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Comments: Please find the attached comments from the South Dakota Mineral Industries Association regarding the Draft EA/FONSI for the proposed Pactola Mineral Withdrawal.

Dear Supervisor Cochrane:

#### I. Introduction and General Comments

The South Dakota Mineral Industries Association (SDMIA) appreciates the opportunity to provide comments on the proposed Pactola Reservoir - Rapid Creek Watershed Mineral Withdrawal announced on March 21, 2023 by the Department of Interior, Bureau of Land Management. On behalf of our membership, representing nearly 1,500 employees working in the Mineral Industries, mainly in the Black Hills, SDMIA offers the following comments. The South Dakota Mineral Industries Association's mission is to communicate, educate and advocate for the mineral industries in SD. We focus on informing the public about the mining life cycle, the mining industry, and how mining is beneficial to society and other industries. The South Dakota Mineral Industries Association purpose is not to approve or disapprove of any specific projects proposed in the Black Hills or South Dakota.

SDMIA is here to provide the facts and information related to what exploration activities entail, the difference between exploration and mining and what is involved to move an exploration project from exploration, into development, mining, and closure.

SDMIA and our members recommend the No Action Alternative and strongly oppose:

1.) The proposed withdrawal of 20,574 acres of National Forest System Lands in Pennington County, South Dakota, from settlement, sale, location, or entry under the public land laws; location and entry under the United States mining laws; and leasing under the mineral and geothermal leasing laws for 20 years, subject to valid existing rights, to protect the cultural and natural resources of the Pactola Reservoir[Rapid Creek Watershed, including municipal water for Rapid City and Ellsworth Air Force Base, from the adverse impacts of minerals exploration and development. 2.) The EA's Draft Finding of No Significant Impact.

The EA fails to define a clear need/purpose, excludes an analysis of alternative protections as mentioned in FSM 2761.4, uses highly speculative, hypothetical scenarios with no detailed, clear, science-based analysis, depends on incomplete data/reports, violates ADA requirements, overall, the EA is inadequate for a FONSI and a full EIS must be completed to make a science-based decision.

SDMIA's concerns on this proposed withdrawal are related to: (1) the process being used by the agencies that is different than past proposals; (2) the precedence that may be established for additional withdrawals within the Black Hills; (3) the lack of scientific basis for the proposed withdrawal; (4) the lack of science/data in related reports to support the area of the proposed withdrawal; and (5) any potential impacts to other projects or user groups.

#### I. Specific CommentsA. The USFS Must Articulate the Basis for the Proposed Withdrawal

1. The lack of a scientific basis for the proposed withdrawal is of great concern to the SDMIA. Although the stated reason is to "protect cultural and natural resources in the Pactola Reservoir - Rapid Creek Watershed, including drinking water for Rapid City and Ellsworth Air Force Base," no plausible scenario is presented that establishes the link between exploration and mining in the Pactola watershed and harm to the downgradient cultural and

natural resources. Until a realistic scenario for harm is developed, the proposed withdrawal appears to be arbitrary and capricious.

#### B. Mineral Potential Report is inadequate/incomplete

1. The report is inadequate, it needs complete comprehensive revision due to plagiarism, incomplete citations, incorrect/out of date geologic information, and incomplete detailed examination of appropriate literature. This report frequently states it has conducted detailed research but fails to incorporate any new meaningful literature since the last Mineral Potential Report.

2. ADA Standards for Color Blindness: The EA/reports fail to meet certain ADA requirements, with several figures being designed in a manner which discriminates against people with red-green colorblindness due to the heavy reliance on a red and green color scheme. Figure 24 is almost exclusively made with a red-green color scheme and needs to be reconstructed for the sake of inclusivity.

3. Research and Geology: The report makes several claims that is based on, "...detailed examination of peer-reviewed literature[hellip]" While making claims such as:

- \* "It is unknown to the present author if detailed geophysical surveys[hellip] [hellip]have been conducted over the withdrawal application area"

- \* "There are no known publications describing the lithogeochemistry in the withdrawal application area."

- \* "There are no known rock sampling programs or radiometric ground surveys focused on the identification and assessment of radioactive minerals in the vicinity of the withdrawal application area."

