



RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

October 2, 2025

Submitted electronically via: Joe_Byrnes@sullivan.senate.gov

Honorable Senator Dan Sullivan
706 Hart Senate Office Building
Washington, DC 20510

RE: Support for S.J. Res. 63

Dear Senator Sullivan:



The Resource Development Council for Alaska (RDC) writes in support of S.J. Res. 63 to disapprove the November 12, 2024, Central Yukon Record of Decision and Approved Resource Management Plan (Central Yukon RMP). RDC strongly supports this joint resolution and urges Congress's and the President's swift action to reject this misguided and harmful planning decision.

RDC is a statewide, non-profit trade association founded in 1975. Our membership is comprised of individuals and companies from Alaska's fishing, tourism, forestry, mining, and oil and gas industries and 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 general, RDC supports an RMP that incorporates resource management, such as opening the Central Yukon RMP area to resource development, increased access for exploration, mineral leasing, mining, and oil and gas development. Much of Alaska's federally managed lands are closed to responsible resource development, and RDC encourages an RMP that provides the greatest opportunities for public access, including potentially necessary access to State and private projects (primarily land owned by Alaska Native Claims Settlement Act [ANCSA] corporations), and provides opportunities for overland access to remote communities.

RDC urges caution against unnecessary duplication and potential conflicts in the RMP with existing State and Federal laws and regulations for environmental permitting and resource management.



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Benefits of maintaining multiple-use areas

The Central Yukon RMP will provide future direction for approximately 13 million acres of U.S. Bureau of Land Management (BLM)-managed land in central and northern Alaska, including lands surrounding rural communities, the Dalton Highway Corridor, and the central Yukon River watershed, and therefore it is vital BLM plan for multiple uses.

RDC maintains that the Central Yukon RMP should include multiple uses areas allowing for mining (exploration, leasing, development) for oil and gas, coal, and minerals, as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands, including public lands. Resource development in the area could provide economic benefits to the region, as well as improved or added infrastructure and access to areas for multiple use. RDC encourages the BLM to recognize that multiple use activities often incorporate mitigation measures, and that a one size fits all plan should not be considered.

Concerns with proposed ACEC designations and general objections to ACECs

The 2024 Central Yukon RMP improperly designates certain Areas of Critical Environmental Concern (ACECs)/Research Natural Areas by including areas that do not meet applicable requirements for designation and management of ACECs and improperly determines special management attention is required. RDC is concerned ACECs add an unnecessary layer of “protection” to BLM managed public land that already has protections and restrictions in place. RDC discourages additional land use restrictions inhibiting access to areas in Alaska and encourages the BLM not to adopt unwarranted ACEC designations. RDC is further concerned the ACECs proposed lack scientific basis, and RDC offers general objections to ACECs as they are unwarranted.

Past federal government promises assured access for resource development in this area and others not set aside through the Alaska National Interest Lands Conservation Act (ANILCA). The passage of ANILCA in 1980 withdrew 106 million acres of federal lands in Alaska into conservation system units. Today, Alaska accounts for 70 percent of all national park lands in the United States, as well as 53 percent of federally-designated Wilderness.

Rare Earth elements are a much-needed commodity

The area covered under the Central Yukon RMP contains known and likely unknown deposits of Rare Earth Elements (REEs). Many of these REEs are imported to the United States, often from



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countries with lesser environmental regulations. According to the Mineral Commodity Summaries 2025 report by the U.S. Geological Survey, the U.S. depended on imports of 50-100% of needs for 40 minerals in 2024, some of which are found in Alaska. Keeping areas open to mining in Alaska not only provides the opportunity for future responsible resource development, it also may improve national security.

Therefore, areas like the Central Yukon that have not been fully inventoried, should be open to mineral exploration and development, and should be mapped by the U.S. Bureau of Mines, and listed as favorable for mineral discoveries. RDC asserts that the potential for mining in the area should be fully considered and designated as such in any future RMP.

Some other key flaws justifying congressional disapproval of the 2024 Central Yukon RMP include the following:

- The 2024 Central Yukon RMP further complicates access to and use of lands under the Alaska Native Claims Settlement Act's (ANCSA) settlement of aboriginal land claims, potentially preventing full realization of the economic and other benefits intended by Congress.
- The 2024 Central Yukon RMP fails to fully consider potential impacts of designating certain lands as Visual Resource Management (VRM) Class II and redesignate them as VRM Class III or IV.
- The 2024 Central Yukon RMP inappropriately concludes that hypothetical future development of mineral deposits in the Ambler Mining District, Wiseman East and West deposits, and the Ray Mountains could “significantly restrict subsistence uses and have a disproportionate negative impact” on certain “environmental justice communities” as well as “significantly restrict subsistence uses for” certain communities.
- The 2024 Central Yukon RMP fails to appropriately address impacts of right-of-way exclusion and avoidance areas on access and other activities.
- The 2024 Central Yukon RMP fails to adequately and appropriately address access rights guaranteed under Section 1323(b) and Title XI of ANILCA.
- The 2024 Central Yukon RMP violated the National Environmental Policy Act (NEPA) in adopting a new alternative not made available to the public for review and comment and



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in not providing the public an opportunity to provide informed comment after correction of an error in stated ANCSA 17(d)(1) acreages.

We appreciate you introducing S.J. Res. 63 and moving forward with disapproval of the 2024 Central Yukon RMP. Thank you for the opportunity to comment on this vital issue important to Alaska's economic future.

Sincerely,

Leila Kimbrell
Executive Director
Resource Development Council for Alaska
Celebrating 50 Years of Responsible Resource Development in Alaska

CC: The Hon. Lisa Murkowski (R-AK)
The Hon. Nick Begich (R-AK)



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