

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

RE: Public comments on Pactola Reservoir-Rapid Creek Watershed Withdrawal #NP-3479

Supervisor Karchut,

My name is Melanie Bond, I grew up in and currently live in Lawrence County and now have a portion of the North Fork of Rapid Creek running through my property. I am a registered professional engineer in the states of South Dakota and Alaska with a Bachelor's degree in Metallurgical Engineering, Master's degree in Environmental Science and an academic minor in Anthropology. I have worked in mining related jobs for the past 27 years on both the mineral processing and water treatment sides of projects, as well as for the government in the US Bureau of Mines Western Field Operations (now defunct). Outside of the mining industry I also worked as a Forestry Technician (Fire) for the US Forest Service in Idaho (Clearwater National Forest), engine crew member with South Dakota Wildland Fire, and am still active in the local volunteer fire service. I am currently an independent consultant to the mining industry, based out of Lead, SD.

I am writing today to oppose the proposed Rapid Creek Watershed Mineral Withdrawal. This withdrawal, initiated at the Federal level and not within our local region, is a gross overreach that blatantly ignores the local Black Hills National Forest Plan<sup>1</sup> as well as Federal regulations<sup>2,3,4</sup> which govern multiple use of the resources within the Black Hills National Forest. The primary reason given in the local meetings for the proposed withdrawal were for the protection of the water supplies of the cities of Rapid City and Box Elder (among other communities in Pennington County). The aforementioned Forest Plan and Federal regulations are all designed to protect people and the environment, based on science and not emotion, while also considering the multiple use benefits of the area.

According to the US Geological Survey Bulletin 1580, last updated in 1986, the Mineral Resource Potential of the Black Hills states that "Deposits in the Forest are currently producing gold, silver, base metals, pegmatite products, limestone, oil and gas, sand and gravel, and dimension stone. The Forest has produced uranium, vanadium, tungsten, gypsum, and industrial sand, and could again produce these commodities in addition to molybdenum, rare-earth elements, thorium, and fluorine. Active exploration programs by industry are seeking new deposits of base and precious metals, thorium, rare-earth elements, oil and gas, and other mineral resources. Economically important mineral production in the future seems assured." This bulletin was compiled in accordance with 36 CFR, Chapter 2, Part 219.22 – *The overall role of science in planning* to "supply resource information and interpretations so that the mineral resources of this Forest can be considered with other resources in land use planning".

Rare earths, lithium, graphite, cobalt, nickel, and other critical minerals<sup>6</sup> like those found in the Black Hills are used in everything from smartphones to electric vehicles to state-of-the-art fighter jets like the B-21 Raider. Without increased domestic sources of these minerals, and other vital minerals like copper, iron, silica sand, and precious metals, the United States cannot sustain our scientific, military, and economic progress. Not only is there no domestic supply for many of these critical minerals (although they do exist in South Dakota) companies are being prevented from looking for them while the current administration works deals to source them from foreign countries rather than bringing jobs to American citizens. In addition, mining operations in the United States must comply with dozens of State and Federal laws to protect human health, dignity, cultural resources and the environment, unlike many countries that may end up sourcing our critical minerals which have questionable human rights and environmental protection values.

The United States is arguably the safest and most environmentally protective jurisdiction in the world for mining. Nearly 1/3 of Federal lands, including National Parks and Monuments, wilderness, and Federal wildlife refuges, have already been determined off limits to mineral development regardless of any resources contained within. By law, the remainder of Federal lands are required to be managed for multiple uses, including hunting, recreational use, timber, and mineral development (as noted in the BH National Forest Plan itself). We are not able to pick and choose where mineral deposits are placed in the earth, and we are fortunate enough to have already identified several within the Black Hills National Forest. If companies wish to conduct exploration to further delineate the known and probable deposits, they should be allowed to do so in accordance with the Forest Plan.

I believe that before additional public lands are withdrawn from mineral exploration and development, the Bureau of Land Management and the United States Forest Service should complete a full NEPA Environmental Impact Statement analysis in accordance with the Forest Plan to justify the important decision to exclude future mineral extraction from a known, proven resource area.

If there is actual concern for the water quality entering Pactola Reservoir, this analysis needs to include the impacts of septic and sewer systems in the watershed, road maintenance impacts (runoff, salt, etc...), OHV use, recreational use of the reservoirs (gasoline, waste release into waters), grazing/ranch runoff into the watershed, among other impacts. This decision needs to be science based and not emotional in nature.

For these reasons, as stated previously, I am opposed to the (federal administrative action/overreach in contradiction to the local Forest Plan) Forest Services' March 21, 2023, proposal to withdraw 20,574 acres of National Forest System lands in Pennington County South Dakota from mineral location.

Respectfully submitted,  
Melanie Bond, P.E.  
Lead, SD

1. [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd592921.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd592921.pdf), *Black Hills National Forest, Land and Resource Management Plan, 1997 Revision Phase II Amendment*, March 2009, US Department of Agriculture, Forest Service, Rocky Mountain Region, Black Hills National Forest, Custer, SD
2. <https://www.ecfr.gov/current/title-36/chapter-II/part-228?toc=1>, US Code of Federal Regulations, Title 36 – Parks, Forests and Public Property, Chapter II – Forest Service, Department of Agriculture, Part 228 Minerals
3. <https://uscode.house.gov/view.xhtml?path=/prelim@title30&edition=prelim>, US Code, Title 30, Mineral Lands and Mining
4. <https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter55&edition=prelim>, US Code, Title 42, Chapter 55, National Environmental Policy Act
5. <https://pubs.usgs.gov/bul/1580/report.pdf>, *Mineral Resource Potential and Geology of the Black Hills National Forest, South Dakota and Wyoming*, U.S. GEOLOGICAL SURVEY BULLETIN 1580, 1986
6. <https://www.usgs.gov/news/national-news-release/us-geological-survey-releases-2022-list-critical-minerals>, US Geological Survey Releases 2022 List of Critical Minerals, February 22, 2022