

Data Submitted (UTC 11): 10/20/2026 10:25:25 AM

First name: Christopher

Last name: Gagnon

Organization:

Title:

Comments: The U.S. Army Corps of Engineers is preparing an Environmental Impact Statement for the Arctic Mine Development Project (POA-2019-00081), an open-pit copper, zinc and lead mine Ambler Metals LLC proposes at the headwaters of Subarctic Creek in northwestern Alaska. The notice says the mine would permanently fill 120.7 acres of wetlands and other waters, store its tailings behind an engineered dam, and keep treating water after it closes. I ask the Corps to scope this EIS to everything the mine would set in motion.

The notice says the tailings dam would hold "flood volume 1.5 times the probable 100-year maximum flood event," while the applicant's parent company told the SEC the design is 1.5 times the probable maximum flood, a different standard. The company's own technical report says the treatment plant "will operate in perpetuity," but its annual report prices treatment over a 100-year closure period, at \$1,095 million undiscounted, or \$258 million discounted. BLM's own supplemental EIS says it is reasonably foreseeable that the Bornite road would be connected to the Ambler Road to support both the Bornite and Arctic mines. At Red Dog, the same document reports concentrate dust carried up to 2.5 miles from the haul road even with sealed lids, and this mine plans about 23 concentrate truck trips a day. The Kobuk supports what BLM calls the largest population of spawning sheefish in northwestern Alaska, and the Western Arctic Caribou Herd has fallen from 490,000 in 2003 to 121,000 in 2025.

I ask the Corps to (1) analyze the Ambler Access Project, the Bornite deposit and the district's other foreseeable mines as cumulative effects of this one; (2) price water treatment for as long as it would run, name who holds that obligation, and require financial assurance for it before deciding; (3) state the dam's design flood, model a breach downstream, and compare filtered, dry-stack tailings and other sites under the Section 404(b)(1) Guidelines; (4) model concentrate dust along the whole haul and take baseline metals samples before hauling starts; (5) analyze the mine's effects on Dolly Varden in Subarctic Creek, sheefish downstream, caribou and the subsistence that depends on them, together with the road's; and (6) define purpose and need broadly enough to analyze permit denial, and disclose where the concentrate would be processed and the federal government's financial stake in the company.