

Data Submitted (UTC 11): 10/13/2024 7:30:51 PM

First name: Sandra

Last name: Seberger

Organization: Black Hills Group Sierra Club

Title: Chair, Executive Committee

Comments: Thank you for the opportunity to comment on the Pactola Reservoir - Rapid Creek Watershed Withdrawal project. The Black Hills Group of the South Dakota Chapter Sierra Club support the proposed action.

(We do question, however, the misleading title of the project, since it implies that it includes the entire watershed. Sierra Club and coalition members who attended the Public Meeting on October 21 were shocked at the lack of knowledge of the presenters, who were insistent on claiming the project encompassed "the Rapid Creek watershed.")

WHO WE ARE

The South Dakota Chapter of the Sierra Club was established in 1972 when Sam Clauson organized a group to stop a proposed tramway that would have taken passengers to the top of Black Elk Peak (now in the federally protected Black Elk Wilderness). Sam's activities were the birth of the Sierra Club Chapter in South Dakota, and he still serves on our Black Hills Group executive committee.

The Chapter represents more than 1,000 active members, and almost 13,000 additional members, donors, and supporters in South Dakota. They and their families and friends use the BHNF for camping, hiking, fishing, photography, snowshoeing, skiing, hunting, viewing wildlife, picnicking, botanical and geological studies, biking, and orienteering. Their uses of the BHNF are as diverse as their interests. Many supporters of the coalition to protect the Rapid Creek Watershed earn their living through outdoor recreation professions, businesses, and jobs.

Today our Black Hills Group group fights for clean water, advocates sustainable agriculture, works to protect the Black Hills National Forest (BHNF), and lobbies for conservation and environmental legislation.

The purpose of the South Dakota Chapter of the Sierra Club and its Black Hills Group is to explore, enjoy, and protect the earth's wild places. Our members use the outdoors and the wild country of the Black Hills and Northern Great Plains for recreation and renewal. We rely on the watershed of Rapid Creek for our drinking water, agricultural, and recreational activities. The knowledge that healthy environments and intact wild country exist, sustains us. Our members want to practice and promote the responsible use of Earth's ecosystems and resources. And to that end we work to educate and use grassroots activism to protect and restore the quality of the natural and human environment.

WHERE WE STAND

We supported the grassroots coalition campaign to protect the watershed from the threats of mineral exploration and mining that began in the summer of 2020, with intent that a limited campaign had one goal: protect not only Jenny Gulch, not only from F3 Gold LLC, but the entire acreage of the Rapid Creek Watershed with a permanent mineral withdrawal by passage of congressional legislation: the Rapid Creek Watershed Recreation Area Act.

As members of a broad coalition of environmental, conservation, tribal, water recreation and outdoor businesses, Sierra Club provided support in the form of grants, volunteers, board members and attendance at events. We gathered thousands of signatures, made comments, gathered data, met with local officials, commented, objected, worked to resolve objections, and welcomed the proposed withdrawal.

We submitted substantial technical comments in support of the proposed withdrawal in July 2023. (Document

uploaded)

And here we are. We support the proposed action, Alternative A. We are gratified that you considered a variety of alternatives, even though they were not possible within the rules of mineral withdrawals at this time.

Protecting the area around Jenny Gulch for recreation is consistent with recreation areas around Deerfield Reservoir, Sheridan Reservoir, and other areas protected by past mineral withdrawals for a variety of purposes. The Environmental Assessment - though it was assessing the withdrawal, not the initial proposed action to permit exploration - is a vast improvement including updated information. We thank you for finally acknowledging the requirements of the CEQ NEPA process, which was largely ignored, and in some cases violated, in the initial FONSI.

The Pactola Reservoir withdrawal is a first step. To assert that it will protect the water that serves Ellsworth Air Force Base, Rapid City, users of private wells within the watershed, our aquifers and our water treatment capacity is foolhardy. Pactola Reservoir is one piece of the watershed pipeline. But it is in the middle, not the beginning or the end of the water flow. What goes into surface water upstream goes into the aquifers and comes out at our taps, regardless of the Pactola Reservoir withdrawal. So, we also encourage protecting further upstream areas, as there are mining claims there, too.

We recognize the parameters of the Council on Environmental Quality regulations implementing the National Environmental Policy Act (NEPA), found at 40 CFR Parts 1500-15081, the Department of the Interior's NEPA regulations found at 43 CFR Part 46 and the USDA Forest Service NEPA regulations found at 36 CFR Part 220, and will continue to seek further protection of the ACTUAL Rapid Creek Watershed, the Black Hills National Forest, and the entire He Sapa, the Heart of Everything That Is to the Oceti Sakowin.

--The Black Hills Group and the South Dakota Sierra Club Chapter support Alternative A, the Proposed Action.
--We thank you for reviewing the Alternatives Considered but Eliminated.
--We fiercely oppose Alternative B, the No Action alternative.