## ADDENUM FROM JERRY AND MARGARET NELSON

March 6, 2023

SUBJECT: ADDITIONAL COMMENTS ON NEWARK EXPLORATION DRILLING PROJECT

#### ADDITIONAL COMMENTS:

**1.** We are opposed to mining of ANY minerals in our Black Hills (gold, lithium, uranium )and any other ore sourced for these elements/minerals.

**2**. We do not see how you can use Section 8 as a Categorical Exclusion (CE) under NEPA per 36 CFR 220.6 (e) (8).

# It clearly states "CONSTRUCTION OF LESS THAN 1 MILE OF LOW STANDARD ROAD"

Your scoping letter states "An estimated  $\sim$  5,500 linear feet of temporary new access alignment for drill site access are proposed"

Also stated under Section 8 (vii) it states "Approving a plan for exploration which authorizes repair of an existing road and THE CONSTRUCION OF 1/3 MILE OF

**TEMPORARY ROAD;** clearing vegetation **FROM AN ACRE OF LAND** for trenches drill pads, or support facilities.

Your estimated acreage is 4.49 acres . This exceeds one acre requirement. (Drill pads 2.24 acres, Laydowns 0.75 acres, New temporary access alignments 1.5acres (roads)

Your new road exceeds both the 1 mile and the 1/3 mile requirement.

**3.** Categorical Exclusion List states the USFS *can develop CE's for categories* of agency actions **that they have found DO NOT HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT.** How can you determine this? We strongly feel the impact on the environment is very significant.

## 4. Categorical Exclusions (c) Scoping

This states " **if the responsible official** determines, based on scoping , that it is uncertain whether the proposed action my have a significant effect on the environment, prepare EA. If the **responsible official** determines, based on scoping that the **proposed action may have a significant environmental effect, prepare an EIS.** 

## Who is the 'responsible person?'

**5.** We feel F3 Gold is under estimating the size of the drill pads and the time frame for such a project . They are trying to meet the criteria for a categorical exclusion and once their foot is in the door, who stops them if the acreage is larger? The time frame expands?

The USFS needs to protect the environment . These F3 Gold figures are not feasible. Why rush this? Do an Environmental Impact Statement.