

RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

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BREAKFAST MEETING

Thursday, May 5, 2011

1. Call to order –Phil Cochrane, Vice President
2. Self Introductions
3. Headtable Introductions
4. Program and Keynote Speaker:

Mining and Fish – Can't we all just get along?

Dan Graham, Project Manager, PacRim Coal

Next Meeting:
 Thursday, May 19: Business Update & Major Project Status, Chris Aadnesen, President, Alaska Railroad Corporation

Please add my name to RDC's mailing list:

NAME/TITLE: _____

COMPANY: _____

ADDRESS: _____

CITY: _____ STATE: _____ ZIP: _____

PHONE/FAX/EMAIL: _____



Mining Day

Effective Date: Thursday, April 14th, 2011

WHEREAS, mining was the primary driving force for early development of Alaska; and

WHEREAS, many communities across Alaska were initially established to support the mining industry. Today, Alaska has six large mines and approximately 200 small family placer mines and 120 gravel and quarry mines currently in production, employing individuals from over 120 communities across our state; and

WHEREAS, Alaska's mining industry includes exploration, mine development, and mineral production. Alaska's mines are currently producing zinc, lead, gold, platinum, silver, and coal, in addition to construction materials such as gravel, rock, and sand; and

WHEREAS, the mining industry has demonstrated its ability to provide wide-ranging employment opportunities and to help advance and diversify Alaska's economic development for both urban and rural areas of the state; and

WHEREAS, mining is a high tech industry that requires professionals from a range of engineering, scientific, environmental, and equipment operating disciplines, who are dedicated to the responsible development of Alaska's resources while often enduring difficult working conditions; and

WHEREAS, Alaska is by far the most under-explored state for mineral deposits and is considered highly prospective with regard to strategic and critical minerals needed for domestic use, including Rare Earth Elements (REEs). We have the promising opportunity to produce REE's to meet the United States' technological demands and decrease our dependence on foreign sources of REE's; and

WHEREAS, May 10th is an important day for Alaska as it marks the day the General Mining Law of 1872 was adopted, which encouraged mining settlement in the West and offered incentives for the exploration and development of mineral resources on public domain. Since then, Alaska has responsibly developed vast quantities of mineral resources on our public domain, and untold reserves still remain untapped.

NOW, THEREFORE, I, Sean Parnell, Governor of the State of Alaska, do hereby proclaim May 10, 2011 as:

Mining Day

in Alaska, and encourage all Alaskans to recognize the importance of mining in the founding and early development of Alaska's history, and to appreciate the efforts of all Alaskans involved in the mining industry today.

Dated: April 14, 2011



FOR IMMEDIATE RELEASE

No. 11-079

Parnell Joins Outer Continental Shelf Governors Coalition

May 2, 2011, Juneau, Alaska - Governor Sean Parnell has joined a coalition of coastal state governors who want to begin a new dialogue with the federal government on offshore energy issues. The new group, the Outer Continental Shelf Governors Coalition, includes Parnell and the governors of Louisiana, Texas, Virginia and Mississippi. Today, in a letter, Parnell and other governors invited other U.S. coastal states to join the coalition.

The governors said in the letter they support policies that "encourage an American energy expansion with all forms of energy production - both onshore and offshore."

Alaska Department of Natural Resources Commissioner Dan Sullivan joined Mississippi Governor Haley Barbour and natural resource commissioners from Texas, Louisiana and Virginia in Houston today for a panel discussion about offshore energy development in the aftermath of the Deepwater Horizon spill.

Barbour, Sullivan and the other commissioners announced the creation of the coalition during the 2 p.m. (CT) panel discussion, hosted by the Consumer Energy Alliance at Houston's Offshore Technology Conference.

Governor Parnell said today that he joined the coalition because "developing Alaska's offshore resources is vital for Alaska's future and for the nation's economic and national security interests."

According to the coalition's letter on Monday, federal decisions regarding exploration and production require consultation from affected states.

"In recent months, however, the federal government has taken sweeping actions regarding offshore oil and gas activities with little consultation with the states. Unfortunately, many of these federal actions have been in conflict with our states' and citizens interests," the letter stated.

During the conference panel, Sullivan underscored "the critical role that Alaska can and should play in addressing America's energy security challenges." But, he said, "We need a partner in the federal government. Right now we have a federal administration that has been proactively shutting down resource development in Alaska. This policy hurts Alaska and Alaskans and undermines broader national security and energy security interests."

