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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

BREAKFAST MEETING

Thursday, September 20, 2018

1. Call to order – Jeanine St. John, RDC Senior Vice President
2. Self Introductions
3. Head Table Introductions
4. Staff Report – Marleanna Hall, Executive Director
5. Program

Liberty Update and EIS Review

David Wilkins, Senior Vice President for Alaska, Hilcorp Alaska LLC
Mike Dunn, Project Manager, Liberty, Hilcorp Alaska LLC

Next Meeting:

Thursday, October 4th

Advancing the Ambler Mining District in Alaska by Forming Strong Partnerships

Rick Van Nieuwenhuysen, President and CEO, Trilogy Metals Inc.
Dena'ina Center

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This breakfast packet and presentation may be found online at:

akrdc.org



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OIL & GAS



MINING



FORESTRY

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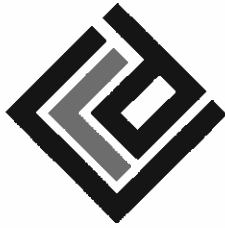
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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

ACTION ALERT

Support Willow Prospect in NPR-A
Comment Deadline: Thursday, September 20, 2018

Overview

The extended comment period on the Master Development Plan Environmental Impact Statement (MDP/EIS) for the Willow oil and gas prospect within the National Petroleum Reserve-Alaska (NPR-A) closes Thursday, September 20th. The Bureau of Land Management (BLM) intends to prepare the MDP/EIS in accordance with recently issued Executive Orders and Secretarial guidance on streamlining and improving the National Environmental Policy Act (NEPA) and other regulatory processes. The action has drawn immediate condemnation from environmental groups who would like to see the oil remain in the ground.

ConocoPhillips has initiated discussions with the BLM regarding potential development of its Willow prospect, which is located on federal oil and gas leases approximately 30 miles west of Nuiqsut. The MDP/EIS will analyze the environmental impacts and appropriate mitigation measures for developing and operating the Willow prospect, which may include one central processing facility, an infrastructure pad, up to five drill pads, access and infield roads, an airstrip, pipelines, a gravel mine, and a temporary island to support module delivery via sealift barges.

Recent exploration indicates there could be 400 million to 750 million barrels of recoverable oil at Willow, with more upside potential. It is believed the resource estimate is sufficient to justify a stand-alone hub. First oil is estimated to be achieved by 2024 or 2025 for approximately \$2-3 billion spent over the course of four to five years after a final investment decision. It is estimated an additional \$3 billion of cumulative capital will be spent over multiple years to maintain production at the facility.

For more information: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage¤tPageId=161457>

Action Requested

If you haven't already done so, please submit comments supporting development of the Willow prospect. Comments may be submitted by any of the following methods below.

Email: BLM_AK_Willow_Comments@blm.gov

Mail: Willow MDP/EIS Scoping Comments
Bureau of Land Management
222 West 7th Avenue, Stop #13
Anchorage, AK 99513

Points to Consider:

- The BLM should include in the MDP/EIS the socio-economic and subsistence benefits of the Willow prospect to the region, state, and nation.
- Development of the proposed \$5 billion project would provide benefits to the local and state economies through local hire for jobs created during construction and operations, tax revenues, federal revenue sharing from royalties and lease rentals/bonuses, and new resources to help meet domestic energy demand.

- The proposed Willow project conforms to the BLM's 2013 Integrated Activity Plan (IAP) which provides a framework for minimizing impacts. The project proponent has collected extensive biological and engineering data since 2017 to inform the Willow EIS process.
- Oil and gas development in NPR-A could ultimately prove indispensable, given forecasts that predict this nation's energy demands increasing over ten percent in the next quarter century. Even with dramatic increases in alternative energy sources, the majority of these growing energy demands will continue to be satisfied through use of fossil fuels.
- Production from Willow would serve to help maintain the integrity of the Trans-Alaska Pipeline System (TAPS), a critical link to America's energy distribution. Given the vast resources believed to be available in NPR-A, future production could reverse the decline in TAPS, allowing it to remain viable for decades.
- Conversely, prohibiting development and production at Willow would set a dangerous precedent for future development in NPR-A, severely compromising the long-term energy and economic security of Alaska and the nation.
- Production from Willow would help meet the purpose of NPR-A, which is to develop America's energy resources. The 23-million acre reserve was set aside nearly a century ago for its petroleum value. In an updated report, the U.S. Geological Survey estimates the reserve could hold nearly 9 billion barrels of oil.
- Industry has made great strides in responsibly designing projects in the Arctic with minimal impact on the environment, wildlife, and subsistence activities.
- The proposed Willow project minimizes impacts and maintains high standards for safety and emergency response, and leverages contemporary North Slope best management practices to avoid and minimize impacts.
- Industry employs rigorous standards to protect the environment and subsistence resources. Industry has an excellent track record and a long history of operating responsibly and working with stakeholders on the North Slope and in the Arctic.
- The BLM should move forward in preparing the MDP/EIS in accordance with the recently issued Executive Orders and Secretarial guidance on streamlining and improving the NEPA and other regulatory processes.

Comment deadline is Thursday, September 20, 2018

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Executive Director
Marleanna Hall

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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

September 6, 2018

Mr. Ted Murphy, Alaska State Director
Willow MDP/EIS Scoping Comments
Bureau of Land Management
222 West 7th Avenue, Stop #13
Anchorage, AK 99513

Dear Director Murphy:

I am writing on behalf of the Resource Development Council for Alaska, Inc. (RDC) to express support for the development of the Willow prospect within the National Petroleum Reserve-Alaska (NPR-A). RDC also supports the preparation of the Master Development Plan Environmental Impact Statement (MDP/EIS) in accordance with the recently issued Executive Order and Secretarial Guidance on streamlining and improving the National Environmental Policy Act and other regulatory processes.

RDC is a statewide non-profit business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, fisheries and tourism industries. RDC's membership also 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.

In the EIS, BLM should clearly outline the substantial social and economic benefits of the Willow prospect to the North Slope Borough, the State of Alaska, and the nation, including the billions of dollars generated for the NPR-A Impact Mitigation Grant Program, which will focus on local communities and impacted areas.

Willow is estimated to contain as much as 750 million barrels of oil with more upside potential. Daily production could exceed 100,000 barrels per day. This production would substantially boost throughput in the Trans-Alaska Pipeline System (TAPS), currently running at approximately one-fourth capacity. It would also extend the life of TAPS, a critical component of our domestic energy complex, and help meet domestic energy demand. Clearly, Willow production would help fulfill the primary purpose of NPR-A, which is to harvest American energy resources.

Production from the \$5 billion Willow project would generate billion of dollars in royalties and tax revenues to the State of Alaska, the North Slope Borough and the federal government. Willow would also generate thousands of direct and indirect jobs for local residents and other Alaskans. These would be high-paying, year-round jobs that would sustain Alaskan families and benefit local communities in many ways. Overall, the activity and revenues generated by this major project would substantially boost Alaska's economy, which is has been stuck in a recession for approximately three years.

Moreover, the project would also deliver the positive benefits of new roads on subsistence hunting. Roads built for other nearby projects have benefited subsistence hunters by providing timely, safe, and affordable access to the resource. Roads also insure that the operator can respond to any medical, environmental and safety issues in a harsh Arctic environment in an adequate and timely manner. These positive aspects should be acknowledged in the MDP/EIS.

When it comes to the environment, industry has a solid track record of conducting its operations in a responsible manner, which respects and protects the subsistence way of life. Industry also has a long history of working with all stakeholders in the Arctic and has made great strides in designing projects with minimal impact on the environment, wildlife, and subsistence activities. With regard to Willow, the project will utilize existing road and pipeline infrastructure in the Colville River and Kuparuk River Units to minimize impacts. Moreover, the proposed project conforms to the BLM's 2013 Integrated Activity Plan.

RDC acknowledges that there are special interests that oppose further development of fossil fuels in the Arctic and elsewhere. However, oil and gas development in NPR-A could ultimately prove indispensable as forecasts indicate our nation's energy demands will increase over ten percent in the next quarter century. Despite sharp increases in alternative energy sources, the majority of these growing energy demands will continue to be satisfied through the use of fossil fuels, and as long as there is a market for oil and gas, the resources should be developed and produced here where operations and emissions are strictly regulated and best management activities are employed to avoid and minimize impacts.

In conclusion, RDC is fully confident the Willow project will be developed in a responsible manner with minimal impacts to the environment and subsistence resources. The BLM should prepare the MDP/EIS in accordance with the recently issued Executive Orders on streamlining and improving the NEPA process. The agency should also clearly state and the many positive socio-economic benefits of the project to the region, state, and nation.

Thank you for the opportunity to comment on this important project.

Sincerely,

Resource Development Council
for Alaska, Inc.



Carl Portman
Deputy Director

Public Hearings Schedule and Public Comment received for Citizen Initiative 17FSH2 (Ballot Measure 1)

Citizen initiative 17FSH2 will appear before voters on Alaska's Tuesday, November 6, 2018 general election ballot.

AS 15.45.195 requires a minimum of two public hearings on the initiative be held in each of Alaska's four judicial districts prior to October 6, 2018.

Each hearing will last two hours. Public testimony will be in-person only and limited to two minutes per person. The public may begin signing up to speak a half hour before the hearing begins.

You can listen to live testimony online at <http://akl.tv>, or toll-free by telephone (For Juneau callers: 586-9085; For Anchorage callers: 563-9085; Toll-free anywhere else: 844-586-9085.)

