Stacie McIntosh

Bureau of Land Management

222 W 7th Ave, Stop 13

Anchorage, AK 99513

Re: Comments for the Supplemental Draft Environmental Impact Statement for the Proposed Ambler Mining District Industrial Access Road

Dear Ms. McIntosh:

Thank you for the opportunity to comment on this project.

I believe that the proposed project, if built, will have negative cascading effects on the peoples, lifestyles, traditions, habitats and wildlife, birds, fisheries and marine mammals in the very extensive project area and beyond. The previous authorizations were deficient in consideration of mitigation measures, of considerable widespread and local public opposition to this project, and relied on future commitments of unsated designs, mitigation measures, locations, resource use details and many other issues, contrary to the requirement of NEPA, FLPMA, ANILCA, the NHPA, and the CWA 404 permit requirement. I believe that at this point, prior authorizations should be withdrawn and the No Action alternative should be selected.

Glaringly, this SEIS does not provide the comprehensive baseline information required by law.

Under NEPA, the agencies must “describe the environment of the area(s) to be affected … by the alternatives under consideration.” [40 CFR Sec 1502.15] “Without establishing the baseline conditions … there is simply no way to determine what effect the [action] will have on the environment, and consequently, no way to comply with NEPA.”[ *Carlucci*, 857 F.2d at 510]

How can the consequences of the project construction and operation be known if the baseline information is not first provided, relating to such things as surface and groundwater resources, fisheries inventory, air quality, wildlife resources, habitat specifics, avian species and numbers, and cultural, recreation and economic resources? In plain language, if we don’t know what we have, how can we know how our actions will effect things? And how can you reasonably define mitigation measures when you don’t know what you have?

I am also deeply concerned about the direct, indirect, and cumulative effects of the proposed road and future development of the Ambler mining district, and the lack of analysis done to date of the full range of likely impacts. The road’s construction and future use will create heavy truck traffic though a mostly pristine wilderness area, which will result in noise and dust pollution, and their public health threats; it would negatively impact wilderness recreation opportunities, disturb wildlife, destroy wetlands, and permanently alter the lifestyles of the rural peoples who depend on subsistence opportunities for traditional food resources like fish and caribou. All of the agencies (BLM, NPS, and the Corps) have previously failed to consider widespread public opposition to this project, much less the true range of its negative environmental impacts. Previous authorizations did not include a sufficient range of mitigation measures to avoid significant impacts to, and minimize any negative impacts on, historical and ecological resources, particularly wetlands.

I am a signatory to another set of comments submitted by multiple organizations, that details the deficiencies listed above. In my personal comments, I would like to stress the harm that this project will do to local peoples, while the project itself does not prove itself as being necessary to provide ‘rare earth minerals’ for future alternative energy production. Indeed, there has yet to be any proven lode of rare earth minerals that can be efficiently mined in the Ambler Mining District. The District does not contain any proven economic deposit of cobalt. One of the four proposed mines previously listed cobalt, but this year the company entirely removed cobalt from its mineral resource estimate. At present, increases in the global supply of cobalt has lowered the sale price and a new cobalt mine in Idaho was declared to be unprofitable and mining activity there was suspended. It is probable that a cobalt substitute may be used to make lithium-ion cathodes in the future. The Trilogy Metals announcement that germanium might be a byproduct at one of the sites remains unconfirmed. No economic feasibility study has been done to see if it was possible to economically develop the deposit. At present, germanium plays no role in clean energy development. Any zinc processed in the District would have to be shipped to East Asia for processing, and as such would not increase the U.S. mineral independence or supply chain security. The U.S. currently gets 60% of its zinc resources from Canada, an allied nation. Lastly, neither lead nor gold are critical minerals. Lead poses great threats to public health and the ecosystem, and the sole purpose of mining gold is to increase wealth (in this case, mainly of an international mining consortium). It is therefore my contention that mining of the Ambler District would do nothing to strengthen our national security, or our supply of minerals necessary for clean energy production, or further secure our supply chain.

