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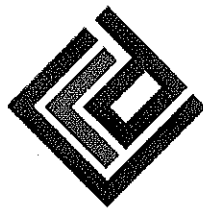
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# RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

## BREAKFAST MEETING

Thursday, September 7, 2017

1. Call to order – Eric Fjelstad, RDC President
2. Self Introductions
3. Head Table Introductions
4. Staff Report – Marleanna Hall, Executive Director
5. Program

**Guest Speaker**  
Governor Bill Walker

Next Meeting: Thursday, September 21<sup>st</sup>  
Egan Convention Center  
Further information forthcoming

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# RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

## Membership Form

RDC is a statewide business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

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<i>Membership Levels</i>			
Membership is a one-year term with an annual fee, expiring on the anniversary of your enrollment, with an online renewal option.			
<u>Individual:</u>		<u>*Corporate:</u>	
Basic	\$75	Basic	\$500
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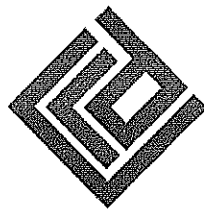
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# RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

August 31, 2017

Ms. Karen Mouritsen, Acting Director  
BLM Alaska State Office  
222 W. 7<sup>th</sup> Avenue, Mailstop 13  
Anchorage, AK 99513-7504

Re: Call for comments for National Petroleum Reserve – Alaska

Dear Ms. Mouritsen:

Thank you for the opportunity to submit comments at this early stage of the new planning efforts to re-examine future management of the National Petroleum Reserve-Alaska (NPR-A). Given the outstanding track record of the oil and gas and mining industries in the Alaska Arctic, as well as the technological advances of the past 40 years, the Resource Development Council for Alaska, Inc. (RDC) supports opening all of the energy reserve to oil and gas, mineral, and coal leasing. In addition, RDC encourages the Bureau of Land Management (BLM) to update provisions for transportation corridors inside NPR-A to facilitate future resource development.

RDC is an Alaskan business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

## Oil and Gas Leasing and Development

Expanded oil and gas development and production in Alaska will help strengthen American energy independence, promote domestic energy production, and support local job growth. However, the 2013 Integrated Activity Plan for NPR-A unnecessarily prohibits leasing and development in much of Northeast NPR-A and oil-rich lands adjacent to Teshekpuk Lake.

In 1923, Congress designated NPR-A for energy production. Therefore, all prospective areas should be opened to leasing, especially closed areas in the northeast part of the energy reserve and lands around Teshekpuk Lake. In planning for future development, BLM can deploy reasonable mitigation measures to protect surface resources important to local residents for subsistence needs, and the environment.

Decades of oil, gas, and mining activity clearly demonstrate industry has the capability to operate throughout the Arctic while maintaining the highest standards of safety and environmental sensitivity. New advances in technology have greatly reduced the footprint of development, allowing for greater consolidation of facilities and the preservation of more acreage within development zones for wildlife habitat.

Industry has proven it can explore and develop potential reserves in these areas in a way that minimizes impacts on the environment, wildlife, traditional subsistence activities, and cultural resources. Industry has taken the best practices and technology of the past 40 years of Arctic development and has applied them to the latest generation of oil field development. This has led to a new and higher standard for environmentally-responsible development and has reduced the footprint of development in sensitive areas.

The discovery and development of new oil and gas deposits will benefit Alaska and local communities. State and local revenues derived from production will help sustain important state services. New industry activity will also provide thousands of job opportunities, boost the local, state, and national economy, and refill the Trans-Alaska Pipeline System (TAPS), which is currently running at three-quarters empty. Development of new energy deposits will also reduce reliance on imported oil and help establish American energy dominance.

Given NPR-A was specifically designated by Congress for the production of energy resources, it is important BLM provide access to prospects with the highest potential. North Slope oil and gas deposits have occurred almost exclusively within a 25-mile strip of the Beaufort Sea coastline – a geologic structure known as the Barrow Arch. Acreage within this area could hold significant deposits and should be open to development.

Three large discoveries have been announced in recent years outside the east and north borders of NPR-A in two little-explored reservoirs that extend into the energy reserve – the Nanushuk and Torok formations. Armstrong Energy and Repsol drilled into the Nanushuk formation in 2015 to make a major discovery in the Pikka Unit, a chunk of State of Alaska leases north of the village of Nuiqsuit. Two wells drilled this winter by Armstrong at a prospect known as Horseshoe showed new evidence of a large find that extends its already huge Nanushuk play by an additional 20 miles. The Horseshoe wells confirm the Nanushuk reservoir as a significant emerging opportunity on the North Slope and a potential game changer with billions of barrels of conventional oil. Geologists believe the discoveries in the relatively shallow reservoir increase the likelihood of large oil discoveries in NPR-A.

In addition, ConocoPhillips announced in January a major discovery of 300 million barrels of oil at its Willow prospect in Northeastern NPR-A and Caelus Energy Alaska has reported a potential multi-billion barrel field at Smith Bay, located in state waters off the northern coast of the energy reserve. More than 500,000 barrels a day in new production could come from these and other projects on state and federal lands in the area, triggering a major reversal in TAPS throughput.

These new discoveries and the highly-promising Nanushuk reservoir indicate NPR-A's energy reserves may be much higher than estimated under the Obama administration. Previously, federal geologists estimated the energy reserve contained approximately 10 billion barrels of recoverable oil, but those estimates were sharply reduced to less than 900 million barrels by the Obama administration in 2010. Following that dramatic revision, nearly half of the reserve was put off-limits to development, including large swaths of highly-prospective lands within the Barrow Arch.

RDC is concerned with the alarming trend over the past eight years of "locking up" oil-rich lands in NPR-A and the Alaska Arctic Outer Continental Shelf. Through the previous planning process, 11 million acres of the energy reserve's 22.8 million acres were closed to leasing, including areas beneath and around Teshekpuk Lake. We are very much concerned that the trend clearly has been toward less leasing and less access. Much of the most prospective acreage within the Barrow Arch has now been removed from leasing, including those closest to potential future production. It is important to remember this is a petroleum reserve.

RDC strongly supports the BLM in re-visiting the Integrated Activity Plan for NPR-A to incorporate the most current information and develop new management goals, objectives, and actions that would be consistent across the entire energy reserve. It is our hope that such efforts will re-open oil-rich areas in the northern areas of the reserve.

RDC recognizes coastal areas of the petroleum reserve contain large populations of waterfowl and caribou and are valued by local residents for subsistence hunting. However, a variety of protective measures, operating procedures, standards, and stipulations are employed to mitigate impacts of energy development on other land uses and resources in areas where development currently occurs on the North Slope. We urge BLM to provide access to NPR-A's prospective acreage while providing reasonable measures to mitigate impacts. These measures should be both technically and economically feasible.

RDC believes it is unnecessary for BLM to defer or continue to keep closed highly prospective acreage in NPR-A to potential future lease sales. These withdrawals only serve to significantly reduce ultimate recovery of oil from the energy reserve with little or no benefit to the environment and wildlife. If BLM removes the best prospects from future leasing, there is unlikely to be significant industry interest going forward in the energy reserve. If much of the coastal areas remain closed to leasing and exploration, then much of the energy reserve's potential will be gutted and industry's interest and investment will move elsewhere beyond Alaska, weakening the local and statewide economy.