In addition to providing information about the hearings schedule and locations, this notice (<http://notice.alaska.gov/189769>) will also function as a hub for anyone to submit public comment about the initiative or to access the recorded audio of each completed hearing.

Public Hearings Handouts: Ballot Summary - Bill - F.A.Q.

Public Hearings Schedule:

Friday, September 7, 2018 - Juneau, Alaska - 9:00 a.m. to 11:00 a.m.

Capitol Committee Rooms 203 and 205, State Capitol Building, 120 4th Street, Juneau, AK 99801
Sign-In Sheets - Hearing Video

Monday, September 10, 2018 - Kotzebue, Alaska - 1:30 p.m. to 3:30 p.m.

Northwest Arctic School District, Board Room (room 115) - 744 3rd Street, Kotzebue, AK 99752
Sign-In Sheets - Hearing Audio

Tuesday, September 11, 2018 - Nome, Alaska - 1:00 p.m. to 3:00 p.m.

City Council Chambers, Rooms 5 & 6 - City of Nome, 102 Division St, Nome, AK 99762
Sign-In Sheets

Tuesday, September 18, 2018 - Anchorage, Alaska - 2:00 p.m. to 4:00 p.m.

Legislative Information Office Auditorium - 1500 W. Benson Blvd., Anchorage, AK 99501

Friday, September 21, 2018 - Sitka, Alaska - 10:00 a.m. to 12:00 p.m.

Harrigan Centennial Hall - 330 Harbor Drive, Sitka, AK 99835

Monday, September 24, 2018 - Fairbanks, Alaska - 2:00 p.m. to 4:00 p.m.

Legislative Information Office - 1292 Sadler Way, Suite 308, Fairbanks, AK 99701

Tuesday, September 25, 2018 - Bethel, Alaska - 2:00 p.m. to 4:00 p.m.

Yup'it Piciryarait Cultural Center - 420 Chief Eddie Hoffman Highway, Bethel, AK 99559

Saturday, September 29, 2018 - Dillingham, Alaska - 2:00 p.m. to 4:00 p.m.

Bristol Bay Campus - 527 Seward Street, Dillingham, AK 99576

Statewide Teleconference Only Session - 1:00 p.m. to 3:00 p.m.

Saturday, October 13, 2018 - Testimony will be taken only over the phone for this hearing.

For Juneau callers: 586-9085; For Anchorage callers: 563-9085; Toll-free anywhere else: 844-586-9085.

Public Comment:

The public is also encouraged to submit written testimony and comment on the initiative.

Comments may be submitted through the commenting functionality built into this notice (click on the "Leave a Comment" link at the bottom of the notice or in the upper right corner.) Comment may also be submitted in writing or in person at each scheduled hearing or may be sent by mail addressed to:

Office of Lieutenant Governor Byron Mallott
P.O. Box 110015
Juneau, Alaska 99811

All comments received by 5:00 p.m. on Friday, November 2nd will be published as attachments to this notice, which will be updated each Friday afternoon through November 2nd.

17FSH2CommentsReceived-Batch1-2018-09-14

Related Links:

[Alaska Division of Elections Home Page](#)

Information and documents related to initiative 17FSH2 - "An Act providing for protection of wild salmon and fish and wildlife habitat."

[Leave a Comment](#)

[Attachments, History, Details](#)

Attachments

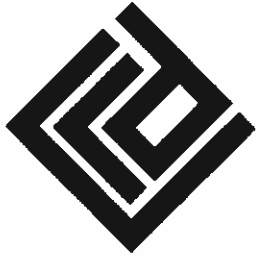
17FSH2 - FAQ's - 9.6.18.pdf
17FSH2 Impartial Summary Post-Supreme Court Decision.pdf
17FSH2 Post Supreme Court Revised.pdf
17FSH2CommentsReceived-Batch1-2018-09-14.pdf
BBY-Dillingham.pdf
GCY-Bethel-Dillingham.pdf
JuneauSign-InSheets.pdf
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Details

Department:	Governor's Office
Category:	Public Notices
Sub-Category:	
Location(s):	Statewide
Project/Regulation #:	17FSH2 citizen initiative 2018 general election
Publish Date:	8/30/2018
Archive Date:	12/1/2018
Events/Deadlines:	Anchorage Public Hearing for Ballot Measure 1 - 17 9/18/2018 2:00pm - 4:00pm View on Map
	Sitka Public Hearing for Ballot Measure 1 - 17FSH2 9/21/2018 10:00am - 12:00pm View on Map
	Fairbanks Public Hearing for Ballot Measure 1 - 17 9/24/2018 2:00pm - 4:00pm View on Map
	Bethel Public Hearing for Ballot Measure 1 - 17FSH 9/25/2018 2:00pm - 4:00pm View on Map
	Dillingham Public Hearing for Ballot Measure 1 - 1 9/29/2018 2:00pm - 4:00pm View on Map



RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

Public Hearing on 17FSH2
September 18, 2018 • Anchorage LIO

Good afternoon and thank you Lt. Governor for holding this meeting. My name is Marleanna Hall and I am the executive director for the Resource Development Council for Alaska, Inc. RDC is a member of the Stand for Alaska – Vote no on 1 coalition.

[RDC is a statewide trade association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, fisheries and tourism industries, as well as the 12 land owning Alaska Native corporations. My membership also includes labor, municipalities and boroughs, the support industry sector, and individuals from around the state.]

My member companies, who employ thousands of Alaskans and have invested billions in our state, have a huge stake in advocating for fair and equitable regulatory processes. Of our many concerns, Ballot Measure One would eliminate our science-based fish habitat protections and replace them with red tape and unclear, untested regulations.

Increasing uncertainty and adding additional, unnecessary regulatory burdens to community and resource development projects across Alaska with little to no added benefit to salmon habitat is not sound policy. This ballot measure would delay, or even halt, these projects and increase costs for our communities and private sector and would send Alaska further down on the regulatory-certainty scale.

Further, it threatens the way the Native corporations manage and develop their land, and the way the ANCs provide for their people. Whether it be a community or development project, this measure will dramatically increase costs and harm rural opportunities.

The idea that our fish habitat is not protected is very misleading. Alaska has some of the best-managed fisheries in the world, and each one of us has a stake in maintaining that reputation.

The notion that this measure won't impact existing projects is also misleading. Projects across the state must renew fish habitat permits as necessary, and will be subject to the new, untested practices described in the flawed ballot measure.

Because of this and many reasons, we are urging Alaskans to vote no on Ballot Measure 1.

**Stand for Alaska – Vote on 1 Opposition Statement • City Hall • Nome
September 11, 2018**



Good morning. Thank you Lt. Governor for holding a hearing here in Nome. My name is Marleanna Hall, I am the Executive Director for the Resource Development Council for Alaska, Inc.

While that is my job, I'm here today because I was born and raised here in Nome. I've lived in Alaska my whole life, and hope to be able to continue living here for the rest of it. I grew up fishing and hunting and boating the rivers around the Seward Peninsula as well as much of our state on the road system. I grew up during the construction and operation of the Trans-Alaska Pipeline, the creation and administration of the Permanent Fund Dividend, and other significant economic developments that make Alaska's economy tick and provides us with the ability to live and work here.

I have the pleasure of serving as the Chair of the Stand for Alaska: Vote No on 1 coalition as there are many reasons why this measure concerns me. Ballot Measure 1 would eliminate our science-based fish habitat protections and replace them with red tape and unclear, untested regulations. This not only threatens our jobs and our economy; it threatens our rights as property owners, and our ability to maintain or develop public infrastructure; and it doesn't do the one thing that supporters say it will do: fix the problems facing our salmon runs.

For communities like Nome, the ability to improve the port, the wastewater treatment facility, or the airport will be jeopardized. Across the state, road safety improvements, North Slope projects, docks and more will be put at risk- this measure will shutdown or delay existing operations and future projects that support the livelihoods of tens of thousands of Alaskans. Key projects would see extreme delays or shutdowns.

Under Ballot Measure 1, simple projects like adding or repairing a dock or a culvert on your property will become tangled in endless red tape.

For the people of Nome, it is a blessing to visit different areas of the Peninsula, because of the roads and bridges that let us go to Teller and Brevig, to Council or up past Kuzitrin. This area is fortunate to have this fairly large amount of road infrastructure. Other parts of the state are less fortunate when it comes to infrastructure. And this ballot measure will only hinder building or improving roads and other much needed projects around the state. And it doesn't do what the proponents say it will do.

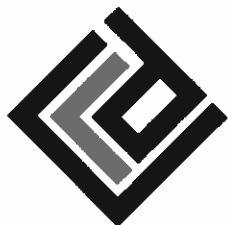
More than 450 Alaskan businesses, organizations and groups and thousands of individual Alaskans have joined together to oppose the measure. The Alaska Native corporations have joined the Stand for Alaska – vote no on 1 effort. Because it threatens the way the Native corporations manage and develop their land, and the way the ANCs provide for their people. Whether it be a community or development project, this measure will dramatically increase costs and harm rural opportunities.

This measure threatens Alaskan jobs, the way we do business, and our rights as Alaskans to develop our lands and our communities. This measure causes too much damage and goes too far.

Could we make reasonable improvements to habitat protections? Perhaps. But Ballot Measure 1 doesn't do that and eliminates the opportunity to have a conversation. The measure is poorly written, vague and gives too much power to one singular government appointee. If it passes, lawyers and the courts will determine what exactly this complex measure does and doesn't do at great costs to Alaskans and our communities.

The ballot measure does not solve but rather, creates problems. For these reasons, and many more, I ask my fellow Alaskans to vote no on Ballot Measure 1.

