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Comments: Letter Text:

On behalf of the South Dakota Backcountry Hunters and Anglers, a community deeply rooted in the ethos of conservation and stewardship of our natural resources, we support the proposed withdrawal of the Pactola-Rapid Creek watershed from mineral and geothermal exploits as outlined in the Environmental Assessment and draft finding of no significant Impact.

While BHA recognizes the multiple-use laws that govern our public lands, we seek to ensure that any public land development proposals take into consideration the value of fish and wildlife habitat, water quality, migration corridors and potential impacts to hunting and fishing to ensure responsible siting of projects. This includes extractive industries such as oil and gas drilling and mining as well as renewable energy development. BHA does not broadly oppose mining or other the many other uses of our public lands. However, there are some places that are simply too important to our North American traditions of hunting and angling in a natural setting to risk developing them - the Pactola-Rapid Creek watershed in the Black Hills is one of those places.

Rapid Creek is the largest watershed in the Black Hills National Forest (BKNF) and is arguably the best brown and rainbow trout fishery in the region. Pactola Reservoir's extreme depths and year-round cold water create a unique fishing environment. This provides a quality experience for anglers targeting a variety of salmonoid and warmwater species.

As stated in the draft EA, hunters in the BKNF can pursue both big-game and small-game species including turkey, deer, elk, bighorn sheep, mountain goat, mountain lion, cottontail rabbit, and ruffed grouse. Most of the withdrawal application area is categorized as a big-game, winter-range-emphasis management area. The management focus in these areas is on providing high-quality winter and transitional habitat for deer and elk, high-quality turkey habitat, habitat for other species, and a variety of multiple uses. These areas provide important habitat to deer and elk, including birthing, foraging, and wintering grounds.

According to a 2016 survey commissioned by South Dakota Department of Game, Fish, and Parks, resident and nonresident hunters spent \$89 million in the Black Hills region; this was about 13 percent of statewide spending by hunters. The popularity of this region for hunters has only increased and the current economic impacts are likely much larger. During this time,

hunting in the Black Hills region supported 1,013 jobs, \$34 million in labor income, \$8 million in federal taxes, \$5 million in state and local taxes, and a cumulative \$57 million toward statewide gross domestic product.

Both exploratory drilling and full-scale mining would create new temporary access roads with the potential to limit fish movement and fragment and isolate existing aquatic habitat. As indicated in the draft EA, aquatic habitats can be impacted by access roads, staging areas, and drill-site land clearing. These activities can affect aquatic resources directly by accelerating erosion and sediment loadings, altering stream channel morphology, and changing runoff characteristics of watersheds. Beyond potential impacts to fish habitat and water quality, new roads would pressure and impact big game in the BKNF.

Quality undisturbed riparian habitat is rare in the Black Hills National Forest. All efforts to protect these important habitats should be supported. Excessive disturbance from mining activities could drastically reduce the presence of valued game and fish populations along with other valued non-game wildlife.

Lastly, the noise and ground disturbance in the area will inevitably detract from the outdoor experience that draws visitors to the Black Hills National Forest, especially to this unique watershed. Please take action to protect this area for residents and visitors alike.

Sincerely,

Cody Grewing

Backcountry Hunters and Anglers,

South Dakota Chapter