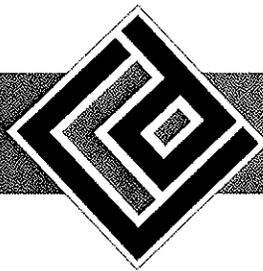
Sullivan also noted that the federal government's policies harm global environmental protection. "Alaska is one of the most environmentally stringent places on earth to explore

for and produce oil. When responsible resource development is shut down in Alaska, exploration and drilling activities are driven to countries that have lax environmental standards, harming the global environment."

A copy of the letter is available at:

http://gov.alaska.gov/parnell_media/resources_files/05022011ocsgovscoalitioninvite.pdf

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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

January 19, 2011

Mr. Russell Kirkham
Department of Natural Resources
550 W 7th Ave Ste 290
Anchorage, AK 99501

Re: Petition to Designate the Chuit River Watershed as Unsuitable for Surface Coal Mining

Dear Mr. Kirkham:

The Resource Development Council for Alaska, Inc., (RDC) urges you to reject the petition filed by Trustees for Alaska on behalf of Chuitna Citizens Coalition and Cook Inletkeeper to designate the Chuit River watershed unsuitable for coal mining.

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.

This is the Petitioners' second request to designate the area unsuitable for coal mining. The Petition filed in July 2007 was deemed incomplete and rejected by the Commissioner. Apart from minute details and a narrower scope of the area to be designated, the current petition is nearly identical to and contains the same arguments as the rejected one.

The Chuit River watershed lies in the area now covered by the State Kenai Area Plan. Area planning is a management tool used by the Department of Natural Resources that involves extensive public input. The Kenai Area Plan was developed over an eight-year period and included four rounds of public comment, and public meetings in six communities, including Tyonek and Beluga. The final plan concluded that the highest value use for the Chuit River lands was coal development, and specifically addressed coal development in the petitioned area.

PacRim Coal, LP assumes a responsibility of operating under the Alaska Surface Coal Mining Control and Reclamation Act (ASCMCRA) and employing the most advanced mining practices and environmental standards possible. The Petition alleges that these standards will not be met. If this were true, a permit would not be issued and the mine would not be allowed to operate. PacRim has not only committed to adhering to the highest environmental standards, but has also submitted improvements to current habitat designed in collaboration with area stakeholders.

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In its request to intervene in the Petition, Tyonek Native Corporation (TNC) states its support for responsible coal development in the area. TNC has engaged in efforts to increase local employment opportunities for its shareholders, who comprise the majority of the area's population. The corporation states that developing the Chuitna coal resources is critical to economic growth and would attract shareholders living outside the region to return, should jobs be available for them. This local support from Alaska Native people refutes the Petition's claim that development activities will damage cultural values in the region.

In its intervention in the Petition, the Alaska Mental Health Trust Authority Trust Land Office (TLO) asserts its position as lessor of lands in the area subject to the Petition. TLO receives annual lease payments during the exploration stage, and should production occur, an estimated \$300 million in royalties could be collected to benefit mental health programs in Alaska. Designating the lands as Unsuitable to Mining would affect land specifically conveyed to the TLO for its potential coal and mineral value.

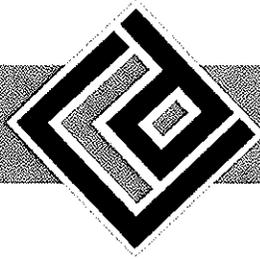
RDC urges you to reject the Petition to designate the Chuit River watershed as Unsuitable for Coal Mining. PacRim should be allowed the opportunity to navigate the State's thorough permitting process, and at the time a mine plan is submitted, the Petitioners will be given ample opportunity to provide input.

Thank you for the opportunity to provide comments on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Deantha Crockett', written in a cursive style.

Deantha Crockett
Projects Coordinator



RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

April 29, 2011

National Ocean Council
722 Jackson Place, N.W.
Washington, DC 20503

Submitted via www.whitehouse.gov/administration/eop/oceans/comment

Re: Development of Strategic Action Plans

To Whom It May Concern:

The Resource Development Council for Alaska (RDC) is writing to express apprehension regarding the development of strategic action plans for the national policy for the stewardship of the ocean, our coast, and the great lakes, and the potential impacts on Alaska.

