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Comments: As a local resident of Rapid City and geologist working in the Black Hills, I want to express my opposition to the proposed watershed mineral withdrawal around Pactola Reservoir. The Black Hills National Forest has always been, and must remain, multi-use. The proposed withdrawal area is centered on a historic mining district, with over 1,000 surface and underground mine workings visible on publicly available LiDAR imagery. As such it has been the focus of semi-continuous exploration, historic mining, prospecting and claimstaking activities since the 1880's. It is also populated, seen generations of logging activities, cattle grazing, agriculture and is heavily used for recreational activities today. This is hardly a pristine wilderness area and all of these industries and uses have existed alongside each other for over 100 years. A proposed mineral withdrawal is unnecessary.

The withdrawal has been proposed as a solution to protecting water quality in the Rapid Creek watershed, largely in response to the proposed F3 exploratory drilling program. As a professional geologist, I am unaware of any case study on similar federal lands involving the contamination or degradation of surface waters, aquifers or local water wells by an exploratory core drilling program. Existing Federal and State guidelines and laws regarding exploration activities are sufficient to protect water resources from F3's proposed action. I believe a far more significant impact to water quality along Rapid Creek comes from the ever-growing recreational use of forest lands around the watershed and on the reservoir itself. Thousands of motorized watercraft and tens of thousands of recreators almost certainly lead to contamination of the reservoir through spills of gasoline, motor oil, trash and human waste. Thousands of residential sites along the creek and its tributaries use water wells and septic tanks that also impact water quality. The skyrocketing use of recreational vehicles such as ATV's and UTV's on USFS lands has far more impact on wildlife, as well as visual and noise pollution, than the proposed drill program. A mineral withdrawal would have no effect on these significant sources of impact to the watershed. I hope that a full Environmental Impact Statement analysis be performed to evaluate the full impacts of all industries, not just mineral exploration in the watershed.

In addition to the small amounts of gold present in the Silver City mining district, the withdrawal area contains potential for antimony, graphite, nickel, cobalt, zinc and palladium resources, all of which are currently listed as critical strategic minerals by the USGS. All of these metals are present in rock samples I have collected as a geologist from the Silver City mining district. The potential for these minerals cannot be properly assessed from the sparse existing data available to government geologists who will perform the evaluation from a desktop study. The discovery of new mineral resources can only be done through sustained exploration in the field that generates new primary geologic datasets. The withdrawal would prevent this critical work from ever being performed in an area that contains real potential for multiple important metals. Although a company is proposing to explore for gold today, a future company may choose to search for a different strategic metal. I believe the desire to withdraw the watershed due to the impacts of a relatively limited and minor proposed gold exploration program is short-sighted and removes an area that could contain important resources for other strategic minerals and metals vital to the US domestic supply chain.

The proposed withdrawal also ignores important procedural requirements required under NEPA. How can the USFS evaluate the impact of a theoretical gold mining operation in the watershed, and identify or propose alternatives, if no such mine exists? The impacts of an underground versus surface mining operation would be radically different and impossible to evaluate at the current stage. Over 140 years of prospecting and limited historic mining has failed to discover economically viable concentrations of gold in the district and the odds of a gold mine being developed in the watershed are almost nonexistent.

For these reasons, I am opposed to the proposed withdrawal of 20,574 acres of USFS lands around Pactola

Reservoir from mineral entry.