



August 11, 2026

Secretary Douglas Burgum
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Secretary Burgum:

The undersigned organizations, write to express our support for restoring the original intent of Section 1326(a) of the Alaska National Interest Lands Conservation Act (ANILCA), commonly known as the "No More" clause. Providing lasting certainty for Alaska's public lands will help ensure that the Administration's efforts to unleash Alaska's extraordinary resource potential are durable, predictable, and not subject to reversal through future administrative action. We respectfully request that the Department work with Congress to advance a legislative amendment that restores the certainty Congress intended when it enacted ANILCA in 1980.

ANILCA represented one of the largest conservation measures in our nation's history. Today, nearly 40 percent of Alaska's land, more than 145 million acres, is managed for federal conservation purposes, including approximately 106 million acres within national parks, wildlife refuges, wilderness areas, and other Conservation System Units. Congress specifically found that ANILCA struck the proper balance between conservation and development and concluded that the need for future conservation designations in Alaska had been satisfied.

The No More clause was intended to provide certainty that additional large-scale federal conservation withdrawals in Alaska would occur only through an act of Congress. That certainty has eroded over time as changing federal policies have created uncertainty for communities, employers, infrastructure investment, and long-term resource development. The result has been an unpredictable regulatory environment that shifts from one administration to the next and discourages investment in projects that require decades of planning.

Restoring the effectiveness of the No More clause would reaffirm congressional intent and provide the long-term certainty that Congress envisioned when ANILCA became law. It would also reinforce Alaska's unique status under federal law while preserving Congress's role in making decisions on future large-scale conservation withdrawals.

We appreciate your leadership and your commitment to ensuring Alaska can continue to contribute to America's energy security, mineral supply chains, economic growth, and national security. We respectfully request your support for legislation that restores the original intent of

ANILCA's No More clause and provides the certainty Congress intended for Alaska's public lands.

Additionally attached is Alaska Governor Mike Dunleavy's September 17, 2025, letter to the President with suggested legislative language and request for support of this amendment. Please reach out to Connor Hajdukovich at connor@akrdc.org with any questions.

Thank you for your consideration.

Sincerely,



Connor Hajdukovich
Executive Director
Resource Development Council for Alaska



Kati Capozzi
President and CEO
Alaska Chamber



Tessa Axelson
Executive Director
Alaska Forest Association



Deantha Skibinski
Executive Director
Alaska Miners Association



Steve Wackowski
President and CEO
Alaska Oil and Gas Association



Rebecca Logan
CEO
Alaska Support Industry Alliance



Alicia Kresl
Executive Director
Associated General Contractors of Alaska

CC:

Senator Lisa Murkowski
Senator Dan Sullivan
Representative Nick Begich
Governor Mike Dunleavy



Governor Mike Dunleavy
STATE OF ALASKA

September 17, 2025

The Honorable Donald J. Trump
President of the United States of America
The White House
1600 Pennsylvania Avenue, N.W.
Washington, D.C. 20500

Dear Mr. President,

As you are fully aware Alaska contains approximately 222 million acres of federal land, most of which are rich in critical mineral opportunities yet to be explored and developed. Your January 20, 2025, Executive Order, "Unleashing Alaska's Extraordinary Resource Potential," recognizes this by declaring it to be "the policy of the United States to fully avail itself of Alaska's vast lands and resources for the benefit of the Nation and the American citizens who call Alaska home." Alaska remains immensely grateful for this, and all your other Executive Orders that focus national and international attention on Alaska's resource potential and direct your Administration to eliminate barriers to making those resources available to the entire United States.

You did your utmost to make these resources available to the American people during your first Administration only to have those efforts revoked by the Biden Administration. A powerful example is your Administration's promulgation of a regulation exempting the mineral-rich Tongass from the 2001 Roadless Rule in October 2020. Sadly, the Biden Administration rescinded that exemption on its first day in office.

The Alaska Legislature and Senator Stevens included the so-called "No More" clause in the Alaska National Interest Lands Conservation Act of 1980 (ANILCA Sec 1326 (a)) to prevent future Administrations from such renegeing on ANILCA's land settlements. Unfortunately, a federal judge misinterpreted one word in ANILCA Sec. 1326 (a) which rendered the entire concept ineffective. So, the Roadless Rule hinders development by continuing to make road access to the Tongass's mineral riches subjective and uncertain.

Attached to this letter is legislative language which would restore the "No More" clause's purpose. It would protect the actions taken by your Administration pursuant to "Unleashing

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Alaska's Extraordinary Resource Potential," from being reversed by future administrations. We need your help and advice to make this happen.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Dunleavy", with a long horizontal stroke extending to the right.

Mike Dunleavy
Governor

Enclosure

REQUEST TO MAKE THE ANILCA "NO MORE" CLAUSE MEANINGFUL BY PLACING IT IN LEGISLATION.

In 1979 the Alaska Legislature requested the Congressional Delegation to include a “No More” provision in ANILCA that would prohibit any post ANILCA “withdrawal” of Alaska land without the approval of Congress. It was one of seven ANILCA “must haves.” Without a legislative fix, Alaska land now being opened for development through rulemaking will again be set aside by new rulemaking or public land orders by a new Administration

The term "withdraw" as used in Sec. 1326 (a) of ANILCA is not defined. In *Southeast Conference v. Vilsack*, 684 F. Supp. 2d 135, 143 (2010) the D.C. District Court used the Federal Land Policy and Management Act (FLPMA) definition at 43 U.S.C. Sec. 1702 (j) to define “withdraw” to mean: “[A] withdrawal exempts covered land from the operation of laws that otherwise authorize the transfer of federal lands to the private domain for private use.” Federal agencies use this definition to get around the intended dictionary definition of the “No More” clause of ANILCA by setting aside federal land in Alaska through their land planning regulations by calling the set aside something other than a “withdrawal” – for example they will call such a set aside a “roadless area,” an “area of environmental concern,” an “old growth reserve,” or something similar. This overreach is contrary to the expectations of the Alaska Legislature, Alaska citizens, and to the intent of Senators Stevens and Tsongas whose colloquy inserted the No More clause into ANILCA (126 CONG. REC. S 11 1 18 (daily ed. Aug. 18, 1980) (remarks of Sen. Tsongas)).

Clarified ANILCA Sec. 1326 (c) - Definition:

Notwithstanding any other provision of law, the terms “withdraw(s)” and “withdrawal” as used in this section shall be construed to mean any executive branch action that prohibits, or functionally prohibits, or restricts or limits development and use of the public land and resources on, and within, the public lands in Alaska that was not in effect on December 3, 1980. Prohibitions and functional prohibitions and restrictions and limitations include, but are not limited to, executive branch land use planning directives to manage land permanently or temporarily as if the land was a conservation system unit, wilderness area, wild and scenic river, LUD II area, roadless area, area of environmental concern, old growth reserve, or similarly restricted use area.

This clarification is intended to reaffirm that the purpose of the No More Clause is to keep Alaska’s land under responsible, long-term management for the benefit of all Americans as the Alaska Legislature, the Alaska Delegation, and Alaskans had expected the day after ANILCA went into effect on December 2, 1980.