RDC is an Alaskan non-profit, membership-funded organization founded in 1975. Our membership is comprised of individuals and companies from Alaska's oil and gas, mining, timber, tourism, and fisheries industries, as well as Alaska Native corporations, local communities, organized labor, and industry support firms. RDC's purpose is to link these diverse interests together to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

With more coastline than all other states in our nation combined, Alaska's stake in the emerging ocean policy is unmatched. Subsequently, the impact of any oceans policy will affect Alaska significantly. It is essential that Alaskan stakeholders be involved in the development of the strategic action plans. A large number of industries, not only in Alaska, but across the nation, including transportation, fishing, oil and gas, tourism, and mining, may be impacted in a largely economic way from any new regulations, with no added benefit to the environment.

Moreover, the proposed plans should focus on helping – not harming – American communities. Unfortunately, it appears more harm than good will come of this process. Without enhanced stakeholder involvement, the proposed plans will likely increase litigation on important resource and community projects, causing further burden to projects in rural and remote locations, especially in Alaska.

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Please consider the following comments when addressing the nine objectives described by the National Ocean Council.

Objective 1: Ecosystem-Based Management

The science used to develop the foundation for this principal must be the best available science and must include industry-developed science. Much of what is known about the Alaskan Arctic can be attributed to science done in conjunction with natural resource project development and operation, such as through the Minerals Management Service (now BOEMRE), oil industry, and other natural resource developers. Supplemental research will enhance existing knowledge of the Arctic and should be pursued. Alaskan science must be used to develop an ecosystem-based management plan, rather than a one size fits all approach for the nations waters.

Objective 2: Coastal and Marine Spatial Planning (CMSP)

CMSP, or ocean zoning, will have a more substantial impact on Alaska than any other region. CMSP must clarify the role of existing management procedures, such as the North Pacific Fishery Management Council (NPFMC), state specific programs, and others, while addressing valuable science-based practices Alaska already adheres to.

Objective 3: Inform Decisions and Improve Understanding

RDC supports continued research and mapping of oceans and other water bodies, particularly in the Arctic. Consideration should be made to existing studies and procedures to avoid duplication and additional cost to stakeholders. Adding more layers and overriding regulation of successful practices will provide no added benefit to creating a national policy.

Objective 4: Coordinate and Support

Stakeholder involvement has been minimal, at best. RDC urges additional representation in this process from economic stakeholders to include, but not be limited to outer continental shelf and land based oil and gas leaseholders, coastal communities and boroughs, village and Alaska Native leaders, fishing and fish processing, and transportation users. Economic advisory groups should be utilized to identify economic impacts of uses of the oceans, coasts, and river deltas.

Objective 5: Resiliency and Adaption to Climate Change and Ocean Acidification

Alaska – with two-thirds of our nations coastline, over 40% of the surface waters, and over half the nations wetlands – is at the forefront of impacts from changing climate and ocean acidification.

Greenhouse gas emissions/climate change and its potential impacts should not be regulated by ocean zoning. The potential impact to communities and projects if this were to be done could be devastating to Alaska's economy, with minimal or no added benefit to the environment.

Objective 6: Regional Ecosystem Protection and Restoration

Alaska has developed some of the best resource management practices in the world, with some of the highest standards and requirements for projects.

Alaska has the best-managed fishery in the world under the purview of the NPFMC and State management. These fisheries are managed by the best available science, and are closed when catch limits are met, even when the limits are set at numbers well below the scientific recommendations, thus, creating sustainable fisheries.

Further, some of the best response mechanisms are also in place for development projects in and around water bodies. The oil industry has well developed spill contingency plans specific to Alaska's unique Arctic conditions. Additional response plans implemented through the strategic action plans will only add another layer that will

hinder the opportunity for responsible development in Alaska, driving similar projects to be developed in countries with less stringent standards and regulations.

Objective 7: Water Quality and Sustainable Practices on Land

Existing protection measures are in place and working, such as the National Environmental Policy Act (1969), Coastal Zone Management Act (1972), Magnuson-Stevens Fishery Conservation Act (1977), the Clean Water Act (1977), and as part of the Magnuson-Stevens Act, Essential Fish Habitat (1996). We ask you to consider how another bureaucratic layer would benefit the environment.

