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February 10, 2025

Bureau of Land Management Eastern Interior Field Office

Attn: Jennifer Nelson

Submitted via email at [jnelson@blm.gov](mailto:jnelson@blm.gov)

Re: Wade Creek Restoration Project DOI-BLM-AK-F020-2025-0005-EA

Dear Ms. Nelson and BLM Eastern Interior Field Office personnel:

The Alaska Miners Association (AMA) writes to comment on the scoping notice for the Wade Creek Restoration Project DOI-BLM-AK-F020-2025-0005-EA.

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. AMA's more than 1,400 members come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Alaska's miners are 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 wishes to comment on the scoping notice to one, reiterate previously conveyed concerns about BLM-led restoration projects and two, ensure AMA is again in the record as the proposal moves forward.

*From its notice, the BLM notes it... "proposes to conduct restoration activities on approximately twelve miles of Wade Creek and install information kiosks in the Taylor Highway Right-of-Way. Past placer mining left the Wade Creek watershed with a rich mining history and a legacy of highly disturbed river bottoms. Over the last decade, BLM improved river bottom conditions at portions of Wade Creek with multiple restoration and rehabilitation efforts. Restoration efforts, legacy impacts from past mining, and active placer mining operations at Wade Creek are highly visible from the Taylor Highway, a popular access and tourist route, but on-site information describing past and present land uses are sparse. Under the Proposed Action, the BLM would continue restoration efforts on the Wade Creek river bottom for at least five years and install information kiosks to enhance visitor experience."*

AMA embraces reclamation of historic sites and agrees with the concept that past impacts should be remediated. While doing so, we urge the agency to conduct reclamation activities in a manner that is realistic and reasonable, ensuring that reclamation tactics employed are site-specific and done in a manner best suited for the Wade Creek area. Tactics like regrading, contouring, re-seeding, etc. are not a one-size-fits-all mechanism versus performing work in a way that suits the specific location, climate, and terrain. We highly encourage you to consult the placer miners in the region, who have been mining the land for decades, to model the restoration after their proven methods.



We also ask that, after reclamation is performed, that specific tactics used are not automatically applied to other reclamation requirements on private sector miners in the Field Office area. Reclamation and restoration proposals outlined in Plans of Operations by placer miners are created through experience, the best education for the land on which placer miners operate.

Finally, AMA is excited about the informational kiosks that are planned along the tourist route. Unfortunately, historical kiosks and museum placards depicting mining around our nation oftentimes depict mining as a harmful and offensive activity. Mining in the Fortymile Mining District has long been done responsibly by upstanding citizens, and it is our hope that the kiosks indicate as much.

AMA would greatly appreciate the opportunity to be part of the ongoing dialogue and assist with this project as it moves forward. We look forward to working with you.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Skibinski".

Deantha Skibinski  
Executive Director