





October 3, 2025

The Honorable Lisa Murkowski United State Senate 522 Hart Senate Office Building Washington, D.C. 20510

The Honorable Dan Sullivan United States Senate 706 Hart Senate Office Building Washington, D.C. 20510

The Honorable Nicholas Begich III United States House of Representatives 153 Cannon, House Office Building Washington, D.C. 20515

# Re: Support for H.J. Res. 106 and the Senate Companion – Disapproval of the 2024 Central Yukon RMP

Dear Senators Murkowski, Sullivan and Representative Begich,

We write in strong support of H.J. Res. 106 and the Senate companion resolution disapproving the November 12, 2024, Central Yukon Record of Decision and Approved Resource Management Plan (Central Yukon RMP) and urge swift congressional and presidential action to reject this harmful and unlawful planning decision.

The Central Yukon RMP, if allowed to stand, would have significant and far-reaching consequences for Alaska Native landowners, critical transportation and infrastructure, economic development opportunities, and the ability of our people to exercise the self-determination guaranteed under the Alaska Native Claims Settlement Act (ANCSA). Like our neighbors in Interior Region of Alaska and Doyon, Limited, whose lands are directly impacted, we have consistently raised concerns about how the 2024 plan undermines ANCSA's framework, disregards the principles of multiple use and sustained yield under the Federal Land Policy and Management Act, and violates key provisions of the Alaska National Interest Lands Conservation Act (ANILCA).

### **Background**

The North Slope Iñupiat have lived in the Arctic for over 10,000 years. We are proud of our self-determination efforts to ensure future generations of Iñupiat continue to reside in our communities and have access to essential services. Without a stable economy, our communities will suffer and so too will our ability to engage in our Iñupiaq cultural traditions, including a subsistence way of life.

The North Slope of Alaska spans an area nearly the size of the state of Minnesota and, within that expansive area, there are eight Iñupiaq communities—Anaktuvuk Pass, Atqasuk, Kaktovik, Nuiqsut, Point Hope, Point Lay, Utqiagʻvik, and Wainwright. None of our communities are connected by a permanent road system; all supplies must be flown or barged in, making the cost of living extremely high and economic opportunities generally low.

Fifty years ago, the Federal Government directed Alaska Native people to organize in a new structure of indigenous representation. The Alaska Native Claims Settlement Act of 1971 (ANCSA) was a dramatically different approach by the Federal Government to federal Indian policy. The fact that our ancestral lands were claimed by the Federal Government before our people had a right to settle aboriginal land claims should inform every decision of the Federal Government in managing those lands.

Unlike the Lower 48 model of indigenous representation where tribal governments typically administer the delivery of services such as healthcare, public safety, education, land management, and economic development, the passage of ANCSA created a shared system of Alaska Native representation and delivery of services. Our region has a multitude of Alaska Native entities that work together to effectively serve, provide for, and enrich the lives of the North Slope Iñupiat we represent. Our three regional entities, the Iñupiat Community of the Arctic Slope (ICAS), the North Slope Borough (Borough), and Arctic Slope Regional Corporation (ASRC) are three of those entities. While our roles differ, our constituencies overlap, which is why we work closely together to protect the cultural and economic interests of the North Slope Iñupiat.

While our leaders over fifty years ago were initially wary of any development on our lands, our Iñupiaq leaders have spent decades focused on open communication and transparency in planning with industry. We have exercised true self-determination through a unique framework of Alaska Native governance—a framework that relies on our tribal governments, municipal governments, and Alaska Native corporations established by Congress to serve our indigenous constituents. For millennia Iñupiaq ingenuity has transformed our relationship with industry into a partnership that has both protected our environment and our way of life and has brought significant economic benefits to the region that would have otherwise been absent. Our North Slope residents are keenly aware that advances in our communities—running water, local schools, health care, public safety, electricity, and

more—have come because of the coordination and cooperation of Alaska Native leaders and entities across the region.

#### *ICAS*

Established in 1971, the Iñupiat Community of the Arctic Slope is the federally recognized regional tribal government for the North Slope and represents over 13,000 Iñupiaq tribal members. The mission of ICAS is to exercise its sovereign rights and powers for the benefit of tribal members, to conserve and retain tribal lands and resources including subsistence For millennia Iñupiaq ingenuity has transformed our relationship with industry into a partnership that has both protected our environment and our way of life and has brought significant economic benefits to the region that would have otherwise been absent. Our North Slope residents are keenly aware that advances in our communities—running water, local schools, health care, public safety, electricity, and more—have come because of the coordination and cooperation of Alaska Native leaders and entities across the region.