Objective 8: Changing Conditions in the Arctic

Alaska is at the forefront of changing conditions in the Arctic, and should be afforded the opportunity to address this issue. Stakeholder involvement is principal from this aspect.

Because of the vast natural resource development potential in Arctic waters off the coast of Alaska, RDC is very supportive of increased Coast Guard presence. With this presence must come additional infrastructure. New Coast Guard bases in Alaska will improve safety to remote villages, while also increasing national security.

Proactively, the Arctic fish management plan was developed closing the Arctic to fishing until further research is completed and data is collected. This action should not imply endorsement of a permanent closure of the area, but rather the need for a better understanding of the ecosystem prior to management decisions being made. Moreover, the need for additional research and stakeholder involvement to develop a plan should be recognized by the National Ocean Council.

Objective 9: Ocean, Coastal, and Great Lakes Observations, Mapping, and Infrastructure

Alaska, being a relatively young state, lacks infrastructure, especially in rural and much of the coastal communities.

Other Impacts for Consideration: Alaska's Abundant Natural Resources and People

In addition to the previously listed concerns, please consider the following cultural, economical and societal characteristics of Alaska in developing a final plan that will preserve opportunities and ways of life for Alaskans.

Alaska's People

In 2010, Alaska's population was roughly 710,000 people in a state with more than 365 million acres. With over 3 million lakes, 3,000 rivers and 34,000 miles of coastline, Alaska is a unique part of the United States. Alaska's economy, based on responsible resource development – development done in accordance with local, state and federal environmental protections and laws already in place – must be fully considered before plans are implemented, and projects, cultures and communities are jeopardized.

Fishing

Alaska is one of the most bountiful fishing regions in the world, producing a wide variety of seafood and over half the U.S.'s annual harvest. All five species of Pacific salmon, four species of crab, many kinds of groundfish, shrimp, herring, and sablefish are all harvested from Alaska. The fisheries of Alaska continue to be recognized as some of the best-managed fisheries in the world, providing thousands of jobs and a vital, sustainable economic engine for Alaska communities and the state.

Seafood harvesting and processing jobs provide more than 50 percent of the private sector employment in coastal Alaska. In recent years, the fishing industry generated nearly 54,000 jobs.

Alaskans must continue to have access to this valuable and traditional resource without further bureaucratic levels and regulations, which would provide no added benefit to the resource.

Mining

Much of the existing infrastructure in Alaska, such as roads, docks, and airports was originally constructed to serve the mining industry. Alaska's active mineral extractions include silver, zinc, gold, and lead, as well as coal production. Additionally, Alaska could potentially produce copper and molybdenum, increasing overall statewide mineral extraction. In 2007, Americans needed 19 minerals that were 100% imported, while an additional 50% of 25 other minerals were also imported. Of the 30 minerals the U.S. imports from abroad, 22 of them are found in Alaska.

Mining activity provides for 3,500 direct, well-paying jobs, and over \$350 million in direct and indirect payroll. Mining contributed \$71.9 million to local and state government in 2010. In addition, mining paid \$145 million to Alaska Native Corporations.

Mining in Alaska, overseen by rigorous and thorough local, state, and federal regulations should not be unnecessarily subjected to additional layers of government, which these plans may bring forth, leading to further delay and unwarranted litigation.

Oil and Gas

As America's energy consumption continues to rise, affordable energy is much needed. In 2009, over half the petroleum consumed in the U.S. was imported. Alaska has significant energy resources, both on and offshore, that can be produced as America continues to work its way to renewables. The ocean, specifically the nation's outer continental shelf, can also go a long way to helping the U.S. reduce its dependence on foreign sources of energy. Emphasis in any ocean policy must be placed on allowing access to these resources while protecting traditional uses such as subsistence hunting and other cultural uses. We urge the administration to include Alaska on the forefront for development of offshore resources, including renewable and non-renewable resources.

In recent years, the oil industry has supported as much as one-third of Alaska's workforce, employing people in well paying jobs. Since 1957, the State of Alaska has received \$95 billion from the oil and gas industry.

Similar to mining, oil and gas development has existing local, state, and federal regulations and should not be subjected to unnecessary extraneous layers of government. Oil and gas development in Alaska should be applauded as an effort to reduce the U.S. dependence on foreign oil.