- \* "These evaluations were based on a combination of extensive literature reviews (as cited in Chapter 7 - References)"

- \* There have been several peer-reviewed and published literature on lithogeochemistry, rock sampling programs, and radiometric ground surveys. In fact, some of the sources this report uses references peer-reviewed literature covering these topics. These claims have allowed the report to willfully ignore, and not complete important sections. Some examples of peer-reviewed literature covering the topics that were stated as not known are:

- \*

- \* Sharma, R.K., Stone, J.J. Chemical composition of bottom sediments within black hills region reservoirs of South Dakota and Wyoming. *Environ Earth Sci* 74, 4381-4393 (2015). <https://doi.org/10.1007/s12665-015-4444-1>

- \* Angela M. Van Boening, Peter I. Nabelek, Petrogenesis and tectonic implications of paleoproterozoic mafic rocks in the Black Hills, South Dakota, *Precambrian Research*, Volume 167, Issues 3-4, 2008, Pages 363-376, ISSN 0301-9268, <https://doi.org/10.1016/j.precamres.2008.09.008>.

- \* Duke, E.F., 1996, Geochemistry of Lower Proterozoic metagraywacke, Black Hills, South Dakota: Regional and outcrop-scale variations, in Paterson, C.J., and Kirchner, J.G., eds., *Guidebook to the geology of the Black Hills*, South Dakota: South Dakota School of Mines and Technology Bulletin 19, p. 180-190.

An additional note, specifically pertaining to, "There are no known rock sampling programs or radiometric ground surveys focused on the identification and assessment of radioactive minerals in the vicinity of the withdrawal area."

- \* One of the sources this report heavily relies on, (Redden, 1980), contradicts this statement by writing: "Deposits are irregularly shaped lenses within the conglomeratic units of the Boxelder Creek Formation (unit Xcqc, fig. 15) in an area well defined by mapping, ground radiometric surveys, and drilling". Box Elder Creek being within the vicinity of the exterior boundary. There have also been other rock sampling programs/radiometric ground surveys within the vicinity.

After reviewing the references for this report, the overwhelming amount of peer-reviewed scientific literature is before the 2000s, and are dominantly the same sources of the last mineral report. Most citations post-2000s are technical publications of law/reporting/writing guides, regional government evaluation reports, local map updates, and non-local literature. There is a clear void of post-2000 locally focused literature.

The geologic sections demonstrate the lack of, "[hellip] detailed examination of peer-reviewed literature." There are several instances of time shifts of geological events, descriptive pleonasm, and making noncompatible geological statements. An immediate example is:

\* "Paleoproterozoic metabasalt, metachert, slate, and "metagraywacke" schists and phyllite (i.e. hard, dark colored, fine to coarse grained, graded beds of metamorphic rock that were originally muddy sand and silt turbidite deposits)[hellip]."

\* "I.E." is latin for 'Id est' or "that is". This means the above passage is indicating that Metabasalt's protolith was "[hellip]originally muddy sand and silt turbidite deposits". Current scientific literature cites metabasalt's protolith being basalt, an igneous-volcanic rock, not a muddy sand and silt turbidite deposit.

Additional examples of Research and Geology issues are:

\* There are several instances of time periods and stated ages changing. One such event is the Trans-Hudson Orogeny. Throughout the report the dates frequently change between 1.6-1.8, 1.6-1.9, 1.7-1.9 and 1.88-0.0175 billion years ago. It is important to note that current scientific literature cites this event occurring between 1.8-2.0 billion years ago. Thus, the dates are inconsistent within the report, and they do not even accurately represent current geological understanding. This invalidates the statement made within the Methodology section regarding detailed examination. The following are instances of inaccurately stated Trans-Hudson Orogeny time frames from this report [bya: Billion Years Ago]:

\* "The entire Precambrian section was then deeply buried sometime between about 1.9 to 1.7 bya, when[hellip] [hellip]Called the "Trans-Hudson Orogeny"."

\* "[hellip]during the Trans-hudson Orogeny, approximately 1.9 to 1.7 bya[hellip]"

\* "Both feature types may have been related to Paleoproterozoic deformation during the Trans-Hudson Orogen based on their estimated age, ranging from post 1.88bya to pre-1.75 mya."

\* Also note, Paleoproterozoic age range was 2.5bya to 1.6 bya. The cited age range is not reasonable. If 1.75 mya is true then "Paleoproterozoic" can't be used, rather the Paleoproterozoic-Jurassic

\* "[hellip] and tectonic environment about 1.6-1.9 bya (i.e. during the Trans-Hudson Orogeny)."