#### North Slope Borough

The Borough is a home rule government located above the Arctic Circle that represents roughly 10,000 residents. The Borough's jurisdiction includes the entire NPR-A and the eight villages within it. In 1972, the North Slope Iñupiat formed the Borough, in part, to ensure our communities would benefit from oil and gas development on their ancestral homelands. It was the first time Alaska Natives took control of their destiny using a regional municipal government. The Borough exercises its powers of taxation, property assessment, education, and planning and zoning services to serve our communities. Taxes levied on oil and gas infrastructure have enabled the Borough to invest in public infrastructure and utilities, support education, and provide police, fire, emergency, health, and other services. Elsewhere in rural Alaska, these services are typically provided primarily by the State or Federal Government, or both.

## **ASRC**

ASRC is a for profit, land-owning Alaska Native regional corporation formed pursuant to ANCSA. ASRC represents the same region as the Borough and ICAS, and the same eight villages whose residents are predominantly Iñupiat, and who comprise many of our approximately 14,000 Alaska Native shareholders. ASRC holds the title to approximately five million acres of land on the North Slope, including both surface and subsurface lands. These lands—the ancestral lands of the North Slope Iñupiat—were conveyed to ASRC by the United States pursuant to ANCSA to provide for the economic and cultural wellbeing of our Iñupiaq shareholders.

ASRC is committed both to providing sound financial returns to our shareholders, in the form of jobs and dividends, and to preserving our Iñupiaq way of life, culture, and traditions, including the ability to maintain a subsistence lifestyle to provide for our communities. In

furtherance of this congressionally mandated mission to provide benefits to our shareholders, ASRC conducts and will continue to invest in a variety of activities related to infrastructure and natural resource development and other economic initiatives.

ASRC's perspective is based on the dual realities that our Iñupiaq culture and communities depend on a healthy ecosystem and subsistence resources, as well as infrastructure and resource development as the foundation of sustainable North Slope communities.

## Disapproval of the 2024 Central Yukon RMP

Several fundamental flaws justify disapproval of this plan:

- Access and Infrastructure: The RMP fails to account for the North Slope Borough's Community Winter Access Trails (CWAT) project and the Arctic Strategic Transportation and Resources (ASTAR) initiative, both of which are vital to lowering costs and connecting isolated communities. The plan also misrepresents existing rights-of-way and ignores the mandates of Section 1323(b) and Title XI of ANILCA, which guarantee reasonable access to Native-owned inholdings.
- Impact on Native Lands: The RMP designates 21 ACECs and other restrictive areas that surround ASRC lands, devaluing them by blocking development potential and preventing reasonable use. These decisions not only harm ASRC's economic viability but also diminish potential revenue-sharing distributions under ANCSA Section 7(i), reducing benefits for Alaska Natives statewide.
- Allotments and Alaska Native Veterans: By restricting surrounding BLM lands, the plan cuts off opportunities for individual Alaska Native allotment owners—including veterans eligible for allotments under recent legislation—to pursue development and long-term economic benefits from their property.
- Land Status Conflicts: The RMP disregards the unique patchwork of ownership in the Planning Area, where BLM manages only limited tracts compared to ASRC and the State. In several parcels, BLM manages only the surface estate while ASRC holds subsurface rights, yet the plan creates barriers to cooperative management and development.
- Economic and Energy Development: The RMP forecloses future opportunities on the North Slope unnecessarily limits exploration for rare earth elements critical to U.S. energy security. At the same time, it fails to acknowledge that adjacent lands already provide extensive wilderness values under ANILCA, making additional restrictive designations duplicative and unjustified.
- Procedural Failures: After a decade of consultation contrary to those consultations, the Central Yukon RMP was finalized through a flawed process that included adopting alternatives not subject to public review, retaining outdated ANCSA 17(d)(1) withdrawals without justification, and failing to engage in meaningful government-togovernment consultation with Alaska Native entities like ICAS and ASRC.

The result is a plan that ignores congressional intent under both ANCSA and ANILCA, disregards the economic needs of North Slope communities, and creates unnecessary obstacles to infrastructure, energy, and community health across northern Alaska.

Despite claims to the contrary, the Central Yukon Plan <u>does not</u> open the Ambler Access Road and covers a planning area of fifty million acres of land which largely are unmanaged by the BLM while directly preventing our ability to exercise self-determination through our respective entities.

## Support for H.J. Res 106 and Senate Companion

We therefore strongly support **H.J. Res. 106** the Senate companion resolution and urge Congress and the President to act swiftly to disapprove the 2024 Central Yukon RMP. The North Slope Regional Trilateral stands ready to provide additional information and testimony as needed to ensure Alaska Native rights and priorities are upheld.

Thank you for your leadership on this critical issue.

Sincerely,

IÑUPIAT COMMUNITY OF THE ARCTIC SLOPE

Micole Wojciechowski

President

NORTH SLOPE BOROUGH

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ARCTIC SLOPE REGIONAL CORPORATION

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