



June 16, 2023

Black Hills National Forest
Bryan Karchut, Forest Supervisor's Office
1019 North 5th Street
Custer, South Dakota 57730

Dear Mr. Karchut,

The Izaak Walton League of America (League) appreciates this opportunity to comment on the Application for Withdrawal for the Pactola Reservoir-Rapid Creek Watershed, in the Black Hills National Forest. The League has over 42,000 members in more than 200 chapters across the country. Our members enjoy the abundant year-round recreational opportunities available in the Black Hills National Forest.

The United States Forest Service (USFS) and the Bureau of Land Management (BLM) have requested that the Secretary of the Interior withdraw 20,574 acres of National Forest System (NFS) lands in Pennington County, SD. The withdrawal includes settlement, sale, location, or entry under public land, mining, and mineral and geothermal leasing laws for 20 years, subject to valid existing rights.

The purpose of this request is to protect the cultural and natural resources of Pactola Reservoir and the Rapid Creek Watershed. The proposal would protect municipal water for Rapid City, Box Elder, and Ellsworth Air Force Base, from impacts of mineral exploration and development. We understand temporary land use authorizations may be allowed, with USFS approval, during the segregation period if those uses comply with USFS land use plans.

League comments

The League supports approval of this application. However, along with other groups and organizations, we believe the amount of land in the application is not adequate to meet the goal to "protect the cultural and natural resources of the Pactola Reservoir— Rapid Creek Watershed." To accomplish the stated goal, the League believes the boundaries of the proposed ban must be expanded. We believe the proposal should include more of the Rapid Creek Watershed, and its tributaries that supply water to Pactola Reservoir. The tributaries also replenish water in the aquifers that municipal water systems and private wells depend on.

The application includes areas near Pactola Reservoir, but it does not consider the source of the water that ends up in Pactola, and where that water flows after it's discharged from the reservoir. The application does not consider that mining below Pactola is as big a threat to water quality as mining upstream or next to the reservoir. This is because of the connection between surface and groundwater in the Rapid Creek watershed.

The League was pleased to see the proposed mineral withdrawal won't interfere with recreational or cultural activities, grazing, or timber harvest on the withdrawn public land, or will

it impact private land mining. The proposed withdrawal may benefit the other uses as it would prevent mineral exploration and mining from damaging the land and natural resources all these activities depend on in the Black Hills National Forest.

The League understands the USFS' final decision on F3's gold exploration drilling plan has been postponed. The decision won't be made until the environmental analysis and withdrawal process for the requested withdrawal is complete. During this time, expected to be two years, the mineral withdrawal is temporarily in effect. Federal officials will gather public input, and conduct the studies and analysis needed to help the Secretary of the Department of Interior decide if the mineral withdrawal should be implemented for a 20-year term.

Summary

Mining has occurred in the Black Hills for over 150 years. Previous mining activity resulted in long-lasting water pollution issues for the state and federal government. Bankruptcies and abandoned mines left the water contaminated with lead, arsenic, and cadmium. Former mining sites have become EPA Superfund Sites requiring substantial ongoing federal funding.

The proposed mineral withdrawal on USFS lands near Pactola Reservoir and in the Rapid Creek Watershed would help protect the invaluable natural and cultural resources of the Black Hills National Forest. The withdrawal would also offer protection to the water supply for Rapid City, Box Elder, Ellsworth Air Force Base, and for tribal members and ranches to the Missouri River.

The League strongly supports the Application for Withdrawal for the Pactola Reservoir-Rapid Creek Watershed in the Black Hills National Forest of South Dakota. We urge a thorough review to consider expanding the proposed boundaries in this application to increase the benefits of the proposed water and resource protections.

The Izaak Walton League of America thanks you for the opportunity to comment and we respectfully ask to be kept informed on this issue as it moves forward. Thank you for your time and consideration.

Sincerely,



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