



**DAKOTA GOLD**

June 16, 2023

Black Hills National Forest,  
Forest Supervisor's Office  
1019 N 5th Street  
Custer, South Dakota 57730

*Submitted electronically at <https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3479>.*

**Re: Proposed Mineral Withdrawal of 20,574 Acres of Black Hills National Forest**

Dear Forest Supervisor,

Dakota Gold Corp. ("Dakota Gold") is a gold exploration and development company headquartered in Lead, South Dakota and focused on revitalizing the historic Homestake Mining District (the "Homestake District") in South Dakota. We currently hold rights to over 46 thousand acres in the Homestake District, including a mix of private lands and mining claims in the Black Hills National Forest. Dakota Gold opposes the proposed mineral withdrawal of 20,574 acres of National Forest System (NFS) lands in Pennington County, South Dakota.

Mining has occurred in the northern Black Hills for more than 145 years. Prior to passage of the modern environmental laws in the 1970s and 1980s, mining was conducted in ways that would never be tolerated today. Despite this, the natural beauty and water quality of Black Hills remains exceptional and tourism in the Black Hills has flourished and coexisted with mining since the late 1800s. Modern hard rock mining operations in the United States are heavily regulated and have excellent environmental and safety records.

We further believe that at a time when the domestic production of critical minerals is an urgent priority, it is poor policy for the United States to remove public lands from mineral location based on vague concerns over potential impacts to "cultural and natural resources." According to the United States Geological Survey's Mineral Commodity Survey 2023, "of the 50 mineral commodities identified in the '2022 Final List of Critical Minerals,' the United States was 100% net import reliant for 12, and an additional 31 critical mineral commodities ... had a net import reliance greater than 50% of apparent consumption." The United States relied on China to provide net imports of more than 50% on twenty-six nonfuel mineral commodities, including minerals critical to our clean energy transition.

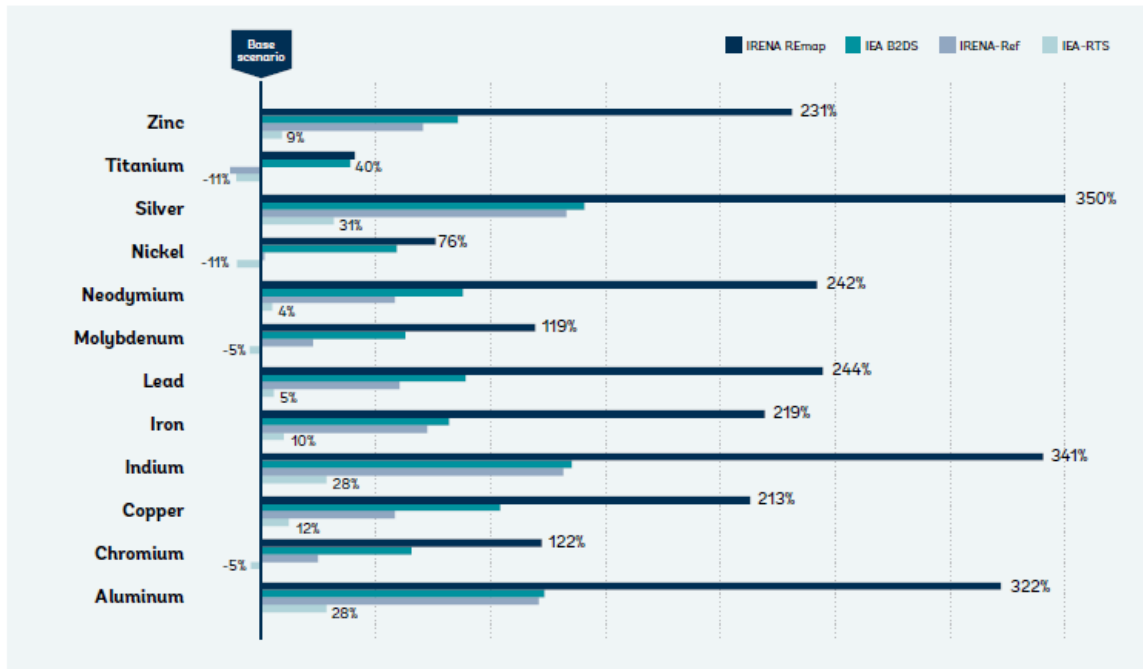
Regarding the need for additional minerals to achieve our clean energy ambitions, the following graphic from the World Bank is enlightening:

**MAIN OFFICE: LEAD, SOUTH DAKOTA**  
106 Glendale Drive, Suite A  
Lead, South Dakota, 57754, USA  
☎ +1 605 717 2540

**VANCOUVER OFFICE**  
1588 609 Granville Street  
Vancouver, British Columbia, V7Y 1G5, Canada  
☎ +1 778 655 9638

info@dakotagoldcorp.com  
www.dakotagoldcorp.com  
NYSE American: DC

*Relative change in demand for minerals from energy technologies through 2050 (various scenarios considered)*



Note: Base scenario - 4-degree scenario, B2DS - beyond 2-degree scenario, IEA - International Energy Agency, IRENA - International Renewable Energy Agency, Ref - reference scenario, REmap - renewable energy roadmap scenario; RTS - reference technology scenario.

Source: *The World Bank, "Minerals for Climate Action: The Mineral Intensity of the Clean Energy Transition," page 72.*

Additionally, the need for domestic mineral supplies is critical for the strategic defense of the United States. China currently controls more than 92 percent of the supply chain for rare earth magnets that are critical components in missiles, firearms, radar, and stealth aircraft. These risks have been repeatedly identified by the Biden Administration and there is broad consensus that reliance on hostile regimes for our critical minerals is dangerous.

It is also unacceptable to outsource our own mineral needs to other parts of the world that do not have the extensive environmental and human rights protections. For instance, the world cobalt supply is largely produced by Chinese companies that allegedly rely on modern day slave labor in Africa. See, e.g., <https://www.npr.org/sections/goatsandsoda/2023/02/01/1152893248/red-cobalt-congo-drc-mining-siddharth-kara>. The answer, of course, is revitalization of domestic mining in the United States.

The decision to withdraw public lands has very real and significant consequences on not only individual companies and communities, but also on the strategic interests of the United States, our ability to deliver a clean energy transition, and on our commitment as a country to protecting human

health and the environment around the world. These consequences must be fully considered as part of any decision to pursue mineral withdrawals of public lands.

For the foregoing reasons, Dakota Gold is opposed to the unilateral withdrawal of public lands from mineral location. At a minimum, this decision must be supported by a full Environmental Impact Statement level analysis of all foreseeable impacts. We must trust in our robust Federal and State laws and regulations to identify and mitigate any actual risks from future mining operations.

Thank you for your consideration of our concerns.

Regards,

A handwritten signature in black ink, appearing to read 'P. Malone', with a long horizontal stroke extending to the right.

Patrick Malone  
Chief Sustainability Officer  
Dakota Gold Corp.

cc: Governor Kristi Noem  
Senator Mike Rounds  
Senator John Thune  
Representative Dusty Johnson  
South Dakota Attorney General Marty Jackley  
South Dakota Minerals Industry Association