

**RECORD OF DECISION**

**United States Department of the Interior**

**United States Department of Transportation**

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We hereby adopt the Northern Alignment as described in the Final Environmental and Economic Analysis for the Proposed Ambler Mining District Industrial Access Project as the route for the issuance of the right-of-way across the Gates of the Arctic National Park and Preserve in accordance with Section 201(4) of the Alaska National Interest Lands Conservation Act. This Decision constitutes the final decision of the Department of the Interior and, in accordance with the regulations at 43 CFR 4.410(a)(3), is not subject to appeal under Departmental regulations at 43 CFR Part 4, and the final decision of the Department of Transportation.

Approved by:

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Robert Wallace

Assistant Secretary for Fish and Wildlife and Parks

U.S. Department of the Interior

Approved by:

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Timothy Hess

Associate Administrator for Federal Lands, Federal Highway Administration

U.S. Department of Transportation

## RECORD OF DECISION

### AMBLER MINING DISTRICT INDUSTRIAL ACCESS PROJECT

#### Decision by the Secretaries of the Interior and Transportation on Alignment for the Ambler Road through the Kobuk Preserve

##### I. Introduction and Need for Action

The Alaska National Interest Lands Conservation Act (ANILCA) of 1980 established or expanded 10 national parks and monuments and added 10 new national preserves, roughly doubling the size of the national park system. ANILCA also added 26 rivers to the wild and scenic rivers system and placed 57 million acres into the National Wilderness Preservation System, more than tripling its size. The designations were so vast, often encompassing entire communities and potentially making future development of the young and largely undeveloped state impossible, that Congress included specific measures to mitigate the impact of the conservation designations. Areas managed by the National Park Service but designated as national preserve, rather than national park, were anticipated to include uses otherwise not compatible with national park management like industrial roads or sport hunting. This was the case for Gates of the Arctic National Park and Preserve (GAAR, or when referring solely to the Kobuk Unit of the Preserve, the Preserve) which was created in ANILCA and includes 7,523,897 acres of designated park and 948,608 acres of designated preserve. The Kobuk Wild and Scenic River, also established in 1980, flows within both the park and preserve and 7,167,192 acres of designated wilderness comprise nearly all of the national park area. Protecting access to an important mineralized area known as the Ambler Mining District was a priority in the designation of the new preserve and wild and scenic river. To prevent this important mineral resource from being landlocked by its actions, Congress guaranteed access across the Preserve and Kobuk River to allow for a road connection from the Ambler Mining District located to the west of the Kobuk River to the Dalton Highway, the only access road to the Arctic, located to the east.

To ensure access would be granted, Section 201(4) of ANILCA requires the Secretary of the Interior to permit a right of way (ROW) for surface transportation across the Preserve, including the Kobuk River. The Alaska Industrial Development and Export Authority (AIDEA), a public corporation of the State of Alaska, now proposes to construct a 210+-mile road to provide the link to the Ambler Mining District, a portion of which requires a ROW across the Preserve (the Proposed Project). AIDEA has reported many positive impacts it expects to flow from the construction of this road, including:

- the development of a major mining district that will create over 68,000 jobs, generating over \$5 billion in wages, and over \$1.3 billion in local and state revenues over the life of the mines;
- additional access that could be used for emergency response and fiber optic infrastructure improving telecommunications in remote communities; and
- lower costs for fuel and other community goods and services as needed supplies are trucked into roadside staging areas rather than flown in or delivered by barge.

ANILCA further directed the Secretary of the Interior and the Secretary of Transportation to jointly prepare an environmental and economic assessment (EEA) in lieu of an environmental impact statement for the ROW through the Preserve, with the EEA to be “solely for the purposes of determining the most desirable [Alignment] for the right of way and development of terms and conditions which may be required for issuance of that right of way.” The EEA was to be completed within one year of the receipt of the application (unless extended for cause), is deemed to satisfy all requirements of the National Environmental Policy Act, and is not subject to judicial review. Required considerations include:

- alternative Alignments that are economically feasible and prudent, and that would result in fewer or less severe adverse impacts upon the Kobuk Preserve;
- the environmental, social, and economic impacts of the ROW, including the impacts of the Alignments on wildlife, fish, and their habitat, and rural and traditional lifestyles (including subsistence activities); and
- measures that should be instituted to avoid or minimize negative impacts and enhance positive impacts.

