



**ALASKA MINERS**  
ASSOCIATION

121 W. FIREWEED SUITE 120 | ANCHORAGE, ALASKA | 99503 | 907.563.9229 | ALASKAMINERS.ORG

April 18, 2019

Ms. Kimberly Sager  
Alaska Department of Natural Resources  
500 W 7<sup>th</sup> Ave Suite 1020  
Anchorage, AK 99501

Re: Notice for two Proposed Reservations of Water: Tanana River Reaches E & F

Dear Ms. Sager:

The Alaska Miners Association (AMA) writes to comment on two proposed reservations of water, Tanana River reaches E & F, LAS 29897 and LAS 29898.

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.

AMA has engaged in discussions with the Department for several years on how the current management of instream flow reservations impacts not only Alaska's resource industries, but all community and economic development projects. Specifically, we expressed concerns with both the process but also the fundamental flaws within the hydrology data used by the Department in its decisions. Most recently, we submitted a detailed objection to the public notice of IFRs for the Kadashan River, highlighting important legal and hydrological errors, and urged that the applications should not be approved and that the Department should take the necessary time to remedy the significant legal methodological flaws in its approach to all instream flow decisions.

The concerns expressed by AMA and other entities have remain unaddressed and continue to exist in these proposed reservations for the Tanana River. AMA has made several requests in the past and recently to meet with DNR on this issue, and we urge you to extend this comment period until this discussion takes place and these issues can be remedied.

Sincerely,

Deantha Crockett  
Executive Director

cc: Corri Feige, Commissioner  
Brent Goodrum, Deputy Commissioner  
Marty Parsons, Director, Division of Mining, Land, and Water