



RESOURCE DEVELOPMENT COUNCIL
Growing Alaska Through Responsible Resource Development



THE ALLIANCE
Linking Alaska's Resources to Alaska's People

June 20, 2024

Mr. Steve Cohn, State Director
Bureau of Land Management – Alaska
222 W 7th Ave #13
Anchorage, AK 99513

Re: Ambler Road Final Supplemental Environmental Impact Statement

Dear Director Cohn:

The undersigned organizations write to express deep disappointment in the Department of the Interior's (Department) decision to recommend a "No Action Alternative" in the Ambler Road Final Supplemental Environmental Impact Statement (SEIS), and to encourage the Department to adopt "Alternative A" instead in its Final Record of Decision.

We represent businesses that are directly impacted by the Bureau of Land Management's (BLM) recommendation, which will deny thousands of Alaskans good-paying jobs not only in construction and resource extraction but also throughout the supply chain and service sectors. If the Department chooses to move forward with the "No Action Alternative," it will be unlawful on its face and an inappropriate intrusion on the State of Alaska's affairs that will have negative economic impacts statewide.

For starters, the Department's decision to suspend and potentially revoke the permits needed to cross Gates of the Arctic National Park and Preserve and BLM land violates the plain language of Section 201(4) of the Alaska National Interest Lands Conservation Act (ANILCA), which requires federal approval of a right-of-way to access the Ambler Mining District from the Dalton Highway. This provision was carefully negotiated to allow for resource extraction from State of Alaska-owned lands, while protecting federal lands. The strong bipartisan support for ANILCA in 1980 – which included the backing of then-Delaware Democratic Sen. Joe Biden – is a clear signal of congressional intent to build the Ambler Road. It is unconscionable for the federal government to deny a 22-mile right-of-way across federal lands for the more-than-200 mile Ambler Road after Congress specifically authorized passage in ANILCA.

Furthermore, it is an egregious abuse of authority for Interior to voluntarily remand its environmental impact statement of the Ambler Road in the federal courts to address a narrow and defined set of issues on subsistence and historic preservation – and then use that review as a pretense for a full denial of the project. However, for example, the BLM is using the evaluation of the National Historic

Preservation Act Section 106 review to prevent baseline work from being done on both State of Alaska and private lands.

This recommendation is particularly insulting to Alaska Native Corporations, which Congress empowered specifically to pursue economic activities such as those that would be facilitated by the Ambler Road. Mining is the lifeblood for many rural Alaskans, providing not just paychecks but also revenues that support schools, as well as local services and infrastructure. To deprive Alaska Native Corporations from accessing their lands, and local communities and the state of much-needed taxes and revenues from road construction and mining activities, just adds insult to injury.

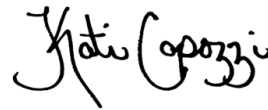
Coming on the heels of multiple anti-resource development actions by the Biden Administration, the decision to once again reverse already-issued permits for a project will have a profound chilling effect on future investment in Alaska. Unless reversed, the consequences of this flawed decision will be felt across Alaska for many years.

Alaska has fought since its inception to safely develop its own resources to support its economy and we are proud of the state's long tradition of responsible resource development. We respectfully request that you honor the promise that Congress and former President Carter made to Alaskans in ANILCA over 40 years ago and choose Alternative A for Ambler Road.

Sincerely,



Alicia Amberg
Associated General Contractors of Alaska



Kati Capozzi
Alaska Chamber



Jeremy Johnson
Greater Fairbanks Chamber of Commerce



Rebecca Logan
Alaska Support Industry Alliance



Leila Kimbrell
Resource Development Council for Alaska, Inc.



Deantha Skibinski
Alaska Miners Association

Cc: Tracy Stone-Manning, Director, Bureau of Land Management
Senator Lisa Murkowski
Senator Dan Sullivan
Congresswoman Mary Peltola
Governor Michael Dunleavy

About the Associated General Contractors of Alaska

The mission of Associated General Contractors of Alaska is to advocate, educate, and promote the construction industry in Alaska.

About the Alaska Chamber

The Alaska Chamber is a non-profit founded in 1953 working to promote a positive business environment in Alaska. The Chamber is the voice of small and large business representing more than 700 businesses, manufacturers, and local chambers across Alaska. Our member companies employ more than 55,000 hard-working Alaskans. The Chamber advocates for a positive investment climate that provides certainty and stability for Alaska.

About the Greater Fairbanks Chamber of Commerce

The Greater Fairbanks Chamber of Commerce is the leading voice advocating for community by supporting business prosperity to our more than 600 members in the Interior of Alaska.

About the Alaska Support Industry Alliance

The Alaska Support Industry Alliance is a 45-year-old professional trade association representing 500 Alaska companies with 35,000 employees who provide support to the oil, gas and mining industries in Alaska.

About the Resource Development Council

RDC is the Resource Development Council for Alaska, Inc., is a statewide trade association comprised of individuals and companies from Alaska's fishing, forestry, mining, oil and gas, and tourism 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.

About the Alaska Miners Association

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. AMA's more than 1,400 members come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Alaska's miners are individual prospectors, geologists, engineers, suction dredge miners, small family mines, junior mining companies, major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.