\* Referring to the Trans-Hudson Orogeny, "[hellip]formed in a metamorphic and tectonic environment about 1.6-1.8 bya when hydrothermal solutions[hellip]"

4. This report draws significant conclusions by asserting that sedimentary rocks are not found within the withdrawal application area. However, this report also states there are sedimentary rocks and deposits within the withdrawal area. The following are quotes from the report demonstrating the inconsistency:

\* "The three mineral deposit types (Table 6) for mining districts in the withdrawal application area were described by DeWitt et al. (1986) and are presented below[hellip].. 3. Quaternary or Tertiary Gold or Tin Placer Deposits: Tertiary and Holocene placers of bedded sedimentary deposits[hellip]"

\* "Sedimentary rocks do not occur in the withdrawal application area (Norton et al. 2008; Redden et al. 2017; Redden and Fahrenback 2020)."

\* "It is entirely contained within the area of exposed Precambrian crystalline rocks [hellip]."

\* Do note, several figures and references cite Non-Precambrian crystalline rocks and formations, such as: unconsolidated Quaternary Terrace deposits (Qt), Colluvium (Qc), and Alluvium (Qal)

\* "As noted above, sedimentary rocks are absent from the withdrawal area[hellip]" This statement is then

repeated 3 times under Section 6 justifications

- \* "The USGS 1986 mineral potential report for the Black Hills National Forest described these accumulations as bedded sedimentary deposits formed in terrestrial environments by rivers transporting and concentrating heavy minerals, especially gold, in stream channels (DeWitt et al. 1986). That report delineated an area along Rapid Creek, extending from the west-central boundary of the withdrawal application area approximately 2 miles to the east and overlapping the Upper Rapid Creek Mining District, as a potential area for the accumulation of such deposits and identified Au as the only resource commodity for placer deposits in the withdrawal application area (Figure 24 and Figure 25)

5. Examples of pleonasm and poor phrasing which potentially indicate the report's limited understanding of geologic terms:

- \* "In addition, numerous areas with unconsolidated colluvium of poorly-sorted landslide and loose talus material occur over small areas at the base of steep and unstable hill slopes throughout the range."

- \* Colluvium

- \* By definition colluvium is loose, unconsolidated sediments that deposit at the base of a hill slope.

- \* Thus stating "unconsolidated colluvium" is extremely redundant

- \* Talus

- \* By definition talus is loose rock fragments/material that accumulate on a slope

- \* Thus stating "loose talus material" has a double redundancy.

- \* "The basal formation stratigraphically underlying Metagraywacke[hellip]"

- \* Basal

- \* By definition Basal means bottom layer or base, thus, the author is stating the 'bottom layer' is 'underlying' or underneath the layer above it. Although, this statement is technically true, it is inappropriate for technical reports and is redundant

- \* Report states, "Much of the present-day topography and subradial drainage pattern of the Black Hills was probably established at that time. Then, during the Oligocene[hellip]"

- \* This passage suggests the Oligocene (34-23mya) comes after the present day.

6. Making dozens of minor but false statements such as: "Oil and natural gas deposits represent the accumulated remains of algae, plankton and other organisms that were deeply buried and converted into petroleum-based fluids which then migrated and became trapped in the subsurface within sedimentary rock reservoirs."

- \* As written, this suggests that oil and natural gas deposits are trapped in sedimentary rock reservoirs.

- \* This is fundamentally untrue. Although, most are trapped in the subsurface within sedimentary rock reservoirs, there are instances where oil is trapped in a matrix of fractured igneous/metamorphic rock and capped by non-sedimentary. This is an extensively covered topic, some recommend resources to enhance this report's research:

- \* Zou, C. (2017) Unconventional petroleum geology. Amsterdam, Netherlands: Elsevier. ISBN 978-0-12-812234-1

- \* Fanchi, J.R. (2002) Shared earth modeling. Amsterdam: Butterworth-Heinemann. ISBN 978-0-7506-7522-2

- \* Portions of this source are dedicated to unconventional reservoir

- \* This report states, "[hellip]withdrawal application area is extremely complex and involved multiple deformational

events during the Paleoproterozoic."

- \* Only one deformational event has been explained in this report during the Paleoproterozoic

- \* Additionally, this statement ignores the established deformation of other non- Paleoproterozoic events, such as the Laramide Orogeny which had significant impacts

- \* This report states, "[hellip]subsurface geothermal reservoirs are commonly associated with areas that have geyser, fumaroles, mud volcanoes, or thermal springs and are often within Quaternary or Neogene volcanic settings, especially where calderas, cones, and vents are common, or along major tectonic boundaries (Schoon and McGregor 1974)

- \* After reviewing the cited paper, only a few references to the above statement of Quaternary or Neogene volcanic settings are identified. These references do not support what this report's conclusions:

- \* "[hellip]South Dakota is higher than the national average; however, it is more difficult to establish volcanic activity in the area during or subsequent to Precambrian time." This contradicts the cited report that they are commonly associated (Schoon and McGregor 1974).

