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Title:

Comments: To Whom it May Concern

I am expressing my opposition to the withdrawal of 20,574 acres of land in the Pactola watershed. There is a process for conducting compliant projects on Federal Lands that has become increasingly difficult for good companies to comply with. As flawed as that process may be, the proposed withdrawal circumvents the entire process of establishing actual risks related to the project and developing solutions to mitigate those risks. The withdrawal proposal is not reacting to a real risk that has been identified in the drill plan, but rather it is an arbitrary action that has apparently been proposed from the top of the department down to the field office rather than from the bottom up, as is intended. The withdrawal proposal does not address real concerns associated with other use within the same footprint, including development and recreational activities that are far more damaging on a much larger scale. A withdrawal proposal aimed at protecting a sensitive area of the National Forest would have addressed all potential uses through study. This action is arbitrarily aimed at one particular use, which is mineral exploration. The area of proposed disturbance is minimal and the actual environmental risk is negligible. It is the same process as a water well and nobody seems to be suggesting water wells are not safe in the Pactola Watershed.

I believe that the risks and concerns that are meant to be addressed by this action should be clearly stated and then studied through the same environmental impact study process that a project proponent must comply with to make the case for action. Nobody cares more about the Black Hills than I do. If there is an identified harm with no opportunity for mitigation, than I'm on board for a withdrawal to protect the area ....including all uses that might possibly cause harm.

It does not appear that a potential harm has been demonstrated.... because there is no potential harm. If there is, it should be proven. Imagine if it was possible for a project to be arbitrarily approved without any investigation to support the assertion that it is safe. Not only does this withdrawal do that, but it is also in stark contrast to the Administrations stated goals for mineral development.

Sincerely,  
Gerald M. Aberle