

**Western Interior Alaska Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
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RAC/WI 18001.ZS

**JAN 16 2018**

Karen Mouritsen  
Bureau of Land Management  
Acting State Director  
222 West 7<sup>th</sup> Avenue #13  
Anchorage, Alaska 99513

Dear Ms. Mouritsen:

I am writing on behalf of the Western Interior Alaska Subsistence Regional Advisory Council (Council) to provide written comments on the Ambler Road Project presently under public comment for the scoping phase under the National Environmental Policy Act (NEPA). The Council is opposed to development of this road.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands in the Western Interior Region of Alaska. The Council was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Additionally, Section 805 of ANILCA and the Council's charter establish the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside the region that may impact subsistence resources critical to communities served by the Council. The Council also provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held its fall public meeting on October 10-11, 2017 in Fairbanks to review wildlife proposals, the 2018 Fisheries Resource Monitoring Plan, and other issues related to subsistence in the Western Interior Region. At this meeting, the Council also received updates on the Ambler Road Project from the Bureau of Land Management (BLM), National Park Service (NPS), and Northern Alaska Environmental Center.

These presentations addressed the status of the Ambler Road NEPA process. Additionally, information was shared providing maps documenting geospatially explicit lifetime subsistence use in the vicinity of Gates of the Arctic National Park and Preserve. A presentation was also provided addressing community outreach associated with the BLM's NEPA process and NPS

Environmental and Economic Impact Analysis in response to a right-of-way application submitted by the Alaska Industrial Development and Export Authority as part of the Ambler Industrial Access Project (Ambler Road Project).

The people of the Western Interior Region are blessed with abundant fish and wildlife resources that have sustained families and defined cultural identity since time immemorial. Residents of the Western Interior Region of Alaska have a Customary and Traditional Use Determination for Sheefish (*Stenodus nelma*) and Chum Salmon (*Oncorhynchus keta*).

Additionally, the Federal Subsistence Board has recognized the customary and traditional use by residents of the Western Interior Region of the Western Arctic Caribou Herd in Unit 21D (encompassing numerous communities, including Huslia, Koyukuk, Galena, Nulato, Kaltag, and Ruby) and Unit 24 (encompassing numerous communities, including Wiseman, Coldfoot, Evansville, Bettles, Alatna, Allakaket, Hughes, Huslia, Galena, and Koyukuk).

The Council stated its opposition to the Ambler Road Project, citing numerous adverse impacts to subsistence resources and Federally qualified subsistence users in the Western Interior Region, specifically:

- Adverse impacts to migration of the Teshekpuk Caribou Herd and Western Arctic Caribou Herd due to habitat fragmentation resulting from development of the Ambler Road, road usage, and road maintenance;
- Adverse impacts to Sheefish and Chum Salmon spawning habitat in the Alatna River, Kobuk River, Henshaw Creek, and the Malmuit Fork of the John River due to changes in water quality and quantity resulting from development of the Ambler Road, road usage, and road maintenance;
- Adverse impacts to Federally qualified subsistence users resulting from the influx of non-Federally qualified users accessing the road to hunt for finite subsistence resources; and
- Adverse economic impacts to Federally qualified subsistence users who shoulder the burden of increased cost and competition for food while subsidizing private mining exploration.

Public concern for the impacts of large-scale road project development on Federally qualified subsistence users in the Western Interior Region is well-established through substantial oral testimony delivered on the record by Pollock (P.J.) Simon, Jr., First Chief of Allakaket Village at the Council's February 21-22, 2017 public meeting in Fairbanks. The Council amplified its concern for the impacts of large-scale road development on Federally qualified subsistence users in the Western Interior Region in its FY2017 Annual Report to the Federal Subsistence Board. In its report to the Federal Subsistence Board, the Council noted opposition to the modification of PLO 5150 to allow State selection of Federal public lands in the existing Dalton Utility Corridor under the BLM Central Yukon Resource Management Plan.