- \* The other reference to tertiary volcanic activity was to the thermal gradient at the Homestake Mine on Page 11 of Schoon and McGregor, 1974.

#### C. Plagiarism, Incorrect/Misleading Statements, and Errors

There are over 60 instances within this draft of the federal report that repetitiously insert uncited information, and incorrectly citing sources. There are numerous simplistic and complex errors, incorrect referencing of figures and tables throughout this report that make it unfit by academic standards. Some assorted examples:

1. The Report claims 161 Active Lode Claims but references Appendix E which states and lists, "209 Active Lode Claims"

2. The Report incorrectly states acreage values several times in the preamble, an example being:

- \* "[hellip]gold and silver lode deposits across the same 8,234 acres based on direct evidence (M/C). Lode resources for the remaining 13,542 acres in the withdrawal application area were determined[hellip]"

- \*  $8,234 \text{ acres} + 13,542 \text{ acres} = 21,776 \text{ acres}$  which does not equal the proposal number of 20,574 acres.

3. There are several instances of incorrectly referencing figures, tables, and sections. Many tables and figures have typographical errors, format inconsistently, and there are instances of improper or nonexistent citation. Examples:

- \* "[hellip]. ation under the General Mining Act of 1872 (Table). These"

- \* "[hellip]West Branch Empire, East Branch Empire, Silver City, Sunnyside Gulch, and Pactola Lake faults (Figure 11)." These are not named/depicted.

- \* Sec 5 Reference Table 6 listing 3 mineral deposits, but it does not, rather listing historic mines

- \* Reference Dams within Figures that are not labeled Section 2

- \* References headers incorrectly e.g. Section 2.3 Reserved and Outstanding Mineral rights. The correct reference is 2.3.2.

- \* underlining elemental names Sec5

- \* Several shifts in line spacing, indicative marker of 'Copying & Pasting' different formats

- \* Incorrectly labeling the United States

4. This report cites, and states there are a Proterozoic, Phanerozoic, and Quaternary metal rich deposits within the withdrawal area. Later, the report then declares that there are only two metallic bearing deposits which are Proterozoic aged.

1. Thus, the number of deposits, age range, and descriptions completely contradict.
2. Within the same section, the report switches elemental terms, Pb and Fe several times.

5. The report states, [ldquo]The nearest oil and gas well is over 17 miles east of the withdrawal application in sedimentary units such as the Upper Cretaceous Pierre Shale, that are not present within the subject area (SDSG 2024)[rdquo]

1. There are several permitted wells with oil and gas within 13 miles of the withdrawal area according to the cited source SDSG 2024 (see attached letter for map)

#### 6. Instances of uncited information:

1. [ldquo]The four other faults probably also exhibit right-lateral displacement, but the direction of movement and amount of displacement is difficult to assess because of the complex structural arrangement, rapid facies changes, and imprecise correlation of units across the central Black Hills. The fault planes and their intersections are important because these features are commonly fractured and often serve as conduits for mineralized hydrothermal fluids, sometimes resulting in the localized deposition of metallic and other minerals as ore veins.[rdquo]

2. [ldquo]The IBA is responsible for the governance and oversight of the London Bullion Market Association (LBMA), which is a trade association comprised of over 145 member companies representing international banks, mining companies, metal refineries, precious metal trading companies, funds, etc. from more than 20 countries around the world.[rdquo]

3. [ldquo]Although mining is no longer an important part of the local economy of the greater Rapid City area mining was a major employer in the area until the Homestake Mine shutdown in 2001.[rdquo]

1. Note, this claim contradicts recorded public meetings from the BLM-USFS- USDA pertaining to the importance of mining in the Black Hills (i.e)

4. [ldquo]Hydrothermal solutions concentrated the metals in the Paleoproterozoic metasedimentary rocks during the regional metamorphic and compressional tectonic regime of the Trans- Hudson Orogeny. Significantly fewer metallic mineral deposits in the withdrawal application area are associated with Upper Cretaceous or Paleogene vein deposits with discordant to concordant concentrations of base and precious metals formed during the Laramide Orogeny beginning about 62-65 mya. Hydrothermal fluids rich in lead, zinc, and silver, and containing minor amounts of gold, deposited sulfide minerals in tensional fissures within the deeply buried Paleoproterozoic metasedimentary rocks during this most recent episode of basement uplift.[rdquo]

