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February 26, 2021

Mr. Brandon McCutcheon
Alaska Department of Natural Resources
Division of Mining, Land, and Water
550 W 7th Ave Suite 1070
Anchorage, AK 99501
Submitted electronically via dnr.fees.regulation@alaska.gov

Subject: Notice of Proposed Department of Natural Resources Fee Regulations

Dear Mr. McCutcheon:

The Alaska Miners Association (AMA) appreciates the opportunity to comment on proposed fee 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, major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.

AMA has concerns about the proposed changes to 11 AAC 05.120(d)(M), which would allow the Department to seek reimbursement for the actual costs of conducting an inspection for compliance with the terms of the reclamation plan. This new fee structure is too open-ended, and could result in excessive costs to miners, especially small miners. The cost-reimbursement provision should have some limitations, or language to ensure control so that the provision is not abused, either by the department, or hostile third parties that may request unnecessary inspections.

Thank you for this opportunity to comment, and we look forward to working on this issue with you.

Sincerely,

Deantha Skibinski
Executive Director