

Data Submitted (UTC 11): 6/19/2023 1:54:18 PM

First name: Rebecca

Last name: Terk

Organization:

Title:

Comments: I am writing in support of the proposed mineral claims withdrawal in the Pactola area of the Rapid Creek Watershed, and I am urging the Forest Service & Bureau of Land Management (BLM) to initiate an expanded withdrawal to protect the entire Rapid Creek Watershed.

The stated purpose of the withdrawal is to, "to protect the cultural and natural resources of the Pactola Reservoir-Rapid Creek Watershed, including municipal water for Rapid City and Ellsworth Air Force Base, from the adverse impacts of minerals exploration and development." The current proposed withdrawal is a start, but will only protect about 10% of the watershed. And, protecting that small area around a major reservoir without protecting the waterways upstream from that reservoir will not protect the water in the reservoir. Similarly, failing to protect Rapid Creek and its tributaries downstream from Pactola Reservoir will not accomplish the stated protection goal because of known surface and groundwater interplay between Rapid Creek and the major aquifers (Madison & Minnelusa) that Rapid City, Ellsworth Air Force Base, and surrounding communities rely on to supply their water.

I live on Rapid Creek, and my family utilizes its waters for full-immersion recreation, as well as utilizing its riparian areas for harvest of traditional plant medicines. Our well (and those of our neighbors here in Dark Canyon) is supplied by the same aquifers relied on by the City of Rapid City and Ellsworth Air Force Base-as well as numerous smaller water systems in and around the Rapid City area. A major "loss zone" in Rapid Creek-where the creek directly recharges those aquifers with several million gallons a day of clean water-occurs less than a mile downstream from our home.

Contamination of those waters (that is, one of the "adverse impacts of minerals exploration and development") would imperil our quality of life, plummet our property values, and render our entire canyon without a safe, reliable water supply-potentially requiring massive infrastructure investment to connect us all to municipal water systems that would also need to be retrofitted for real-time monitoring and expensive removal of contaminants.

And, we are not the only neighborhood that could be impacted. While many rural residents have private wells in the threatened aquifers, there are also multiple small & independent water systems (partial list here: <http://www.waterbillingservices.com/home.html>) that provide water to hundreds of area households inexpensively because of the high quality of water coming directly out of the aquifers. The cost to retrofit those systems to deal with potential contaminants from large scale mining operations would be devastating. So, too, would be the cost of building out infrastructure to connect them with municipal water from the closest larger water system.

Tourism and recreational activities of both residents and visitors to our watershed are a major contributor to our economy and our quality of life. And those activities are hugely reliant on the high-quality of the water and the wildlife and fisheries habitat that exists here. Unlike other areas of the Black Hills that have seen long-term, irreversible damage to their waterways from large-scale mining, this watershed has so far avoided that fate-and has provided incredible opportunities for people and businesses to grow and thrive while sustaining the natural resources they rely on.

Recent studies indicate that the Rapid City area is one of the fastest-growing areas in the Midwest (<https://www.kotatv.com/2022/10/06/study-shows-rapid-city-growth-will-continue/>). Part of that growth is related to the "one-of-a-kind outdoor recreation opportunities" we have in this area. At the same time, scientists at the Western Hydrology Conference indicate that our water supply (Rapid Creek and associated aquifers) won't be adequate to meet the demands of this growth. One proposed solution to this issue is to build a pipeline from the Missouri River to utilize reserved water rights there. However, that project is projected to cost billions of dollars,

and will likely take decades to build.

Whatever one's opinion about that giant infrastructure project (and about the desirability of exponential growth in our population), the take-away is clear: we MUST protect and conserve the water we have now because another source will be a long time coming. And, pipeline water will not protect natural resources and habitat that wildlife and vegetation depend on-those "one-of-a-kind outdoor recreation opportunities."

I serve on the board of an organization that works to protect Rapid Creek. Working with a professional map-making company, we were able to develop a map (attached) of the watershed showing the proposed withdrawal area as well as currently withdrawn 8.2 recreation areas, and pulling data on active mining claims directly from the BLM database. The results were illuminating-and concerning. While the proposed withdrawal area does address legitimate concerns regarding habitat, recreation, and cultural resources in the Jenny Gulch area, it leaves open the potential for "adverse impacts of minerals exploration and development" on thousands of claims both up- and down-stream of Pactola Reservoir. Exploration and/or potential large-scale mining in those areas also threaten the very resources the proposed withdrawal seeks to protect.

While I strongly support the proposed withdrawal, I will reiterate that it simply isn't enough to fulfill its stated goal. I urge the Forest Service and BLM to greatly expand the proposed withdrawal area to encompass the entire Rapid Creek Watershed and to protect the resources our entire region depends on.

Thank you.