Ironically, had sensitive wildlife and wetland areas along the central North Slope coastal plain been withdrawn from exploration in the 1960s, there would have been no discovery of oil at Prudhoe Bay, Kuparuk, and other North Slope oil fields. Alaska would not have the economy and public infrastructure it has in place today, and the nation would have been forced to import at least an additional 17 billion barrels of oil over the past 40 years at a staggering cost. Instead, North Slope oil fields have elevated Alaska's economy over the past four decades. In addition, the Central Arctic caribou herd population has grown from 5,000 animals in 1970 to over 60,000 in recent years, demonstrating oil and gas development can coexist with wildlife and the environment.

As the BLM begins the process of re-visiting and updating the management plan for NPR-A, we encourage the agency to ultimately produce a plan that demonstrates federal lands in Alaska are open for business.

### **Minerals and coal leasing**

Given the outstanding track record of the mining industry in the Arctic and sub-Arctic, the technological advances of the past four decades, and the increasing need for strategic minerals, RDC also supports opening NPR-A to mineral entry, as well as mineral and coal leasing. RDC acknowledges that before the mining of minerals and coal can occur, an act of Congress would be required to open NPR-A to mineral entry. We encourage the Secretary of the Interior to advance such a recommendation to President Trump.

Specifically, the northern foothills of the Brooks Range have significant potential for base metals discoveries similar to the rich zinc and lead ores found elsewhere in Alaska. It is well known that the region also holds significant deposits of copper and iron, as well as some of the most significant coal deposits anywhere in the world. In fact, America is called the "Saudi Arabia of coal," partly because of the reserve base inside NPR-A.

NPR-A should be managed with a true multiple use philosophy as mandated by BLM, allowing for the coexistence of development, recreation and subsistence uses. RDC opposes the establishment of single-purpose, highly-restrictive conservation units in NPR-A as Alaska already has an overwhelming majority of the nation's public lands closed to development. As noted earlier, environmental concerns and habitat issues can be adequately addressed through lease stipulations and the permitting process. Decades of

mining activity with today's technology clearly demonstrate industry has the capability to operate throughout Alaska while maintaining the highest standards of safety and environmental sensitivity.

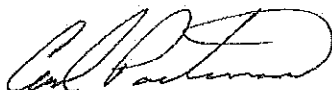
### **Conclusion**

The development of new oil, gas, mineral, and coal deposits in NPR-A will benefit Alaska, local communities and the nation. Revenues derived from new production will help sustain important state services. Industry activity will also provide new job opportunities for local residents and others while boosting the economy. Increased access to NPR-A should be accommodated with provisions to protect the traditional ways of life, especially the subsistence needs of Northwest Alaska residents.

Opening highly-prospective areas of NPR-A to future lease sales would advance the President's and the Department of Interior's "all-of-the-above" approach to energy development, which includes oil and gas, coal, strategic minerals and renewable sources.

Thank you for the opportunity to provide comments in this early planning stage for future lease sales in NPR-A.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl Portman', written in a cursive style.

Carl Portman  
Deputy Director

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Marleanna Hall

2017-2018

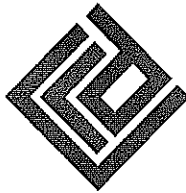
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# RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

August 21, 2017

Kelly Denit  
National Marine Fisheries Service, NOAA  
Office of Sustainable Fisheries  
1315 East-West Highway  
Silver Spring, MD 20910

Re: Request for comments on "Streamlining Regulatory Processes and Reducing Regulatory Burden" Docket No. NOAA-NMFS-2017-0067-0001

Dear Ms. Denit,

The Resource Development Council for Alaska, Inc. (RDC) is writing in response to the National Ocean and Atmospheric Administration's (NOAA) request for input on how to streamline the regulatory process and reduce regulatory burden. RDC appreciates NOAA's efforts in seeking out meaningful feedback from stakeholders impacted by over-burdensome and in many cases duplicative regulations.

RDC is an Alaskan, non-profit, membership-funded organization founded in 1975. The RDC membership is comprised of individuals and companies from Alaska's oil and gas, mining, timber, tourism, and fisheries industries, as well as Alaska Native corporations, local communities, organized labor, and industry support firms. RDC's purpose is to link these diverse interests together to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

Based on the diversity of RDC's membership both geographically and across various resource sectors, there are a number of regulatory processes that have placed unnecessary burden and created uncertainty for their businesses and current or potential future projects. The Endangered Species Act (ESA) in particular is a policy that has increasingly been used as a tool to drive up costs, delay, or in some cases halt projects, without demonstrating any real benefit to a species. Thus, the majority of these comments will focus on areas of concern within the ESA.

### ESA Compensatory Mitigation Policy

The ESA Compensatory Mitigation Policy (The Policy,) which was finalized on August 18, 2017 is an unnecessary application of voluntary compensatory mitigation program that will only create additional confusion and uncertainty for project proponents, potentially resulting in delayed operations and increased costs at best. At worst, The Policy could prevent projects from moving forward at all.

The Policy raises a number of concerns, most notably the assertion made that the U.S. Fish and Wildlife Service (USFWS), jointly with the National Marine Fisheries Service (NMFS, "the Service" or "Services") has authority to require compensatory mitigation resulting in a 'net gain' or 'no net loss' under the ESA. The ESA and its implementing regulations do not require or recommend The Services enforce compensatory mitigation measures and in fact clearly state as much in the ESA Section 7 Consultation Handbook, which reads: "the objective of incidental take analysis under section 7 is minimization, not mitigation." The Services must ensure that an action is not likely to jeopardize or cause adverse modification and may prescribe measures to minimize — not "mitigate" or "fully compensate" for — the impact of the authorized incidental take.

The Policy acknowledges “the Service’s authority to require compensatory mitigation under the ESA is limited and differs under Sections 7 and 10” and the Service’s “authority to require a ‘net gain’ in the status of listed or at-risk species has little or no application under the ESA.” Nonetheless, The Policy goes on to offer guidelines with the end goal of “net gain” or “no net loss” compensatory mitigation under the ESA. This paradox distorts the Services intent for how The Policy would be implemented and suggests that the Services would unlawfully require “net gain” or “no net loss” compensatory mitigation of project applicants.

RDC acknowledges that The Policy represents the Services attempt to implement an Executive Order and Department of Interior mitigation policies in the context of the Services responsibility to administer the ESA. However, new policy directives apply only to the extent they are consistent with existing laws adopted by Congress. If Congress had intended to require that every impact to listed species be completely offset (or result in a net gain), it would have written such a requirement into the ESA. If the Service or the President desires such a result, the only solution is for Congress to amend the ESA to provide that authority to the Executive Branch. For this reason, RDC urges The Policy be withdrawn.

### **Critical Habitat Designation**

A recently revised rule (**Listing** Endangered and Threatened Species and Designating Critical Habitat; Implementing Changes to the Regulations for Designating Critical Habitat (revising portions of 50 C.F.R. § 424). 81 Fed. Reg. 7413–40 (Feb. 11, 2016)) allows the Services to designate as critical habitat areas that are currently not occupied by the listed species or are considered potential future habitat. This interpretation is inconsistent with the plain language and intent of the statute to designate as critical habitat to those areas within the species’ current range in which essential physical or biological features are present at the time of listing.

The rule gives the Services limitless discretion to determine the scale at which critical habitat should be designated for a listed species, without relying on present day sound science. The Service can and has designated critical habitat areas that are larger than necessary, including areas outside the specie’s range. Excessively large designations, such as for polar bear and proposed ringed and bearded seal critical habitat, does little to protect the species yet places burden on industry, individuals, local governments, and Native organizations due to increased permitting and mitigation actions that are then required under other laws.