After completion of the EEA, the Secretaries are required to jointly agree upon a route for the issuance of a ROW across the Preserve. The ROW permit is required to be issued by the Secretary of the Interior in accordance with ANILCA section 1107, which contains various requirements for mitigating adverse impacts.

It should be noted that it is not possible to construct and operate a road through previously undeveloped territory without some adverse impacts, no matter how well designed and constructed the road may be. Congress clearly understood that, as it directed the Secretaries to consider environmental, social *and* economic impacts, with no requirement to select the least impactful Alignment. Further, the terms and conditions accompanying the permit for the selected Alignment are to “avoid or minimize negative impacts”, not eliminate them altogether.

The Alaska Department of Transportation and Public Facilities developed plans for two Alignments across the Preserve: (1) AIDEA’s proposed Alignment (Northern Alignment), and (2) an alternative, through a narrower portion of the Preserve, as requested by the NPS (Southern Alignment). While both Alignments are technically feasible, AIDEA provided economic data that documents a significant cost disparity between them. The Northern Alignment, which would cross 26 miles of the Preserve and be 211 miles total, would cost an estimated \$1,537,428,400 over the 50-year life of the road. In comparison, the Southern Alignment would cross 18 miles of the Preserve, would be 228 miles total and would cost approximately \$144 million more, estimated at \$1,681,612,205 over the 50-year life of the road. Considering construction costs alone, the Northern Alignment would cross eight more miles of the Preserve but would cost approximately \$80 million or 16% less to construct.<sup>1</sup> The Southern Alignment would be much more expensive to construct and maintain, but would not result in any increased user fees, and therefore is less economically feasible.

Due to the need for the overall road to traverse land managed by the Bureau of Land Management (BLM) and the need for other federal permits, including a section 404 permit from

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<sup>1</sup> All costs cited in this decision are estimates provided by the applicant.

the Army Corps of Engineers, the full project is subject to NEPA, with BLM as the lead agency for that analysis. The BLM's Final Environmental Impact Statement (BLM EIS) and the BLM and Army Corps of Engineers (ACOE) Joint Record of Decision (JROD) are referenced herein and were taken into account in this decision.

Title VIII, Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA) requires the Secretary of the Interior or his designee to evaluate the potential impacts of proposed actions on subsistence uses and needs. Because the overall road requires ROWs across BLM- and NPS-managed lands, BLM and NPS collaborated on the required evaluation and findings, with BLM serving as the primary author. The Section 810 Final Evaluation is included in the JROD and is attached as Appendix E thereto.

## **II. Decision Summary**

This Decision selects the Northern Alignment as the most desirable route for the ROW through the Preserve. We find the Northern Alignment to be the most economically feasible and prudent alternative with less severe adverse impacts allowing for construction, operation, maintenance and reclamation of a private, industrial-access road within the Preserve.

Appendix A of this Decision includes measures which are recommended to avoid or minimize negative impacts and enhance positive impacts and incorporating the design features the Applicant has agreed to undertake to avoid and minimize impacts from the Project.

## **III. Alternatives, Project Description and Impact Analysis**

### **A. Economically Feasible and Prudent Alternatives**

In its application for a ROW through the Preserve, AIDEA identified two potential Alignments: the Northern Alignment and the Southern Alignment. The Southern Alignment was developed at the request of NPS, as a means of potentially reducing impacts within the Preserve by crossing a narrower section of the Preserve, passing further from the boundary of Gates of the Arctic National Park and areas more frequently used by park visitors. No other economically feasible and prudent alternatives were identified by NPS or AIDEA, and none were identified through public scoping. Appendix G of the BLM EIS details why other Alignments or modes of surface transportation that could pass through the Preserve are not feasible and prudent. In sum, the only two economically feasible and prudent Alignments through the Preserve are those analyzed in the EEA.

The Northern Alignment includes approximately 26 miles within the Kobuk Preserve, and would be 211 miles in overall length. It crosses into the Kobuk Preserve north of the Helpmejack Hills and south of the southern boundary of the national park, and roughly parallels the national park boundary from the eastern boundary of the Preserve to the Kobuk River crossing.

The Southern Alignment includes approximately 18 miles within the Kobuk Preserve, and would be 228 miles in overall length. It travels east-west across the narrowest portion of the Kobuk Preserve, crossing into the Preserve south of the Helpmejack Hills and 12 miles south of the

southern boundary of the national park. It crosses the eastern boundary of the Kobuk Preserve north of Norutak Lake.

A map showing the two Alignments is available at EEA Figure 2, Appendix A.

