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Comments: Comments on Pete Lien & Sons Rochford Mineral Drilling Project

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Submitted by

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1. We are concerned by the potential for cultural, social, ecological, historical, and environmental impacts due to this project and any resulting follow-on projects. Specifically, the project area is adjacent to the Pe'Sla sacred site to which Lakota people return ceremonially throughout each calendar year.

2. We are greatly concerned that the Government may not have adequate resources to manage this project and enforce the terms of the operational plan if approved, given recent downsizing in staff and funding for the USFS across the nation, including within the Black Hills districts. Examples of potential enforcement issues include:

*Project documents mention temporary access roads will be constructed for some locations and that these temporary roads will be obliterated by PL&S following completion of the activities. How will the Government ensure 1) PL&S adequately identifies and addresses their damage to existing roads, and 2) PL&S adequately "obliterates" temporary roads, returning the areas to their natural state?

*Similarly, the Plan of Operations states drill pad sites will be "reclaimed" upon completion of all drilling activities. How will PL&S be held accountable for these activities?

*How will the Government hold PL&S accountable for not drilling more than their plans describe? How will the Government enforce the maximum footprint of each drill site does not exceed the size described?

*How will the Government fulfill its responsibilities to monitor and address potential long-term impacts of the exploratory activities, and hold the exploration company accountable? How can we be reassured that PL&S has the financial resources to fulfill any potential long-term responsibilities?

3. Noise from day-to-day operations, an increase in traffic on public roads, and drilling activities will all be immediate impacts to the area. However, there is no mention of noise management in the Plan of Operations.

4. The Scoping Letter and Plan of Operations make no mention of Health and Safety procedures relevant to the potential for hunters and/or hikers while exploratory actions are going on.

5. The Scoping Letter and Plan of Operations make mention of water tanks for storage; the Plan of Operations also states that petroleum products, oils, lubricants, and fuels including gasoline will be onsite for refueling the drill rig and lubricating mechanical parts. A Spill Prevention Control and Countermeasures Plan (SPCC) was not included. How will the Government ensure that an adequate SPCC plan is prepared and reviewed prior to use of hazardous materials and substances?

6. The Plan of Operations states that in the event of a reportable quantity spill, the spill will be reported to the U.S. Forest Service and SD Department of Environment and Natural Resources. How will the Government ensure this requirement is enforced? This is particularly important in an area where there is 1) a potential for contamination to groundwater and surface water, and 2) potential risks for wildfires.

7. The Plan of Operations makes no mention of emergency management procedures in case of fire resulting from sparks generated by equipment. A wildfire could quickly destroy the surrounding habitat.

