

Data Submitted (UTC 11): 6/8/2023 4:28:27 PM

First name: Amy

Last name: Davison

Organization:

Title:

Comments: I submitted a comment on June 7 and received a confirmation, but I don't see it in the reading room, so I am trying again via a different browser.

I live in Spearfish and work in the cycling tourism industry. I oppose the Golden Crest project because the drilling will negatively impact tourism, our local economy, pose a risk to our water supply, and negatively affect our quality of life here.

According to the Environmental Assessment, Solitario Zinc's proposed drilling would impact the Madison aquifer. Drilling will take place near various creeks and springs as well, up to 100 holes to a depth of 500 meters in any direction. No monitoring ground or surface water is proposed even though the drill sites are surrounded by ground and surface water. The Madison aquifer supplies our drinking water. The creeks they are working near, Little Spearfish Creek especially, flows directly into Spearfish Creek and through our town. Water from Spearfish Creek also flows into the Madison aquifer. These facts alone should trigger a greater level of scrutiny than an Environmental Assessment. I ask that you require an Environmental Impact Statement in this situation to further examine the potential impact to the Spearfish Creek watershed and the City of Spearfish's drinking water.

If the ground and surface water are not monitored, how would we know if contamination occurred? How would Solitario Zinc be held accountable? It appears they have to post a reclamation bond, but if they fail to clean up contamination, what is our recourse? As you can imagine, this is a sore subject given the Gilt Edge Mine Superfund site that is 24 years old with cleanup still ongoing.

I'm also concerned about the amount of water needed to sustain this drilling project, in addition to the Dakota Gold drilling project off Maitland Road and the many other projects in the Black Hills. This region is growing rapidly and the demands on water are high from household use to agriculture. Water is not an infinite resource and I question if this is a worthwhile use especially when balanced against other needs and the fact that this community will see no economic or other benefit from this project.

The proposed drilling will also have an impact on several recreational trails which are used year-round by the local community and tourists for everything from hiking, biking, snowmobiling, off roading, skiing, birding and the list goes on. There are also events like the Dakota 5-0, Pine Island and others which bring in significant tourism dollars. The EA concludes the effects will be minimal causing only temporary inconvenience to users. The reclamation appears to focus on grading and seeding drill sites. The impacts are understated. There is no requirement to restore trails to their original condition if damaged by heavy truck traffic or drilling operations. In addition, while drilling at any particular site is expected to be somewhere between one week and 60 days, the EA acknowledges there could be weather or technical delays. It states that reclamation will not take place until assay results are returned which could take 3 or 4 months, and if this happens late in the year, reclamation would not happen until operations resume the following year. This could result in loss of access to trails for a year or longer, which could cause event cancellations and significant loss of tourism. It would also result in local groups like Ridge Riders having to use time and resources to reconstruct the trails. There should be a requirement to pay for qualified trail builders to rebuild any damaged trails and/or build trails to route around lengthy closures.

As an aside, I understand that trail building projects have been required to prepare an EIS, which makes it particularly hard to fathom how this project could get by with an EA.

It also seems that Tribal consultation was inadequate. The nature of consultation is to have a conversation and it appears that Solitario simply did a historical record search. The Black Hills are sacred to indigenous

communities, particularly the Lakota Sioux, and their spiritual beliefs extend beyond archeology. To fail to even acknowledge this and have a meaningful dialogue is to add insult to a long history of injury.

The impacts to wildlife are also understated. The EA mentions federally endangered northern long eared bats are potentially in the project area and then concludes that they would be "affected, but not adversely affected." There's no analysis or explanation of how they determined that the disturbance caused by lengthy and/or repeated stints of round the clock drilling, noise, and light pollution would not be adverse. There is no mention of other endangered animals like black footed ferrets, peregrine falcons, American dipper, northern goshawks, ospreys, whooping cranes, etc. Further, the EA states that any impacts to other animals will be a short-term disruption, that the animals will return, and they therefore won't be adversely affected. Again, this is a conclusion with no analysis. There is no indication they made any effort to determine where the animals live, their patterns and behavior (including for example, if drilling would interrupt breeding or caring for young - what if an osprey pair is driven off their nest when their eggs just hatched), and how they would actually be affected. At some point, animals run out of habitat. At some point, the stress is too much for them to take. The impacts on all wildlife deserves further study in an EIS as the EA simply recites concerns and summarily concludes there won't be any adverse impact.

The impacts under Socioeconomics are also understated. The EA notes that the local economies are driven by tourism, legalized gambling and consumerism and that Spearfish generated over \$856k in hospitality revenue alone. According to the South Dakota Department of Tourism, visitor spending in the Black Hills and Badlands Region was \$1.813 billion in 2022. They note that tourism would diminish because of drilling. They note that Solitario may hire a couple of people and bring in temporary workers for drilling. They may contribute about \$25,000 in state and county sales tax. Further study should be required on the total negative impact to tourism dollars. Tourism revenue is available and chances are even slight losses will far eclipse the meager potential increase in sales tax from a few temporary Solitario employees.

Likewise, the suggestion that home values are going up and won't be affected by drilling fail to take into account that many people don't have any idea this is happening. Presumably home values are not helped by drilling or that would have been mentioned. Regardless, the real questions are what happens to home values and tourism when the next environmental disaster occurs? Why should residents be forced to accept this risk to their health, livelihood and property values? Again, we have everything to lose and nothing to gain here.

While I know this project is not directly about mining, it is the first step toward establishing another gold mine and it is one of many mining projects threatening to destroy the Black Hills bit by bit. A whopping total of 261,000 acres or about 20% of the Black Hills are subject to active mining claims that could become large scale mining operations. If every project is subject to this narrow, low level of scrutiny, the future of the Black Hills is bleak. We already live with the risks posed by the toxic heap leach pads of the Wharf Mine and the Gilt Edge Superfund site here. We don't need more.

I urge you to consider the long-term cumulative impact of what is happening across the Black Hills and use the tools at your disposal to protect the surrounding communities' watersheds, economies and quality of life. Specifically, I urge you to pursue a Mineral Withdrawal for the area covered by the Golden Crest and Ponderosa Project claims as well as the entire Black Hills National Forest, similar to the "Pactola Reservoir-Rapid Creek Watershed Withdrawal #NP-3479. The same reasons apply here - threats to drinking water, recreation and tourism.

Last, I can't help but mention that gold is not a strategic mineral. Most of it is used for jewelry. This is simply about money. If it were about circuit boards, they would focus their resources on reclaiming gold from landfills instead of destroying wilderness and contaminating our environment.

In closing, Solitario Zinc should be required to prepare an EIS for Golden Crest. The EA mentions the Ponderosa Project but is not entirely clear if that is the subject of the EA. To the extent they are combined, my comments are directed at both, however, I would urge that they be kept separate and each be subject to an separate EIS.

Further, I ask that you propose a Mineral Withdrawal for the area covered by both projects and the entire Black Hills National Forest and/or seek to add this land to the Pactola Mineral Withdrawal.

Thank you for your time and consideration of these extremely important issues.