

From: [REDACTED]
To: [F3-comments-rocky-mountain-black-hills-hell-canyon](#)
Subject: [External Email]Categorical Exclusion Proposal for Newark Project
Date: Monday, February 13, 2023 12:27:15 PM

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Greetings --

I oppose giving the Newark Project a categorical exclusion. It does not qualify for this designation for the following reasons:

1. the proposed project would involve construction of almost a mile of new roads -- regardless of what they are called, they are roads. This is more than one-third mile.
2. the project would involve clearing more than an acre. Between the road and the staging area and the drill pads, it would be substantially more than an acre.
3. this is a beautiful area that is commonly used for outdoor recreation and that includes a major creek and wetlands. It is immediately upstream of Custer, which relies on tourism and would be very negatively impacted if there was a spill of drilling fluid or sediment into French Creek.
4. there are likely to be cultural resources in the area, as it would have provided a likely route for travel and campsites for indigenous peoples over time.
5. I don't believe that F3 Gold can complete this project and reclamation within a year. Thirty-nine drill pads and almost a mile of roads will take some time to create, drilling will take some time, and if they start in May and drill into the Fall, they will not be able to complete reclamation over the winter -- because grass can't get started in the winter.
6. this is not a small project. With 39 drill pads -- and given industry practices -- there could be as many as 390 holes drilled into this fragile and unique ecosystem. Plus, the company actually wants to do a lot more drilling. Their original plan was for 49 drill pads, and they have thousands of acres of claims in the area. I believe this is just the beginning of their activities and should be given substantial study before exploration begins in the area.

These factors add up to extraordinary circumstances. The project should not be given a categorical exclusion and should at least be studied through the lens of an Environmental Assessment. An Environmental Impact Statement would be preferable.

Please put me on the list to receive all future communications regarding this and other mining- and exploration-related projects in the Hell Canyon District. I did not receive information on this Project, and this is my second request to be put on your list.

Thank you for your consideration --

Lilias Jarding, Ph.D.

