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Comments: On behalf of F3 Gold, LLC, I submit the following comments in opposition to the proposed mineral withdrawal for the Pactola Reservoir-Rapid Creek Watershed. The proposed withdrawal specifically targets our Jenny Gulch Exploration Project, despite the Forest Service's earlier comprehensive environmental assessment, which resulted in a Finding of No Significant Impact (FONSI). The proposed withdrawal is therefore not only redundant but contradictory to the USFS's own findings and commitments to managing mineral resources in an environmentally responsible manner, as outlined in the Black Hills National Forest (BHNF) Forest Plan.

Inconsistency in USFS's Assessment of Environmental Impact

The Forest Service's comprehensive Environmental Assessment (EA) of F3 Gold's proposed Jenny Gulch Exploration Project concluded with a FONSI, affirming that our project poses no significant environmental risk. This determination followed an exhaustive review process that assessed all environmental, cultural, and socio-economic factors, and incorporated feedback from public, tribal, and governmental stakeholders.

Yet, the current proposal to withdraw lands from mineral entry contradicts these findings by suggesting that mineral exploration—such as our responsibly planned, limited-scale project—poses a threat to the Pactola Reservoir and surrounding areas. This stance not only disregards the FONSI issued for Jenny Gulch but also ignores the evidence-based conclusion that our project, with its rigorous mitigations and environmentally sensitive planning, has minimal or no impact on the watershed and recreational uses of the area.

The Pactola Reservoir mineral withdrawal proposal contains several arguments that are both weak and internally inconsistent, especially when viewed in the context of the USFS's (FONSI) for F3 Gold's Jenny Gulch project. In particular, we note with objection the following:

1. **Contradiction with Previous FONSI:** The USFS had already issued a FONSI for the Jenny Gulch exploration project after a detailed Environmental Assessment (EA). This assessment found no significant environmental risk associated with F3 Gold's limited-scale, mitigated exploration activities. Proposing a mineral withdrawal now, while citing general threats from mineral exploration, conflicts directly with the USFS's prior findings for this specific project.

2. **Overreach Beyond Forest Plan's Multi-Use Mandate:** The Black Hills National Forest (BHNF) Forest Plan emphasizes sustainable, multi-use management, including responsible mineral exploration. The proposal's broad prohibition on mineral entry in the Pactola area dismisses the BHNF Forest Plan's guidance on balanced use, especially as F3 Gold's project met strict environmental standards. This blanket withdrawal appears to overstep the Plan's intent to allow compatible, low-impact mineral exploration.

3. **Lack of Site-Specific Justification:** The withdrawal proposal broadly frames mineral exploration and development as risks to water quality and cultural sites in the watershed, without providing specific evidence that F3 Gold's exploration activities pose such a threat. This generalization fails to consider the detailed, site-specific mitigations included in F3 Gold's project, which were acknowledged in the FONSI as effective safeguards against environmental harm.

4. **Inconsistent Protection Strategy:** While the proposal emphasizes protecting the Pactola Reservoir as a water source, it doesn't differentiate between higher-impact mining projects and limited-impact exploration projects like Jenny Gulch. This one-size-fits-all approach lacks nuance and may be seen as an overreach, given that F3 Gold's project is short-term, non-invasive, and subject to extensive environmental controls.

5. Weak Rationale for Withdrawal Necessity: The proposal lacks a compelling argument for why a full mineral withdrawal is necessary when the existing permitting process and NEPA requirements already provide a framework for environmental oversight. For example, the Forest Service has the discretion to enforce project-specific mitigations, making a full withdrawal seem excessive given the existing regulatory mechanisms.

The Black Hills National Forest Plan and Statutory Rights

The BHNH Forest Plan explicitly supports the environmentally acceptable exploration and development of mineral resources as an integral part of its multi-use mandate. Specifically, the Plan outlines objectives to manage mineral resources sustainably and acknowledges their role in economic growth and security. The Pactola withdrawal proposal runs counter to this policy by prohibiting mineral exploration despite established rights and an existing FONSI that verified the safety of F3 Gold's exploration activities.

Furthermore, F3 Gold's exploration efforts are conducted under the General Mining Act of 1872, which protects our statutory right to explore valid mineral claims on public lands. By attempting to restrict mineral access in an area where our rights have been acknowledged, the proposed withdrawal presents a legal inconsistency that places undue restrictions on responsibly managed projects.

F3 Gold's Environmental Stewardship and Community Commitment

Our company has consistently prioritized environmental stewardship throughout our exploration efforts. We have worked closely with the Forest Service and relevant communities to design and implement a project that minimizes disturbance, conserves cultural resources, and addresses local concerns. The Jenny Gulch project, for instance, was adjusted significantly to avoid impacts to culturally and environmentally sensitive areas, as documented in the EA's Alternative C.

We continue to stand by our commitment to sustainable exploration, recognizing the Black Hills' importance to local communities, indigenous tribes, and recreational users. The proposed withdrawal, however, challenges the efficacy of the environmental assessment process and disregards F3 Gold's proactive measures to safeguard the land.

Conclusion: Opposition to the Proposed Withdrawal

In conclusion, F3 Gold opposes the proposed mineral withdrawal for the Pactola Reservoir-Rapid Creek Watershed. We urge the U.S. Forest Service to adhere to the conclusions drawn in its exhaustive environmental review and FONSI, recognizing that F3 Gold's project meets stringent environmental standards and poses no significant risk to the watershed. Moving forward with the withdrawal would contradict these findings and undermine the fair application of federal mineral laws designed to balance resource development with environmental protection.

We respectfully request the Forest Service to honor its commitment to science-based decision-making, uphold our statutory rights, and maintain the multi-use vision of the BHNH by rejecting this proposed mineral withdrawal.