### **The ESA and Climate Change**

The Service has, for the first time, determined that a distinct population segment of a currently healthy and even abundant species, the bearded seal, is “threatened” based solely on harm predicted to occur nearly a century after the listing. The Service ignored that the current Alaska bearded seal population is healthy at about 155,000 individuals and that the International Union for the Conservation of Nature and Natural Resources has classified the bearded seal as a “species of least concern.”

The listing of the bearded seal relied principally, if not solely, upon climate change resulting in the loss of sea ice as the governing factor. Moreover, The Service has concluded that this identified threat will not likely manifest until the year 2100. The Service also readily acknowledges that the threat triggering the listings—climate induced reduction in Arctic sea ice—is not imminent, predictable, or addressable under the ESA’s regulatory mechanisms.

With the bearded seal listing, The Service has effectively replaced the ESA’s listing framework with a new “precautionary” approach that, taken to its logical extreme, could result in the nearly automatic listing of almost all species, especially in the Arctic.

Alaska is in many ways “ground zero” for the potential effects of climate change. Allowing multiple pointless ESA listings of Arctic species will make things materially worse for Alaskans. These listings will have no appreciable conservation benefits and instead, will stifle the responsible economic development that is the lifeline for all of Alaska. This case perfectly encapsulates why the ESA is not an appropriate or effective tool to combat the long-term challenges posed by global climate change.

There are many other areas of the ESA that need to be improved, and RDC supports the ESA specific comments submitted in this Docket by the State of Alaska on August 21, 2017.



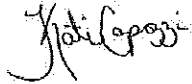
**National Ocean Policy**

Lastly, the National Ocean Policy (NOP) instated under the Obama Administration by Executive Order has negatively impacted opportunities for job creation by unnecessarily increasing federal bureaucracy and regulatory directives, costs, and uncertainties. The NOP alters the governance of marine uses and resources in the United States. Among other things, it orders dozens of federal agencies to conform all their actions and decisions to be consistent with "coastal and marine spatial plans" (CMSP) created pursuant to the Executive Order. This process also fundamentally changes the implementation of numerous federal laws – including but not limited to the National Environmental Policy Act, Magnuson-Stevens Fishery Conservation and Management Act ("MSA"), Coastal Zone Management Act, and Outer Continental Shelf Lands Act ("OCSLA") – as it inappropriately removes any regulatory options or alternatives from consideration unless they are consistent with the marine plans and the broader NOP.

The NOP has introduced new regulatory processes that conflict with the mandates and intent of multiple existing federal statutes, introduced new permitting hurdles that lead to delays and unduly burdensome conditions, and increase the likelihood of litigation, all to the detriment of jobs and economic growth. In short, RDC urges the NOP Executive Order be vacated.

In closing, RDC applauds efforts to streamline the regulatory and permitting processes so that Alaskans can responsibly develop our natural resources as mandated by the Alaska Constitution (Article VIII, Section IV). Thank you for your consideration of these comments.

Respectfully,



Kati Capozzi  
Communications & Projects Manager

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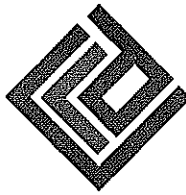
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# RESOURCE DEVELOPMENT COUNCIL

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August 15, 2017

Ms. Kelly Hammerle  
National Program Manager  
Bureau of Ocean Energy Management  
45600 Woodland Road  
Mailstop VAM-LD  
Sterling, Virginia 20166

RE: Request for Information on 2019-2024 Outer Continental Shelf Oil & Gas Leasing Program

Dear Ms. Hammerle:

I am writing on behalf of the Resource Development Council for Alaska, Inc. (RDC) to express strong support for a new five-year Outer Continental Shelf (OCS) oil and gas leasing program that would replace the current program which excluded most of the Alaska Arctic from future exploration and development.

RDC is an Alaskan business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC urges the Bureau of Ocean Energy Management (BOEM) to consider in the Draft Proposed Program (DPP) those areas that were not included in the 2017-2022 program, especially prolific areas of the Beaufort and Chukchi seas. By scoping all areas for potential leasing, BOEM would ensure all options remain on the table and the most promising opportunities are seriously considered.

The Beaufort and Chukchi seas form one of the most prospective basins in the world. Together, these areas are estimated to hold 23.6 billion barrels of oil and 104 trillion cubic feet of natural gas. In fact, the Alaska Arctic would constitute the eighth largest oil resource in the world, ahead of Nigeria, Libya, Russia, and Norway.

The Arctic's untapped resources are of critical importance to both Alaska and the United States. Oil and gas development offshore the North Slope is predicted to produce an annual average of 35,000 direct and indirect jobs over the next half century for Alaska alone. Those jobs would represent a total payroll of over \$70 billion.

Economic activity resulting from OCS development in Alaska is estimated to generate an annual average of nearly 55,000 jobs nationwide, with an estimated cumulative payroll amounting to \$145 billion over the same time period. From an economic standpoint alone, Arctic OCS development would represent a windfall for the national

economy. Revenues generated from Arctic OCS oil and natural gas production could amount to \$200 billion to federal, state and local governments.

In Alaska, offshore development would serve to help maintain the integrity of the Trans-Alaska Pipeline System (TAPS). The pipeline, which came on line 40 years ago, has safely transported more than 17 billion barrels of oil. TAPS reached peak throughput in 1988 at two million barrels a day, at which time accounted for 25 percent of domestic production. However, throughput has now declined to approximately 528,000 barrels per day, despite the vast resources available in the Arctic – both onshore and offshore. Future offshore production could stem the decline, allowing for TAPS to remain viable for decades. In contrast, excluding the Alaska Arctic from future lease sales could lead to the premature shutdown of TAPS and compromise the long-term energy and economic security of Alaska and the nation.

Industry has shown that impacts to marine mammal subsistence activity can be avoided and mitigated through close cooperation and communication with subsistence users. Newly instituted technologies will further ensure that development and environmental protection can continue to coexist in the Arctic.

Leasing and subsequent exploration and development would bring much-needed infrastructure to the region and would also provide additional response capabilities in an area where shipping and other activities are increasing.

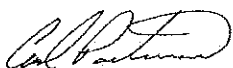
In addition to the Alaska Arctic, BOEM should also consider expanding access in the Gulf of Mexico and provide access to the Atlantic basin to bolster domestic energy production. Such action would generate hundreds of thousands of new jobs, billions of dollars in new federal revenues, and help establish American energy dominance. Currently, 94 percent of the American OCS is unavailable for leasing. Overall, the federal OCS is estimated to contain 89.9 billion barrels of oil and 327.5 trillion cubic feet of natural gas.

However, there are special interests in our nation that are opposed to further development of America's energy resources – both offshore and onshore. They advocate leaving oil in the ground, but even in an era of climate change, reality requires continued development of America's oil and gas resources. While renewable and alternative energy will make up a growing part of the U.S. energy portfolio, they will not significantly reduce our reliance on oil in the near or mid-term, given they are projected to account for a relatively small percentage of America's energy in 2030. The health of our economy and national security will require utilization of both conventional and unconventional energy sources.

Every barrel of oil not developed in America will simply be imported from overseas where environmental regulations are often weaker. To further reduce our reliance on foreign sources of oil, America must continue to pursue responsible oil and gas development onshore and offshore Alaska, in the Lower 48 states, the Gulf of Mexico, and the Atlantic basin. New production would provide a bridge to the alternative and renewable energy sources of the future.

In conclusion, RDC encourages BOEM in its new five-year program to provide access to those areas of the Arctic that were omitted from the current program. Thank you for the opportunity to submit comments on the new 2019-2024 program.