Paid for by Stand for Alaska Vote No on 1, 200 West 34th Avenue, PMB 1219, Anchorage, AK 99503. Marleanna Hall, chair, Aaron Schutt, Jaeleen Kookesh, Joey Merrick, and Sarah Lefebvre, co-chairs, approved this message. Top contributors are ConocoPhillips Alaska, Anchorage, Alaska, Donlin Gold LLC, Anchorage, Alaska and BP Alaska, Anchorage, Alaska.



RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

ACTION ALERT

Rulemaking for Alaska-specific Roadless Rule
Comment Deadline: Monday, October 15, 2018

Overview

The U.S. Forest Service is initiating an environmental impact statement (EIS) and public rulemaking process to address the management of inventoried roadless areas in the Tongass National Forest. The intent is to evaluate a regulatory exemption for the Tongass to the current nationwide Roadless Rule as well as evaluate other management solutions that address infrastructure, timber, renewable energy, mining, access, and transportation needs to further economic development, while still conserving roadless areas for future generations.

The nationwide Roadless Rule was established in January 2001 as President Bill Clinton was leaving office. It set in place prohibitions on timber harvests and road construction within inventoried roadless areas of the national forest system. The federal government and the State of Alaska reached a settlement in 2003 exempting the Tongass from the Roadless Rule. In 2011, a federal court set aside the exemption and reinstated the rule. The court's ruling was initially reversed, but the rule was once again reinstated by a 6-5 decision of the Ninth Circuit in 2015.

In response to a State of Alaska petition, the Forest Service agrees that the long-standing controversy surrounding management of roadless areas in the Tongass may be resolved through rulemaking creating a state-specific Roadless Rule. Both the State and the Forest Service believe a long-term durable approach to roadless area management is needed that balances preservation with social and economic needs in the Tongass and the region. While exempting the Tongass from provisions of the Roadless Rule, the proposed rulemaking would leave the nationwide rule in place in the Chugach National Forest.

RDC believes the 2001 Roadless Rule prohibitions are unnecessary in both the Tongass and Chugach National Forest, which can be adequately protected under amended land management plans.

For more information: <https://www.fs.usda.gov/project/?project=54511>
<https://www.gpo.gov/fdsys/pkg/FR-2018-08-30/pdf/2018-18937.pdf>

Action Requested

This rulemaking is an opportunity to revisit a sweeping federal rule that never made sense in Alaska and to help create local sustainable economies. What happens next will depend on how Alaskans react. It is critical that RDC members weigh in. Let the Forest Service know that Alaska is unique and deserves a rule that is modeled to the needs of Alaskans. Comments may be submitted by any of the following methods below.

Public Hearings:

Juneau – Thursday, September 20

5:30-8:00 p.m. Elizabeth Peratrovich Hall

Sitka – Monday, September 24

5:30-8:00 p.m., Aspen Suites

Wrangell – Monday, September 24

5:30-8:00 p.m., Nolan Center

Petersburg – Tuesday, September 25

5:30-8:00 p.m., Petersburg Borough Assembly Chambers

Anchorage – Thursday, September 27

5:30-8:00 p.m., University of Alaska, Gorsuch Commons, Room 107, 3211 Providence Drive

Electronically:

[https:// www.fs.usda.gov/project/?project=54511](https://www.fs.usda.gov/project/?project=54511)

Mail:

Alaska Roadless Rule, USDA Forest Service, Alaska Region, Ecosystem Planning and Budget Staff,
P.O. Box 21628, Juneau, Alaska 99802-1628

Points to Consider:

- Alaska is unique and deserves a state-specific roadless rule that is tailored to the needs of Alaskans.
- A new Alaska-specific roadless rule should balance roadless area characteristics with timber harvesting and road construction that are determined to be needed for forest management, economic development opportunities, renewable energy, and the exercise of valid existing rights.
- The EIS should include an alternative that includes both the Tongass and Chugach National Forest in an Alaskan-specific roadless rule.
- The nationwide Roadless Rule usurped much of the land planning process mandated by the National Forest Management Act (NFMA), particularly on the Chugach and the Tongass national forests. Exempting Alaska's national forests from the Roadless Rule will not authorize any development activities, but it will enable the NFMA planning process to function as intended. That process specifies in detail how each portion of each national forest should be managed.
- Acting in response to specific recommendations by both the Forest Service and many environmental groups, Congress has already enacted over six million acres of Wilderness and roadless areas on the Tongass. The remaining areas were passed over so they could support local employment, including year-around timber manufacturing jobs in a region where there are minimal state or private timberlands available to the mills.
- The Roadless Rule has never made sense in Alaska. Application of the 2001 rule has severely impacted the social and economic fabric of Southeast Alaska communities and violates the Alaska National Interest Lands Conservation Act and the Tongass Timber Reform Act. It has devastated the timber industry where sustainable harvests have plummeted and employment is now a fraction of what it was prior to enactment of the rule.
- The Roadless Rule as applied to Alaska doesn't work – it doesn't work for our timber and mining industries and it doesn't work for renewable energy and other economic development activities either.
- A one-size fits all approach doesn't account for Alaska's uniqueness, needs, and limited surface infrastructure.
- Unlike Lower 48 forests, most of the Tongass and 99 percent of the Chugach National Forest are roadless and fall under the high-restrictive Roadless Rule. Both forests are now being managed more like a national park than a multiple-use unit as mandated by law.
- The current Roadless Rule is impacting access for a wide variety of uses. The result is a weaker economy as local communities face few employment opportunities, higher energy costs, and a smaller tax base to support local services.
- An Alaska-specific roadless rule should allow further road access for not only timber, mineral, tourism, and energy uses, but access to resources important to residents for subsistence, recreation and other community economic, cultural, and social activities.

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Marleanna Hall

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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

August 20, 2018

Edward A. Boling
Associate Director for the National Environmental Policy Act
Council on Environmental Quality
730 Jackson Place NW
Washington, DC 20503
Via regulations.gov

Re: CEQ request for revisions to NEPA Process, Docket # CEQ-2018-0001

Dear Mr. Boling:

The Resource Development Council for Alaska, Inc. (RDC) appreciates the opportunity to provide comments on potential revisions to update and clarify the Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) 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.

RDC appreciates the CEQ's efforts to streamline the NEPA review process, reduce unnecessary regulatory burdens, and clarify longstanding CEQ regulations. Further, as stated by the CEQ, it has issued numerous guidance documents but has amended its regulations substantively only once.

The proposed rule sets forth process and content requirements to guide the development, amendment, and revision of NEPA. RDC members view this as an excellent opportunity to fix the broken or often-misused NEPA process, using a federally streamlined, science-based process.

Environmental lawsuits continue to threaten the responsible development of Alaska's natural resources. At the forefront of these lawsuits are cases challenging the NEPA process, often times brought against the process itself and not always the project.

The costs of completing the NEPA process along with the prevalence of environmental lawsuits are often prohibitive for the nation's countless small businesses and landowners, especially in Alaska. Few federal laws have more impact on resource development in Alaska than the Environmental Impact Statement (EIS) process required by the National Environmental Policy Act (NEPA).

RDC's comments respond to CEQ's specific questions in the ANPRM and offer additional views on what many in the regulated community have experienced in dealing with the confusing, time-consuming, and uncertain NEPA process.

1. Should CEQ's NEPA regulations be revised to ensure that environmental reviews and authorization decisions involving multiple agencies are conducted in a manner that is concurrent, synchronized, timely, and efficient, and if so, how?

Yes. NEPA should be amended to make clear that an EIS will be focused on a limited number of issues identified in the scoping process. Further, NEPA should be amended to have a presumptive page limit with a process that would give the lead agency the ability to make a determination that only a pre-determined number of pages can be used. This will help increase efficiency.

2. Should CEQ's NEPA regulations be revised to make the NEPA process more efficient by better facilitating agency use of environmental studies, analysis, and decisions conducted in earlier Federal, State, tribal or local environmental reviews or authorization decisions, and if so, how?

Yes. Regulations should require agencies to use existing data when available to the greatest extent possible.

3. Should CEQ's NEPA regulations be revised to ensure optimal interagency coordination of environmental reviews and authorization decisions, and if so, how?

Yes. Requirements to enforce timelines and time limits to the existing process should be implemented. NEPA should be amended to have a presumptive timeframe to complete the EIS with a process that would give the lead agency the ability to make a determination to extend the time frame by a set number of months if (and only if) necessary to address the specified issues.

4. Should the provisions in CEQ's NEPA regulations that relate to the format and page length of NEPA documents and time limits for completion be revised, and if so, how?

Yes. See previous responses.

5. Should CEQ's NEPA regulations be revised to provide greater clarity to ensure NEPA documents better focus on significant issues that are relevant and useful to decision makers and the public, and if so, how?

Yes. CEQ's existing regulations should be reaffirmed and clarified.

6. Should the provisions in CEQ's NEPA regulations relating to public involvement be revised to be more inclusive and efficient, and if so, how?

Yes. In addition to responses to questions 1 and 2, CEQ should consider limited administrative appeals to agency decisions.

10. Should the provisions in CEQ's NEPA regulations relating to the timing of agency action be revised, and if so, how?

Yes. In addition to the response to question 3, the CEQ should consider deadlines that do not exceed existing ranges.

11. Should the provisions in CEQ's NEPA regulations relating to agency responsibility and the preparation of NEPA documents by contractors and project applicants be revised, and if so, how?

Yes. CEQ should explore the use of third parties to reduce the backlog of NEPA documents as consistent with other government agencies.

12. Should the provisions in CEQ's NEPA regulations relating to programmatic NEPA documents and tiering be revised, and if so, how?

