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First name: Lee

Last name: Gochmour

Organization:

Title:

Comments: Pursuant to 43 CFR 2310.3-l(b)(2), I am writing this letter in opposition to the proposed Pactola Reservoir-Rapid Creek Watershed Withdrawal #NP-3479. This process is being done for political reasons and is bypassing normal rules, regulations and procedures for managing US Forest Lands.

To begin with, the US Forest Service (FS) is bypassing existing rules, regulations and procedures in place for management of Black Hills National Forest. Specifically, the FS is not using the Resource Management Planning process to assess forest conditions, develop management options and allow for "all (multiple) users" to utilize the forest. Instead of a holistic approach that provides for and benefits the most, the decision is being made to limit mineral exploration and development. A proposal of this magnitude requires more detailed analysis under the National Environmental Policy Act. A proposal of this magnitude surely requires the preparation of an Environmental Impact Statement considering all of the potential impact(s). In addition, this EIS needs to look at other resources and impacts (beyond mineral exploration and development). These should also look at but not be limited to the following:

- Potential Impacts from storm water run-off in Rapid City along Rapid Creek.
- Potential Impacts from septic systems within the Rapid Creek Watershed.
- Potential Impacts from Rapid City Land Fill Water Violations and Sewer Plant along Rapid Creek.
- Potential Impacts/remediation efforts of Zebra mussels in Pactola Reservoir (Recreational Impacts).

The FS should also evaluate the socio-economic impact of not having these mineral resources available to public. At a minimum this would require a geologic study to determine the mineral potential of the proposed withdrawal area and provide a detailed report of the area's mineral potential.

The public is told this "withdrawal" is needed to protect environmental resources. However, there are existing regulations (on the federal, state and local levels) in place to do just this. In addition, the FS has performed environmental evaluations on previous proposed mineral actions that have shown no adverse impact and/or that these impacts can be mitigated.

Finally, mineral exploration and development is only done where minerals exist. Artificially curtailing the potential of these resources puts pressure to meet the demand for these minerals on other areas throughout the world. An example of this is in cases where regulations are not as stringent or when development occurs on other Projects that are not as economically viable. This in turn, can be wasteful.

Just as there is a right and wrong way to explore and develop mineral resources, there is also a right and wrong way to regulate. Let science and facts guide this process. Not politics.

Respectfully,

Lee P. Gochmour