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Comments: The Black Hills have been utilized as a gold mine for too long. First and foremost, technically and ethically, this is the land of the Lakota and Cheyenne and extracting wealth from land that is not your own, without compensation, should not be the legacy of US public lands. Secondly, the extraction of natural resources from public land should be granted by and should benefit the public. Because of the 1872 Mining Law, neither of these take place. Because the USFS is required to grant mining companies the right to explore, the managers of this land need to take every precaution possible to protect the environmental integrity and economic wellbeing of this area. Thus, a categorical exclusion is not appropriate for this project and an Environmental Impact Statement needs to be conducted for a few reasons:

1. The ecological integrity of the BHNF has been devastated by the way the forest is managed for fire and timber. This is one of the most biologically diverse areas in the region with unique macro and microhabitats. As areas that are intact and functioning in a healthy manner ecologically dwindle, they have been further encroached by the sheer amount of exploratory mining projects. Although 39 drilling pads could have a major impact on this particular microhabitat, this project should not be viewed on its own but with the amplified affect of these types of projects happening across the entirety of the BHNF, and the compounding impact that that has on the forest, and therefore the people that rely on this forest. An Environmental Impact Statement needs to be conducted to measure the impacts this could have to biodiversity and ecological integrity of this incredibly unique, biodiverse, and valued area.
2. There are two main aquifers that this entire region relies on. Amongst years of droughts, with oncoming climate change, and with more people moving to the region, conserving and protecting our water should be of highest concern and greatest priority. The risks that even drilling for exploration poses to our water is not worth the benefits that the public receives from a project such as this. An Environmental Impact Statement needs to be conducted to make sure that this is safe for our water. And a better cost-benefit analysis needs to be conducted and published that shows how this might benefit the public and what costs or potential risks it might have. Then the public needs to be able to decide the best option.
3. Along the lines of point one, this project cannot be taken alone and must be considered with the compounding impacts of all exploration happening across the BHNF. This must be considered in relation to the impact to culture and economy. Although economics are usually voiced more prominently within our society and values of our culture, I want to emphasize that people value this land for much more than the money it brings in. Our families are tied to it, our kids are entwined with it, we rely on it for food from hunting, fishing, and foraging, it feeds our spirit, it nourishes our relationships, it is embedded within the ways and whys that we live. Thus, we rely on it for so much more than just money, but tourism and the outdoor recreation are by far the greatest portion of our regional economy. 39 drilling pads impact the experience of recreating in the Black Hills, especially in this area. Taken in whole with the other exploratory drilling operations happening across the BHNF, this has major implications for damaging our tourism economy, which takes a very long time to rebuild once damaged. Thus an EIS should be conducted for these reasons as well.

Thank you for your time and for your stewardship of our public lands.