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Comments: We have previously submitted comments on the subject project and are therefore qualified to submit these objections.

First we want to say that after reading the draft Decision Notice and Finding of No Significant Impact (FONSI) on the proposed drilling program, we are somewhat relieved that at least Alternative C, the Modified Proposed Action, was chosen. This Alternative is best because it includes the moving of certain drill pads to avoid cultural resources, avoids the need to have a Forest Plan Amendment, limits certain drill activities to daytime hours, addresses the bighorn sheep issues, and minimizes the duration of Project-related disturbances by completing reclamation upon completion of drilling at each site instead of upon completion of all drilling activities.

However, in general, we're astounded by how much you leave up to F3 to do what they're supposed to do. It's great that you reference various SD Administrative Rules that "must be followed," but who's going to enforce them? We know that government agencies such as the FS and DANR are short-staffed and not like to be on-site with enough regularity to ensure all these rules are followed. To give the public confidence that all the rules will actually be followed, the plans should also specify exactly which regulatory agencies are responsible to enforce the requirements and how often they will be visiting the site, etc.

On pg 11 of the EA in §2.2.2 Site Access, it says: "These temporary overland trails would be obliterated and returned to natural conditions after Project completion. " We object to such a vague statement. How much time after Project completion? After F3 tears down so many trees to gain access, it will take decades to return these areas to conditions that existed before the project began. By then, F3 will be long gone. In Table 2.1 on page 13, it only says: "...the affected area would be reseeded/replanted as part of reclamation with Black Hills seed mix. " However, the plan should require that F3 plant not only grass seed, but also plant replacement trees to return all disturbed areas to the natural conditions that existed beforehand. Furthermore, on page 24 in §3.3.4 Alternative C - Modified Proposed Action, it says: "...these activities would result in approximately 6.05 acres of temporary vegetation disturbance." We object because tree clearing is not some minor "disturbance," but rather it's a severe effect to the natural botanical resources.

Especially in terms of reclamation, way too much has been left up to the discretion of F3. For instance, on page 12 in §2.2.5 Reclamation, it says: "...and stockpiled soils would be either spread over the drill pad area, stacked in soil-free piles, or disposed off-site at an approved facility." Who decides which of these three alternatives will be done? It should not be left up to F3 to decide what is cheapest/easiest for them to do. They should be required to conduct appropriate analytical testing of the waste materials that will determine how these waste materials should be properly disposed. For instance, if any drill cuttings or other material contains sulfides greater than "X" (FS should decide the appropriate value), these high sulfide materials must then be properly disposed off-site.

On page 9 of the FONSI in §2.2.2.6 Monitoring and Implementation, it says: "Sites will be monitored for a minimum of three years after reclamation." Our specific objection is that we cannot find anywhere in the documents that F3 will also be required to pay the expenses of whatever government agency (FS or DANR, etc.) does oversight of their reclamation and monitoring. You should be reimbursed for these expenses that benefit F3 - otherwise we taxpayers will be footing the bill.

On page 12 of the EA in §2.2.6 Monitoring and Implementation, it says: "F3 is responsible for submitting a reclamation bond to the USFS for the Project, with the bond amount determined by the USFS." Then on page 19 of the FONSI in §4.1.2 Financial Assurance, it says: "This guidance includes costs for the government to remove

structures and equipment, regrade and recontour the surface, revegetate the reclaimed land, and it accounts for costs for long-term monitoring and maintenance costs, if such were to be required to meet applicable laws and regulations. Furthermore on Page 19 of the FONSI, it says: "The Forest Service process does not require calculation of the financial assurance bond prior to publication of the final EA or completion of the National Environmental Policy Act process, as the financial assurance bond must reflect all activities and mitigations required under the selected action of this decision." So apparently we cannot object to the financial assurance issue at this time, but we'll be closely watching the methodology used to determine the size of the bond F3 will be required to obtain to make sure that it is sufficient to pay for all the reclamation and long-term monitoring that will be needed.

Thank you for your consideration of these objections.