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First name: Margaret M.
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Comments: Rob Hoelscher, District RangerBlack Hills National ForestHell Canyon Ranger District1019 North 5th StreetCuster, SD 57730RE: "Newark Exploration Drilling Project"Dear Ranger Hoelscher:I am writing to state my opposition to the granting of a Categorical Exclusion for the F3 Gold Newark Exploration Drilling Project and to request that, at the very least, there must be an Environmental Impact Study (EIS) conducted before any drilling is permitted in the project boundaries. More explicitly, I request that the area be withdrawn from exploration under the public land laws as was recently proposed by the Bureau of Land Management for the property included in the "Jenny Gulch" project. (See, Federal RegisterNol. 88, No 54/ Tuesday, March21, 2023).I live, with my husband, Tom Patterson, on a parcel of land that is virtually surrounded by public lands that are part of the Black Hills National Foresrt We have lived here since 2008 and have owned our 19.6 acre parcel of land since 2000. My husband has previously commented on what we understand to be the Forest Service's intent to grant F3 gold a Categorical Exclusion. Mr. Patterson's comments describe our situation and I join in his concern over the effect of the drilling proposed by F3Gold on our water supply and quality. I submit to you that the grant of a Categorical Exclusion (CE) for the F3 project is contrary to the rules for such a grant. First, a CE should be granted only if the proposed action does not have a significant effect on the quality of the human environment. The examples given in the regulations include, "issuing administrative personnel procedures, making minor facility renovations and reconstruction of hiking trails on public lands." A project that involves drilling of 39 exploratory wells during more than a year obviously has more impact on the environment than that. The impact of the drilling proposed by F3mining would definitely be significant!Without repeating the arguments Mr. Patterson made in his letter to you of March 8, 2023, let me join in his comments and add a few of my own. First, the Forest Service has authority to regulate mining activities and must require preparation of an EIS if the action significantly affects the quality of the human environment 42 U.S.C. 433 (C).The consideration whether this project's effect on the environment is significant includes whether it involves unknown risks and hether it is related to other actions that have a cumulative effect on the environment. The effect this project would have on the groundwater in the Upper French Creek watershed cannot be known without a baseline study over a period of years. The water supply to the many residences in the French Creek watershed ranges from deep to shallowwells, where seepage and water pockets often supply residential water wells. Whether those water sources will be adversely affected by drilling of the magnitude proposed by F3Gold cannot be known by reference to other watersheds.F3 gold is known to have amassed mining claims in the area, covering thousands of acres in the Black Hills National Forest. It has made known its intent to explore those claims and, even if the proposed drilling of 39 exploratory were permissible, (which I do not believe to be the case) the likely expansion of the project would definitely have cumulatively significant impact. I urge you to require an EIS for this project and to lend your support to withdrawing the area from mining activities.There are many other reasons that an EIS should be conducted, and I join in the comments that have expressed them. I simply urge you at the very least to require an EIS for this project.Very truly yours, Margaret M. PrahlFor the Firm