Sincerely,



Carl Portman  
Deputy Director

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Executive Director  
Marleanna Hall

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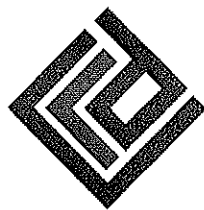
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# RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

August 9, 2017

The Honorable Byron Mallott  
Lieutenant Governor of Alaska  
P.O. Box 110001  
Juneau, AK 99811-0001

Re: Proposed Initiative 17FSH2

Dear Lieutenant Governor Mallott:

The Resource Development Council for Alaska, Inc. (RDC) is writing regarding a proposed initiative titled "An Act providing for protection of wild salmon and fish and wildlife habitat" (Initiative 17FSH2), a revised version of 17FSHB.

RDC is a statewide business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC continues to have significant concerns with Initiative 17FSH2. Our concerns with the original version remain, and key additional concerns with the new version are briefly described below.

First, RDC believes 17FSH2 continues to mandate an appropriation of Alaska's resources. This action would fundamentally change the Alaska Legislature's allocation of uses for anadromous fish habitat. In a June 30, 2017 letter signed by Assistant Attorney General Elizabeth Bakalar to the initiative proponents, she writes, "... 17FSHB makes an appropriation, which cannot be done by initiative according to the Article XI, section 7 of the Alaska Constitution." Despite minor changes, 17FSH2 takes the same action of resource appropriation as the original initiative. It does this because it fundamentally reworks the legislature's priorities an use for watersheds and replaces them with the priorities of the initiative proponents.

Second, the new Section 16.05 of the ballot initiative actually makes the initiative even more impactful on the resource development community and other users of Alaska's water resources. This new language in 17FSH2 clarifies that the initiative would apply to existing facilities, including community and resource development projects, when the permits are up for renewal. This means there would be no "grandfathering" under the initiative and the anti-development mandate would apply to proposed and existing activities. This would create chaos and tremendous legal uncertainty across Alaska.

Third, the June 30<sup>th</sup> letter, on Page 5, states, "First, permits would be denied for some dams. Under section 7, a permit could not be issued for an activity that causes "substantial damage to anadromous fish habitat," as a dam inevitably would.<sup>19</sup> Second, some large-scale hard rock mines could not be developed, because they would require "perpetual" water treatment, another basis for denying a permit. Depending on the location of a large-scale hard rock mine and other variables, long-term water treatment might be required for some mines. In addition, some roadways, gaslines, and pipelines are likely to require permanent re-routing of anadromous waters, as did the Trans-Alaska Pipeline System. These probably would not be the only types of project that the initiative would prevent but they are the most obvious to our agency representatives."

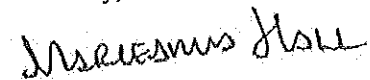
While the above statement addressed 17FSHB, the slight revisions to the text in 17FSH2 do not solve these grave defects. The removal of the word "perpetual" and use of the phrase "adversely affect" does not change the conclusion that the initiative would increase uncertainty and add additional, unnecessary regulatory burdens to community and resource development projects across Alaska with little to no added benefit to salmon habitat. In many cases, it would be impossible to permit an operation. This is particularly the case for the hard rock mining industry. It is very likely a mine could not be built or operated under 17FSH2.

In closing, we reiterate a message in the HB199 coalition letter to Representative Louise Stutes (April 2017), "the intent to safeguard Alaska's salmon fisheries is an objective we share and it is why we support Alaska's existing rigorous and science-based regulatory system. Shutting down economic and community development is a disproportionate response to a problem that doesn't exist."

It is clear there are many flaws in 17FSH2. RDC's concerns demonstrated in our July 5<sup>th</sup> letter on 17FSHB remain the same with regard to 17FSH2, and our above-mentioned issues are of vital importance to our members.

Thank you for your consideration of our concerns and comments.

Sincerely,



Marleanna Hall  
Executive Director

cc: The Honorable Bill Walker, Governor  
Jahna Lindemuth, Attorney General  
Elizabeth Bakalar, Assistant Attorney General  
Sam Cotten, Commissioner, Alaska Department of Fish & Game  
Andy Mack, Commissioner, Alaska Department of Natural Resources  
Larry Hartig, Commissioner, Alaska Department of Environmental Conservation

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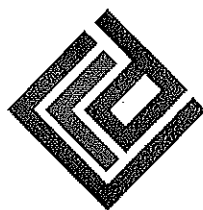
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# RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

August 7, 2017

DEC Division of Water  
Attn.: Earl Crapps  
555 Cordova Street  
Anchorage, AK 99501

*Via email to [earl.crapps@alaska.gov](mailto:earl.crapps@alaska.gov)*

Re: Draft Antidegradation Implementation Regulations

Dear Mr. Crapps:

The Resource Development Council for Alaska, Inc. (RDC) is writing to comment on the Department of Environmental Conservation (DEC) Division of Water's Draft Antidegradation Implementation Regulations.

RDC is an Alaskan business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

It is a policy of RDC to advocate for predictable, timely, and efficient state permitting processes based on sound science and economic feasibility, as well as provide adequate resources to permitting agencies for personnel, research, and science. That said, RDC is concerned the proposed regulations will further unnecessarily burden permittees as well as DEC staff with additional work, creating delays or even halting future projects due to permitting uncertainty and delays.

## **Implementation Methods for Antidegradation Analyses Related to APDES; Removal of Tier 3 References**

The June 2, 2017 Public Notice from DEC announced comments would be accepted on the implementation methods for Antidegradation analyses related to the Alaska Pollutant Discharge Elimination System (APDES), omitting Tier 3 from the notice. With respect to the public notice, RDC believes references to Tier 3 should be removed from the draft regulations.

Furthermore, the antidegradation regulation package should be inclusive and describe in full the nomination process, requirements for designation, and Tier 3 status. Referencing Tier 3 in the regulations while not allowing comments on the designation is a clear example of moving the goal posts. As these regulations are developed, RDC urges DEC to carefully consider what the end result will be for the first project to test the proposed new rules.

RDC appreciates that the state is mandated to develop antidegradation regulations, but also believes more time should be spent on clarifications. These important regulations require additional study and consideration. However, RDC is concerned the scope of the revisions is too broad, and should be more narrowly focused to what the Environmental Protection Agency (EPA) is requiring. It is important to note DEC's existing antidegradation policy and its implementation methods are already consistent with the EPA's antidegradation regulations and requirements.

Moreover, RDC believes the existing policies are sufficient for protecting Alaska's watersheds. The current implementation policy is legally compliant, and another layer of regulations will be duplicative of the extremely rigorous process already in place.

Further, RDC strongly believes that the State's current permitting and water quality standards programs ensure that all uses of the state's waters are fully maintained. These programs are already among the most rigorous and stringent in the country. As such, implementation of the proposed regulations will produce a significant additional burden on applicants during permitting and operations without producing any real benefits in regards to protecting the uses of State waters.

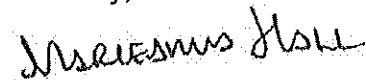
Projects in Alaska, both resource and community development, are already more expensive to establish and maintain, and an additional layer of permitting will likely have a negative impact with no added benefit to the environment. As a resource economy state, with a constitutional mandate to develop its natural resources, Alaska should not continue to discourage investment.

In addition to concerns described in this letter, RDC urges the DEC to address concerns made by the Alaska Miners Association (AMA) (August 7, 2017).