5. [ldquo]The Homestake Mine is located approximately 23 miles north-northwest of the Pactola Reservoir and was the largest and deepest gold mine in North America when it closed, producing about 40 million troy ounces of gold during its operation[rdquo]

#### 7. Logical Fallacies

1. Report states: [ldquo]The potential for development was determined to be low based on an absence of any exploration or production mining activity for these resources in the withdrawal application area over the past 15 years[rdquo]

\* This is a Hasty Generalization Fallacy, as it assumes that just because there are no active claims currently, the long-term development potential must be low, which is a hasty conclusion without considering all influencing factors

\* The report also states, [ldquo]Since much of the available information on accessory metallic minerals is historic and generally focused on the primary commodities, future geological investigation could easily result in revision of the resource occurrence and certainty ranking for accessory metallic lode minerals in subject area[rdquo]

\* This asserts other variables, that MUST be considered in conjunction with, [ldquo][hellip]an absence of any exploration or production mining activity[hellip][rdquo]

2. The Report declares, [ldquo]The stated purpose of this withdrawal is to protect the cultural and natural resources of the Pactola Reservoir-Rapid Creek Watershed, including municipal water for Rapid City and Ellsworth Air Force Base, from potential adverse impacts of mineral exploration and development.[rdquo]

\*

\* This is an Overgeneralization Fallacy;

\* Report states 60% of the area is not prone to exploration and development, thus no risk. By implying that the entire area needs protection for all its resources, the argument overstates the risk and uses it to justify broader action than what may actually be required.

\* This is also the same for the cultural resources, as the cultural report states no risk.

Those are a fraction of the issues within the EA and associated reports. An extension is required to allow the federal stakeholders to:

1. Conduct an appropriate literature review covering lithogeochemistry, rock sampling programs, geophysical and radiometric surveys
2. Correct citations, remove or cite instances of plagiarism, and fix cross-linking citations
3. Change figures to not impede Color-Blind individuals[rsquo] capacity to extrapolate information
4. Correct geologic inconsistencies, factual errors, and usage of terminology
5. Correct errors such as incomplete figure and table references, mathematical errors, and other assorted errors.

Due to this report being in the infancy of a draft stage and after corrections are made it would be appropriate to have another 30-day public commenting period on a revised draft. This will ensure corrections are made for the public[rsquo]s review and to bring to light the more modern peer-reviewed literature that has been excluded from this report.

#### D. Environmental Impact Study

This withdrawal is completely redundant and unnecessary. There are existing regulations in place that assure that any activities within the watershed meet strict environmental standards. Existing regulations include the federal NEPA process as well as state perm metals and potential impacts from mineral exploration or mining, including but not limited to acid base accounting (ABA), net acid generation (NAG), synthetic precipitation leaching procedure (SPLP), and whole rock analysis. This analysis would be required to understand potential water quality impacts. The NEPA process results in mitigation measures as recommended and approved by the U.S.F.S. and other consulted agencies. These mitigation measures are designed on a project-by-project basis and serve to minimize and prevent environmental impacts of exploration or mining projects.

SDMIA requests, based on the incompleteness of the current draft EA, a full Environmental Impact Study (EIS) be completed over the entire withdrawal area for the proposed mineral withdrawal. The EIS should include detailed analysis as it would be required to determine potential impacts from any proposed development/mining proposal. The EIS should also include the cost of not developing minerals in the entire withdrawal area, providing a detailed discussion for each scenario on the affected environment for the following subject areas:

- 1.
- 1.
1. Land Use
2. Geology/Mineral Potential Study
3. Soils
4. Surface Water Hydrology and Water Quality
5. Groundwater Hydrogeology and Water Quality
6. Air Quality
7. Climate Change
8. Vegetation (including timber resources, grazing, and weeds)
9. Wildlife
10. Cultural Resources
11. Noise
12. Socioeconomics
13. Transportation
14. Visual Quality/Landscape
15. Recreation

The No Action impacts analysis should be segregated into multiple components or scenarios, including a scenario where 1) the current F3 exploration PO is approved, 2) other valid claims are drilled, 3) an underground mining operation commences, and 4) a surface mining operation commences. 5) Processing is done off site vs. on site. 6. Types of processing based on potential [ldquo]ore types[rdquo]. Other federal/state agencies, stakeholders and members from the mining industry should be included in the process of defining these No Action scenarios.