Indeed, the negative effects of the Ambler Mining District proposed access road are so significant and widespread that I have a hard time imagining a suitable reason for its construction. I have personally commented on past phases of the EIS, and on the scope of this SEIS, about the detailed problems the road would create. At this time I would like to stress that the DSEIS Technical Subsistence Report is fully supportive of the No Action Alternative. BLM determined that “Alternative A, B, C and the cumulative case may significantly restrict subsistence uses in multiple communities (ES-7)” The restrictions would be the result of “a potential decrease in abundance and availability of Caribou, fish and vegetation(ES-7)”

It is known that the Western Arctic Caribou Herd population has dropped significantly over the last decade, especially the last two years; and new hunting restrictions have been put in place. The Yukon River salmon runs are now at historic lows. Thus any actions that would further deplete these vitally important subsistence resources must be evaluated in a much more stringent light. The mere existence of the road will probably alter the historic caribou migration routes. Migration route changes would not just affect subsistence use access but cause further stress to the herd, already in a “preservative decline”. Changes in water flow and water resources might change both migration routes and caribou calving ground locations. The same is true with the fact that mines and mining roads built as a result of this proposed project will “increase habitat fragmentation exponentially”, affecting caribou migration patterns and grazing areas. The studies have also shown significant, substantial impacts to all fish, migratory birds, eagles, and small mammals that are harvested and shared within the effected communities.

These impacts would be felt the worst by the rural, low income and minority communities and peoples. These same areas would disproportionately experience other high, substantial adverse impacts of the Road, and ultimately of the mining projects that the road would create opportunities for. Numerous Tribal and First Nations have passed Resolutions of Opposition. This includes a resolution in opposition passed by 74 tribes and First Nations on the Yukon Watershed; a resolution of opposition passed 3 times, most recently in March of this year, by 37 Tribal Governments in the Tanana Chiefs Conference Region; opposition from 23 Yupik tribes and 10 Inupiaq Tribal Governments; and 5 individual resolutions of opposition by tribes nearest the proposed development and road.

I have lived and worked in the Northwest Arctic, have family there, and the area is near and dear to my heart. Our family went out and harvested caribou, moose, Dall sheep, fish, berries, ptarmigan and other birds as the major source of our diets. We recreated through the beautiful valleys of the Noatak and Kobuk Rivers and visited all of the villages from Kotzebue up. I sat in awe of the beautiful, hours long, late night sunsets on the river; I stood on the beach at Onion Portage, listening to fiddle music from a friend, as hundreds of caribou walked right by me in a long procession of clicking hooves and quiet grunting, one of the most stirring memories of my life. I snowshoed into small valleys where many dozen ptarmigan created a moving, clucking image of white on white. I had fish jump on my lines as I hauled them from the river to detangle them. Our daughter requested that we spend her 18th birthday at our camp near Noyuq, to fish and play cards all night long. And always, the pristine waters, air and tundra provided the basis for what made us who we were; they fed us, they provided solace, they provided beauty in the animals and flora that flourished there.

I have no doubt that the construction of the proposed Ambler Mining District access road will cause irreversible damage to the wildlife, the water and air quality, the subsistence opportunities and the public health of the area and the villages and people that rely on its resources. A promise of jobs for a few cannot offset these damages. The Biden Administration has promised to make Environmental Justice a leading consideration, and this project would be a major travesty to that effort.

I cannot imagine sitting in the quiet of the arctic tundra outside of Kobuk and hearing the noise level of trucks making 68 round trips per day, 61,320 per year; nor can I imagine breathing the dust that they would create. I cannot imagine families such as ours worrying about the dangers of the man camps, construction of which is directly linked to an increase in violence in local communities, especially to women. In addition to violence, the man camps would bring more substance abuse problems from the increase in imported drugs and alcohol.

The FEIS and the SEIS have both admitted that significant effects to subsistence use would result from construction of this project. They also detail the adverse public health, mental health, local economic and social impacts. All the while, not one of the mines that the proposed road would service has even obtained permits to operate.

Please select the No Action Alternative. The evidence supports no other alternative.

Sincerely,

Loren J Karro

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