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Comments: I would like to express my opposition to the proposed mineral withdrawal within the Pactola Reservoir-Rapid Creek Watershed. This action is unnecessary given the existing stringent environmental standards required for any project on federal lands (e.g., NEPA) and is in contradiction to Biden administration's stated goals regarding decarbonizing our world and in improving state security by strengthening the supply chains of our critical minerals.

North America currently has the strictest mining standards in the world in terms of social license to operate and environmental requirements. A mineral withdrawal is unnecessary and redundant given these existing standards. Many of the supporters of a mineral withdrawal cite concerns about water quality and water quantity. The only activities currently proposed consists of drilling exploration holes that are smaller in diameter than water wells for residential use. If a mining exploration project ever advanced to a point where an actual mine may be feasible, the existing, strict environmental laws would prevent any project from progressing that did not meet water quality and quantity requirements. The proposed moratorium is therefore unnecessary and a waste of government time and money.

The criticisms of the mining industry that have been voiced in this forum are based on a dated view of the industry. Many mining projects recycle and reuse process water, limiting the overall water quantity impact. Water treatment plants at mine processing operations have been able to discharge treated water that exceeds the baseline water quality of the natural system. Potential mining projects should succeed or fail on their own merits, not based on an antiquated view of only the worst events of the past 200 years. As a point of comparison, let us consider the agricultural industry. If we were to judge the entire agricultural industry only on the worst events of past 200 years, we may well conclude that we should have a moratorium on agriculture. Of course, that would be ridiculous because we all need to eat. But if it can't be grown, it must be mined. We need to remember where the necessities and amenities we use every day originate from before we attack an entire industry.

The Biden Administration's own Department of Energy and Department of Defense have highlighted the need to develop critical minerals supply chains within the United States (America's Strategy to Secure the Supply Chain for a Robust Clean Energy Transition FINAL.docx_0.pdf, 100-day-supply-chain-review-report.pdf (whitehouse.gov)). Mineral resources cannot be developed anywhere; they are extremely dependent on local geology. Eliminating potential access to lands where these important commodities could be sourced further restricts our already weakened supply chain and increases our dependence on foreign entities. We cannot blind ourselves by the current proposed mining exploration in this area being related to gold, criticized as not being among the list of critical commodities. Critical minerals can often be byproducts of gold, such as at the Perpetua Resource Stibnite gold project that is now producing antimony (Department of Defense Awards up to \$24.8M to Perpetua Resources - Perpetua Resources). We truly will not know what critical minerals may or may not occur within the proposed mineral withdrawal until drilling is completed. We need to allow that exploration to occur.

In closing, I support clean water and the responsible use of this valuable resource. But I strongly oppose this mineral withdrawal. We must allow each project to succeed or fail on its own merits, not on irrational fears- however well-intentioned they may be. Mineral withdrawals such as the one proposed here will further limit our ability to decarbonize our society, handcuff our ability to improve our existing supply chain weakness, and increase our dependence on foreign geopolitical actors that do not share our values. We need a measured and responsible response to address these crucial issues impacting our society: "No" to blanket mineral withdrawals in the Black Hills.