



## **Black Hills Regional Multiple Use Coalition**

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Bryan Karchut  
Black Hills National Forest  
1019 N. 5th Street, Custer, SD 57730

Mr. Karchut,

The Black Hills Regional Multiple Use Coalition (BHRMUC) appreciates the opportunity to provide comments on the proposed Pactola Reservoir-Rapid Creek Watershed mineral withdrawal. The BHRMUC advocates for sustainable, multiple use of public lands. Our membership is comprised of more than 30 organizations and individuals representing a diverse array of interests including motorized recreation, grazing, and timber harvest, among others. The BHRMUC opposes designations that reduce the ability for multiple use and, as such, oppose the proposed mineral withdrawal.

In consideration of the proposed withdrawal, we believe it is important to recognize the proposed activities in the area. Currently, the activities related to minerals in the proposed withdrawal area are limited to exploration activities. After years of environmental analysis, the Black Hills National Forest (BHNF) issued a draft decision for these exploration activities with a “Finding of No Significant Effect”. Although actual a proposal for mining activities at some point in the future can’t be ruled out, that isn’t what is being proposed now and reactive proposals should be tailored to the current issue at hand. It is disconcerting to think the mere possibility of proposed mining activities at some point in the future could trigger such a withdrawal, and is difficult to recognize which areas of the BHNF or other national forests would be precluded in entirety of any potential future mineral uses and such mineral withdrawals.

We also believe the BHNF should produce an Environmental Impact Statement to fully analyze and evaluate the alternatives available for this issue. An EIS is particularly applicable in this situation given the previous FONSI for the proposed exploration activities and the potential impact on the human environment. It is well recognized that NEPA analysis applies to socio-economic issues in addition to the natural environment (<https://nij.ojp.gov/funding/national-environmental-policy-act-nepa>). A complete analysis through an EIS would also allow for contemplation of other laws and regulations (ie. Clean Water Act, Clean Air Act, etc) that would

also apply to the exploration activities or potential for future proposed mining activities. Without complete consideration of these issues, any decision pertaining to this mineral withdrawal may be arbitrary in nature.

THE BHRMUC appreciates the opportunity to comment in opposition to the proposed mineral withdrawal and recommends the BBNF take the time needed to completely analyze the issues surrounding this proposal.

Thank you,

*Don Hausle*

Don Hausle  
President