Yes. The provisions should be revised to create efficiency and improve the process.

16. Are there additional ways CEQ's NEPA regulations should be revised to promote coordination of environmental review and authorization decisions, such as combining NEPA analysis and other decision documents, and if so, how?

Yes. The CEQ should promote coordination by indicating agencies should communicate to identify appropriate ways to evaluate proposals.

17. Are there additional ways CEQ's NEPA regulations should be revised to improve the efficiency and effectiveness of the implementation of NEPA, and if so, how?

Yes. Existing reviews, analyses, and other documents should be used to the fullest extent possible.

19. Are there additional ways CEQ's NEPA regulations should be revised to ensure that agencies apply NEPA in a manner that reduces unnecessary burdens and delays as much as possible, and if so, how?

Yes. The CEQ should work with other agencies to reduce delays in processes that may not involve the NEPA process.

20. Are there additional ways CEQ's NEPA regulations related to mitigation should be revised, and if so, how?

Yes. CEQ should clarify that NEPA does not require mitigation, and agencies should be directed not to use the NEPA process to influence or promote mitigation. Instead, mitigation should be considered an option.

Thank you the opportunity to comment on potential revisions to update and clarify the NEPA process. We look forward to working with the CEQ to improve the efficiency of the NEPA process.

Sincerely,



Marleanna Hall
Executive Director

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Executive Director
Marleanna Hall

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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

August 13, 2018

Mr. Andrew Wheeler, Acting Administrator
U.S. Environmental Protection Agency
Office of the Administrator: Mail Code 1101A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Via www.regulations.gov

Re: Environmental Protection Agency and Army Corps of Engineers proposal to rescind the "Water of the United States" Definition, Docket No. EPA-HQ-OW-2017-0203

Dear Acting Administrator Wheeler:

The Resource Development Council for Alaska, Inc. (RDC) is writing to comment on the U.S. Environmental Protection Agency's (EPA) and U.S. Army Corps of Engineers (Corps) proposed rule to repeal the 2015 Rule Defining Waters of the United States, which amended portions of the Code of Federal Regulations (CFR).

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 supports the proposed rule to rescind the 2015 Rule: Definition of "Waters of the United States," (WOTUS) 80 Fed. Reg. 37,054 (June 29, 2015), and codify the status quo that is now being implemented under the U.S. Court of Appeals for the Sixth Circuit's stay of the 2015 Rule. In Alaska, the 2015 Rule, if implemented, would inhibit job creation and economic investment and growth, subject resource development operations to undue permitting delays and expenses, unlawfully expand federal jurisdiction over land and waterways, and create further regulatory confusion and financial risks for the state's resource development industries.

RDC submitted comments on the proposed 2015 Rule on November 14, 2014, and at that time stated that the agencies had introduced a rule that radically defined the definition of a WOTUS much further than what is statutorily authorized. Additionally, our letter explained the significant negative impacts the 2015 Rule would have on Alaska, and RDC's membership.

The definition of WOTUS is of utmost importance to RDC and its membership. As Alaska's economy is based on the development of its natural resources, and with more wetlands than all other states combined, and more coastline than the contiguous 48 states, Alaska is uniquely vulnerable when it comes to EPA regulations.

Under the 2015 Rule, the obscure and poorly defined changes and significant expansion of the Clean Water Act jurisdiction in 2015 could result in conflict with other Federal regulations, such as 43 C.F.R. 3809 reclamation regulations, and would undoubtedly result in significant delay and additional cost burden in permitting – which is not aligned with this Administration's priorities.

Given Alaska's dependence on development of its natural resources, 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 2015 rule will impact the ability of its membership to responsibly develop Alaska's natural resources.

One major concern lies in the lack of clarity throughout the document. Definitions of numerous key terms and concepts, like waters, floodplain, wetlands, subsurface connection, adjacent, ordinary high water mark, dry land, and significant nexus, etc. are ambiguous and unclear. Without explicit definition of all technical and enforceable terms, we are left with an unpredictable and confusing rule.

Moreover, by allowing for jurisdiction over remote, isolated features, ephemeral washes and on-site water management features, the 2015 Rule improperly reads the word "navigable" out of the statute and implicates significant constitutional concerns about the appropriate scope of federal authority. Furthermore, nothing in the record created during the 2015 rulemaking process dictated the adoption of such a sweeping definition of WOUSA.

To effectively address these concerns, RDC supports rescinding the 2015 Rule and urges the EPA and Corps to recodify the regulations in place immediately prior so that the CFR accurately reflects the applicable regulations. Since the Sixth Circuit's October 2015 issuance of a nationwide stay, the agencies have been currently implementing the regulations defining WOTUS that were in effect immediately before the 2015 Rule. The proposed action would simply continue that practice and recodify the status quo that has been in place for decades.

RDC agrees with the agencies' proposed conclusions from the supplemental notice:

- That the "administrative goals of regulatory certainty would be best served by repealing the 2015 Rule";
- That "the 2015 Rule exceeded the agencies' authority under the CWA";
- That "the 2015 Rule may have altered the balance of authorities between the federal and State governments" in violation of the CWA;
- That "many features that are categorically jurisdictional under the 2015 Rule...test the limits of the scope of the Commerce Clause...";
- That "the definitional changes in the 2015 Rule [may have had] a more substantial impact on the scope of jurisdictional determinations...than acknowledged in the analysis for the rule..." and

- That "regulatory certainty may be best served by repealing the 2015 Rule [because the] 2015 Rule creates significant uncertainty for agency staff, regulated entities, and the public, which is compounded by court decisions [in litigation challenging the 2015 Rule] that have increased litigation risk and cast doubt on the legal viability of the rule.

The validity of these and other conclusions will be the central issues in litigation that is likely to follow if the agencies finalize their proposal.

Furthermore, in regards to wetlands policy, RDC members across Alaska's natural resource sectors have serious concerns regarding the requirement of compensatory mitigation for development projects in the state. A "no net loss" of wetlands policy designed for the Lower 48 states is not practicable or realistic in Alaska due to the limited availability of sites or technical/logistical limitations. The Corps needs a policy that is unique to Alaska and recognizes the reality of the Alaska environment – a state with vast areas that have little or no opportunities for compensatory mitigation.

Thank you for the opportunity to provide comments on the proposal to withdraw the poorly promulgated 2015 rule and restore the regulatory text that existed prior to the 2015 Rule.

Sincerely,



Marleanna Hall
Executive Director

July 17, 2018

The Honorable Lisa Murkowski
United States Senate
Washington, D.C. 20510

Re: Bulletin 38 Revision and Ch'u'itnu Traditional District

Dear Senator Murkowski:

The Resource Development Council for Alaska, Inc., (RDC) and the Alaska Miners Association (AMA) are writing to request your office seek a ruling from the General Accounting Office (GAO) on whether Bulletin 38, "Guidelines for Evaluating and Documenting Traditional Cultural Properties," is a rule as defined by the Congressional Review Act (CRA).

It is our understanding that revisions to Bulletin 38 had been proposed but were never finalized during the final days of the Obama Administration. One of the proposed changes would have been used to expand the definition of a historic property beyond the terms of statute to include landscapes and properties associated with cultural practices or beliefs of any living community. However, the National Historic Preservation Act (NHPA) does not recognize traditional cultural landscapes as a property type eligible for listing. The existing Bulletin 38 expressly disclaims eligibility for non-properties and cultural resources that are purely intangible, recognizing no legal authority to address them unless they are somehow related to a specific historic property.

Given the revised Bulletin 38 was never finalized, we are left concerned with the current status. As you know, the CRA compels an agency to submit a copy of the rule to Congress before it can take effect. The CRA also provides an opportunity for Congress to disapprove a rule by adoption of a resolution, which we would support in the case of Bulletin 38 in order to give the Department of Interior time to craft a new Bulletin that is consistent with statute. Understanding whether Bulletin 38 is a rule as defined by the CRA will help bring clarity to this issue.

If and when revisions are contemplated going forward, it is important to recognize the significant concerns such revisions, lacking statutory authority, could have on responsible resource and community development in Alaska. The National Park Service and the Advisory Council on Historic Preservation (ACHP) proposed revised Bulletin 38 regulations which would create a new property type, "traditional cultural district," which replaces "landscape." Under such a revised approach, any place that is valued by any racial, ethnic, minority, majority group, community, or organization whose members share traditions, beliefs, practices, lifeways, arts, crafts, or other social institutions, would be considered eligible. Such updates to the Bulletin depart from any existing law or regulation and could have a substantial effect on land use designations in Alaska, Hawaii, and the contiguous 48 states.

We are particularly concerned with the Native American Rights Fund proposal to list 109,000 acres (170 square miles) of state and private land in Southcentral Alaska on the National Register as a "Traditional Cultural District." The nomination, commonly referred to as the Ch'u'itnu Traditional District, was considered by the Alaska Historical Commission and, despite objection by the vast majority of land-based property owners, it was accepted by the Commission.

The decision is extremely troubling. The proposed area, encompassing broad swaths of land, is not supported by any verifiable information identifying any physical features or specific location of where people regularly returned or where a historic or culturally significant event occurred.

The proposed Ch'u'itnu designation does not meet the criteria for listing on the National Register of Historic Places because it is the type of expansive outline, supported in large part by unidentified and unidentifiable sites, traditionally rejected by the National Park Service Keeper and the courts. It would set a precedent where virtually all land in Alaska historically used for subsistence, including among other places the National Petroleum Reserve-Alaska, the Colville River Delta, and the Coastal Plain of the Arctic National Wildlife Refuge, could be nominated as a traditional cultural district.

