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November 30, 2023

Ms. Molly Benson
Alaska Department of Natural Resources
Division of Mining, Land, and Water
550 W 7th Ave Suite 1070
Anchorage, AK 99501
Submitted via email

Re: Notice and Supplemental Notice of proposed changes relating to water management in the regulations of the Department of Natural Resources (DNR)

Dear Ms. Benson:

The Alaska Miners Association (AMA) appreciates the opportunity to provide comments on DNR's proposed changes to water management regulations.

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.

We have reviewed the proposed changes for the following sections of the January 2021 regulations package:

11 AAC 93.115 Closure of an application for a water right
11 AAC 93.210 Temporary water use
11 AAC 93.220 Procedure for temporary water use
11 AAC 93.510 Public notice and meeting (for Critical Water Management Areas)
11 AAC 93.530 Effect of the order
11 AAC 93.970 Definitions

The proposed changes consist largely of cleanup and clarifying language that we believe are positive and beneficial, and we have no suggested edits or further comments on the changes.

In the Notice, DNR indicates it has opted to postpone proposed changes relating to applications and certificates for instream flow reservations. In the Questions and Answers materials, the Department indicates it plans to hold scoping meetings in 2024, which will involve an interactive process with multiple stakeholders. AMA has long engaged with the Department on this important issue, and we look forward to continuing to do so.



AMA's comments on the 2021 regulations package, in which we extensively detail our comments on the existing instream flow reservations regime, can be seen [here](#) for your reference.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "DSK", is positioned above the printed name.

Deantha Skibinski
Executive Director