### **B. Proposed Project Description**

AIDEA proposes construction of a private, industrial road, including support facilities. The requested term of the ROW authorization is 50 years, based on an estimate of when mineral exploration and development in the Ambler Mining District is anticipated to be completed. AIDEA proposes to remove the road and reclaim and restore the ROW upon cessation of mining activities in the Ambler Mining District.

The ROW typically would be 250-feet wide. In most cases, this would allow a sufficient area beyond the construction limits for future maintenance and repair activities, brushing, and minor relocation or re-alignment of the road if a problem develops. It would allow for drainage maintenance for culverts on both sides of the road. The ROW will be widened at specific locations to account for stream and river crossings and certain topographic features. The applicant identified the conceptual road locations for both Alignments under consideration, but the exact locations proposed for the road within the ROW will not be determined until completion of more detailed engineering studies. The selected Alignment will be refined in subsequent engineering and design phases based on the results of continued field surveys.

The applicant proposed to build and use the road in three phases. Phase I would be a pioneer (seasonal use) road (constructed in Years 1-2); Phase II a year-round, single-lane road (constructed in Years 3-4); and Phase III a two-lane road (constructed only if road use warrants, estimated no earlier than Year 10). AIDEA's proposal includes numerous design features that reduce adverse impacts. For example, to minimize disturbance, culverts installed during Phase I would be sized for the Phase II road footprint. A complete list of these design features is contained in Appendix A.

The applicant's proposal for the full length of the road includes construction of support facilities, including a fiber optic line, communications systems, material sites, construction camps, maintenance facilities, airstrips, turnouts and access roads. Within the Preserve, AIDEA's application for the Northern Alignment includes one material site and one communications tower, while the application for the Southern Alignment includes one material site, one communications tower, one construction camp/long term maintenance facility, and one airstrip.

The proposed Ambler road would be constructed on top of an embankment ranging from 3 to 8 feet or more above the current grade, creating essentially a dam and potentially disrupting the flow of groundwater and surface water, including hundreds of ephemeral and smaller streams. Bridges and culverts are an important element of the project, to maintain stream and wetland water flows and ensure fish passage. Within the Preserve, 1 large and 4 smaller bridges and 539 culverts would be needed to convey water across the Northern Alignment, while 2 large bridges and 317 culverts would be needed within the Preserve for the Southern Alignment. Considering the entire length of the Ambler road, the Northern Alignment would require 29 bridges and 2,903 culverts, and the Southern Alignment would require 25 bridges and 3,179 culverts.

Access to the road would be controlled, with no public access and primarily limited to mining-related industrial uses. Any subsequent commercial use would only be allowed under a separate permit process through AIDEA. Once a mine is developed – the date for which is currently unknown – an estimated 80 trucks per day are anticipated on the road (40 round trips). The number of vehicles is expected to increase over time as other mines are developed within the mining district and could reach approximately 168 round trips per day year-round.

We note that on February 5, 2020, AIDEA amended its Clean Water Act Section 404 permit application to the ACOE. Through this amended application, AIDEA reduced the requested term for the ACOE Section 404 permit to 10 years and reduced the road width to Phase II. For the Northern Alignment, AIDEA also proposed relocating the material site and communication tower outside GAAR. AIDEA proposed these changes to reduce project impacts. AIDEA later provided information suggesting the Southern Alignment could be redesigned to remove the proposed material site, communications tower, construction camp/long term maintenance facility, and airstrip from the Preserve, but doing so would require additional infrastructure on either side of the Preserve. AIDEA did *not* amend its application to NPS for a ROW within the Preserve authorizing a 50-year term and construction through Phase III with the aforementioned support facilities. For this reason, impacts from the full scope of the ROW application are analyzed in the EEA and considered in this Decision. However, we interpret this information from AIDEA as demonstrating that it may be possible to construct the project without locating these support facilities within the Preserve, and therefore such measures are considered as potential mitigation herein and in the EEA.

