



July 21, 2025

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

Sent via email c/o josh.walton@mail.house.gov.

Dear Representative Begich,

Thank you for introducing H. J. Res. 106, to disapprove the November 12, 2024, Central Yukon Record of Decision and Approved Resource Management Plan (Central Yukon RMP). Doyon, Limited (Doyon) strongly supports this joint resolution and urges Congress's and the President's swift action to reject this misguided and harmful planning decision.

Doyon is a major stakeholder in the Bureau of Land Management's (BLM) Central Yukon RMP planning process. Many large tracts of lands that were conveyed to Doyon under the Alaska Native Claims Settlement Act (ANCSA) are surrounded by, or abut, BLM-managed public lands. Doyon owns substantial interests in the Central Yukon Planning Area, holding an ownership interest in approximately 4.65 million acres. In addition, it has selected an additional 127,000 acres in the Planning Area under ANCSA that have not yet been conveyed. Doyon's land base shares approximately 3,000 miles of border with BLM lands—potentially more than any other Indigenous landowner in the nation. Consistent with ANCSA's intent, much of the land that Doyon selected was selected for its economic development potential.

As Doyon explained to BLM throughout the Central Yukon RMP planning process, further enveloping Doyon's lands within new or expanded Areas of Critical Environmental Concern (ACECs) and other restrictive land designations, and otherwise imposing restrictions on use of surrounding lands, will further complicate access to and use of Doyon lands, and potentially prevent Doyon from fully realizing the economic and other benefits that Congress intended it would enjoy as a result of ANCSA's settlement of aboriginal land claims. In addition, because oil and gas, mineral, and other resource prospects often straddle federal, state, and/or private lands, the more that BLM planning processes place lands off limits to multiple uses, the more likely resource development opportunities will be unavailable on Doyon (and other non-federal) lands in the vicinity, impeding Doyon's ability to make economically productive use of its lands as Congress intended when it settled aboriginal land claims in Alaska. The management decisions made in the 2024 Central Yukon RMP also will have long-term implications for communications, electric transmission, and other infrastructure activities in the region, adding further obstacles to what already are extraordinary challenges to connecting rural communities in Alaska.

Doyon devoted significant resources to engaging with BLM over the course of the Central Yukon RMP planning process to ensure that the result of that process reflects the principles of multiple use and sustained yield established under the Federal Land Policy and Management Act, as well as the unique framework that Congress established in Alaska under ANCSA and Alaska National Interest Lands Conservation Act (ANILCA). Unfortunately, despite these concerted efforts of Doyon and others, the 2024 plan fails to do that.

Key flaws justifying congressional disapproval of the 2024 Central Yukon RMP—as further detailed in the protest that Doyon submitted in response to the Central Yukon Proposed Resource Management Plan and Final Environmental Impact Statement released by BLM on April 19, 2024—include the following:

- The 2024 Central Yukon RMP improperly designates certain 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. It also improperly designates ACECs that effectively surround or restrict access to Doyon-conveyed lands, as well as that include Doyon-selected lands.
- 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 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 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 improperly ignores the long history of BLM’s calling for the lifting of the ANCSA 17(d)(1) withdrawals and fails to provide a rational explanation for retaining those withdrawals other than for the limited purposes of selection by Alaska Native Vietnam-era veterans.

- 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 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 your efforts to move forward with disapproval of the 2024 Central Yukon RMP and we urge Congress and the President to move quickly to enact this joint resolution.

Please let us know if you have any questions or if we can provide any additional information.

Sincerely,



Sarah E. Obed
SVP External Affairs
Doyon, Limited

Cc:

U.S. Senator Lisa Murkowski, c/o [garrett boyle@murkowski.senate.gov](mailto:garrett_boyle@murkowski.senate.gov)

U.S. Senator Dan Sullivan, c/o [larry burton@sullivan.senate.gov](mailto:larry_burton@sullivan.senate.gov)