1. Additional Alternatives should be explored to evaluate a significantly smaller withdrawal area where a direct surface water nexus immediately adjacent to Pactola and Rapid Creek exists.
2. The impacts analysis for water quality should provide documentation and peer reviewed studies proving potential impacts to water quality that can be directly tied to exploration drilling. Small simple spills that were cleaned up without impact, or non- hazardous spills, do not prove water quality impact.
3. The Affected Environment water quality review should thoroughly describe the current conditions and active threats and impacts to water quality, including but not limited to septic tanks, zebra mussels, stormwater runoff, and historic spills documented in the SD DANR database related to transportation or other events on USFS lands.
4. The Affected Environment geology should include an assessment of the geochemistry of all mineralized deposits within the withdrawal area to identify natural occurring heavy metals and potential impacts from mineral exploration or mining, including but not limited to acid base accounting (ABA), net acid generation (NAG), synthetic precipitation leaching procedure (SPLP), and whole rock analysis. This analysis would be required to understand potential water quality impacts.

#### E. The Nation[rsquo]s Need for Minerals

1. This withdrawal is in complete opposition to the administration[rsquo]s stated goals for green energy transition and critical minerals supply lines from the DOE, DoD, and USGS/DOI. Removing large tracks of land from exploration and mining without understanding the resource potential will have detrimental effects on the US green energy transition and national security.
2. The findings in the IIJA that [ldquo]critical minerals are fundamental to the economy, competitiveness, and security of the United States[rdquo] and that [ldquo]the Federal permitting process has been identified as an impediment to mineral production and the mineral security of the United States[rdquo] must result in constructive action to streamline permitting and eliminate permitting impediments.
3. Critical Minerals occur in the area and the Department of Defense, Department of Energy, and other relevant



agencies should be consulted as part of this process.

F. Multiple Use on the Black Hills National Forest [ndash] Potential Impacts to User Groups

1. This withdrawal is government overreach and sets a dangerous precedent. This time the withdrawal impacts the mineral industry, but next time it could impact grazing, logging, National Forest homeowners, or recreation either by mineral withdrawal or another federal designation.

2. Past mineral withdrawals were developed by local Black Hill[squo]s National Forest Staff and would allow for the Black Hills National Forest Advisory Board to provide input from local user groups. This withdrawal came from the national level and the local advisory board was not given an opportunity to provide input.

III. Conclusions

Since 1970, Congress has consistently and repeatedly recognized that minerals and mining are essential to all facets of our economy, society, and national defense. For example, the MMPA (1970), the FLPMA (1976), the MMPRDA (1980), the Energy Act (2020), the IIJA (2021), and most recently the IRA (2022) all direct the Executive Branch agencies to respond to the Nation[squo]s need for domestic minerals. The proposed withdrawal proposal fails to follow FSM guidelines, conflicts with mineral policy/laws set by Congress, executive orders from the current administration, and fails to recognize the significance of critical minerals, including Antimony, that occur within the proposed withdrawal area.

The agency has also failed to properly inform the public about the existing mineral withdrawals covering existing recreation areas and water resources used by the public, including tributaries, campgrounds, and Pactola Reservoir. The agency is focused on protecting water quality, but provides an inadequate summary of current and future impacts from other resource uses. SDMIA recommends:

1. A full EIS be completed so a detailed analysis, based on science, is provided for determining speculative/hypothetical scenarios in the No Action Alternative.
2. Extend the comment period on the current EA, Draft FONSI for 45 to 60 days and allow the National Forest Advisory Board to provide input.
3. Make corrections to the EA/reports and issue another draft with a 30 day-comment period.

Any future withdrawal proposals should be conducted by the local Forest Service staff, provide a full EIS, follow the process, allow for input from the Black Hills National Forest Advisory Board and encourage communicating administrative actions with our federal, state, county officials, agencies, and other relevant user groups/stakeholders.

Lastly, SDMIA requests a detailed explanation as to how the request for the withdrawal or the application to BLM to prepare for the Secretary, nor the decision by the Secretary is subject to the USFS pre-decisional administrative review (objection) process under 36 CFR Part 218 or the administrative appeal process [ldquo]at[rdquo] CFR Part 4 or 36 CFR Part 214.

For these reasons, SDMIA strongly opposes the Administrative Mineral Withdrawal proposal and the EA[squo]s draft FONSI.

Respectfully submitted on behalf of the South Dakota Mineral Industries Association.