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Comments: I would like to go on record as opposing the proposed withdrawal of 20,574 acres of land from potential mineral or geothermal development in the Pactola watershed area. This withdrawal would not significantly increase the protection of the watershed, and in fact does not address the most significant water quality threat for the water shed. Based on water quality data, the primary danger to water quality in the Pactola reservoir and Rapid Creek is E. Coli which has been detected in excess of water quality standards in Rapid Creek both above and below the reservoir in recent years. Withdrawal of these land from mineral and geothermal development will not address this threat.

The withdrawal of land in the Pactola drainage area from mineral development will do little if anything to protect the water resources of the area in question. Modern mineral exploration and development is subject to significant regulations that protects water resources as evident from the long history of mining and the current high quality of the water resources in the Black Hills. The high quality of the water resources and its natural beauty is the reason why people visit and live in the Black Hills. The same Black Hills that has seen active mining ongoing for 148 years.

While mining can have impacts to water quality, by far the greatest danger are other human activities that can more severely impact water quality. The SD Department of Agriculture and Natural Resources has recently published their annual report identifying impacted waters in the State. In this report, South Dakota's Final (2022) Vision Priority Waters and Status list a number of water bodies that do not meet water quality standards and are a priority to undergo studies or activities to bring these water bodies into compliance. The cause for non-attainment is for a variety of reasons, but none of these exceedances are caused by mining in the State of South Dakota.

For these reasons it is hard to understand why mineral and geothermal development are targeted for a moratorium when much more likely risks are present. A formal risk assessment would certainly identify several more likely threats to water quality in the Pactola watershed than mining and geothermal development. Why these other risks are ignored while targeting an activity that is necessary for modern society is hard to understand.

To continue to utilize the forest for multiple use, I would like for the proposed withdrawal to be denied.