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October 26, 2022

Alaska Department of Natural Resources  
Via Electronic Mail: [jonesvillemooserange@alaska.gov](mailto:jonesvillemooserange@alaska.gov)

RE: Matanuska Valley Moose Range and Jonesville Public Use Area

Dear Mr. Perrin:

The Alaska Miners Association (AMA) offers the following comments in response to the September 2, 2022, scoping letter seeking public comment on the Jonesville Public Use Area (JPUA) and Matanuska Valley Moose Range (MVMR) Management Plan update process.

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

As you know the MVMR, JPUA and the Matanuska Coal Fields overlap. There is a long history of mining in the area. As early as 1894, trappers and prospectors heard about the rich coal veins in the Matanuska Valley. By the early 1900s, all the major geologic features had been described by federal government geologists. In 1904, a private railroad company began laying track from Seward toward the Tanana River and planned to use Matanuska coal to fuel its engines. By 1916 the railroad reached the Matanuska Coal Field and mining continued until the 1980s.

The JPUA and MVMR plans each highlight coal resources and recognize that there are active subsurface leases in the area. Furthermore, the JPUA mentions the MVMR management plan and its overarching goal to "maintain, improve, and enhance moose populations, habitat and other wildlife resources" and to "perpetuate public multiple use" including recreation and natural resource extraction in accordance with State and Federal laws.

Today, there are active mining leases and mining permits in the Matanuska Coal Fields. As part of the planning process for JPUA and MVMR, it is critical that the Alaska Department of Natural Resources continue to acknowledge and protect mining as an important use in the area, not infringe upon future mining opportunities, and clearly identify areas with mineral potential. AMA offers the following recommendations for the updated plan:

- The JPUA and MVMR plan should mark all existing coal leases and permitted mines on all relevant maps.

- As a permitted mine, the Wishbone Hill mine should be discussed in the plan's text in addition to inclusion on the maps.
- While recreational use is currently allowed in the overlapping sections of active coal leases and the MVMR, continued use could create conflicts in the future. AMA recommends no new development of trails or recreational facilities on existing coal leases.

Thank you for the opportunity to comment.

Sincerely,



Deantha Skibinski  
Executive Director