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First name: Crystal
Last name: Hocking
Organization:
Title:
Comments: I have reviewed the proposed Pactola Mineral Withdrawal and have strong concerns about this action. I am a geological engineer, with both Professional Engineer and Professional Geologist licenses in multiple states. I have educational experience and knowledge of Black Hills hydrogeology and have over 15 years of experience working on exploration and mine development projects in the Black Hills and across the United States. I have conducted baseline environmental studies, prepared EAs for operations in the Black Hills, and completed two EIS projects for mine expansions in Montana.

I will keep my comments brief:
*Redundant - This withdrawal is redundant as the NEPA process is designed to evaluate existing conditions and impacts to cultural and environmental resources from proposed projects. This action causes considerable uncertainty to the NEPA analysis. I have built a career around the NEPA process and believe in that process and the science behind it.
*Excessive - Proposed drill pads and staging areas by F3 Gold under their Jenny Gulch PO would disturb less than 3 acres of land, yet the mineral withdrawal area is 20,574 acres. Further, the PO in question is or exploration activities, not mining. Only a fraction of exploration projects advance to further stages of mineral development, and even fewer become active mine operations.
*Fiscally Irresponsible - This withdrawal will require an EIS to evaluate current conditions and impacts of this withdrawal. Such a study of the entire watershed will undoubtedly cost millions of dollars, a cost that will have to be funded by public tax dollars and is fiscally irresponsible.
*Schedule - I also doubt the ability of the BLM and USFS to complete this study within 2-years time if a 3-acre disturbance project can not be reviewed within that time frame.
*NFAB - The Black Hills National Forest Advisory Board was not consulted and should be included in review of this decision.
*Unfair - I opine that this withdrawal unfairly targets the mineral industry. Impacts of other current and future uses on forest land have environmental impacts that would have greater impacts to Rapid Creek than the proposed exploration drilling activities. For example, motorized vehicles result in increased soil erosion and sediment load in area streams and grazing leases impact vegetation and water quality. I recommend that "all" land uses that cause equal or greater harm to the watershed be evaluated and considered for exclusion versus target a specific industry if the goal is genuinely to project water quality.
*Critical Minerals - The United States has a need to invest in exploration and development of critical minerals for our national security and future. An abundance of critical minerals, including lithium, have the potential to be located within the Pactola Mineral Withdrawal area. A study should be conducted to define those potential critical mineral resources prior to enacting a mineral withdrawal.