Data Submitted (UTC 11): 4/10/2023 6:00:00 AM
First name: S. Elizabeth
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Organization:
Title:
Comments: Hello, Hell Canyon Ranger District:

Attached you will find my comments regarding the F3 Newark Exploration Project west of Custer.

Thank you for considering my comments and noted comments from the community at the recent meeting at Custer High school.

Dear, Hell Canyon Ranger District/To Whom It May Concern:

My objections the F3 Newark Exploration Project, Exploratory Drilling Operations, as proposed in the USDA, Forest Service form FS-2800-5 (rev.12/11), accompanying documents disseminated at https://usfs-public.app.box.com/v/PinyonPublic/folder/193669874743, and discussed at the recent public meeting in the Custer High School band room, are strong and multifold. It is my intention to be clear and constructive, protect public lands, approach this issue from an evidence-based position, and impact decisions in favor of requiring an environmental impact statement (EIS). Prevent environmental damage to Custer County, its water and watershed, and the larger Black Hills region due to negative impacts of the exploration and mining of gold.

Several facts are clear, multiple parties are coming at this issue (both the specific F3 Newark proposal for exploration and the general act of mining for gold in the Black Hills) with multiple perspectives on why or why not exploration and eventual mining should or should not happen in the Black Hills. Objections ranging from economic to sacred (note to some these may be equivalent[hellip]). Another clear aspect is the presence of the current legal framework in which we must function, including: 1872 Mining Law, NEPA, Clean Water Act, CERCLA (Superfund), historic site preservation, ESA, and laws related to Custer State Park (water from French creek quantity and quality), private land- and homeowners[rsquo] rights, water rights, impacts on water of the City of Custer City, disturbing the peace, and relevant treaties. There are a lot of moving parts here. I would like to point out a federal law, the NMA, the National Monument Antiquities Act of 1906 that did not get much attention at our local meeting. This applies to the water usage and run-off issue as it relates to national monuments. In 1908, Jewel Cave was designated as a National Monument and is thereby protected. I mention this because of irreversible impacts from accidents involving water flow/lack thereof or possible contaminated water leaching into the cave system. I find this plausible enough to warrant a contribution to the argument for an EIS due to the proximity and nature of the proposed drilling (and eventual mining) activities, the value of Jewel Cave National Monument, and federal law.

All the complications arising from the presence of a gold mine west of Custer may seem premature when discussing exploratory drilling, but it is relevant as a gold mine is the end goal of exploring for gold. Importantly, there are no guarantees. Potential issues surrounding water usage/quality, disturbances to land use and tourism, destruction to historic sites and national monuments are all real risks and cannot be merely discussed or advertised away. It would be laughable how one of our district politicians recently stated that a gold mine would bring jobs and revenue to the area, if not for the fact that so many people[rsquo]s livelihoods and the unique beauty of our public lands were not threatened. Yes, a few jobs and the like might come to Custer, but at the risk of our current portion of the $2 billion/year tourist industry in the Black Hills and Badlands. The community is interested in keeping Custer healthy and beautiful. There have been pollution problems in the northern Black Hills with gold mining and water quality[ndash] including downstream issues with cyanide (stops mitochondria from producing energy for cells and, even small amounts[mdash]EPA enforceable levels 200 ppb are not great for

living things). Chemicals cycle within an ecosystem and can accumulate and cause major long-term problems. It is my understanding that the current applicants on this proposal are or do business with the same group that had the issues with cyanide recombination reactions in the Northern Hills. I wanted to ask this at the meeting (to clarify the issue), but they left the meeting. Not to stray from the topic, but that was a bad move in community relations[hellip]Wow. It made the more level-headed community members doubt the preparedness of the company. How would they face a true emergency or accident if they could not stay to meet with the community to meet their NEPA requirements. I will not get into what the rest said, it is not constructive. Thanks to the Hell Canyon Rangers who stayed and spoke with the community.

Do not underplay the importance of the need for an EIS in this situation. The USFS motto, [ldquo]Caring for the Land and Serving People,[rdquo] is something the public is counting on right now. We can talk about money and tourism and beauty and livestock and religious beliefs, but no matter the reason for the objection, once the forest and lands are gone, they are gone. The Black Hills region is unique in a myriad of ways, especially in the large contiguous stretches of public lands. Private land tends to fragment a landscape and increase pollution. This makes the care for the public land even more important. It cannot serve people as intended by federal law if it is fragmented or allows activities that have the potential to pollute it beyond its function, either societal or ecological function. I formally ask the Hell Canyon Ranger District to conduct an environmental impact survey regarding the above proposal.

Below are my notes/list of topics of objections to the above proposal brought up by the Custer and Lakota communities from the evening of the Custer [ldquo]band room[rdquo] meeting with the Hell Canyon Ranger District. It is just what I heard and was able to write down. Although not all my objections, they hopefully help build a picture of the communities[rsquo] objections, concerns, and desire to keep mining out of our area.

Thanks for Your Time and Efforts.

Best Regards

List of Issues from Meeting:

Monetary Issues

Tourism

Livestock

Surrounding Area impact, private land

Surrounding Area impacts, State lands

Surrounding Area impacts, Federal

Duty to Public

Clean Water

Drought

Pollution

Light

Sound, Noise at night?

Water

Grazing rights

Religious Beliefs

Historic sites

Property value

No clean-up

Open pit mine

Mine with no clean-up or restoration

Value of Environment

Our Communities Values

Biodiversity

Functional Ecosystem

EPA Bristol Bay

Mining Laws outdated.

Who holds the bond?

Will they really clean-up?

Taxes-mines not paying.

City water bills

Many claims[hellip]not on public land[hellip]

Once here, they are not going away and will only get worse, will create more problems.

Information session inadequate

F3 Behavior

Gold and uranium mining, especially dangerous.

EIS required, meets substantial requirements as required by NEPA.

EA, not enough

No Categorical approval (especially, year after year)

Not prepared to talk, how can we think they are prepared to complete work and clean-up properly?

Historical Cultural Area sacred

Running from any polluted water

Caves systems

Animals

Private wells

French Creek new water waste discharge issues and drilling/mining?

Future outcomes devastating

Future generations

Leaking water tank

Lack of communication with community