It is a major threat to Alaska Native corporations and could result in a "taking" of lands conveyed under the Alaska Native Claims Settlement Act (ANCSA) for economic and resource development for the well-being of all Alaska Native people. Proposals such as Ch'u'itnu would likely be seen by Alaska Native entities as a violation of their conveyances under ANCSA.

Consequently, large swaths of private, state, and public land could be determined eligible with little public or landowner awareness. This not only holds true in Alaska, but could also be used throughout the entire nation. The designation would be used as a means to stop development projects or impose additional and substantial delays and costs through litigation and required mitigation.

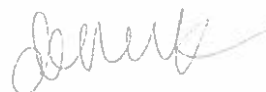
Efforts in earlier years, including those by former U.S. Senator Frank Murkowski, recognized the significant impact amendments to the NHPA would have on Alaska. Most notably in 1992, H.R. 1601 and S. 684 would have included "landscapes" as historic properties, including trails, roads, and places that figured in traditions and lifestyles of ethnic groups. The Department of Interior and the National Park Service also expressed concern about applying the provisions of the NHPA to intangible values and suggested it is not appropriate for those values to be included in the National Register of Historic Places. Ultimately, the amendments to the NHPA were rejected.

Given revision of Bulletin 38 may now be under review by senior Department of Interior officials, there is a unique opportunity to ensure a new Bulletin is consistent with statute. The ACHP needs to be returned to its original mission intended by Congress to restore decision-making authority to the federal agencies with jurisdiction. We would appreciate your inquiry to the GAO on the aforementioned question.

Sincerely,



Marleanna Hall
Executive Director
Resource Development Council for Alaska, Inc.



Deantha Crockett
Executive Director
Alaska Miners Association

cc: Steve Wackowski, U.S. Department of the Interior
Brian Hughes, U.S. Senate Energy and Natural Resources Committee

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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

June 29, 2018

Program Manager, Regulatory Division
U.S. Army Corps of Engineers
P.O. Box 6898
JBER, AK 99506-0898

Submitted via <https://pebbleprojecteis.com/>

To Whom It May Concern:

The Resource Development Council for Alaska, Inc. (RDC) is writing to comment on the U.S. Army Corps of Engineers (Corps) Public Scoping for the Pebble Project Environmental Impact Statement (EIS).

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's priorities include promoting and defending the integrity of the permitting process and advocating for predictable, timely, and efficient state and federal permitting processes based on sound science and economic feasibility. It is vital Alaska's rigorous permitting process is predictable and stable as our resources compete for investment around the globe.

RDC urges the Corps to include the following in the EIS scoping of the proposed project: the social and economic benefits to the region, state, and nation; the demand for the resources at the deposit, including their use in renewable technology and energy; Alaska's constitutional requirements; Alaska's extensive and thorough permitting process; and the alternatives to a newly-proposed mine plan put forward by project proponents.

Social and economic benefits to the region, state, and nation

RDC urges the Corps to consider the family-wage jobs and economic benefits to the region, Alaska, and the nation. The project is expected to employ up to 2,000 people during the four-year construction phase, and 850 people during the 20 years of operations.

The Pebble deposit is located in Southwest Alaska, approximately 200 miles west of Anchorage, nearest to the communities of Iliamna, Newhalen, and Nondalton. The project is located in a region of Alaska that experiences higher unemployment rates and has few other opportunities. A project like this is a rare opportunity to positively impact the local economy where the option for meaningful employment is scarce.

These new job opportunities could reduce out-migration, which could help maintain rural schools and allow people in the region to participate in subsistence activities.

Further, RDC urges the Corps to consider the benefits of the jobs not only in Alaska, but across the nation, that will likely come from development of Pebble. The prospect is one of the most significant mineral deposits in the United States, with the potential for billions in economic activity and thousands of jobs.

The demand for the resources at the deposit

RDC urges the Corps to fully weigh the benefits as well as the need for the mineral resources at Pebble. These minerals would likely be used for the growing worldwide demand for the products and technology related to renewables and energy.

The mineral deposit at Pebble could be a vital resource for increasing Alaska, and America's, technology and energy resources.

With the growing worldwide consumption and dependence upon technical products powered by critical minerals such as copper, the expanding demand for renewable energy technologies, and the development of projects with strategic national significance, the Pebble deposit has the potential to generate hundreds of millions in annual economic activity for Alaska, as well as significant revenues for state and local governments.

Alaska's Constitution

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 Alaskans. RDC urges the Corps to fully consider Alaska's sovereignty and constitutional requirement to responsibly develop Alaska's natural resources.

Moreover, the State of Alaska selected this land specifically for its mineral resource potential. The deposit is not located on federal land, nor inside a refuge or park – it is located on state land designated for mineral exploration. The State of Alaska depends on the responsible development of natural resources on its lands to diversify and support its economy.

Alaskans have the greatest stake in seeing that any and all development is done in a way that protects resources, including the environment. RDC believes it can be done, because it's already being done.

Alaska's extensive and thorough permitting process

RDC members firmly believe in due process and the rule of law. Alaska utilizes a well-established permitting and review process, with multiple opportunities for public input, and review by local, state, and federal agencies. RDC believes the permitting process is the best place to make decisions about the merits of development projects in Alaska.

Alaska has enjoyed the benefits of mining for well over 100 years, with the last several decades seeing new innovations and advancements for protecting the environment. Alaska has stringent regulations to protect its lands.

Every project, no matter the size or location, should have an opportunity to be reviewed under existing legal processes. In the case of mining, there are more than 60 major permits and hundreds more from local, state, and federal agencies that must be successfully obtained. If the process determines a project as

designed cannot protect the environment and other resources, it will not advance. The process will not permit one industry or resource to advance at the expense of another.

RDC urges the Corps to consider and acknowledge Alaska's stringent permitting process and a track record built upon modern technology, regulations, and laws to protect the environment. In fact, the Corps should consider the project proponents record of environmental safety. According to public records, the project has been inspected by the State 57 times since 2003, and regulators have found the project to be in compliance.

The activities at the Pebble deposit are no different than exploration activities at other sites throughout Alaska and no different from previous activities undertaken at the Pebble site.

The alternatives to a newly-proposed mine plan

Project proponents have incorporated a number of alternatives to the newly-proposed mine plan. The footprint of the facilities has been reduced to minimize the impact to areas of known subsistence use, waterbodies, wildlife, and areas of cultural significance. The project plan has eliminated the need for a permanent waste rock storage facility, a key consideration for the EIS to include.

Project proponents have studied the environment to design a plan that best co-exists with the surrounding elements. These studies have placed significant emphasis on analyzing the fish and water resources in and around the proposed project. These studies must be fairly evaluated and considered via the EIS review process.

To date, no thorough evaluation of the technical information has been undertaken by a regulatory agency. The EIS should review all data gathered by the company as part of a rigorous and complete analysis of the project's plan. This should include how the company can responsibly operate a mine and balance this with environmental protection.

More than a decade of environmental research has been conducted since exploration ramped up in the early 2000s. Extensive environmental baseline data collection and geotechnical programs have also been done. Further, under the new plan, all water would be captured and carefully treated prior to discharge. And water discharge would be done strategically to enhance fish habitat – another matter the Corps should acknowledge in its review.

Conclusion

RDC urges the Corps to work in an efficient manner to rationally and scientifically determine the merits of the project, with consideration of the full social, economic, and environmental impacts and benefits. Now is the time to encourage responsible resource development in Alaska, and in America, and to encourage investment in projects by way of a predictable, timely, and efficient permitting process at the state and national level.

In addition, this is an early step in a very long process, which will also include multiple and ongoing opportunities for public input. Thank you for the opportunity to provide comments on the scoping for the Pebble EIS.

Sincerely,



Marleanna Hall
Executive Director

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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

June 19, 2018

Ms. Nicole Hayes
U.S. Bureau of Land Management, Alaska State Office
Attention: Coastal Plain EIS
222 West 7th Avenue, #13
Anchorage, AK 99513-7599

Re: Scoping comments on development of the ANWR Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement

To Whom It May Concern:

The Resource Development Council for Alaska, Inc. (RDC) is writing to express its strong support for the proposed oil and gas lease program that would allow limited activity within the non-Wilderness coastal plain of the Arctic National Wildlife Refuge (ANWR).

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.

Alaskans statewide strongly support oil and gas exploration and development in the non-Wilderness coastal plain. In fact, polling has shown more than 70 percent of Alaskans support development of energy resources beneath the 1002 area. Local residents and many of the Inupiat people who actually live adjacent to the 1002 area have also supported development.

RDC is advocating for Alaska's and, indeed, our nation's interests in supporting the opening of a tiny fraction of the coastal plain to responsible oil and gas exploration and development. In 1980, the Alaska National Interest Lands Conservation Act (ANILCA) expanded the refuge, but in a compromise set aside 1.5 million acres of the coastal plain for potential drilling. The leasing program that has been authorized by Congress and signed into law by President Donald J. Trump would allow development of only 2,000 acres of the coastal plain, which itself represents a very small portion of the 19-million acre refuge.

With advances in technology, it is possible to develop the coastal plain's energy reserves while directly utilizing a small footprint. Moreover, such development can be accomplished without significant disturbance to wildlife. In fact, over the past 40 years of North Slope oil production, many wildlife populations have grown or remained stable. One example at Prudhoe Bay shows the Central Arctic caribou population has grown from 5,000 animals in 1970 to more than 66,000 animals today.

