Data Submitted (UTC 11): 3/8/2023 7:00:00 AM
First name: Mark
Last name: Boddicker
Organization: RC Chapter of IWLA
Title: President
Comments: On behave of the 18 active members of the Rapid City Chapter of the Izaak Walton League of America I would like to submit the attached letter containing our comments in opposition to the Newark Project.

Thank You for your consideration.

Mark Boddicker, President

RC Chapter of IWLA

redacted

[text from attached letter below]

For its entire one-hundred-year history the Izzak Walton League of America has worked to conserve, maintain, and protect the natural resources of our country for the benefit and enjoyment of all our citizens as well as for the visitors who come from around the globe to witness this magnificent land, we call home. We at the Rapid City, South Dakota Chapter of the Izzak Walton League have for many years, in concert with many other environmentally concerned organizations, been a driving force in the Black Hills region in promoting the responsible use of our forests, prairies, and riparian areas. As such, the membership of our Chapter has voted unanimously to oppose F3 Gold's Newark Gold Exploration project near Custer, South Dakota and its likely impact on the French Creek watershed.

We are well aware that the 1872 Mining Act and other legislation ties the hands of the US Forest Service in it's ability to "just say no" to such projects outright. However, it seems to us that the fiduciary obligation the Forest Service has towards the other stakeholders would dictate that every precaution, and a demand for total accountability from those proposing this project, would be a bare minimum to proceed. If reasonable, judicious, and scientifically based restrictions and guidelines prove too onerous for F3 Gold, then in our view they should not proceed.

An absolute minimum requirement should be a full Environmental Assessment as per the guidelines in NEPA, The Clean Water Act, and the National Historic Preservation Act, amongst others. Rather than that approach we have been told that the Forest Service is considering a "categorical exclusion" for this project. We assume that the only rational for that approach would be work previously done on F3's Jenny Gulch Project, which by the way we also opposed because of the relaxed approach to it's approval process. Regardless, the two projects vary significantly in topography, riparian areas, and impact on Lakota treaty lands, as is obvious to those of us who have enjoyed the big horn sheep and sometimes even elk in the French Creek Drainage. And what of its possible negative impacts on Custer State Park, one of the crown jewels of our tourist industry? Will sub-surface water diversion effect Jewel Cave National Monument? What will be the possible unintended consequences of the proposed exploration? We want to see the analyses of all possible impacts considered before F3 is allowed to proceed.

Let us be real here; the only reason for this exploration is to develop mining operations, including sodium-cyanide

gold leaching in the French Creek watershed. We would be the first to admit that our society needs minerals, including rare-earth metals. But every precaution must be taken in their retrieval to avoid the aforementioned unintended consequences, or more commonly, from allowing bottom-line only driven companies from destroying our tourist industry, our regional biosphere, and our quality of life!

Bear in mind that this is only the beginning, the "tip of the iceberg." It is your responsibility at the USFS to proceed with all caution at every step of the way even when political pushback is a constant. The question will always be, that at this juncture, is mineral mining the "best use" of our precious lands. We contend that, as a starting point, a full Environmental Impact Statement to answer that question is the minimum obligation we all share as good stewards of this land we call Paha Sapa.

Respectfully submitted,

Mark Boddicker, President,

Izzak Walton League of America, Rapid City Chapter