March 5, 2023

Re: Comments on Proposed F3 Gold Newark Project

MAR 07 2023 BHNF/SO

Rob Hoelscher:

Mining is a destructive process which degrades any environment in which the activity takes place. This is well established and the only arguments that occur when a proposed mining project faces opposition is to what extent will the mining damage the water, air, vegetation, or wildlife. When the 1872 Mining Laws were enacted miners were using horses, picks, dynamite, and shovels to extract minerals. Currently, mining companies strip the land for massive pit mines using enormous machinery. Modern mining techniques are exponentially more destructive than the primitive techniques used by early miners arriving on horseback. I find it ironic that French Creek in Custer, SD was where General George Armstrong Custer accompanied the first wave of illegal miners into the Black Hills with the blessing of the U.S. government even through this broke the treaty that was ratified with the Lakota Nation. Time has passed yet the roles have not changed. The federal and state governments still turn a blind eye in order to satisfy their never-ending need for funding, the mining companies put as little effort as possible to ensure the health of local natural resources in order to secure maximum corporate profits, and the voices of the people living in the affected area are ignored or tolerated at best; their health concerns be damned.

As our world becomes more crowded and sustainable practices of farming, mining, manufacturing, and logging face continued obstacles we all suffer albeit unknowingly until symptoms of degradation surface in the form of higher human disease rates, shrinking soil productivity levels, fish kills, or even greater unforeseen consequences yet to be fully realized. Antiquated laws which are repeatedly defended by those who seek to benefit at the expense of local citizens must be challenged, changed, or defied. Laws at their heart are meant to protect those who elect representatives which create them. Laws are not meant to simply shield corporate entities.

I am requesting that an environmental assessment be conducted on this proposed project. A categorical exclusion does not make any sense. Thousands of people live within the proposed project's watershed area. It is impossible for the U.S. Forest Service, Bureau of Land Management, or F3 Gold to know the innumerable possible impacts that test drilling 100's of multi-directional holes could pose to the headwaters of French Creek, local private and municipal wells, and the citizens of Custer without doing appropriate research prior to a genuine dialogue with local and tribal stakeholders. We all understand that the proposed test drilling is simply the beginning. Finding adequate veins of gold deposits would only solidify the greed driven resolve of the mining company along with the enabling branches of government that view our world as a mere pile of resources for the taking.

I am also requesting that consultation must be conducted with the Oglala Sioux Tribe. An archaeological/cultural survey has not been done within the proposed drilling site area. In 1980 the U.S. Supreme Court ruled that the Black Hills were in fact stolen from the Lakota Nation. As a recompense for this theft, the Supreme Court ordered a monetary payment for the value of the land. However, to date the Lakota Nation has not accepted the monetary compensation. In my mind, this case has not been properly resolved. Failing to include the Lakota people in this proposed drilling project discussion again shows the disdain that the U.S. Government has had for native people and their rights to the land which was repeatedly stolen from them over the past 500 years.

Lastly, I am requesting that a socio-economic study be conducted. Foolishly some local residents have been led to believe that F3 Gold will "bring good jobs to our area". In fact, F3 Gold will bring their trained employees to Custer to do the job and then leave. Mining is a highly specialized industry. People from Custer will not be hired to work at this proposed site. Instead, the local mineral resources will be stripped and the out of state company will be the sole financial benefactor. Custer residents will be left behind to suffer the consequences of another ecological mess. The state of South Dakota receives approximately 1000 times more revenue from tourism than mining. Local Custer business owners depend almost exclusively on tourism in some form for their livelihoods. Tourists that visit Custer's national forest and surrounding natural areas do so to hike, horseback ride, 4-wheel, observe bison in Custer State Park, attend Crazy Horse Monument programs, and swim/fish in several local lakes/creeks. A healthy environment is crucial for the appeal of tourism to continue. Due to the semi-arid nature of our climate in Custer, SD the maintenance of a clean water supply is of utmost importance. French Creek originates near the proposed test drillings site. Due to the extent of the proposed drilling it is highly probable that water flows and the quality of French Creek could be altered. If French Creek water flows were to diminish, or even worse, become contaminated

with pollutants, the drinking water supplies from the City of Custer through Custer State Park to Hermosa may become non-potable. This could literally turn Custer into a ghost town. Property values would plummet and the appeal for tourism would follow. Two homes have already been put up for sale which border the proposed drilling area due to the fears which I have stated. In reality, the scenarios of promised environmental safety and economic prosperity from mining projects most typically turn out to be environmental contamination and economic ruin for pristine areas such as Custer, SD.

Sadly, the City of Custer is already well under way to begin dumping the entirety of its treated sewage directly into French Creek after having hatched this plan and set it quietly in motion during the height of the Covid-19 pandemic. Having taken a page from the playbook of mining companies and state and federal government agencies, the City of Custer failed to inform private property owners of their intentions, secretly contacted federal national forest and state park superintendents two years ahead of time to enlist their compliance, and refused to even speak to concerned local citizens who attended public city meetings once they found out about Custer's plans. According to local geologists and water resource specialists, "It is not a matter of if the private wells along French Creek will become contaminated, it is only a matter of when." was the statement received by the City of Custer Council, yet they refused to acknowledge these statements nor engage in a discussion with local property owners in any manner. A rise in water temperatures, a 500% rise in ammonia levels, and chemicals/medications unable to be removed from the wastewater treatment process will flow down French Creek and infiltrate private wells and the surrounding watershed doing insurmountable damage to the local ecology. It appears that our local, state, and federal elected officials fail to in any way uphold the duties associated with their respective offices at the expense of their constituents wellbeing. Combined with the contamination from a proposed mining project and the City of Custer's treated waste, the health of French Creek and local residents don't stand a chance. Please help us change this unimaginable set of circumstances from happening.

I'm sure as a long-time government employee you have been ordered by unnamed powerful players in this situation to "do your job" as described by them, or to "just follow the law". You are probably worried about your pension, your home, and your future dreams. However, as a government employee I hope that you remember that you work for the people, especially the people of Custer to protect the federal natural resources from harm, regardless of what obsolete corrupt mining laws may state. As a person you have an obligation to humanity, not the select powerful few who pull strings from behind the curtain to get what they want. I'm asking you here to do the right thing within your abilities to stop this project. I'm asking you to help curb the tide of greed that is incrementally damaging this world. I'm asking you to be

known as the pivotal man who helped stop another catastrophe instead of becoming the puppet who helped destroy the City of Custer, SD.

Thank you,

Douglas Gaulke