Tourism

Alaska is like no other place. It has more mountains, glaciers and wildlife than just about anywhere else in the world. Alaska has become a top visitor destination and the industry has experienced steady growth as more people than ever discover Alaska.

Alaska's tourism industry depends on access to waterways for travel by cruise ship and access to land transportation by dock. Many communities, such as those in Southeast Alaska, depend on seasonal visitors, offering boat tours, fishing excursions, and recreational activities like kayaking and rafting. In recent years, tourism accounted for 27,000 direct jobs with a payroll of \$800 million.

Tourism is a renewable resource. New restrictions could have a negative impact on people and businesses in coastal and inland communities where no other resources are available.

Peg and Jules Tileston Award:
Conservation and Business Working Together

The 4th Annual Tileston Award

sponsored by:

*The Alaska Conservation Alliance
and
The Resource Development Council*

Nomination Form

*Nominations are due by May 31st, 2011
For more information, visit www.tilestonaward.com*

Vision: To recognize that economic development and environmental stewardship are mutually obtainable goals.

Purpose: To encourage partnerships and solutions that fuse economics and environmentalism and make Alaska a place we wish to live.

Tileston Award Categories and Criteria for 2011 Award

Category 1: Project in Operation

- Project shows voluntary outreach to resolve environmental and local concerns.
- Project has been planned, constructed and while in operation maintained the support of local communities while fully meeting or exceeding all permit requirements.
- Provides a net economic benefit to the state.

Category 2: Long-term Corporate Culture of Environmental Responsibility

- Corporation has been in operation in Alaska for at least five years.
- Demonstrates exemplary environmental business practices in Alaska.

Category 3: Individual

- A person who as demonstrates activities in Alaska that directly affect positive protection of the environment while enhancing Alaska's economic viability.

Peg and Jules Tileston Award:
Conservation and Business Working Together

Project/Solution Name _____

Nominator's Name _____

Category _____

Description of Project/Solution (500 words max).

Explain how this project/solution benefits economic development in Alaska (250 words max).

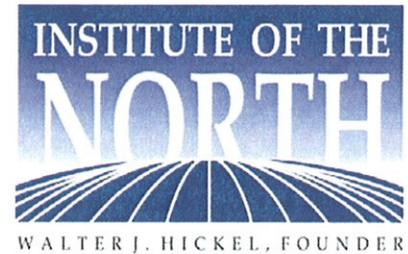
Explain how this project/solution benefits conservation in Alaska (250 words max).

Has the project, company or person received any recognitions and/or violations for their Alaska operations within the last five years? Please explain.

Please describe people, communities, corporations, and others directly and indirectly affected by this project/solution.

Please provide letters of recommendation from persons who can attest to economic and environmental benefits of this project/solution.

2011 Emerging Leaders Dialogue June 2-5 in Kotzebue



The Institute of the North is pleased to announce the 2011 Emerging Leaders Dialogue, June 2-5 in Kotzebue, Alaska. This dynamic event has been held annually for four years across the state, each time engaging participants in discussions of critical policy issues facing Alaska. As a non-partisan, non-attributive venue, the Dialogue has a long history of bringing Alaska's business, policy and social leaders together to deliberate upon new ideas for moving Alaska forward.

The theme of this year's Emerging Leaders Dialogue – **"Livable Communities and the Human Condition"** – will focus on the economic and community development that Alaska's citizens depend on to thrive. Partners for Livable Communities defines livability as the sum of the factors that add up to a community's quality of life—including the built and natural environments, economic prosperity, social stability and equity, educational opportunity, and cultural, entertainment and recreation possibilities. What do these things mean to you?

Held in Kotzebue for the first time, this is an opportunity to highlight the many internal assets Alaska's communities have, as well as the challenges that face all Alaskans and connect people and communities to each other.

Throughout the Dialogue, we will reflect on these issues in ways that focus on both their independence and interconnectedness in the community, region and state. In Kotzebue, 100 young leaders will focus their presentations, small group work and dialogue on two tracks:

- **Structural** – energy, resource development and transportation; and,
- **Human** – education, building social capital and cultural awareness.

You will also have an opportunity to spend a day on the ground. An extra day in Kotzebue will be spent in service to – and learning about – the community. We are working toward expanding this opportunity to visiting nearby communities as well.

