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Title:
Comments: August 22, 2022

TO: Mystic District Ranger James Gubbels
8221 Mt. Rushmore Dr. Rapid City, SD 57702
FROM: James Preston
2419 Buena Vista Dr. Rapid City, SD 57702

RE: OPPOSITION TO USFS FONSI F3 GOLD EXPLORATION PROJECT

Dear Mr. Gubbels,

As a citizen, I adamantly oppose the Findings of No Significant Impact (FONSI) on the F3 Gold, LLC, proposed Jenny Gulch Exploration Drilling Project.

There are numerous reasons to oppose this project that appears to be straight out of the Mike Judge movie "Idiocracy." Why even flirt with the temptation of opening the door for future industrial mining in the heart of Rapid City's sole source for drinking water? Out of respect for the process, it is prudent to state for the record the reasons for this Trojan Horse project that will exploit a 150-year-old law and will inevitably result in costly litigation and a waste of valuable time resources if allowed to continue.

OBJECTION 1.) First and foremost, Tribal Consultation was not respected. Of the 9 Sovereign Domestic Nations in South Dakota, only three (3) tribes were allowed a chance to respond to the hurried Environmental Assessment process even though face-to-face meetings were halted due to the Covid-19 pandemic and more time was allowed to respond, albeit virtually. And yet, even though the period to communicate was elongated, communication between stakeholders and tribes still managed to be far inadequate and lacking genuine attempts to discuss. All of this is mentioned considering the heightened environmentally and culturally evasive results of exploratory drilling (i.e., junior mining) and what it will permanently mean for a select area of the Black Hills. Furthermore, all three tribes vehemently opposed this project (please see Chairman Harold Frazier's letter to USDA Secretary Tom Vilsack dated July 15, 2022).

Due to the Supreme Court's ruling in the landmark 1980 case United States vs. Sioux Nation of Indians, the cultural homelands of many indigenous peoples within and amongst the Black Hills remain contested. Until this verdict from 1980 is finally settled, the attempt to consult with South Dakota tribes will ostensibly function as mere lip service to an unrecognized process. Consent (not consult) must first be awarded for the F3 Gold mining exploration project to continue. This is an open acknowledgement of the violation of multiple treaty rights, a source of generational wounds for many South Dakotans of all races, and the verdict from the highest court of the land- the United States Supreme Court.

OBJECTION 2.) Regarding the bighorn sheep birthing grounds highlighted within a dotted yellow rhombus/parallelogram on the proposed map provided by the USFS. Clearly, that is an area encircled on all sides by the proposed F3 gold exploration project. Out of respect for the natural resources of the Black Hills, how can such an area be marked on paper and then presumptively communicated to be "protected" from the project? With certainty, the bighorn ewes or rams were not the ones to establish such an arbitrary periphery. How about the travel to and from this location in the heart of the proposed exploratory drilling country? What the Forest Service communicated was an admonishment to the reality that this project will directly impact local fauna.

OBECTION 3.) Water utilized for the project and the actual disturbance of drills up to 6,000 feet in depth. In essence, the actual drilling process causes great consternation. Although many experts, including professors from the South Dakota School of Mines, have voiced that the environmental impact may have "minimal risk," there has not been anyone willing to fully commit to the "harmless nature" of exploratory drilling. Even the mining industry's own lobbyist, Larry Mann, told the Rapid City Common Council during the July 27th Finance and Logistics Committee that he'd, "never heard of a problem occurring with exploratory drilling. Except of course for what happened in Keystone by MMR. But that is it." That is not a very resounding assurance whatsoever.

Even the water used questions locals of Silver City and those of us dependent upon the watershed and the aquifers it feeds. For example, the "municipal water" supplied to this project was not addressed in any detail. Is this water even potable? Will F3 be using waste or industrial water to inject into these wells to lubricate the drills? Or will F3 be using the same quality of drinking water to inject into depths as deep as 6,000 feet? Presumably, they will be using the cheapest water they can find. That would make the most "business sense" as this is clearly a Trojan Horse business plan to inevitably sell the rights of the claim. To whom they will eventually sell those rights to, granted they "intercept an ore of value," which they have assuredly and repeatedly reminded the community, remains a closely guarded secret that F3 is not divulging. What water will they use to drill and who are they targeting for an eventual sale? Clearly, these questions are confounded, but still hold weight for those of us in the community that this project will directly affect.

We have heard time and time again that this is "just an exploration project." The insult of our local community's intelligence is beyond belief. Ostensibly, this is a "scientific exploration" to prove what is already known: there is gold in the Black Hills. We know that. The community knows that. F3 knows that. This project is a business plan by a prospecting company from out of state. The Forest Service, as stated in the FONSI, is under the directive of the General Mining Act of 1872. Due to the FONSI, the Forest Service states they are subject to a defined scope on the determination of whether this project is immediately significant or not and yet fails to acknowledge other aspects of the General Mining Act of 1872 that will have assured long-term significance to property owners in and around Silver City and those downstream affecting Placerville Camp, Johnson Siding, Hisega, Chapel Lane Water Co., Rapid City, Box Elder, and Ellsworth AFB amongst others. Perhaps, from an aesthetics perspective, the birds-eye-view footprint of this project in acreage is in fact insignificant. Perhaps no sulfide deposits will be drilled (as what occurred at the Gilt Edge Superfund site) producing little acid drainage apart from the naturally occurring arsenic found near silver deposits. Perhaps these drills can manage to not stress out the bighorn ewes birthing within the center of this project and the population continues as always. But in the big picture, the USFS must acknowledge that the long-term result of such a project will inevitably be a costly, lengthy, passionate, embittered, and unnecessary litigation process that will in fact be a significant impact.

The community has resolutely stood up against this project. Our business community is suffering from rising utility costs and inflation is hurting our county where the per capita income is less than $40,000 per year. To even consider asking the taxpayers to fund, through inevitable tax levies, a possible major infrastructure investment to our water treatment capabilities is unconscionable. Our water is some of the best in the United States and has been recognized as such for 19 straight years. Why not consider that significant impact? Industrial lode mining is the troops waiting inside of this Trojan Horse. We, as a community, have the chance to prevent this destructive action and prevent hardship to our local economy.

I request that you cease any future discussions of exploratory drilling within the Rapid Creek and Castle Creek watersheds that supplies 100% of the drinking water to all those immediately downstream in the Central Hills. Our property rights, the property rights of the indigenous people, the recreational opportunities, the costs of living, the outdoor beauty, the value in billions/trillions that the watershed provides, our supply of water to the Ellsworth AFB, and our futures depend on this watershed. Democracy will not stand for a single company to earn a profit exploiting our natural resources at our expense. Democracy will not stand for this abject profiteering by gold prospectors.

End this operation plan, now.

Sincerely,

James Preston
Concerned Citizen of Rapid City