



## Coalition for Public Access

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April 12, 2011

Via Email attachment

BLM Carson City district, Stillwater Field Office  
Attn: Kenneth Depaoli, Geologist  
5665 Morgan Mill Road  
Carson City, NV 89703

Re: NVN-086663 (Isabella/Pearl LLC) / 3809 (NVC01000)

Dear Mr. Depaoli:

The Coalition for Public Access (CPA) is a nonprofit public benefit corporation dedicated to the preservation of access and use of the federal public lands. We have reviewed the proposed project EA Scoping documentation and appreciate this opportunity to make comment.

The CPA supports the mine project, but has concerns about the three existing routes leading to the canyon that abuts the project's boundary on the northeast. We note there is to be a "Public Rd Reroute" that is to provide access to the canyon.

On Wednesday, April 6, 2011, Ms. Sue Silver, a member of the CPA board of directors spoke with Terri Knutson regarding this matter. Ms. Knutson assured Ms. Silver that a reroute is typical for mining projects that take out access over existing roads and that there will be no effect as to the existing RS 2477 right-of-way acquired by the public over the old Grantsville Road which has existed since about 1866.

Despite Ms. Knutson's assurance, we remain concerned about the effective loss of the public's vested rights-of-way under the provisions of RS 2477 and would be more assured if the BLM would direct us to an agency policy that establishes its authority to transfer this right from an old route to a newer route.

We look forward to your reply as to how the transference of an old right-of-way is accomplished and in what manner it becomes a matter of record within the agency. Should you require further information regarding this inquiry, please contact Sue Silver at 775-945-2009.

Sincerely,

*[Signature on file.]*

Harold Ritter, President