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First name: BRUCE

Last name: ELLISON

Organization:

Title:

Comments: BRUCE ELLISON

8265 Dark Canyon Road

Rapid City, SD 57702

August 22, 2022

Jim Gubbels

U.S. Forest Service, Mystic Ranger District

Black Hills National Forest

8221 Mt. Rushmore Road

SENT VIA EMAIL THIS DATE TO:

<https://cara.fs2c.usda.gov/Public/CommentInput?project=57428>

Re:Comment on Jenny Gulch Gold Exploration Drilling Project

Final Environmental Assessment

District Ranger Gubbels:

As a resident, domestic well and surface water user within the Rapid Creek Watershed and F3 Gold's proposed pre-mining exploration under, in, and around Pactola Reservoir, the so-called "Jenny Gulch Gold Exploration Drilling Project," I hereby submit the following objections and comments to the Final Environmental Assessment (FEA) and its Finding of No Significant Impact (FONSI). Contrary to the FONSI, it is respectfully submitted that a more in-depth study and analysis through an Environmental Impact Statement is needed of the potential cumulative impact of not only this proposed exploration by F3 and other companies in the central Black Hills, but the history and recent surge of large-scale gold mining operations history in the Black Hills shows such exploration is the precursor of.

Since the FEA failed to address in any reasonable form the objections I previously raised by F3's proposed exploratory drilling by my letter dated October 21, 2021, I hereby incorporate my previously raised objections and concerns.

Additionally, while the FEA wrongfully chose to find that the proposed F3 project would have no significant impact on the environment, an EIS is further necessary due to the subsequent, and now unaddressed formal objections and concerns raised by principal water stakeholders City of Rapid City and the County of Pennington to analyze these concerns.

The FEA is inadequate and likely erroneous FONSI since it improperly made its findings based upon outdated NEPA requirements, rather than the current rules and regulations in conducting its analysis and conclusions, making them fatally flawed and requiring an EIS.

The FEA referenced Alternative B regarding F3's plan to utilize three drill pads in the area described in the Black Hills Forest Service Plan, MA 8.2 (Figure 2-2 located in Section 2.3 of the FEA). The FEA notes that the "Forest Plan designates that no new mineral development (including exploratory drilling to inform future mineral development) is allowed and the majority of the MA around Pactola Lake has been withdrawn from mineral entry." However, it goes on to instruct F3 that upon such an amendment proposal, the USFS "would be required to prepare a Project specific amendment to the Forest Plan to authorize the drilling activities, despite the F3-proposed drilling locations coinciding with one of the areas that has not been withdrawn from mineral entry."

The FEA instead has chosen Alternative C which would allow F3 to relocate the three drill pads sought in Alternative B to nearby locations outside the exclusion zones. A review of the included map, however, shows

drill pads proposed just outside the restricted areas claiming that such relocation of the multiple drill holes/pad areas is authorized "in the interest of maintaining WIZ integrity and minimizing water quality and recreation concerns." However, it fails to describe what water quality and recreations concerns will attempt to be minimized, how this would be done (other than the relocation) and what the impact on the environment could be if they were not.

Finally, there is also limited to no discussion of the potential cumulative impact of the proposed F3 drilling on Forest Service administered land as well as adjacent private land.

An EIS is the only reasonable option at this point to address the concerns of Rapid City, Pennington County, and this Rapid Creek Watershed resident and my neighbors.

Thank you.

/s/ Bruce Ellison

Bruce Ellison