### **C. Environmental, Social and Economic Impacts**

The environmental, social and economic impacts of the Northern and Southern Alignments within the Preserve are analyzed in the EEA. Potential means to lessen adverse impacts and increase beneficial impacts are referenced in EEA Appendix C, which largely incorporates the BLM FEIS's analysis of potential mitigation measures and their effectiveness. Impacts to subsistence users and subsistence resources are analyzed in greater detail in the Section 810 Final Evaluation, Appendix M to the BLM JROD. These analyses show that within the Preserve differences in impacts between the Northern and Southern Alignments are very much at the margin. However, taking into account the potentially greater impacts of the Southern Alignment on the wild and scenic river, fish habitat, and wetlands, the Northern Alignment impacts are less severe. In summary:

- The Northern Alignment would impact fewer wetlands, would have less adverse impacts on fish, subsistence, wild and scenic rivers and presents greater economic feasibility;
- The Southern Alignment would not have the potential to impact the Nutuvukti fen and Nutuvukti Lake and is in an area with lower potential for archeological resources;
- Impacts to climate change and human health and safety would not meaningfully differ between the alternatives, and impacts to caribou would not meaningfully differ when their full range is considered; and

- Impacts to the visitor experience, general hydrology, floodplains, permafrost and water quality would differ, but, taken as a whole, the difference between the two Alignments is not significant.

Full details are presented in the documents.

#### **IV. DECISION AND BASIS FOR IT**

After considering the analysis in the EEA and Section 810 Final Evaluation, official findings and comments from other agencies, tribal governments and the public and considering practicable means to mitigate environmental, social and economic impacts, we have decided that the Northern Alignment is the most desirable Alignment for a ROW through the Preserve, finding this route to have superior economic feasibility, less severe potential impacts within the Preserve, and, when considered over its entire course, less overall impact on the environment.

##### **Environmental Considerations**

Within the Preserve, the two alternatives do not meaningfully differ, or equal out when taken as a whole, for impacts to climate change, general hydrology, floodplains, permafrost and caribou.<sup>2</sup> Impacts were also found to be similar overall for water quality, although the Southern Alignment runs near to and parallels the Kobuk River for three miles and the Reed River for one mile, increasing the possibility of impacts if support facilities were allowed to be constructed as proposed.

For wetlands, the Northern Alignment would impact fewer acres of wetlands within the Preserve, resulting in the estimated permanent loss of approximately 174 acres of wetlands and indirect impacts to approximately 1,100 acres. The Southern Alignment would lead to the estimated permanent loss of 240 acres of wetlands and indirect impacts to slightly over 1,200 acres. Even if support facilities are moved outside the Preserve for each Alignment, the Northern Alignment would still impact fewer acres of wetlands within the Preserve.

Apart from the magnitude of the impact on wetlands generally, we have considered concerns raised over the impact of the Northern Alignment on Nutuvukti Lake and the adjacent and relatively unique Nutuvukti fen. The applicant committed to evaluate moving the Alignment further away from these areas, and to use more porous material in constructing the roadbed in their vicinity to better maintain sheet water flow viewed as important to the fen. ACOE special conditions will require AIDEA to locate the road as far from the Nutuvukti fen as practicable and to design the road to minimize the disruption of surface and shallow subsurface flow in order to maintain the fen. Between the applicant's commitments and ACOE's special conditions, both recommended to be reiterated through terms and conditions in the ROW, the lake and fen are

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<sup>2</sup> Areas south of the Northern and Southern Alignments within the Preserve, which Western Arctic Herd (WAH) caribou might have difficulty accessing due to the road, represent 0.6% and 0.5% of the WAH's total estimated range of 140,000 square miles, respectively. Further, research cited in the EEA shows that a similar road did not prove to be a barrier to caribou migration. Moreover, as shown in Figure 11 in the EEA, this small percentage of potentially impacted habitat is at the very southeastern corner of the WAH's migratory range. Therefore, it is difficult to foresee significant impacts should caribou begin to avoid this area within the Preserve in the future.

sufficiently protected, and their complete avoidance would not outweigh the fewer acres of disturbed wetlands associated with the Northern Alignment.

The existing functional capacity of riverine systems that would be impacted along the Northern Alignment are less than the Southern Alignment. The Southern Alignment presents greater opportunity for impacts the locally important sheefish fishery and to anadromous fish streams. The Southern Alignment would have direct and indirect impacts on a larger area of river and stream habitat. Additionally, the Northern Alignment would cross only one stream designated by the State as important for the spawning, rearing or migration of anadromous fish, while the Southern Alignment would cross four such streams. The Southern Alignment also has greater potential to impact important sheefish spawning grounds, one of only two major spawning grounds for the Kobuk/Selawik population of sheefish. Sheefish is an important subsistence resource in this part of Alaska. The Kobuk is highly desirable among anglers for its sheefish fishery, particularly for its trophy sheefish with individuals exceeding 40 pounds, and accounts for more than half of northwestern Alaska's sport sheefish harvest.