It is important that the Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement (EIS) clearly outline the many benefits conventional oil and gas development in ANWR would bring to Alaska and the nation, as well as the evolution of technology that has greatly reduced industry's footprint in the Arctic. The EIS should also outline successful efforts that have mitigated the impact of development on the North Slope environment and wildlife. It is also important the EIS address successful efforts to mitigate impact on subsistence resources and harvesters.

Oil development in the 1002 area would provide a safe and secure source of oil for the nation for decades. It would create tens of thousands of jobs throughout the country and refill the Trans-Alaska Pipeline System (TAPS), existing critical energy infrastructure that is currently operating at only one-fourth capacity. Since the ANWR coastal plain is only several miles from existing North Slope energy infrastructure and less than 60 miles from TAPS, development of energy reserves there would be one of the most environmentally-sound ways to increase oil production in Alaska.

Despite robust oil production in the Lower 48 states today, America will require new supplies of energy from Alaska in the coming decades. Energy production from ANWR will be key to offsetting a projected decline in Lower 48 shale oil production, which is expected to occur in the next decade. Otherwise, America will be forced to once again increase its reliance on foreign oil.

With the decline in North Slope production, refineries on the West Coast already have been forced import more crude from foreign sources. The chart below, which depicts crude oil supply sources to refineries in California, stresses the need for new Alaska projects:

Crude Oil Supply Sources to California Refineries

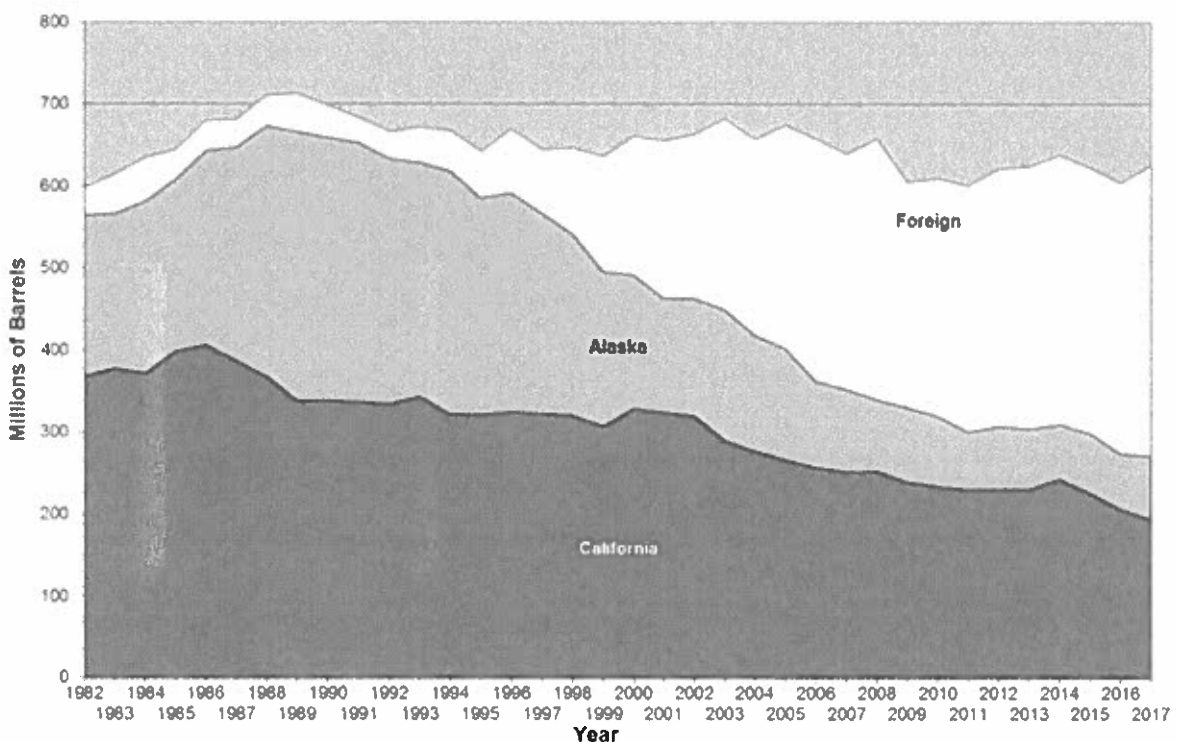


Chart courtesy of the Alaska Oil and Gas Association

With new oil and gas production from ANWR, America can continue to grow its economy and further reduce dependence on foreign imports. According to the Energy Information Administration, oil and gas development in ANWR could result in new conventional domestic production of 880,000 barrels per day for a period extending for approximately 12 years, with additional production for many years following. Such production would not only generate new jobs and boost TAPS throughput, it would generate billions of dollars in new revenues to the Alaska and federal treasuries.

According to a study by the University of Alaska Anchorage, up to 50% of Alaska's current economy and at least one-third of all jobs, including those of public employees, are in some way connected to the oil industry. The same report stressed that nothing else can replace oil in the state's economy. Without oil, the state would be unable to meet its long-term obligations – from funding essential services to public employee pensions, education and health care.

With regard to renewable energy, RDC acknowledges that wind, solar, and other alternative forms of energy are a growing part of America's energy portfolio. While RDC fully supports renewable energy, we also recognize that new oil and gas production will be required to power America's economy and security needs for decades into the future. In

fact, the U.S. Department of Energy estimates renewable energy will still account for a minority of America's energy production in 2050. New oil and gas production can serve as a bridge until renewables are established as a dominant energy source well into the future.

It is important to recognize in the EIS that limited oil and gas exploration and development on the coastal plain is consistent with the intent of Congress in the passage of the Tax Cuts and Jobs Act in December 2017, the passage of ANILCA in 1980, and the Alaska Statehood Act of 1958. Alaska became a state based on the congressional intent that through development of its natural resources it would be able to sustain its economy and not become a ward of the federal government. Early statehood bills failed, and ultimately it was the discovery of oil that convinced Congress Alaska could sustain itself as a state.

In conclusion, RDC strongly supports opening the non-Wilderness portion of the coastal plain to oil and gas exploration and development. Such action would create thousands of jobs, stimulate the economy, reduce America's dependence on foreign oil, and generate much-needed ongoing revenues to the Alaska and federal governments. Moreover, responsible energy development on the North Slope can and does coexist with the environment, wildlife, and subsistence needs of local residents.

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

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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

June 4, 2018

Climate Action Leadership Team
State of Alaska

Via email to climatecomments@institutenorth.org

Re: Draft Alaska Climate Change Policy

To Whom It May Concern:

The Resource Development Council for Alaska, Inc. (RDC) is writing to provide brief comments on the Draft Alaska Climate Change Policy (draft policy) crafted by the Climate Action Leadership Team (CALT).

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 has been a policy of RDC that the regulation of greenhouse gas emissions occur only through independent legislation at a global level, rather than through state or federal legislation. RDC further urges that any regulation be based on sound environmental, scientific, and economic principles that are international in scope.

RDC is concerned any goal at the state level to combat global climate change is unrealistic. State laws are not the right tool to set U.S. climate policy. Again, any action must be at a global level.

Even during an era of climate change and increased utilization of renewable energy, America, including Alaska, still needs to continue developing its domestic oil and gas resources. According to recent reports, projections show renewable energy will account for less than one-half of the nation's energy portfolio in 2050. As long as there is a market for fossil fuels, Alaska should continue producing petroleum resources, given our strong environmental laws. As a result, energy produced here has lower carbon emissions than in many other jurisdictions abroad.

Alaska has responsibly produced over 17 billion barrels of oil from the North Slope in almost 41 years. Fortunately, Alaska still has significant resources on the North Slope that can be developed, providing jobs and improving our economy for generations, as it has the last several decades.

Any effort implemented only at the state level will not stop global climate change, and would do very little, if anything, to offset a changing climate. Taxing is not a good incentive to business and communities, especially not at a state-by-state level. This puts an unfair and unnecessary burden at the local level, and does not move the needle in addressing the real issue.

Instead, Alaska should be applauding state partners who are innovating ways to find energy and other solutions with reduced or low carbon footprints and reducing impacts on the environment. The focus should include examples of industry leaders who are already pushing for alternative/green energy through innovation and dedication to protecting the environment.

The challenges Alaska and its communities are facing are real, but this is a global issue. When we look to develop a policy, it should do no harm to the livelihood of Alaskan families, our communities, our projects, and our economy.

Further, it takes significant investment to move from any form of energy source to a new energy source and as Alaska, and our nation, as well as the world does that, Alaska should not tax one stakeholder over another.

Without a full understanding of the goal of the CALT, RDC has serious concerns with several aspects of the draft policy, including but not limited to:

- Any carbon tax or similar tax at the state level – state laws are not the right tool to set U.S. climate policy.
- How the state plans to incorporate “all impacts of climate change in to research, policy, funding and plans.”
- Taxation at a local level: it is not a good incentive or policy to business and communities, especially not at a state-by-state level.
- Growing the blue and green economic activity in Alaska. We cannot discount the responsible resource development that benefits our other economic sectors. It should not be the policy of the state to put one resource over another, or tax one at the expense of another.

In closing, RDC recognizes the importance of protecting our environment, our state, and our people, but is seriously concerned an effort at the state level that adds additional bureaucracy to community or resource development projects will further jeopardize investment in Alaska without additional benefits to what it is trying to protect.

RDC supports additional focus on climate science and modeling, Arctic ecosystems, human health, ecosystem health, climate impacts, built environment, the application of indigenous knowledge, science communication, monitoring and data systems, and adaptation/mitigation planning.

