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Comments: Dear Mr. Hoelscher,

I'm writing you today asking you not to fast-track F3 Gold/Big Rock Exploration's proposed Newark Exploratory Drilling Project, and instead require of them an Environmental Impact Statement. The people who live in the affected areas have the right to know how an out-of-state corporation plans to conduct themselves while here, and what the effects of those actions might be.

You required F3 to conduct an Environmental Assessment for their Jenney Gulch attempt; it seems right and reasonable to expect the same in this case. Geographically speaking, the two projects are not similar, apart from a Minnesota company's search for gold to extract, see link below:

(<https://www.startribune.com/two-minneapolis-businessman-are-prospecting-for-gold-in-south-dakota-s-black-hills/568574542/>)

We'd like to know exactly which "municipal or industrial source" F3 intends to use for the drill rigs. They say the project will take approximately one year, with 5,000 to 10,000 gallons of water per drill rig (one to four) needed a day. If it's five workdays a week (5 x 52 weeks/year=260 workdays/year, so 260 x 5,000), that means 1.3 million-2.6 million gallons of water would be needed per rig. If, like on many mining projects, they intend to work seven days a week, (365 x 5,000) that would equal a staggering 1.825 million-3.65 million gallons of water per rig, simply for exploration. Where do they plan to source that water, and why should we give up that amount of water?

According to the US Drought Monitor and NOAA's Drought Information System, Custer County is currently designated a Moderate Drought status and has been between Abnormally Dry and Severe Drought consistently since June 2020 (reference links below). I can't be convinced that using such an extravagant amount of water simply for exploration is at all appropriate or responsible given the conditions. Between crop irrigation, livestock watering, and not to mention clean drinking water and recreation, it's my belief that exploratory drilling is a waste of that precious water.

([https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?fips\\_46033](https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?fips_46033))

(<https://www.drought.gov/states/south-dakota/county/custer>)

(<https://www.drought.gov/historical-information?state=south-dakota&countyFips=46033&dataset=0&selectedDateUSDM=20200616>)

If F3 were to find sufficient reason to go ahead with gold mining (which is the completely obvious next step after an "exploratory project"), then they'd be using much more water to extract the gold-at least 16 million gallons of water a day for large-scale operations, supporting link below:

(<https://www.circleofblue.org/2012/world/global-gold-rush-the-price-of-mining-pursuits-on-water-supply#:~:text=The%20Impact%20of%20Gold%20Mining,inlicting%20environmental%20damage%20on%20waterways.>)

All that to say, if in the unfortunate but very real possibility that nearby water sources (Crow Creek and French Creek, which eventually flows into the Cheyenne River) are contaminated in the exploration or mining process, numerous human residents and countless flora and fauna which represent the natural environment of the Southern Black Hills will be seriously affected in long-term scale, and nothing, including metal extraction, is worth

that risk. Besides being a fish and wildlife habitat, French Creek is popular with tourists and residents alike as a trout-fishing stream, swimming and hiking area.

Just as importantly, it needs mention that gold mining has an ugly history in the Black Hills, going back to the Treaty of Fort Laramie (1868) broken in the course of gold exploration. I believe it is F3 Gold/Big Rock Exploration's and the USFS's responsibility to meet with and thoroughly consult the Indigenous Tribes of the Black Hills and surrounding affected areas before going forward with any exploratory plans.

Despite multiple references to the 151-year-old General Mining Act of 1872, The Forest Service, as a government agency, absolutely has the authority to regulate and set restrictions on a project if it truly deems it necessary (<https://www.fs.usda.gov/managing-land/sc>), and I believe that this is such an instance. The Black Hills are a rich and varied landscape, and too important to the state, country, and world at large to open up unscrupulously to business interests.

I'm listing below two different studies showing the risk of contamination by gold mines, which is why I believe the burden is on F3/Big Rock Exploration and the USFS to address that with the public.

(<https://earthworks.org/wp-content/uploads/2021/09/USGoldFailureReport2017.pdf>)

(<https://www.smithsonianmag.com/science-nature/environmental-disaster-gold-industry-180949762/>)

If F3 are so committed to sustainability and transparency like they advertise on their website, why would their representatives duck out early of the 2/16/23 Custer town hall meeting before having to answer any questions? That is really not a good look nor vote of confidence for those who live in the area that will be affected by their actions, and we deserve more respect than that.

This is my position as a proud South Dakota-born and environmentally-concerned citizen. Thank you for reading, and I truly hope you take my and the many other concerns to heart when considering this extractive project being proposed.