

Data Submitted (UTC 11): 11/10/2023 12:51:51 AM

First name: Sidney

Last name: Elkins

Organization: North Central Cascade Miner's Association

Title: Vice President

Comments:

North Central Cascade Miners Association (NCCMA) is an association of miners, most of which have active mineral claims within the Upper Swauk Restoration Project.

NCCMA agrees that the extreme danger of wildfire must be addressed urgently. However, we oppose your proposed actions of "closure, decommission, or change road maintenance levels" included in the document. While recognizing "recreation uses", your proposal does not take into consideration the impacts to mineral claim owners, many of which in our organization would be directly impacted by your proposal.

Although your Figure 10 is not visually clear enough to allow determination, existing rights-of-way granted by RS 2477 are likely to be affected by your proposal. We object to any "closure, decommission, or change road maintenance levels" for accesses present prior to October 21, 1976. Such actions would "endanger or materially interfere with prospecting, mining or processing operations or uses reasonably incident thereto" for many claims held by our members. The existence of such rights-of-way will not be affected by your proposed actions and you could potentially be liable for any such interference. It is your responsibility to determine if a right-of-way is granted under RS 2477 prior to conducting any of your proposed modifications.