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First name: Rebecca
Last name: Terk
Organization: Rapid Creek Watershed Action
Title: Interim Board Chair
Comments: [N.b. These official organizational comments should be considered separately from personal comments made under the same individual's name.]

Thank you for the opportunity to comment on the draft Environmental Assessment for the Pactola Reservoir - Rapid Creek Watershed withdrawal project.

Rapid Creek Watershed Action (RCWA) supports Alternative A, the withdrawal of 20,574 acres of National Forest System lands administered by the BHNF from settlement, sale,
location, or entry under the public land laws; location and entry under the United States mining laws; and leasing under the mineral and geothermal leasing laws for up to 20 years, subject to valid existing rights.

RCWA is a non-profit, non-partisan grassroots organization. Our goal is to protect the Rapid Creek Watershed by advocating for a mineral claims withdrawal on all federally-controlled surface and subsurface lands within the watershed upstream from Rapid City.

Our partners and supporters include hunters and anglers, agricultural producers, wineries, breweries, and coffee roasters, UTV riders, tribal members and organizations, conservation groups, boaters, kayakers and other paddlers, long-time residents of the watershed, newcomers to the Black Hills, outdoor recreation and visitor industry businesses, and citizens who are concerned about national security. Over the past few years, RCWA has collected thousands of signatures from residents and visitors alike on a petition urging our Congressional delegation to bring legislation to enact a mineral claims withdrawal on federal lands in the entirety of the Rapid Creek Watershed. (https://www.rapidcreekwatershed.org/)

Ellsworth Air Force Base and its role in national security, agriculture, tourism, and recreation are not only the primary economic drivers of South Dakota's and the Black Hills' economies - they're our way of life. The unspoiled beauty of this watershed is what makes it such a great place to live and work and makes it an incredible draw for others who want to enjoy a slice of our paradise. Additionally, this withdrawal will protect bighorn sheep birthing range in the area, not to mention the thousands of other wildlife species who make the watershed their home and depend on clean natural flowing water.

Tax revenue, business income, and jobs in the outdoor recreation economy far outstrip the return to communities from mineral exploration and mining. The state's fish, wildlife and boating resources generated more than $1.4 billion annually in 2021, according to the South Dakota Department of Game Fish & Parks. Outdoor recreation expenditures include: $531.7 million by anglers, $681.1 million by hunters, $116.3 million by wildlife viewers and $2.6 million and $91.5 million by trappers and boaters, respectively. These activities support an estimated 16,000 full and part-time jobs which provide $569.4 million of income. In addition, they contribute over $945.8 million to the state's GDP, and generate over $83 million in tax revenue for state and local governments. (https://gfp.sd.gov/economic/)

Hard rock mining-including gold, uranium, and rare earth minerals, offer only a handful of jobs and a miniscule amount of revenue-and large scale mining operations in particular threaten our agriculture and tourism economies by tearing up huge swaths of land, causing heavy wear and tear on our infrastructure, and threatening the water supply we - and our economy - depend on.

RCWA disagrees with the Forest Service determination that it is unnecessary to withdraw a larger area to protect the Pactola Reservoir, its water supply, and cultural and recreational resources. Water flows into Pactola

Reservoir from numerous tributaries upstream as is clearly indicated by watershed maps provided on the project page. Delineating those major tributary areas of the upper Rapid Creek watershed with a line on a map (i.e. North Fork Rapid Creek, South Fork Rapid Creek, Silver Creek - Rapid Creek, Slate Creek, and the North Fork, South Fork, Upper, Middle, and Lower portions of Castle Creek) does not limit those waters, and any contamination they may carry, to the boundaries drawn. According to the US Geological Survey the interactions between Rapid Creek, its tributaries, and the Madison Aquifer are incredibly complex and not completely understood. Large scale mining in this watershed has the high potential to cause contamination of this critical aquifer that could likely never be ameliorated.

All of those waters flow eventually to Pactola Reservoir and/or associated aquifers, and RCWA does not believe that, "the solution to pollution is dilution." Contamination of any one of those tributaries presents a near-term threat to people and wildlife living in its proximity and a longer-term threat to those further downstream and downflow. And, the threat of contamination is not an idle one. The attached map commissioned by RCWA using recent Bureau of Land Management data shows hundreds of active mining claims upstream from the proposed withdrawal area, some of which (e.g. Mineral Mountain Resources drilling near Rochford) have already seen gold exploration activity in recent years.

That said, we do recognize that a broader boundary would require initiating a new withdrawal application and publication of a new Federal Register notice. Recognizing that, we look forward to future opportunities to discuss the necessity of a broader withdrawal with the Forest Service, Bureau of Land Management, and with our Congressional delegation.