One of the core benefits of this event, demonstrated consistently since the Institute launched the first Alaska Dialogue in 2000, is the chance for networking and peer mentoring and leadership. Past attendees have said that the relationships formed at the Dialogue are extremely valuable. Above all, in recognizing the responsibility each Alaskan has to community and state, the Dialogue provides the opportunity to engage with one another while respecting and valuing differing perspectives. This is a chance to share who you are and what you believe in with others who care about this state.

This Dialogue is designed especially for young Alaskans ages 21 to 40 who are good at what they do and have demonstrated a capacity for leadership and commitment to the state and community. The Institute recognizes the strong role that you play in your community. Please feel free to contact us if you have any questions and/or if you have other emerging leaders in mind for this event.

We are very excited about your participation and look forward to seeing you in Kotzebue.

Nils Andreassen, Managing Director

REGISTRATION FORM

Name (prefix, first, last) _____

Preferred First Name _____ Title _____

Company or Organization _____

Address _____

Phone _____ Fax _____

Email _____

Conference Fees: The full cost of the Emerging Leaders Dialogue is \$600 and includes lodging, meals, and materials. We ask that you **pay what you can**, using the following template as a guide. We hope to make this opportunity as accessible as we can for young Alaskans who might not otherwise be able to attend. Please feel free to contact us to talk about what we can do to help in this effort.

\$600 _____ I will be attending the Dialogue and would like a room of my own.

\$500 _____ I will attend the Dialogue but would like to share a room.

\$350 _____ I will attend the Dialogue but do not need a room.

\$200 _____ I would like to apply for a scholarship to attend the Dialogue.

_____ I am a member of Leadership:North and qualify for a 10% membership discount (membership is \$55/yr).

_____ I am unable to attend but would like to help sponsor a young leader by contributing \$_____.

Method of payment: Fax this registration form to us and either mail a check payable to the Institute of the North or use your VISA MC AMEX

Credit Card Number _____ Exp date _____

Signature accepting this agreement _____ Date _____

Lodging: We have secured rooms in Kotzebue and will be providing lodging.

Travel: Kotzebue is accessible by plane on either Alaska Airlines or Frontier. We recommend that you make your reservations as soon as possible. Please contact us for further information about travel discounts or to arrange group travel.

Please mail or fax to:

The Institute of the North, 509 West Third Ave., Suite 107, Anchorage, AK 99501 (Fax: 907 771-2466)

You can also **register online** at www.institutenorth.org. Capacity is limited and early application is encouraged.

Call (771-2448 or 351-4982) or email (akdialogue@institutenorth.org) **Nils Andreassen** with any questions.

Transportation

Transportation providers also rely on future access to the ocean for their responsible and ongoing operations. Shipyards, ports and transportation companies all benefit from activities and energy production in Alaska's waters. The Arctic Ocean, a potential new route for shipping and transportation will present new opportunities for Alaska, and the U.S.

Duplicitous regulations may cause confusion and delays in transportation, increasing cost and waste, especially for remote locations.

Rural, Coastal, and Village Communities

Alaska's resource development projects create and provide jobs in communities throughout Alaska, many of which have few other jobs available. Many of those communities will disappear if overly burdensome regulations are added to existing and new projects.

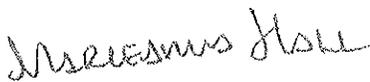
Community and traditional knowledge, further studies, and plans specific to regions should be first and foremost. Any policy for Alaska should be tailored to fit Alaska's specific needs and characteristics, not a one size fits all plan for the nation.

Conclusion

RDC urges cautious development of strategic action plans for national ocean policy, and encourages the task force to take into consideration programs that have already been established and proven to protect and manage the oceans. National oceans policy should include measures to address the need for more research and data collection in the oceans. Any ocean policy should coordinate with existing management programs and stakeholders with a focus on avoiding redundancy and maintaining access. Increased bureaucracy would hamper the already slow processes, delaying projects vital to Alaska's economy with minimal or no added benefits to the environment.

In conclusion, RDC encourages enhanced, open, and transparent communication and coordination with Alaskan stakeholders for national ocean policy. Thank you for the opportunity to comment on this important issue.

Sincerely,



Marleanna Hall
Projects Coordinator

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Coal Classic Golf Tournament
Wednesday, June 15, 2011
Anchorage Golf Course - 7:00 am Start**

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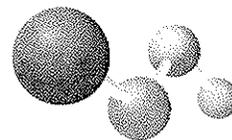
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