These are very important issues to RDC members – oil and gas, mining, fishing, forestry, and tourism industries – and should be fully addressed before implementation begins. RDC further urges the DEC to consider making changes to the proposed implementation plan, as suggested in this and AMA's letters, and republish the draft for public review.

RDC thanks DEC for its efforts to involve stakeholders, and appreciates the opportunity to provide comments.

Sincerely,



Marleanna Hall  
Executive Director

cc: Commissioner Larry Hartig, DEC  
Michelle Hale, DEC

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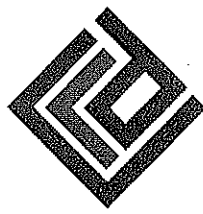
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# RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

July 20, 2017

The Honorable Ryan Zinke  
Secretary, U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

Re: Proposed road from Nuiqsut to Utqiagvik, National Petroleum Reserve-Alaska

Dear Secretary Zinke:

The Resource Development Council for Alaska for Alaska, Inc. (RDC) is writing to support year-round surface access from existing North Slope oil and gas infrastructure near Nuiqsut, through the National Petroleum Reserve-Alaska (NPR-A) to Utqiagvik, formerly known as Barrow.

RDC is an Alaskan business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC applauds your recent Secretarial Order to update assessments of North Slope oil and gas resource basins and calling for the development of a revised plan for NPR-A and the Section 1002 Area of the Arctic National Wildlife Refuge (ANWR). We look forward to the State of Alaska, North Slope leaders, and the Department of the Interior (DOI) working together to achieve a better understanding of the tremendous potential that lies beneath NPR-A and the 1002 Area of ANWR. These promising oil and gas basins have the potential to refill the Trans-Alaska Pipeline System (TAPS), Alaska's economic lifeline and a strategic and critical energy asset for America.

As you know, in 2013 DOI approved regulations that placed 11 million acres of the 23 million-acre NPR-A into special conservation areas, essentially blocking exploration of highly-prospective lands and impeding the development of a road system in the energy reserve. The construction of a road from Nuiqsut to Utqiagvik would be a game-changer in facilitating oil and gas exploration and development in this resource rich area.

Currently, surface access inside NPR-A is limited to expensive ice roads, which melt away each spring and must be rebuilt at great cost each winter. A year-round gravel road would provide all-season access and significantly reduce the high cost of exploration and development activities in this remote and harsh Arctic climate. Therefore, surface infrastructure could significantly improve the economics of developing promising energy prospects in the region. Conversely, the lack of infrastructure is a major impediment to future exploration and development.



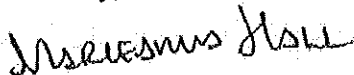
An all-season road would provide a safe and environmentally-sound approach to developing NPR-A's energy resources in a timely and economic manner. The proposed design and citing of the road can be built with mitigation measures to minimize impacts to high-value wetlands, habitat, and hydrology, as well as tundra, wildlife, aquatic resources, and subsistence activities.

A road link between Nuiqsut and Utqiagvik is essential to safe and efficient operations as petroleum development expands in NPR-A. The energy reserve is very large and remote, and recent new discoveries at Smith Bay and near Nuiqsut hint at large reserves inside NPR-A. However, new fields would require new airstrips to move supplies and personnel if no surface access is permitted. In contrast, surface infrastructure would link local communities, as well as responsible resource development operations. Moreover, road access would mitigate the inability to fly in poor weather. Relying only on air access to reach remote fields introduces unnecessary safety risks for personnel and would potentially hinder response to industrial and medical emergencies.

In recent correspondence to your office, Governor Bill Walker noted there is an increasing need for community access and connection in the western North Slope region. We couldn't agree more. Communities across the western North Slope could benefit greatly from surface transportation infrastructure through NPR-A.

RDC appreciates you making access to Alaska's vast energy resources a priority. We respectfully request that you make an all-season road inside NPR-A a transportation infrastructure priority to facilitate future energy production and provide connectivity between local communities. NPR-A could very well contain billions of barrels of conventional oil reserves. All-season road access to these resources would lead to responsible development that has the potential to create thousands of jobs, generate billions of dollars in new government revenues, help refill TAPS, and provide a reliable, long-term energy supply to strengthen national security.

Sincerely,



Marleanna Hall  
Executive Director

cc: Senator Lisa Murkowski  
Senator Dan Sullivan  
Congressman Don Young  
Governor Bill Walker  
Commissioner Andy Mack, Alaska Department of Natural Resources  
Teresa Imm, Arctic Slope Regional Corporation  
Jason Bergerson, North Slope Borough

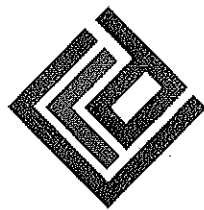
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# RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

July 11, 2017

The Honorable Scott Pruitt  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Mail Code 1803A  
Washington, DC 20463  
Submitted via regulations.gov

Attention: Docket ID No. EPA-HQ-SFUND-2015-0781

RE: Financial Responsibility Requirements Under CERCLA 108(b) for Classes of Facilities in the Hardrock Mining Industry 82 Fed. Reg. 3388 (Jan. 11, 2017)

Dear Administrator Pruitt:

The Resource Development Council for Alaska, Inc. (RDC) is writing to comment on the Environmental Protection Agency's (EPA) Proposed Rule, "Financial Responsibility Requirements Under CERCLA § 108(b) for Classes of Facilities in the Hardrock Mining Industry."

RDC is an Alaskan business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC urges the EPA to withdraw the Proposed Rule and issue a finding that no new rule is necessary. RDC members in the hardrock mining industry, as well as the support sector for mining, have submitted substantial and reasonable evidence for the Administrative record, such as the July 11, 2017 letter submitted for the record by the Alaska Miners Association (AMA, July 11, 2017).

As the Alaskan economy is dependent on natural resource development, including mining, it is vital to have predictable and efficient federal and state permitting processes that are based on sound science. Article VIII, Section I of the Alaska Constitution mandates "the settlement of Alaska's land and the development of its resources by making them available for maximum use consistent with the public interest," to encourage economic prosperity for Alaska's peoples. RDC is concerned the proposed rule will impact the ability of its membership to responsibly develop Alaska's natural resources.

RDC's membership includes the five large producing hardrock mines in Alaska, and several more in either the exploration or permitting phase, as well as many smaller operations throughout Alaska.

The mining industry in Alaska provides jobs across the state, with an average salary over \$108,000 per year, double the state average for all sectors. Mining contributes tens of millions to local governments, and over \$100 million to state government through royalties, rents, fees, and taxes.

Additionally, Alaska's mining industry provides payments to Alaska Native corporations, benefiting all 12 regional corporations, and over 220 village corporations across the state, many of which are RDC members.

This Proposed Rule is a major federal action and was pursued without adequate consultation with stakeholders, recognition of existing state and federal requirements for financial reassurance, and demonstration of the need for the regulations, especially in states like Alaska.

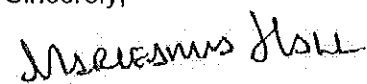
Moreover, the EPA's Proposed Rule is unwarranted and duplicates Alaska's existing requirements. RDC contends the EPA should avoid imposing an expensive requirement that replicates Alaska's proven laws.

