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First name: Suzanne
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Organization:
Title:
Comments: To the responsible official: Thank you for the opportunity to comment on the project. I am representing myself as a resident of the Black Hills, and having served as a volunteer member of the BHNF National Forest Advisory Board for eight years.
My objections to the proposed F3 exploration are as follows:
Although the project description is crafted precisely to fit the Categorical Exclusion exceptions (clever, that) there are still remaining concerns:
1) Statements from tribal officials have expressed insufficient consultation;
2) Although the proposal claims that there are no known threatened or endangered species that would be affected, there may be. There are certainly Region 2 sensitive species and South Dakota GF&P species of concern. Since there has been nothing more than a desk review by F3's contractor, the information on BHNF species' status is anywhere from 14 to 24 years out of date.
3) The underlying documents for the references on watershed condition, plant and animal species are even older.
4) The Forest Plan is under review. Why not wait?
5) The disputed nature of the project, demonstrated by the showing of opposition at your pubic meeting, is enough to trigger the need for an EA. Moreover, it has been my observation over the past two years (since the revision of the NEPA/CEQ regulatory revisions) that the BHNF seems not to be on the cc list for the Federal Register. Here's the relevant language: § 1502.12. CEQ makes this and
grammatical changes in the final rule.
This change will better align the second
clause of the sentence, ''areas of
disputed issues raised by agencies and
the public,'' with the final clause of the
sentence, ''and the issues to be resolved
(including the choice among
alternatives).''
4) Also missing from consideration are the NEPA/CEQ/Executive Order statements related to climate change. While the Black Hills have been blessed with lots of snow and moisture this winter, we're following a longstanding drought.
5) Finally, we all know that exploration companies don't drill exploratory holes because they are curious about mineralogical science. This is prefatory to gold mining.
None of this rises (or descends) to the flick of a pen level of a Categorical Exclusion. This project needs at minimum an Environmental Assessment to put people on the ground to take a look at more than maps and archives.
Do your job, which requires more than rubber stamping permits. Your requirements and duties under forest management enabling laws and other relevant statutes, not just 1972 Mining Act.
§ 1502.13 Purpose and need.
The statement shall briefly specify the
underlying purpose and need for the
proposed action. When an agency's
statutory duty is to review an
application for authorization, the agency
shall base the purpose and need on the
goals of the applicant and the agency's
authority.
With respect, and also grave disappointment, Suzanne Iudicello Martley