RDC is encouraged the discussion will continue before a final policy is accepted, but urges caution and additional consultation by stakeholders, including industry, Alaska Native corporations, and others. As the draft policy is further developed, RDC urges the CALT to do no harm to Alaskan projects, whether it be community or resource development projects. Thank you for the opportunity to comment.

Sincerely,



Marleanna Hall
Executive Director

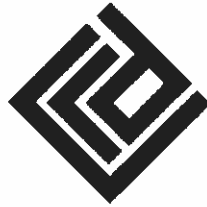
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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

May 30, 2018

Dr. James Kendall
Bureau of Ocean Energy Management, Alaska OCS Region
3801 Centerpoint Drive, Suite 500
Anchorage, AK 99503-5823

Re: Proposed 2019 oil and gas lease sale in the Beaufort Sea Planning Area

Dear Dr. Kendall:

The Resource Development Council for Alaska, Inc. (RDC) is writing to express strong support for a 2019 oil and gas lease sale in the Beaufort Sea Planning Area, as included in the 2019-2024 Outer Continental Shelf (OCS) Oil and Gas Leasing Draft Proposed Program (DPP) published in January.

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 move forward with lease sales in petroleum basins with the greatest resource potential. Given the Beaufort Sea is relatively close to existing infrastructure on the North Slope and the area has been extensively studied, a lease sale in 2019 makes sense in the early stages of the proposed five-year leasing program. However, we encourage BOEM to work closely with Alaskans and subsistence hunters to ensure a balanced approach to the lease sale.

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

The Beaufort Sea is a highly prospective basin. Its untapped resources are of significant importance to both Alaska and the United States and have the potential to serve as a key component of our nation's energy portfolio in the coming decades.

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 an estimated total payroll of over \$70 billion. From an economic standpoint, Arctic OCS development would represent a windfall for the national economy. Revenues generated from Arctic OCS oil and gas production could amount to over \$200 billion to federal, state and local governments.

New oil production in the Beaufort Sea would serve to help maintain the integrity of the Trans-Alaska Pipeline System (TAPS). The pipeline, which came on line over 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 is now less than 530,000 barrels per day, despite the Arctic's vast resources – both onshore and offshore. Future offshore access and production would reverse the decline,

allowing for TAPS to remain viable for decades. In contrast, excluding the Beaufort Sea 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.

Offshore development would bring additional infrastructure to the region and would also provide increased response capabilities in an area where shipping and other activities are increasing as the Arctic ice pack continues to recede.

RDC acknowledges there are special interests that are opposed to further development of America's energy resources – both offshore and onshore. They advocate for 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 portfolio for decades. In fact, the U.S. Energy Information Administration projects fossil fuels will account for approximately 70% of American energy consumption in 2050.

Despite growing Lower 48 production, America is still importing foreign oil – approximately eight million barrels daily to meet its energy needs. With the long-term decline in North Slope production, West Coast refineries have been forced to import more oil from foreign sources. New Alaska production has the potential to feed these refineries with American oil, further reducing imports. Moreover, new production would provide a bridge to the alternative and renewable energy sources of the future.

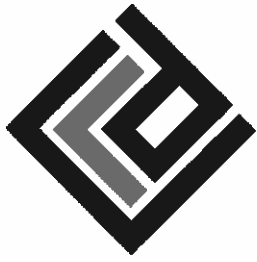
In conclusion, RDC encourages BOEM to move forward with a Beaufort Sea lease sale in 2019. Including the most prospective areas of the Alaska Arctic for potential oil and gas discovery is consistent with advancing the goal of moving America from simply aspiring for energy independence to attaining energy dominance. It is also important to maintain a broad, consistent schedule of lease sales across the Alaska's Arctic Outer Continental Shelf.

Thank you for the opportunity to submit comments on the proposed Beaufort Sea lease sale.

Sincerely,



Carl Portman
Deputy Director



RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

**Bureau of Land Management • Coastal plain oil and gas leasing sale
Dena'ina Center • May 30, 2018**

Good evening. My name is Marleanna Hall, thank you for the opportunity to testify today. I am the executive director of the Resource Development Council for Alaska, but before and above that, I am a lifelong Alaskan. I am Inupiat originally from Nome. I believe the people of Alaska have a right to develop and manage lands in our state in a way that benefits all people and protects the environment. We can, and we do, do it right.

Moving on to my formal testimony tonight, RDC is a statewide trade association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, fisheries and tourism industries, as well as the 12 land-owning Alaska Native corporations. RDC members are truly the life-blood of Alaska's economy. We believe the best approach to expand the economy and generate new jobs is to produce more oil, attract more tourists, harvest more fish and timber, and mine more minerals.

This historic moment, this time in our lives that we get to talk about the opportunity of opening up the non-Wilderness coastal plain to oil and gas leasing has been a long wait for Alaskans.

Alaska has responsibly produced over 17 billion barrels of oil from the North Slope in almost 41 years. Fortunately, Alaska still has significant resources on the North Slope that can be developed, providing jobs and improving our economy for generations, as it has the last several decades.

With advances in technology, and a projected need for oil production, Alaska will play a key role in supplying America, reducing our nation's dependence on foreign oil. All the while, without significant disturbance to wildlife, subsistence, or other use. In fact, wildlife populations on the North Slope have grown or remained stable with the last nearly five decades of activity.

[I would remind those listening tonight, the 1002 area of the coastal plain was set aside, in a compromise in ANILCA for responsible oil and gas exploration and development. Because, believe it or not, much of Alaska is already closed to development, and this small area of the coastal plain could play a vital role in reversing our recession and providing for Alaskans and our nation. * this section was not read due to time]

However, this is just the first step in a very long process, and should lease sales lead to development, I believe industry will strive to reduce its footprint even further, and keep to its long track record of responsible development.

Thank you again for the opportunity to speak today, RDC will submit more detailed comments before the June 19th deadline.



RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

**University of Alaska Board of Regents • Haines Timber Sale
May 21, 2018**

Good afternoon. My name is Carl Portman, Deputy Director of the Resource Development Council for Alaska, Inc. I am testifying this afternoon in support of the proposed 10-year timber sale near Haines.

RDC is a statewide non-profit business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, fisheries and tourism industries. RDC's membership also 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 is pleased the plan is designed to harvest timber in a sustainable manner and in accordance with all applicable laws, order, and regulations of federal, state and local authorities. Moreover, it has been advanced by a private-public partnership of the State of Alaska, the Mental Health Trust Land Office, the U.S. Forest Service, the University of Alaska, and private lands.

The sale of 150 million board feet of timber over 10 years would come from multiple sites within the Haines Borough, including University of Alaska land. As you know, Congress provided Land Grant Trust lands to the University for the intended purpose of monetizing income to help support higher education and scholarship programs. With the State of Alaska facing budget deficits and the University incurring more than \$60 million in budget cuts in the past four years, the proposed timber sale is critically important to higher education in Alaska and the local community.

It is estimated that the Haines timber harvest program will inject over \$90 million in private capital investment into the local area. The project will expand local infrastructure such as roads, bridges, and docks for the long-term benefit of the community and other industries. It will also create new jobs.

The proposed timber plan would help diversify the economy at a time when Alaska is still struggling through a multi-year recession. It makes good on legislative intent for the University to utilize and monetize its Trust resources. It's clearly in the best interests of the State and the local community.

Please move forward with this most reasonable and sensible plan advanced by a diverse public-private partnership.

Thank you.



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GOOD FOR ALASKA.**

KNOW YOUR LEGISLATORS' GRADES

The Alaska Business Report Card grades legislators based on their support for a stable economic climate for business, responsible budgeting and private-sector growth policies. Here are the grades for the 30th Legislature.

ALASKA SENATE

Begich, Tom	F	MacKinnon, Anna	A
Bishop, Click	A	Meyer, Kevin	A
Coghill, John	A	Micciche, Peter	A
Costello, Mia	A	Olson, Donald	D
Egan, Dennis	F	Stedman, Bert	B
Gardner, Berta	F	Stevens, Gary	A
Giessel, Cathy	A	Von Imhof, Natasha	A
Hoffman, Lyman	A	Wielechowski, Bill	F
Hughes, Shelley	B	Wilson, David	C
Kelly, Pete	A		

ALASKA HOUSE OF REPRESENTATIVES

Birch, Chris	A	Millett, Charisse	A
Chenault, Mike	A	Neuman, Mark	B
Claman, Matt	C	Ortiz, Daniel	D
Drummond, Harriet	F	Parish, Justin	F
Eastman, David	A	Pruitt, Lance	A
Edgmon, Bryce	F	Rauscher, George	A
Foster, Neal	F	Reinbold, Lora	A
Gara, Les	F	Saddler, Dan	A
Grenn, Jason	C	Seaton, Paul	F
Guttenberg, David	F	Spohnholz, Ivy	F
Johnson, DeLena	B	Stutes, Louise	F
Johnston, Jennifer	B	Sullivan-Leonard, Colleen	A
Josephson, Andrew	F	Talerico, David	A
Kawasaki, Scott	F	Tarr, Geran	F
Kito, Sam	F	Thompson, Steve	B
Knopp, Gary	B	Tilton, Cathy	A
Kopp, Charles	B	Tuck, Chris	F
Kreiss-Tomkins, Jonathan	F	Wilson, Tammie	A
Ledoux, Gabrielle	D	Wool, Adam	F

Sen. Mike Shower and Reps. John Lincoln and Tiffany Zulkosky were not graded due to their short length of service.

Learn more: alaskabusinessreportcard.com



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A project of Alaska Chamber, Alaska Wins and Resource Development Council for Alaska



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.

