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Title:

Comments: As a registered, Professional Geologist with nearly 40 years of work in the mineral exploration/mining industry, including at least 10 years in the Black Hills, I am strongly opposed to the proposed mineral withdrawal. Further, I support the NO ACTION Alternative provided in the Draft EA as the Draft EA is sub-standard, inadequate and provides no clear scientific basis to define the purpose/need for the proposed Administrative Withdrawal. The Withdrawal was a political action driven by radical, left leaning environmental NGO's and other related stakeholders and supported by the current left leaning administration in Washington DC. Exploration is NOT Mining and the draft EA fails to provide any analysis of alternative protections, as described in the Forest Service Manual, Withdrawals. (FSM 2761.4)

In addition to the above noted issues, the following facts support the notion that the withdrawal was political in nature and in reality is not needed:

* There are already existing mineral withdrawals overlaying all current recreational sites and water resources, which makes this proposed withdrawal redundant and unnecessary.

* Critical Minerals occur in the proposed withdrawal area, including Antimony, a known strategic/essential mineral for the DoD and to U.S. National Security.

* The proposed withdrawal is in direct conflict with the administration policy on Critical Minerals.

* Extend the comment period to allow time for the National Forest Advisory Board (NFAB) to include the proposed mineral withdrawal on their agenda at November's meeting and provide input, as they have with all previous mineral withdrawal proposals in the Black Hills.

* An extension should be made to allow the federal stakeholders to make substantial corrections to the EA and specific reports. After corrections are made there needs to be another 30-day public comment period to review the corrections.

* Is there any recent mineral exploration draft/final EAs in watersheds? If so, what was the finding for those proposed/approved exploration projects and why are they not referenced in the Draft EA?