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Comments: I am writing to express my concerns regarding the proposed mineral withdrawal in the Black Hills and to formally request an extension of the public comment period. This extension is necessary to allow the National Forest Advisory Board (NFAB) to review and provide input on this proposal at their November meeting, consistent with their involvement in all previous mineral withdrawal proposals in the Black Hills region.

Several critical issues require thorough examination:

1. Existing Environmental Assessments

The Draft EA appears to overlook recent mineral exploration assessments in the watersheds. A comprehensive review should include findings from any existing or approved exploration projects in the area. This information is crucial for making an informed decision about the proposed withdrawal.

2. Critical Minerals Considerations

The proposed withdrawal area contains critical minerals, including Antimony, which is essential for Department of Defense operations and U.S. National Security. This proposal appears to directly conflict with current administration policy regarding Critical Minerals development and access.

3. Analysis Deficiencies

The No Action impact analysis requires restructuring into multiple components or scenarios to provide a more accurate assessment of potential outcomes. The current analysis structure does not adequately address the complexity of the situation.

4. Existing Protections

It's important to note that existing mineral withdrawals already overlay all current recreational sites and water resources in the area. This makes the proposed withdrawal both redundant and unnecessary, adding bureaucratic complexity without providing additional meaningful protection.

5. Technical Corrections

Substantial corrections to the EA and specific reports are needed from federal stakeholders. Once these corrections are made, an additional 30-day public comment period should be provided to allow proper review of the revised documents.

Given these significant concerns, I strongly urge you to:

1. Extend the current comment period to allow NFAB review
2. Address the technical deficiencies in the current EA
3. Provide an additional 30-day comment period following corrections
4. Reconsider the necessity of this withdrawal given existing protections
5. Reconsider the proposed withdrawal in light of the current administrations stance on critical minerals.

The current proposal appears to create unnecessary restrictions while potentially compromising national security interests and access to critical minerals. A more balanced approach that considers existing protections and strategic mineral needs would better serve both environmental and national interests.