To join or to view a list of current RDC members, visit akrdc.org/membership

Contact Information:

Name: _____ Title: _____

Organization: _____

Mailing Address: _____

City / State / Zip: _____

Phone: _____ Mobile: _____

Email: _____ Website: _____

Membership Levels

Membership is a one-year term with an annual fee, expiring on the anniversary of your enrollment, with an online renewal option.

Individual:

Basic	\$75
Silver	\$150
Gold	\$300
Platinum	\$500 and up

Corporate:

Basic	\$500
Silver	\$750
Gold	\$1,500
Platinum	\$3,000 and up

*Corporate members receive a listing on akrdc.org

Please select the category or categories in which your business should be classified:

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Membership Amount: \$ _____ Please Invoice Me Check Enclosed

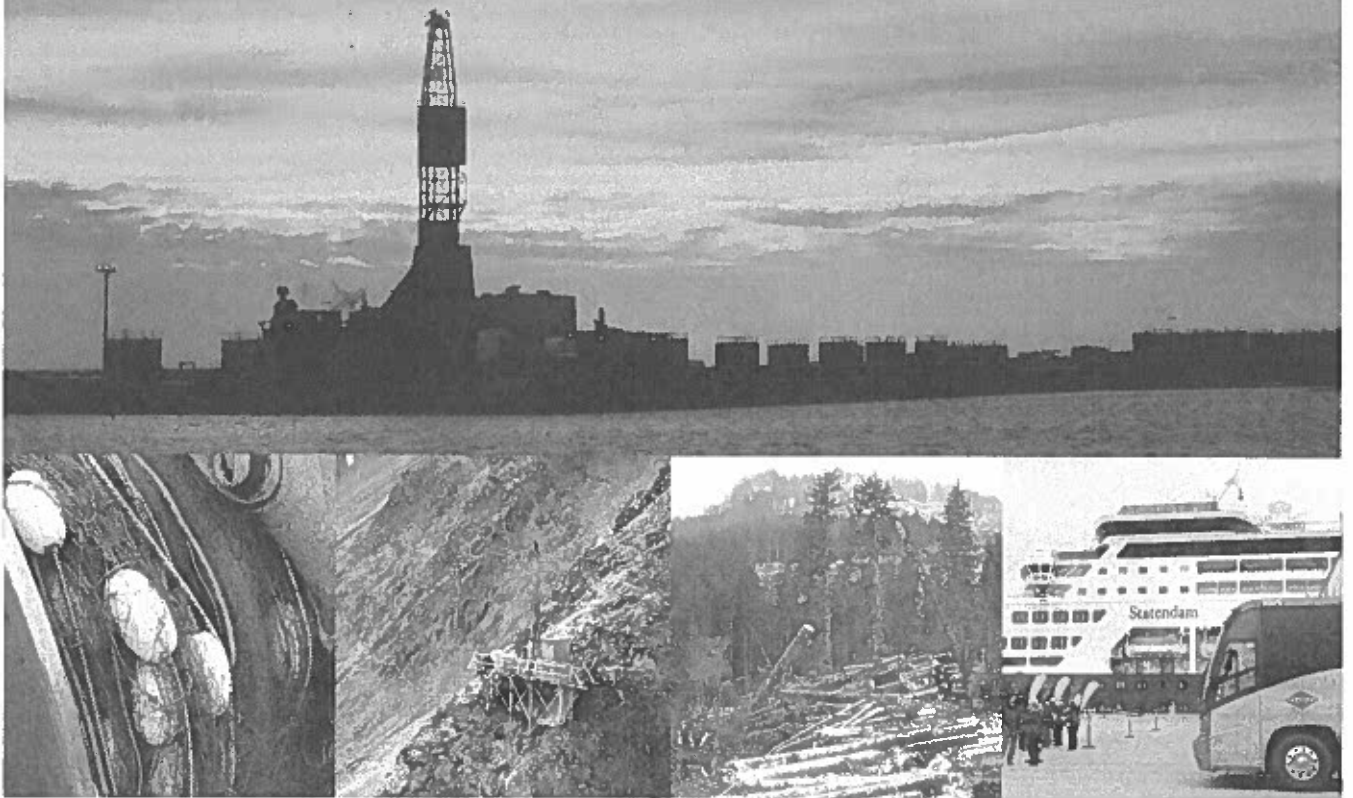
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RDC is classified as a 501(c)(6) non-profit trade association. Membership dues and other financial support may be tax deductible as an ordinary business expense, but not as a charitable contribution. 16.9% of RDC support is non-deductible.

39th Annual ALASKA RESOURCES CONFERENCE

akrdc.org

November 14-15, 2018 // Dena'ina Center // Anchorage



RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

SPONSOR & EXHIBIT OPPORTUNITIES

Economists are predicting Alaska's recession will end within months and exciting new opportunities across the state's resource development sectors are on the horizon. Meanwhile, streamlining of the federal regulatory process is encouraging and ongoing development and production in Alaska's resource industries continue to provide jobs, income, and revenues – all signs of increasing economic strength.

The **39th Annual Alaska Resources Conference** will provide timely updates on new opportunities, projects and prospects, address key state and federal public policy issues, and feature the latest forecasts and updates on Alaska's resource development industries.

Over 800 people are expected to register and attend Alaska's most established and highest profile resource development forum of the year. Attendees will include decision-makers from across all resource industries, support sectors, Native corporations, federal, state, and local government agencies, as well as educators and students. Don't miss out! Please join RDC as we look to a new year of opportunity!

ALASKA RESOURCES CONFERENCE

Event Sponsorship & Exhibit Opportunities

Platinum Sponsor \$5,000

- Ten individual registrations to the conference (Up to \$4,750 value)
- Half-page space in the conference program*
- Sponsor recognition in conference communications and the *Resource Review* newsletter
- Display of your company logo on screens at the conference**
 - * Due Monday, October 29th, send to resources@akrdc.org. Dimensions: 7.25"w x 4.5"h.

Cosponsor \$3,000

- Six individual registrations to the conference (Up to \$2,850 value)
- Quarter-page space in the conference program*
- Sponsor recognition in conference communications and the *Resource Review* newsletter
- Display of your company logo on screens at the conference**
 - *Due Monday, October 29th, send to resources@akrdc.org. Dimensions: 3.5"w x 4.5"h.

General Sponsor \$2,000

- Four registrations to the conference (Up to \$1,900 value)
- Sponsor recognition in conference communications and the *Resource Review* newsletter
- Display of your company logo on screens at the conference**

Underwriter \$1,250

- Two registrations to the conference (Up to \$950 value)
- Sponsor recognition in conference communications and the *Resource Review* newsletter
- Display of your company logo on screens at the conference**

**Logos due to resources@akrdc.org by Friday, November 2nd

Exhibitor \$1,200 (Corporate Member), \$1,500 (Non-corporate member)

DON'T MISS OUT! SOLD OUT LAST SEVEN YEARS!

- Exhibit space at the conference*
- Includes one conference registration (Up to \$475 value)
- Recognition on program insert
 - Reserve early as space is limited. Exhibits sell quickly.
 - Payment due in full by October 31st

**Return sponsorship form by Monday, October 8th
to be listed in the online brochure.**



Specialty Sponsorship Opportunities

All specialty sponsorships receive special recognition and display of company logo!

Sponsorship and Exhibitor payment options are also available online at akrdc.org.

Luncheon Sponsor (Wednesday or Thursday) \$6,000 each SOLD OUT!

Largest attraction of the conference featuring keynote speakers and networking lunch.

Eye-Opener Breakfast (Wednesday or Thursday) \$5,000 each ONE REMAINING!

Every attendee's first stop! A warm buffet with a wide variety of breakfast fare.

Morning Breaks (Wednesday or Thursday) \$5,000 each SOLD OUT!

The conference stops for these popular breaks. Advertise your company with our specially-designed breaks!

Wednesday Afternoon Break \$5,000

Network at an old-fashioned ice cream social event – a big crowd pleaser! Your logo displayed during the break.

Thursday Send-Off Toast \$4,000 SOLD OUT!

Champagne and sparkling cider provide an elegant conclusion to Alaska's premier conference on resource development. Sponsor is welcome to deliver closing toast.

Centerpiece Sponsor \$2,500 SOLD OUT!

Personalized arrangements provided by the sponsor at each table.

Espresso Cart Sponsor \$3,500 SOLD OUT!

A big hit among conference attendees. Your company logo on every cup!

Charging Station Sponsor \$3,500 SOLD OUT!

A high visibility stop during the conference for attendees needing to charge their phones and tablets.

RDC Grand Raffle

Donate a prize of your choice for the popular drawing held at the close of the conference.

Please fill out the following information and email to resources@akrdc.org. RDC will send an invoice or gladly accept credit card payments. Questions? Call 907-276-0700.

Sponsorship Level: Platinum Cosponsor General Underwriter Exhibitor

Specialty Sponsorship Choice(s): _____

Raffle Prize: _____

Company: _____ Contact: _____

Address: _____ City/State/Zip: _____

Phone: _____ E-mail: _____

*Credit Card #: _____ Exp. Date: _____ Type: _____

Security Code: _____ Name on Card: _____

** For security reasons, please do not email this information to us. We're happy to take your credit card by phone or by mail. You may also pay online by logging into your account found at akrdc.org.*

Thank you for your support and participation! Your generous sponsorship sustains RDC and its work on issues important to you and your business.

Thank You!

RDC appreciates the generous sponsors of our 43rd Annual Meeting Luncheon on June 20 featuring Susan Dio, Chairman and President, BP America, Inc. Visit akrdc.org for the presentation.

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