Among the many concerns RDC has with the proposed rulemaking, we urge the EPA to fully review the following concerns as outlined in the AMA, July 11, 2017 letter:

- Proposed Rule Fails to Recognize Modern Mining Practices and Demonstrate Risk from Current Hardrock Mining Industry
- CERCLA Requirements are Already Met by Existing State and Federal Programs
- EPA Failure to Perform Consultations with Alaska Native Corporations
- EPA Lack of Consultation with the Financial Industry and High Cost Versus Minimal Benefits of the Proposed Regulations
- EPA Proposed Rule Undermines the Alaska Statehood Act
- Proposed Rule Inconsistent with Executive Order 13777

In closing, RDC urges the EPA to halt this flawed process, withdraw the Proposed Rule, and demonstrate that no new rule is necessary. Thank you for the opportunity to comment.

Sincerely,



Marleanna Hall  
Executive Director

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Executive Director  
Marleanna Hall

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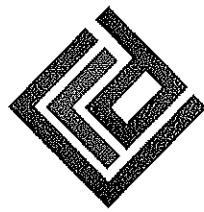
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# RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

July 5, 2017

The Honorable Byron Mallott  
Lieutenant Governor of Alaska  
P.O. Box 110001  
Juneau, AK 99811-0001

Re: Proposed Initiative 17FSHB

Dear Lieutenant Governor Mallott:

The Resource Development Council for Alaska, Inc. (RDC) is writing regarding a proposed initiative titled "An Act providing for protection of wild salmon and fish and wildlife habitat" (Initiative 17FSHB).

RDC is a statewide business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC has grave concerns with Initiative 17FSHB. It is a policy of RDC to advocate for predictable, timely, and efficient state permitting processes based on sound science and economic feasibility. Unfortunately, Initiative 17FSHB proposes to move the state's permitting process dramatically in the wrong direction.

Initiative 17FSHB would increase uncertainty and add additional, unnecessary regulatory burdens to community and resource development projects across Alaska with little to no added benefit to salmon habitat. This initiative would likely delay, or in many cases serve to halt projects, resulting in increased costs for our communities and the private sector.

In April, RDC worked with a coalition of local community, business associations, Alaska Native corporations, and others to develop a letter opposing House Bill 199 (HB199), expressing initial concerns. While Initiative 17FSHB is not the same as HB 199, it still carries many of the components that deeply concern RDC.

The HB 199 coalition letter expressed overlying areas of concern that this bill would seriously impact:

- Community development – including upgrades to infrastructure, such as airports and roads, construction of wastewater treatment plants, natural community growth, and more;
- Economic development – including fish processing, timber harvests, mineral extraction, and oil and gas development;
- A future gas pipeline to transport Alaska's natural gas from the North Slope to markets.

A copy of the full coalition letter is enclosed (please see attached).

Additionally, it is a policy of RDC to encourage programs that not only manage, but in fact enhance Alaska's fisheries resources. RDC believes proper and adequate protections currently exist through state and federal regulations, while encouraging responsible resource and community development.

Further, RDC urges the state to promote and defend the integrity of Alaska's permitting process - a process that should enhance, not discourage or effectively prohibit, community and resource development activities. Alaska has a proud record of balancing the important protections needed for our sustainable fisheries resources while creating jobs and economic benefits through responsible resource development, and allowing for adequate community development and expansion.

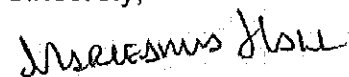
As our state faces a fiscal crisis, it is also imperative projects be allowed to go through Alaska's well-vetted permitting process and show investors that Alaska is "open for business." Alaska must send a message that it has a rigorous permitting process, and that it will foster investment that can meet or exceed our thorough standards – standards that will be fairly and consistently applied to all projects.

As written in the HB199 coalition letter, "the intent to safeguard Alaska's salmon fisheries is an objective we share and it is why we support Alaska's existing rigorous and science-based regulatory system. Shutting down economic and community development is a disproportionate response to a problem that doesn't exist."

In conclusion, RDC is not seeking less burdensome regulatory processes, but we do request that as changes are considered, avoiding harm to Alaskan communities and responsible resource development projects remain paramount.

Thank you for your consideration of our letter expressing some of our many concerns with the fundamentally flawed Initiative 17FSHB, which we believe will severely impact Alaska's economy and local communities.

Sincerely,



Marleanna Hall  
Executive Director

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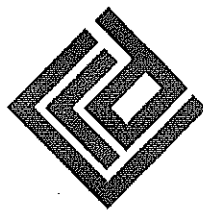
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# RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

June 30, 2017

Mr. David Johnston, Regional Supervisor  
Office of Leasing and Plans  
Bureau of Ocean Energy Management, Alaska OCS Region  
3801 Centerpoint Drive, Suite 500  
Anchorage, AK 99503-5823

Re: ENI Exploration Plan, Nikaitchuq North Exploration Drilling Project

Dear Mr. Johnston:

The Resource Development Council for Alaska, Inc. (RDC) is writing to express support for the Exploration Plan (EP) prepared by Eni US Operating Co. Inc. (Eni) for its proposed Nikaitchuq North Exploration Drilling Project in the Beaufort Sea.

RDC is a statewide business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

Eni is proposing to drill into the federal submerged lands of the Beaufort Sea from its Spy Island Drillsite (SID), a pre-existing facility located on an artificial gravel island within the barrier islands and outside the fall migration path of the bowhead whale. The company is currently producing up to 22,000 barrels of oil per day on its state leases within its Nikaitchuq Unit from Spy Island. There are currently four oil and gas producing islands in the Beaufort Sea: Spy Island, Northstar Island, Endicott Island, and Ooguruk Island.

As outlined in the EP, Eni is proposing to drill two main wellbores, with a lateral sidetrack, from Spy Island that will reach into the company's federal Harrison Bay leases. The EP clearly describes Eni's drilling processes and actions the company will take to meet important safety and environmental standards and to protect access to subsistence resources.

The Nikaichuq North Exploration Drilling Project has been designed to minimize impacts to biological populations and habitats by using existing infrastructure, limit operational windows, following other measures designed to mitigate impact, and conduct activities in a manner similar to Eni's current practices. Moreover, the company will only conduct drilling operations during the winter, mitigating other potential impacts as fewer species of marine mammals are present in winter.

Exploration, development, and production operations will be conducted in a manner that prevents unreasonable conflicts between industry and subsistence activities, including but not limited to, bowhead whale subsistence hunting. Eni is working with

subsistence users in the area to mitigate the chances for conflict by discussing and signing a Conflict Avoidance Agreement. The company has existing procedures in place to mitigate impacts to wildlife.

North Slope oil and gas exploration, development, and production are the lifeblood to the economy of Alaska, the North Slope Borough, and local communities. The responsible development of Alaska's oil and gas resources have generated contracts for service providers and provided billions of dollars in royalty and tax revenue to local, state, and federal governments. Oil revenues provide and fund thousands of private and public sector jobs, as well as critical public services and infrastructure. It's clear that Alaskans and our state's economy would benefit significantly from increased oil production. In fact, the very concept of Alaska's statehood is predicated on the development of natural resources.


However, the Trans-Alaska Pipeline System (TAPS), is now starved for oil, operating at one-fourth its capacity. It's not because Alaska has depleted its natural resources. In fact, there is more oil in place onshore and offshore the North Slope than what has been developed since statehood. The challenge is achieving access to the resource.

Unfortunately, there are special interests in our nation that are opposed to further development of America's energy resources. They advocate leaving oil in the ground, but even in an era of climate change, reality requires continued development of America's oil and gas resources. While renewable and alternative energy will make up a growing part of the U.S. energy portfolio, they will not significantly reduce our reliance on foreign sources of oil in the near or mid-term, given they are projected to account for a relatively small percentage of America's energy in 2030. The health of our economy and national security will require utilization of both conventional and unconventional energy sources.