Only a handful of archeological surveys and inventories have been conducted within the Kobuk Preserve and adjacent areas, which would not permit a conclusive evaluation of the possible impacts of the road. The NPS used a set of documented archeological sites in the overall Park and Preserve to develop a model predicting the relative likelihood of finding undocumented archeological sites in unsampled areas of the NPS project area. The model results show that the proposed Northern Alignment would involve a larger area with high potential to contain archeological sites compared to the Southern Alignment within the Kobuk Preserve. Given the lack of data, we cannot predict with certainty that there is any difference between the Northern and Southern Alignments. Potential impacts are addressed and mitigated through the Section 106 (of the Historic Preservation Act) Programmatic Agreement, to which NPS and AIDEA are signatories.

Within GAAR, the Kobuk River is designated as a wild river under the Wild and Scenic Rivers Act. In mandating issuance of a ROW through the Preserve, Congress acknowledged the need to cross this designated wild river. Due to the need to place bridge piers in the river, the free-flowing condition of the river would be unavoidably altered to at least some degree by both alternatives. Permit terms and conditions directed to bridge design and visual impacts mitigate impacts to the river's wild characteristics and ensure that the overall stream flow of the river and transportation on it are not interfered with or impeded. Overall, the Northern Alignment would have less impact on Kobuk River, as the Northern Alignment has a smaller footprint of permanent development along the river, and it would cross the river valley near its confluence with Walker Lake, thus providing visitors who float the river with approximately 20 more consecutive undisturbed river miles for their wild river experience. The location of the bridge crossing and facilities associated with the Southern alignment much further down river would present a severe disruption in the wild and scenic river visitor experience and could result in reduced economic activity as visitors choose in favor of competing river trips.

If support facilities were required to be removed from GAAR, the Southern Alignment would have fewer impacts on visual resources and the wild and undeveloped character of the Preserve,



but considering the vastness of the Preserve and GAAR as a whole, the difference between alternatives is ultimately minor.

### **Social and Economic Considerations**

Health and human safety impacts within the Preserve were determined to be similar for both alternatives.

With respect to subsistence impacts, the Northern Alignment crosses the Reed River seven miles further upstream of known sheefish spawning habitat than the Southern Alignment, which reduces the potential of population level impacts to this important subsistence resource. The Northern Alignment also avoids the village of Ambler's vegetation subsistence harvest area, while the Southern Alignment overlaps it. The difference in impacts to caribou within the Preserve is minimal, as discussed in the EEA.

Native corporations have the potential to gain revenue from land leases, material sales, and mining-related revenues generated in the Ambler Mining District. Village residents and shareholders of Native corporations in the region could also benefit from providing goods and services to the mining companies conducting exploration and operations in the Ambler Mining District. These benefits are general in nature and unlikely to differ in a meaningful degree between the Alignment alternatives across the Kobuk Preserve.

The Southern Alignment—due to its greater length within the scope of the overall project—would have significantly higher construction and life-cycle costs and reduced economic feasibility, as discussed above. If the Southern Alignment were selected and support facilities required to be located outside the Preserve to minimize environmental and visitor experience impacts within the Preserve, the cost disparity would be even greater.<sup>3</sup>

Also owing to its greater overall length, the Southern Alignment would provide an estimated 50 more jobs annually during the estimated four-year construction phase than the Northern Alignment (730 versus 680; Phases I and II). It is estimated that the operational road would employ approximately 50 full-time employees annually for the Northern Alignment and 60 for the Southern. An estimated 20% of both types of jobs would go to local residents.

Development of the Northern Alignment near Walker Lake, which is used for float plane landings and embarkation for Kobuk River trips, could have a negative impact on the currently minimal float plane-based lodging and guiding businesses using the area. However, the Southern Alignment impact on the Kobuk River wild and scenic river visitor experience could also have a chilling effect on the same floatplane lodging and guiding business as potential visitors choose other competing river trips. Other economic effects of the proposed Ambler road on businesses, communities, and individuals would not substantially differ between the Northern and Southern Alignments. Positive and negative impacts of the project accrue primarily at a regional scale. The

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<sup>3</sup> Requiring AIDEA to remove the proposed construction camp/maintenance station from Preserve would result in the need to locate an additional two such stations, along with their associated communications towers and airstrips, outside the Preserve, for a net increase of one maintenance station, one airstrip and one or two communication towers.

impacts, however, hinge to the greatest degree on the presence of a road and to a much lesser degree on the Alignment alternative through the Kobuk Preserve. It is also reasonable to anticipate that any clients dissuaded from visiting this part of GAAR due to the presence of the Ambler road would disperse to another remote and undeveloped area rather than forgo their recreational endeavors altogether.

