



October 22, 2024

To: U.S. Secretary of the Interior
USDA Forest Service
Elysia Retzlaff, Withdrawal Project Manager

Re: Pactola Reservoir - Rapid Creek Watershed Withdrawal (63876)

I am submitting public comment on behalf of the West Berkeley Alliance for Clean Air and Safe Jobs (WBA) and in my capacity as a health educator and environmental justice advocate for the past 46 years.

To honor, respect and protect the tribal traditional needs and values of the Oceti Sakowin, Cheyenne, Arapaho, Arikara, Hidatsa, Mandan, and Crow Tribes, and to protect the water and all living beings in this area, we support the Pactola Reservoir - Rapid Creek Watershed Withdrawal.

We refer to excerpts from pages 15 and 16 of the Draft Environmental Assessment and FONSI.PDF to support our position.

“The Black Hills, including the lands of the withdrawal application area, are considered to be a sacred landscape and traditional spiritual homeland by the Oceti Sakowin³, Cheyenne, Arapaho, Arikara, Hidatsa, Mandan, and Crow Tribes and contain numerous sites sacred to these Tribes as well as areas they consider to be traditional cultural properties.

Environmental Justice

Environmental justice is the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, programs, and policies (CEQ 1997).

While no “place-based” environmental justice communities were identified in the vicinity of the withdrawal application area, Native American Tribes and Tribal members have been actively engaged in this process and have communicated that this decision will have an impact on them. The purpose and need for the

requested withdrawal is, in part, tied to the self-identified concerns of Tribes and Tribal members in regards to the renewed and heightened interest in mineral exploration across the Black Hills.

Therefore, the Forest Service has identified the Tribes and Tribal members with a connection to the Black Hills and the withdrawal application area, in particular, as a population for which environmental justice may be a concern.

Scoping comments from many of the people identifying themselves as Native American expressed support for the requested withdrawal and a preference for expansion of the withdrawal application area.

Some people expressed the view that all mining in the Black Hills is illegal. Comments also emphasized the importance of protection of water quality from the potential adverse impacts of mining.

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These may be specific points on the landscape or geographic forms such as mountain peaks, high ridges, hills, springs, hot springs, caves, large glacial erratics, fossil outcrops, and other natural landscape features. Areas with rock art, stone effigies, and round stones far from water are also sacred to the Plains groups. Many of these locations are considered to be important landscapes for vision quests, places of power, or the dwellings of spirit animals in Arapaho, Lakota, and Cheyenne beliefs and oral history (Sundstrom 1997, 2018; Albers et al. 2003). For the Kiowa and Cheyenne, the Black Hills area is an important stop during their migration stories (Parks and DeMallie 1992).

Among other specific locations scattered throughout the Black Hills and considered sacred and important for Tribal traditions, is the Rapid Creek Valley (Sundstrom 1997, p 187 and USDOJ NPS 2003). The Rapid Creek Valley traverses the central portion of the withdrawal application area. Tribal members submitted comments stating that the Rapid Creek polishes stones used in ceremonies, and that there are sites of Lakota camps along the valley. Some tribal members' comments note that the withdrawal application area is where they pick medicine, gather sacred foods, teach their families traditions, and connect with the water."

With respect, we support the Pactola Reservoir - Rapid Creek Watershed Withdrawal based on the significant impact which would result from exploration and mining in this area. This area must be fully protected.

Sincerely,
Janice Schroeder
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