Every barrel of oil not developed in America will simply be imported from overseas where environmental regulations are often weaker and emissions from production activities are higher than from domestic operations. To further reduce our reliance on foreign sources of oil, America must continue to pursue responsible oil and gas development onshore and offshore Alaska, where over 30 percent of the nation's technically recoverable resources reside. New production from Alaska would provide a bridge to the alternative and renewable energy sources of the future.

In conclusion, RDC encourages the Bureau of Ocean Energy Management to move forward with this project so drilling can get underway in December, as outlined in the plan. Clearly, Eni can conduct the Nikaitchuq North Exploration Drilling Project in a responsible and safe manner. Thank you for the opportunity to submit comments on the project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl Portman', written in a cursive style.

Carl Portman  
Deputy Director

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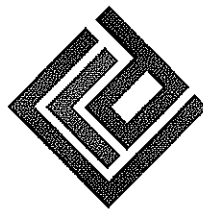
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# RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

May 22, 2017

Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426  
Submitted via [www.ferc.gov](http://www.ferc.gov)

Re: Alaska Gasline Development Corporation application for the Alaska LNG project,  
Docket Nos. CP17-178-000

To Whom It May Concern:

The Resource Development Council (RDC) is writing to express support for furthering the application process for the proposed Alaska LNG project, a project that would benefit all of Alaska and our future economy.

RDC is an Alaskan business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

The Alaska LNG project is positioned to become a significant component of Alaska's economy in the 21st century. The project would create thousands of construction jobs and hundreds of permanent jobs. Moreover, it is important to recognize that historically, for every oil and gas industry job, an estimated 20 additional jobs are generated across Alaska's economy.

The project is expected to generate billions of dollars in revenues annually to the State of Alaska. Providing a market for Alaska's natural gas is secured, the Alaska LNG project will likely spur further exploration across the North Slope and Interior Alaska, leading to increased throughput and an extended life for the Trans Alaska Pipeline System (TAPS). Additionally, the project would generate more private sector economic activity and jobs for Alaskans.

The project has three major components: a gas treatment plant located at Prudhoe Bay, an 807-mile long pipeline to Southcentral Alaska with off-takes for in-state use of natural gas, and a natural gas liquefaction plant in Nikiski at tidewater.

The Alaska LNG project could make affordable natural gas available to Fairbanks and other communities, which in recent years have experienced the highest energy rates in the nation to heat their homes in the harsh Arctic climate.

121 West Fireweed Lane, Suite 250, Anchorage, Alaska 99503  
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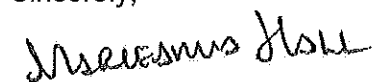


With trillions of cubic feet of stranded natural gas, this project could be essential to providing affordable energy to Alaska and the world.

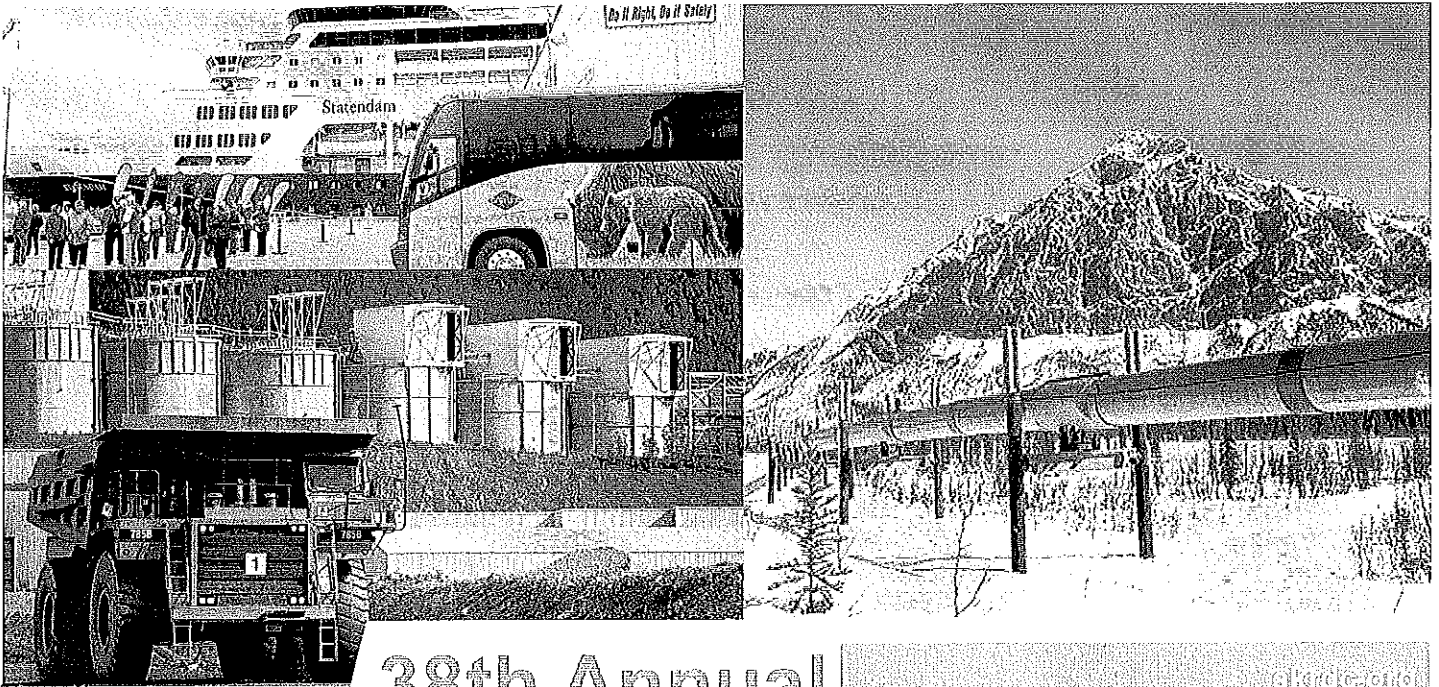
We believe a newly constructed gas pipeline will utilize proven technologies that will enable safe operations while minimizing environmental impacts. RDC is confident this project can be built in an environmentally responsible manner, as was TAPS, which was constructed 40 years ago.

Thank you for your consideration of our comments.

Sincerely,

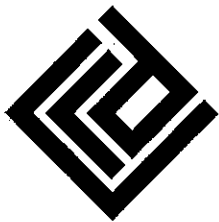
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Marleanna Hall  
Executive Director



# 38th Annual ALASKA RESOURCES CONFERENCE

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Growing Alaska Through Responsible Resource Development

