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April 1, 2022

Nina Brudie

Alaska Department of Natural Resources

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Adam Leland

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Re: Comments on the Application for Private Exclusive Easement for the Ambler Road (ADL 421741) and

 The Public Review Draft of the Ambler Review Site Specific Plan

Dear Ms Brudie and Mr Leland:

I am writing to comment on the application for a private exclusive easement for the proposed Ambler road, and on the draft of the Ambler Road Site Specific Plan. I urge the Department to deny the Easement application and to not finalize the Site Specific Plan due to the many and serious deficiencies as will be detailed below.

I was a long time resident of the Northwest Arctic and lived and/or worked in many of the areas that will be effected by the proposed Ambler Access Road. I relied on this area for my subsistence uses, hunting caribou, fishing for salmon, shee fish, pike, whitefish and greyling, and picking berries every year with three generations of my family. I also trapped on the Noatak and Kobuk rivers and recreated by boat, snowmachine and foot.

There will be many environmental and community effects of the proposed projects, and these effects and any possible mitigation efforts have yet to be thoroughly considered under either the flawed FEIS or the BLM permitting analysis. Part of this reason is that the AIDEA has submitted only generalized road construction plans and has not dealt with maintenance and mitigation considerations. They have not yet presented a complete project design or information, but have continually reneged on promises to answer all questions and provide any detailed information.

From an environmental standpoint, there are too many impacts that have not been considered in any meaningful detail. This is proposed to be a 211 mile long industrial road (4 times the length of the Red Dog Mine road), crossing 2,900 streams, 11 major rivers and 1,700 acres of wetlands. However the AIDEA’s Site Specific Draft Plan barely covers impacts to wetlands, referring only to those waterways they consider to be navigable and anadromous. In fact, there does not yet exist any substantive studies of which waterways are either navigable or anadromous, as noted by BLM.

Both the FEIS and the Corps of Engineers have acknowledged that there would be significant changes and impacts to surface water flows and groundwater, as well as to aquatic resources and fisheries. However these changes and impacts, and any possible mitigation, have not and cannot be properly analyzed because both the road and site design are not sufficiently detailed in their applications. The proposed road will definitely cause changes to ground water runoff, such as creating impounded water. This will cause a rise in water temperature, warming the permafrost and tundra under and around the sedentary groundwater. The effects of water flow changes and water warming on bird migration, caribou migration, native flora and air quality due to methane release must all be considered.

Along with these considerations must be a study of soil and permafrost impacts throughout the proposed road and site. Thawing permafrost and tundra will affect native plant species and air quality. This thawing can be a major source of methane release, and methane is a greenhouse gas considered to have a global warming potential 25 times that of CO2 [*EPA Overview of Greenhouse Gas Emissions in 2019*]

The risk of spills of fuels and/or ores along the proposed road corridor and at its associated storage areas has not been adequately addressed. They are given a mention of being “rare” to occur, although studies of other mining and industrial roads show that not to be true. No real consideration is given of the possible effects of asbestos release during road construction and maintenance, although AIDEA admits in their application that finding gravel that is not asbestos containing will be difficult.

From a community effect standpoint, many of these environmental effects will be seen as major. The road construction and its resulting heavy, industrial traffic will undoubtedly cause major effects, such as air pollution from blowing dust and ore, and pollution of waterways from the same and from possible spills along the roadway, which will effect neighboring communities as well as people who use the area for subsistence and recreational activities. The road will also have a direct effect on subsistence resources, causing changes to caribou migration and perhaps to breeding and birthing behavior; to local fish stocks; to bird migration and nesting behavior and habitat, and to prized flora such as berries and medicinal plants. This is spelled out in a current lawsuit regarding the EIS, which points to inadequate consideration of impacts to subsistence, caribou, water resources and cultural considerations.

AIDEA buries these considerations under a continued palaver of what the great economic benefits of the proposed road will be. However, an independent study [*Powers Consulting, An Economic Analysis of the Proposed Alaska Ambler Access Road, Dec. 2021*] states that AIDEA has failed to consider realistic costs, risks and liabilities inherent in financing the proposed Ambler Road. Financing such a large, pie in the sky project may endanger AIDEA’s credit rating and deplete its loan funding abilities, putting large, multi-national corporations ahead of considerations for low-cost loans for independent Alaskan business. AIDEA is already spending many 10s of millions of dollars without any assurance that these funds will be recovered through road use fees, royalties or direct loan repayment. Indeed, the Powers report states that “…the Ambler Access Road , as presented in the FEIC, cannot pay for itself..” based on the financial projections of the only mine yet to file an EIS. Additionally, the report states that “While the multi-national mining companies may see substantial positive economic impacts from the proposed Ambler Access Road mines, the local people and local economies will see little of those projected economic benefits….”. Instead, small local businesses such as guide services and recreational companies may well see a decreased economy due to the construction and mining activities in their use areas.

There are many other reasons that the Department should not approve the application for a private exclusive easement, nor the draft Site Specific Plan. They do not provide any of the detail needed to show that they will have proper safeguards, that they will not significantly impact natural and cultural resources without proper mitigation, that they will not cause health risks to nearby communities through air and water pollution, and they do not comply with the Constitutional requirement that they are in the public interest or will be financially beneficial to the State. Additionally pending litigation in federal court challenges federal authorizations because of multiple violations in their permitting process, including violations of NEPA, the Clean Water Act, the Alaska National Interest Lands Conservation Act, and the Federal Land Policy and Management Act (FLPMA), and both BLM and the NPS have suspended the federal rights of way while these challenges are being addressed.

Thank you for the opportunity to comment. I have commented during the AIDEA meetings in the past, through the Zoom process, and found that AIDEA has been inconsiderate, rude and unwelcoming in this process.

Sincerely,

Loren J Karro