There would be some impacts to the visitor experience for the relatively few visitors to this area, in that the road could be seen from some locations and traffic heard from fewer. Construction activities and impacts from the road itself would be similar between the Alignments. During construction and operation of the proposed Ambler road, recreational opportunities would persist, and visitor requirements would remain unchanged.

It is acknowledged that exposure to visitors would be greater for the Northern Alignment because of the proximity to Walker Lake and its use as a visitor staging area, but taking into account the relatively limited visitation to this part of GAAR and the potential impacts to the visitor experience associated with the Southern Alignment, we have determined that this factor carries relatively little weight.

### **Most Desirable Alignment Conclusion**

Taking all factors into account, selection of the Northern Alignment most appropriately balances the minimization of environmental and social impacts while allowing for economically sound development. Through the terms and conditions described in Appendix A, this Decision establishes strong protections for physical, biological, social and cultural resources. In accordance with ANILCA Section 810, the Decision also addresses local residents' concerns regarding their subsistence way of life and the subsistence resources on which they depend through inclusion of mitigation measures developed specifically for their protection. Selection of the Northern Alignment is also consistent with the finding of the ACOE in the JROD that the Northern Alignment (encompassed by the BLM and ACOE's "Alternative A") is the least environmentally damaging practicable alternative for purposes of the Clean Water Act Section 404, and the BLM's finding that Alternative A is environmentally preferred for purposes of the National Environmental Policy Act.

## **V. PERMIT TERMS AND CONDITIONS**

Pursuant to ANILCA Section 1107, the ROW must include the following terms and conditions:

- (1) requirements to insure that, to the maximum extent feasible, the right-of-way is used in a manner compatible with the purposes for which GAAR was established or is managed;
- (2) requirements for restoration, revegetation, and curtailment of erosion of the surface of the land;
- (3) requirements to insure that activities in connection with the ROW will not violate applicable air and water quality standards and related facility siting standards established pursuant to law;

(4) requirements, including the minimum necessary width, designed to control or prevent--

(A) damage to the environment (including damage to fish and wildlife habitat);

(B) damage to public or private property; and

(C) hazards to public health and safety;

(5) requirements to protect the interests of individuals living in the general area of the right-of-way who rely on the fish, wildlife and biotic resources of the area for subsistence purposes; and

(6) requirements to employ measures to avoid or minimize adverse environmental, social or economic impacts.

(7) such conditions as may be necessary to assure that the stream flow of, and transportation on, the Kobuk Wild River is not interfered with or impeded, and that the road is located and constructed in an environmentally sound manner.

Appendix C of the EEA lists potential mitigation measures recommended to meet these standards. These measures are in addition to the design features already committed to by AIDEA, which are proposed to be implemented as terms and conditions of the ROW. These measures also encompass the mitigation identified in the Section 810 Final Evaluation, which is specific to protecting the interests of local subsistence users. The complete list of terms and conditions is set forth in Appendix A. If adopted, these measures satisfy the requirements of ANILCA Section 1107.

## **VI. Public Notice and Participation**

From September 27, 2017 through January 31, 2018, NPS engaged in a public scoping process for the EEA, soliciting public input in identifying issues to consider in the EEA, recommendations for the location of the ROW and development of terms and conditions. NPS also joined the BLM for 10 public meetings during that time, in the communities that could be affected by the project: Allakaket, Anaktuvuk, Alatna, Fairbanks, Wiseman, Anchorage, Ambler, Kotzebue, and Shungnak.

On August 23, 2019, NPS released the draft EEA, beginning a public comment period that originally extended through October 7, 2019. Based on feedback from the public, the agencies extended the comment period to October 29, 2019. During this time, NPS joined BLM for 12 public meetings. In accordance with ANILCA Section 1104(e), one meeting was held in Fairbanks, one was held in Washington, DC, and the remaining ten meetings were held in the following communities: Kotzebue, Ambler, Kobuk, Shungnak, Hughes, Bettles/Evansville, Allakaket, Alatna, Anaktuvuk Pass, and Coldfoot/Wiseman. These meetings also as served as ANILCA Section 810 public hearings. A more detailed discussion of consultation and coordination can be found in the EEA.