the work one week on and one off, the State pays for charters to fly the crews up and back. The State also pays for the equipment and fuel as well as parts and supplies that all have to be trucked up. All of the remote operations are not cheap. The Amber Road would be just as expensive, but most likely more.

There would need to be airfields built near the camps to change the crews out. There would need to be a minimum of three to four camps on the Ambler Road. Coldfoot would maintain the east first 60 miles, but the budgeting would need to be increased for the Coldfoot site. Most likely Coldfoot, John River, Alatna, and Ambler would be the camp locations.

The State receives very little royalty from mineral extraction. Selling access needs to have signed agreements to assure cost recovery.

The Northwest Arctic Borough will receive property taxes, but the State will lose tremendous amounts of money for construction and maintenance. Current cost of construction and maintenance projections are highly flawed. The State cannot afford to be squandering money at any time, but especially now.

The State Department of Transportation Planning Division chronically and vastly underestimates the stated cost for new road construction. This agency uses this strategy to get the project started.

The Manley to the Yukon River "Road to Nome" section is an example. Actual cost after completion will be three times the DOT initial stated estimate. Using that typical ratio as the minimum understated costs for the Ambler Road, due to very large river crossings and extensive permafrost requiring use of geotextile, the Ambler Road would cost at least three times the DOT lowballed estimate.

The Ambler Road would most likely cost at least minimum of 1 to 1.2 billion dollars. This is not accounting for the cost of airfield access for some of the maintenance camps, and the camps themselves. The camps and equipment to maintain the road would be tens of millions of dollars. The absolute minimum cost of the crew and equipment would be at least 11 million annually, taking into account the cost per mile of the Dalton Highway of \$49,000, last figures found.

Total State expenditure is needed to truly calculate the tariff rate and viability. There is no realistic cost of construction and maintenance, so AIDEA cannot make a realistic projected tariff per load hauled over the Ambler Road. If the tariff is too high the companies will not use the Road.

This application is very premature. The public and agencies should not be required to research what the real costs and flaws for this incomplete application.

Currently there is no viable demonstrated mining plan by Trilogy Metals.

Where is the huge energy going to come from? A gas line or massive amounts of diesel will be needed; there has been no projection. Everything done to date regarding mining operation by Trilogy Metals is vague at best. The current mining proposal has huge logistical gaps that make this proposal pie in the sky. The reason is Trilogy has stated publicly they are not going to mine. Their intention is to sell to a Company who might mine the copper ore. There is no real plan.

There is no agreement between the Alaska Industrial Development and Export Authority and the mining companies to guarantee that the Ambler Road will be used. There is **no** assurance to the State AIDEA Board that this Road would be profitable to the Alaskan economy, or that the Ambler Road would pay for itself eventually.

The State of Alaska has not fully explored the other more economically viable options to ship the copper ore to market due to reduced annual maintenance cost, such as railroad access to Norton Sound and or a winter ice road to a port on the lower Kobuk River or Hotham Inlet.

There has been no discussion of the Mining Industry investing in and use of the Lockheed Martin PRL Logistics freighting blimp.

There are transportation options that would be far cheaper over the long term.

The fish and wildlife resources of the area will be highly affected by mobile hunters and fishers launching boats and all-terrain vehicles from the Ambler Road.

One only need to look at the Fortymile caribou hunt in the fall from the Steese and Taylor Highways to see what the Ambler Road will be when the Western Arctic Herd tries to cross the road. The herd already has maximum use by subsistence hunters and a few sport hunters. Road access hunters will usurp the Western Arctic Caribou Herd allocation to an entirely new road access user group. Road access will allow large boats to be launched in the Kobuk drainages to hunt all of the drainages and the Chukchi Coast.

Moose populations will be affected up and down the Koyukuk, Wild, John, Alatna, and Kobuk Rivers by boat and all-terrain vehicles, accessing from the Ambler Road.

Local subsistence hunters will have their seasons and bag limits vastly reduced once large numbers of non-local hunters usurp the allocation. The other communities in the Northwest Region and Western Interior that rely on the Western Arctic and Teshukpuk Caribou herds will also be affected by the reallocation of bag limits including Anaktuvuk Pass, Allakaket, Alatna, Ambler, Hughes, Huslia, Bettles, Evansville, Kobuk, Shungnak, and Wiseman/Coldfoot.

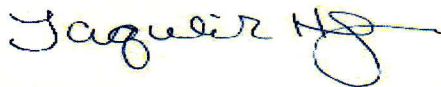
Sheefish population spawning grounds on the Kobuk, Alatna, and Koyukuk Rivers will be highly affected. The Sheefish are highly sought-after fish for sport use

already. These large, and most important fisheries on the south slope of the Brooks Range will be very near the Road alignment. Additionally, grayling and whitefish species like pike also have spawning grounds in the Alatna River.

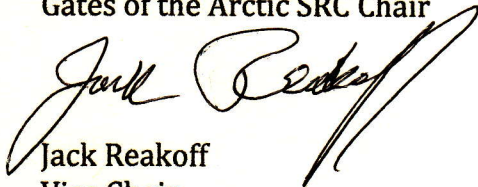
There is a real possibility for copper sulfide and other toxic mining chemicals to be released into the Kobuk River and other watersheds. Hotham Inlet, (Kobuk Lake), and Kotzebue Sound are extremely important estuaries for tom cod, smelt, herring and other small fish in large biomass. Humans as well as sheefish, arctic char, salmon and other larger fish rely on this biomass. Marine mammals including seals and beluga whales use these small fish also. The food chain would be in jeopardy if toxic mining waste were spilled into the Kobuk River watershed. The annual subsistence harvest of fish is hundreds of tons. This fishery and marine mammals are extremely important resources shared by thousands of people of the NANA Region for subsistence.

There are the same concerns for the food chain and spawning grounds of the Koyukuk River Drainage. The king salmon spawning grounds on the South Fork Koyukuk River and on Henshaw Creek are of utmost concern. Human subsistence use of the fishery resource in the Koyukuk and Yukon watershed is also in the hundreds of tons annually.

An ANILCA Title VIII section .810 analyses would show extreme detriment to subsistence users on Federal public lands and all of Northwestern Alaska.



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