

Data Submitted (UTC 11): 10/26/2024 8:31:52 AM

First name: Karen

Last name: May

Organization:

Title:

Comments: My name is Karen May.

I support the Pactola Reservoir-Rapid Creek Watershed Withdrawal application that the USFS has submitted to the Bureau of Land Management requesting the Secretary of the Interior withdraw approximately 20,574 acres of National Forest System lands administered by the Black Hills National Forest, from all forms of entry, appropriation, and disposal under the public land laws; location, entry, and patent under the mining laws; and operation of the mineral leasing and geothermal leasing laws, subject to valid existing rights, for a term of 20 years.

I am a US citizen. I own and am the steward of farmland in North Dakota and Minnesota that has been in my family for over a hundred years. I am a long time PRO water advocate, PRO nature advocate and PRO people advocate so here is why I am supporting this USFS "withdrawal" proposal.

The Black Hills are the headwaters for both surface and ground water for a multi-state area. Because this pristine and sensitive locale is higher than the surrounding area, the Black Hills capture rainfall and snow. Due to the Black Hills geological characteristics, they are a major collector of ground water. That groundwater serves an area from Canada in the north, to all of the Dakotas, to parts of Montana and Wyoming in the west. Most of the remaining surface water eventually runs east. This water serves much of western South Dakota. It also provides water to a good portion of the eastern part of the state, which pumps water from the Missouri River for municipal, rural water, and agricultural purposes. I am a user of aquifer water for agricultural purposes in North Dakota. Consequently I am aware that the Black Hills USFS "withdrawal" area under consideration is an important "recharge" area for the water assets of a multi-state region.

We all agree that climate change here in the middle of the North American continent is exacerbating drought conditions, raising the threat of wildfires and increasing the number of violent weather events resulting in massive, damaging flooding and social chaos in our communities. These events are reducing the availability of clean usable surface water and interrupting vital aquifer recharging.

The resultant water shortage pits tribal, municipal, agricultural, and outdoor recreation interests against each other because for each group, their very economic and cultural survival is at play.

So if mining is allowed and encouraged on public land by the US Government, that mining will use a huge amount of the precious available water for the benefit of very few at the expense of the many. In addition, that mining fouls the ecosystem with long lasting toxic impacts that are widespread and very difficult to recover from. For open pit mining, it also involves removing topsoil and plants, leaving barren ground with less ability to buffer climate change. The impacts and reclamation are inevitably paid for by the public sector (ie the local public already suffering from the impact of that mining), not the private mining benefactors.

Today, roughly 202,000 acres of the Black Hills are under active mining claims. Even if just a couple of those companies start mining, we're talking millions of gallons of water per year that could be diverted from these other uses along with a bill for clean up costs that will bankrupt the public coffers.

As you know, the 1872 Mining Law under which National Forest-controlled lands are leased does not charge a fee for abandoned mine cleanup. Currently the backlog for cleanup of abandoned mines in this area is estimated by the Environmental Protection Agency (EPA) to be between \$20-\$54 billion dollars which is more than the entire yearly US Superfund budget.

This "withdrawal" being advocated by the USFS gives the Black Hills tribal, municipal, agricultural, and outdoor recreation communities the motivation to work cooperatively with each other and look at water as their common public asset.

The proposed "withdrawal" area around Pactola Reservoir and upper Rapid Creek totals 20,574 acres. This is only about 10% of the upper Rapid Creek drainage. Though it is small, it represents a keystone opportunity to bring these communities together in collaboration.

Until the 1872 Mining Law is changed, the National Forest-controlled lands throughout the West are primarily governed by the 1872 Mining Law. This outdated law allows people - including foreign-owned corporations - to mine federal public lands without paying rents or royalties, and to shut the public out of these lands. This is unfair, not in our national interest, does not promote sustainability, does not restore ecosystem health and results in building adversarial communities not cooperative collaborative communities. Through the 1872 Mining Law, private corporations profit while polluting precious irreplaceable public water resources and permanently scarring the land.

Some of the streams in the Black Hills are so clean that they are blue-ribbon trout fisheries. The area is also a hub of water recreation - boats, paddleboards, swimming, tourism, and shoreside enjoyment. Without clean water, this economic activity would either be minimized or go away. With this "withdrawal" protect the sacredness of the He Sapa (Black Hills) from toxic mining. Preserve the cultural signs of all the lives lived here for millennia. Show respect for the people, animals, and plants who live here now.

As my indigenous friends frequently remind me, "Water has always been and will continue to be one of the primary identity shapers to nations and communities around the world. Water is social, cultural, and spiritual. We need to protect it." Let us make our nation proud with this "withdrawal" proposal!

Please expedite the USFS "Withdrawal" proposal to the Secretary of the Dept. of Interior!

Thank you for considering my point of view.

Sincerely, Karen May