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Comments: I am writing to ask the Forest Service to reject the proposed Pete Lien and Sons Rochford Mineral Exploratory Drilling Project in the Rapid/Castle Creek Watershed.

It might well be called the, "Drilling in Castle Creek (and Its North Fork)" project, or the "Disrupting Sacred Sites" project. Or perhaps the, "Pactola's Protected, Now Contaminate Upstream" project.

Multiple drill sites in close proximity to the North Fork of Castle Creek and mainstem Castle Creek have a high likelihood of contaminating waters (surface and subsurface, due to the extreme infiltration rate of these high montane areas) with drilling fluid spills and blow-outs as well as increasing erosion and sedimentation of surface waters due to heavy equipment traffic.

These waters form and feed some of the best cold water fisheries in the Black Hills. They also flow into Rapid Creek and thence to Pactola. We've got a mineral claims withdrawal protecting Jenny Gulch--but Pactola and the water supply for Rapid City and Ellsworth Air Force Base isn't truly protected without protecting the waters upstream.

The Forest Service knows this well. In the recently-scoped Sawbuck Forest Management Project, which overlays the very same area as this proposed exploratory drilling project, the Proposal & Opportunity to Comment (Jan 2025--attached) document notes, "Rapid Creek is the only municipal watershed in the project area. These watersheds are currently rated as "functioning at risk," based on eleven key factors, such as water quality, forest cover, and forest health. There are opportunities to improve watershed conditions for aquatic organisms, riparian wetland plants, and aquatic habitat, which currently vary from poor to good across the area.

Not only does the Sawbuck Project document state that the Upper Rapid/Castle Creek Watershed is functioning at risk, it further describes degraded conditions on the project area, "Over time, stream channels and riparian wetland communities in adjacent grassland meadows and aspen stands have been degraded due to conifer encroachment and the absence of beavers on the landscape. This degradation has resulted in reduced fish habitat quality, lower forage productivity in aspen stands and meadows, increased erosion and sedimentation, a loss of plant species diversity, drying of wetlands and riparian areas, decreased water storage across the landscape and stream channel incision."

Nothing in the Pete Lien & Sons drilling project will improve watershed conditions in these same areas the Forest Service has determined are in need of it--in fact Lien & Son's activities are highly likely to exacerbate conditions like loss of plant diversity, introduction of invasive species, drying of wetlands and riparian areas, increasing erosion and sedimentation, and reduction of fish habitat quality. One highly doubts that introduction of heavy equipment, traffic, noise and disruption will beckon what few beavers we have in the upper watershed to consider resettling the North Fork of Castle Creek.

Additionally, Lien & Son's proposed introduction of drilling equipment, noise, and traffic right on the boundary (and potentially even over the boundary) of Pe'Sla, one of the most sacred sites in the Black Hills to the Lakota people, is an unacceptable encroachment on the Oceti Sakowin Tribes, who only last year signed an MOU to work with the Forest Service--and the Forest Service agreed to work with the tribes.

Again, I quote the Sawbuck Project document, which reference this agreement explicitly:

"Pe'Sla, a sacred site for the Sioux Tribes, lies at the heart of the Sawbuck project area. In a significant step toward honoring this heritage, the USDA Forest Service, Rocky Mountain Region, Black Hills National Forest,

recently signed a Memorandum of Understanding (MOU) in 2024 with the Oceti Sakowin Great Sioux Nation Tribes. This MOU establishes a framework for co-stewardship of the Black Hills National Forest, fostering collaboration and shared responsibility."

With the purchase of timber & rangeland on the southwest side of Deerfield Reservoir four years ago, my husband and I were horrified to learn that a proposed emergency cell tower only a few hundred feet from our property line might involve a constantly blinking red light, totally disrupting our peace and the natural beauty of the night skies. We understand that through negotiation with the Tribes who steward Pe'Sla, the tower was shortened just enough so that it fulfilled its necessary public safety function, but the light was no longer necessary.

We were incredibly thankful, but are now horrified to learn that now instead of the quiet and natural beauty we get to enjoy because of their negotiation, they may be assaulted by an industrial project in clear view (and hearing, and smelling of diesel and lubricant fumes) of Pe'Sla's boundary. It's an outrage. How does this proposal "honor that heritage," and "foster collaboration and shared responsibility"?

Lastly, as property owners in the area, we are concerned about the hazards of additional heavy traffic in the area. The roads throughout the Deerfield/Rochford area are traveled over three seasons by UTVs, RVers, logging, cattle-hauling, and other trucks, and all manner of local and tourist traffic. In the winter months, they are less traveled, but can be extremely treacherous. Adding additional industrial traffic on these roads undermines the public safety and the recreational value of the entire area.

In summary, please review the Forest Service's own work and analysis of the management needs of the proposed drilling project area and surrounding region, as well as the clearly stated need to repair and protect the Rapid/Castle Creek Watershed for the benefit of plant and animal communities and downstream users. Consider also what the MOU with Oceti Sakowin Tribes calls you to do.

Please reject the proposed Pete Lien and Sons Rochford Mineral Exploratory Drilling Project.
Thank you.

Attachments:

"Sawbuck Forest Management Project Description and Comment Opportunity." USFS: Mystic Ranger District, Black Hills National Forest. Jan., 2025

"Upper Rapid Creek Watershed with Proposed [Now Finalized] Mineral Claims Withdrawal." Mato Ohitika Analytics, LLC/Rapid Creek Watershed Action. April, 2023