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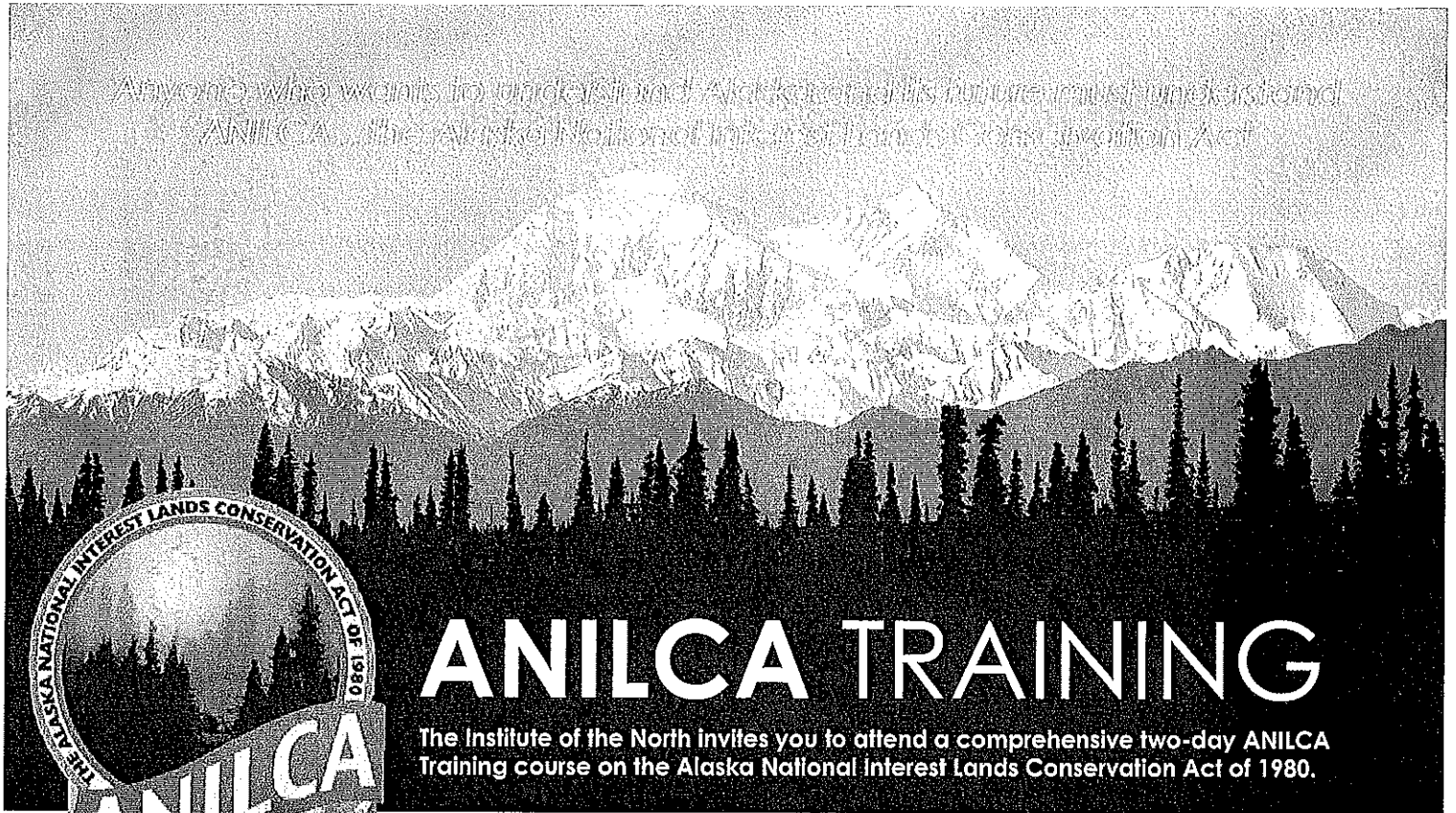
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Anyone who wants to understand Alaska's future must understand ANILCA. The Alaska National Interest Lands Conservation Act.



# ANILCA TRAINING

The Institute of the North invites you to attend a comprehensive two-day ANILCA Training course on the Alaska National Interest Lands Conservation Act of 1980.

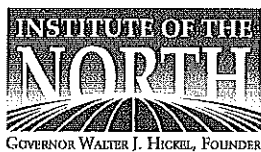


## What is ANILCA?

Through ANILCA, Congress designated 104 million acres of new national parklands, wildlife refuges, and other conservation lands in Alaska, for a total of 139 million acres (more than one third of the state). Congress balanced the unprecedented scale of these designations with similarly unprecedented accommodations for Alaskans' way of life and reliance on a resource-based economy.

## ANILCA Training Includes

- Summary of Alaska's land history from Territorial days to present
- Context of ANILCA's passage – including
  - major constituents
  - issues of the day
  - the Great Compromise
- Overview of ANILCA statutory provisions
- Key access provisions of ANILCA, including access for traditional activities, subsistence, inholdings, and transportation & utility systems
- Subsistence on federal lands
- Wilderness reviews and management
- ANILCA implementation, including federal land planning
- Case studies



Presented by  
Institute of the North  
715 L Street, Suite 300  
Anchorage, Alaska 99501  
[www.institutenorth.org](http://www.institutenorth.org)



**SPONSOR** This course is offered in partnership with the US Department of the Interior University (DOIU), building on a curriculum developed in 2004 with an appropriation from Congress – and now substantially improved to meet contemporary needs.



## ANILCA Training Objectives

Seek a greater understanding of this sweeping legislation and its influence on conservation policy, business opportunities, Alaska residents' way of life, resource development, and public land management in Alaska.

Understanding ANILCA assists both federal managers and non-federal stakeholders in finding implementation solutions that continue to balance conservation and Alaska's unique circumstances. Participation by multiple agencies and non-federal stakeholders enriches the learning experience.

## Recommended for

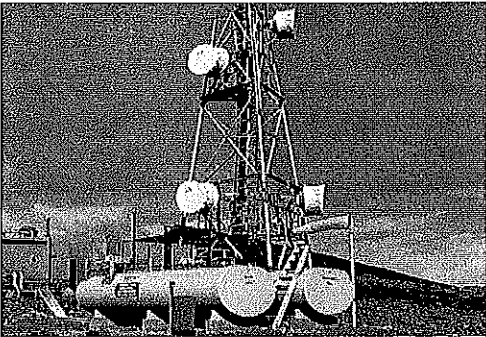
Federal agencies with ANILCA implementation responsibilities, state and local land and resource managers, Native corporations, rural residents and inholders, as well as community leaders, policy makers, consultants, the academic community and the interested public.

## Instructors

Over a dozen presenters include federal and non-federal subject matter experts with extensive ANILCA experience.

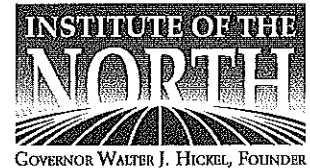
## Cost

\$575 tuition includes two days of instruction, copy of ANILCA & Amendments; presentation documents; "Alaska in Maps - A Thematic Atlas"; and a portable USB drive with relevant laws, regulations and other supporting documents.



## The Institute of the North

Founded by Governor Walter J. Hickel, the Institute of the North's mission is to inform public policy and cultivate an engaged citizenry.



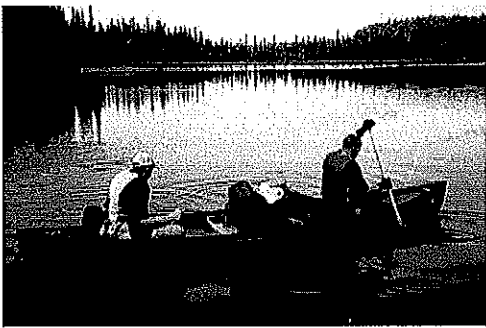
The Institute of the North works to increase knowledge of northern issues at local, national, and global levels and to strengthen Alaskans' voices in northern decision-making.



## Training Schedule

ANILCA Trainings are typically held in Anchorage at the Campbell Creek Science Center each Spring and Fall. Upcoming dates include:

- November 7-8, 2017
- March 6-7, 2018



## To REGISTER or Learn More

Visit [www.institutenorth.org](http://www.institutenorth.org)

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# Thank You!

The Resource Development Council would like to acknowledge the generous sponsors of our 42nd Annual Meeting Luncheon on June 28 featuring Hal Quinn, President, National Mining Association. Thank you for growing Alaska through responsible resource development.

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