



**BACKCOUNTRY
HUNTERS & ANGLERS
ALASKA**

Dear House Natural Resources Committee Chair Westerman and Ranking Member Huffman,

CC: Members of the House Natural Resources Committee

Re: Sec. 80132. Ambler Road in Alaska

Backcountry Hunters & Anglers urges you to remove provisions related to the Ambler Road in budget reconciliation. Alaska's Brooks Range is our nation's most wild and remote hunting and fishing grounds. The fish and wildlife resources in this vast region – including one of the largest remaining caribou herds in North America and world-renowned sheefish fisheries – **supports an enduring economy – a collective of guides, outfitters, transporters, air taxi services, and other small businesses, as well as 66 rural communities.**

The proposed 211-mile Ambler Industrial Road would bisect prime caribou habitat, require more than 2,900 stream culverts and span 11 major rivers, threatening fisheries, the region's outdoor economy, and subsistence resources. More than 14,000 hunters and anglers are already on the record opposing the road. Fast-tracking the project through reconciliation bypasses required consultation and squelches public engagement and environmental review processes which are essential for decisions that will have long term impacts. Budget reconciliation is not the appropriate place for this policy provision that will generate a scant \$500,000 annually through rental revenues. Additional problems with the proposal include:

- **The road would not strengthen U.S. supply chains of critical minerals, but it could strengthen the supply chains of our adversaries.** The road would facilitate the sale of Alaska's mineral resources to foreign processors, including China, an adversary to the United States. The most abundant minerals in the Ambler District are copper, zinc, and lead; only zinc is currently classified as a critical mineral. Based on mining industry reports, none of these mineral concentrates are intended to be processed in the U.S. A feasibility study conducted within the Ambler District (commissioned on behalf of Trilogy Metals for the "Arctic" deposit) made it clear that, "the significance of the Chinese market for concentrate cannot be understated."
- **The Ambler Road amendment directly contradicts the will of rural Alaskans and the hunt-fish community.** The proposed Ambler Road is opposed by dozens of leading outdoor brands, hunt-fish organizations, and Alaska-based small businesses. Within the Northwest Arctic region,



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opposition to the Ambler Road outweighs support. A plurality of NANA Regional Corporation shareholders oppose the project, and more than 85 Alaska Native tribes and First Nations have passed or signed onto resolutions against the Ambler Road. That sentiment was echoed nationally: More than 135,000 Americans—including many Alaskans—spoke out against the proposed Ambler Road within the last year.

- **Alaska National Interest Lands Conservation Act (ANILCA).** The Ambler Road language in ANILCA Section 201(4) refers only to the portion of the road that crosses Gates of the Arctic National Preserve. The Ambler amendment would bypass the law in ways that were not contemplated by Congress when it passed ANILCA: Congress did not intend for Section 201(4) to override Section 810, which prioritizes subsistence uses and resources in permitting projects, including the Ambler Road. Congress did not intend for ANILCA Section 201(4) to override Title XI, which requires a joint permitting process for any transportation system through a conservation system unit. An ANILCA Section 810 Evaluation is required for all land use actions, even if such action is covered by NEPA Categorical Exclusions (CXs) or Determinations of NEPA Adequacy (DNAs). Congress was aware in passing ANILCA that other agencies would be involved in any permitting process to allow surface transportation across Gates of the Arctic National Preserve and other public lands. Finally, ANILCA is a law not directly related to budgetary significance, which should not be considered in budget reconciliation.

On behalf of Backcountry Hunters & Anglers,



Mary Graves
Alaska Chapter Coordinator



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