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First name: Christian David
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Organization:
Title:
Comments: Re: Comments on the Newark Exploration Drilling ProjectI am a resident located within the proposed Newark Exploration Drilling Project (the Project) and am writing in opposition. I request the Operational Plan for the Project NOT BE APPROVED. Specifically, my concerns are numerous and relate to water pollution, visual pollution, damage to roadways, adverse impact to the eco-system and animal habitat, as well as reduction in personal land value and financial impact to the area.To start, the application of a Categorical Exclusion (CX) is inappropriate in this situation. Similar projects (i.e., Jenny Gulch Project, etc.) required an Environmental Assessment which resulted in alternatives that accomplished the goals of the Project while ensuring reasonable environmental accommodations. This is the goal of NEPA. Utilizing a Categorical Exclusion would deprive all parties of such alternatives and could result in unwanted and expensive litigation.The Project area in the BHNF, including Custer and Custer State Park, is one of naturalist tourism that directly supports the financial eco-system of Custer and surrounding areas. Heavy equipment, traffic, road damage, and visual degradation of the natural environment all adversely affect this environment. Additionally, the damage to heavier travelled roads (Upper French Creek Road), constructed from aggregate (not paved) creates risk/hazard to vehicular traffic as well as health concerns from increased road dust.Drilling/excavating to depths of as much as 6,000 feet may adversely impact sub-surface aquifers and individual water wells. There are numerous personal property areas in close proximity to proposed drilling locations. With many possible drilling directions what mitigations are provided to prevent unintended impact to water sources that support residents of the area? Have the cumulative impacts of mining and drilling over the past century (since the Gold Rush of 1874) been considered in the Operational Plan? Additionally, the proposed drilling areas are in close proximity to Upper French Creek. Are there sufficient mitigations to ensure drilling does not affect the creek or downstream areas (Custer State Park, Indian Tribal lands, Cheyenne River, etc.).It is also my understanding that areas in the proposed Operational Plan are home to Elk breeding, bat caves and other wildlife protections during portions of the year. It does not appear these areas have been considered in the Operational Plan, which is another reason to avoid a Categorical Exclusion.In summary, the risks/hazards to the residents, environment, and financial eco-system of the area have not been adequately considered as required by NEPA. Therefore, my comments are in opposition to the proposed Operational Plan of the Project.