Additionally, scientific literature demonstrates a correlation between road development and adverse cumulative effects to wildlife habitat. Specifically, the development and operation of roads has been associated with wildlife habitat fragmentation;<sup>1</sup> decline in water quality and quantity;<sup>2</sup> changes in hydrology and increased sedimentation in stream networks;<sup>3</sup> disruption to wildlife migration patterns;<sup>4</sup> disturbance to the rearing of offspring;<sup>5</sup> wildlife avoidance of areas effected by excessive habitat disturbance;<sup>6</sup> and increased wildlife mortality due to roadkill, hunting, and habitat conversion.<sup>7</sup> The materials presented in each of these resources need to be considered and analyzed in the forthcoming draft environmental impact statement.

The Council emphasizes that the impacts of developing the Ambler Road Project will have adverse and far reaching effects within at least 50 miles of each side of the road. These impacts include noise disturbance to terrestrial and aquatic wildlife resulting from increased motorized off-road vehicle traffic and boat use extending up the coast and into the Kobuk River Drainage. The increased motorized off-road vehicle traffic and boat use resulting from development of the Amber Road will also have significant adverse impacts up and down the Koyukuk River, John River, and Alatna River drainages. The Council emphasizes the environmental impact statement should include the analysis of non-road alternatives to access the proposed mining site, including though not limited to the use of rail to deliver ore to a Bering Sea port. These impacts need to be analyzed in the draft environmental impact statement.

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<sup>1</sup> Ana Benítez-López, Rob Alkemade, and Pita A. Verweij, The impacts of roads and other infrastructure on mammal and bird populations: A meta-analysis, In *Biological Conservation*, Volume 143, Issue 6, 2010, Pages 1307-1316.

<sup>2</sup> Stephen C. Trombulak and Christopher A. Frissel, Review of Ecological Effects of Roads on Terrestrial and Aquatic Communities, In *Conservation Biology*, Volume 14, Issue 1, Pages 18-30.

<sup>3</sup> Richard T.T. Forman and Lauren E. Alexander, Roads And Their Major Ecological Effects, In *Annual Review of Ecology and Systematics*, Volume 29, 1998, Pages 207-231.

<sup>4</sup> Scott A. Wolfe, Brad Griffith, and Carrie A Gray Wolfe, Response of reindeer and caribou to human activities, In *Polar Research*, Volume 19, Issue, 1, 2000, Pages 63-73.

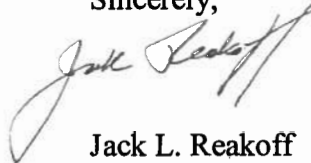
<sup>5</sup> Ingunn Vistnes and Christian Nellemann, Avoidance of Cabins, Roads, and Power Lines by Reindeer during Calving, In *The Journal of Wildlife Management*, Volume 65, No. 4, 2001, Pages 915-925.

<sup>6</sup> Ingunn Vistnes, Christian Nellemann, Per Jordhøy, and Olav Strand, Wild reindeer: impacts of progressive infrastructure development on distribution and range use, In *Polar Biology*, 2001, Volume 24, Issue 7, Pages 531-537.

<sup>7</sup> D. A. Walker and K. R. Everett, "Road Dust and Its Environmental Impact on Alaskan Taiga and Tundra," *Arctic and Alpine Research*, vol. 19, no. 4, 1987, Pages 479-489.

The Council requests a written response from BLM acknowledging the concerns specified in this letter and describing the alternatives the agency proposes to eliminate, minimize, and mitigate these concerns. Thank you for consideration of our request. Any questions regarding this letter can be addressed through our Subsistence Council Coordinator, Zach Stevenson, at 907-786-3674, zachary\_stevenson@fws.gov.

Sincerely,



Jack L. Reakoff  
Chair

cc: Federal Subsistence Board

Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management  
Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management  
Jennifer Hardin, PhD, Subsistence Policy Coordinator, Office of Subsistence Management  
Carl Johnson, Council Coordination Supervisor, Office of Subsistence Management  
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Marcy Okada, Subsistence Coordinator, National Park Service  
Jeffrey Rasic, Chief of Integrated Resources Management, National Park Service  
Clarence Summers, Subsistence Manager, Alaska Region, National Park Service  
Gates of the Arctic National Park and Preserve Subsistence Resource Commission  
Dana Pruhs, Chair, Board of Directors  
Alaska Industrial Development and Export Authority  
Interagency Staff Committee  
Administrative Record