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Comments: My comment represents my opinions and not those of my employer.

I am a hydrogeologist and registered Professional Engineer who has been working on groundwater and mineral industry projects in the Black Hills my entire career. I see myself as a steward of the environment and work towards safe and sustainable mineral resource development. I have experience and knowledge specific to the Black Hills hydrogeologic system as well as environmental impacts associated with mineral exploration. I have also worked on the recently approved Environmental Assessment (EA) for Solitario's Golden Crest Mineral Exploration Project in the northern Black Hills and I am intimately familiar with the USFS NEPA project, local environmental and social resources, and effects of mineral exploration drilling.

First and foremost, I support the No Action Alternative. The proposed mineral withdrawal (the Proposed Action) lacks sufficient documented environmental benefit to support its selection as the USFS' preferred alternative. The Draft EA only speculates on potential impacts from mineral exploration and development and is not based on a factual or actual project impact assessment.

The reasonably foreseeable scenario within the No Action Alternative is speculative or hypothetical and was not developed based on reasonably foreseeable future exploration or in consultation with mineral industry representatives. Additional alternatives should be included and evaluated in the EA that explore mineral exploration and development scenarios that are based on known mineral resource targets. An Alternative is also needed that considers mineral exploration that does not necessitate the use of new access trails or roads to reach drill sites as a large portion of speculative effects of exploration within the Draft EA No Action Alternative is tied to new access roads. Documentation about the USFS' discussions and decisions to not include other Alternatives in the analysis is needed.

I support the USFS and BLM implementation of NEPA being conducted for specific defined and concrete projects, where project specific impacts and mitigation can be evaluated on a case-by-case basis. Recent approval of Solitario's Golden Crest Exploration Plan of Operations, including USFS required baseline assessments and mitigation, is proof that the USFS NEPA process works and is adequate at addressing and minimizing project effects.

Mineral exploration and development on existing claims within the proposed withdrawal area may still take place under both the Proposed Action and No Action Alternatives. As indicated in the Draft EA, that applies to a notably large portion of the mineral withdrawal area including areas immediately upgradient of Pactola. Therefore, the proposed mineral withdrawal will not prevent all mineral exploration upgradient of Pactola. Protections must and shall be developed through individual project Plan of Operations (POO) and USFS decisions on those projects.

The proposed mineral withdrawal only calls out one resource use - mineral resources. Potentially withdrawing the project area only from mineral resource investigation is a "witch hunt". The Draft EA fails to adequately document the existing and potential future impacts of other land uses including but not limited to grazing, timber harvest, transportation, and recreation. There are several sources and documents that describe known impacts to Rapid Creek from leaky septic tanks downgradient of Pactola. Water quality data from a mine in the northern Black Hills has documented increased sediment load resulting from ATV/UTV usage in that area. The Draft EA fails to adequately summarize, cite, and address water quality of the Affected Environment or current condition, failing to note the approved land uses on USFS land that are contributing to current water quality impacts. If the USFS wants to be "fair", the proposed withdrawal should ban all land uses that have proven or suspected future impacts to water quality, that would include banning recreational vehicles, transportation along roads and highways, and immersion recreation or boating on Pactola. Note, I am not proposing said banning of all land

uses, but rather using the statement to demonstrate the farce that is the proposed mineral withdrawal.

Next, one of the primary concerns and reasons for the initiation of the proposed mineral withdrawal was protection of water quality in Pactola reservoir and Rapid Creek. The Draft EA, inclusive of the Watershed Resources Report (WRR), fails to prove future mineral exploration would lead to watershed-scale water quality impacts. The WRR indicates water-quality impacts from mineral exploration would be limited and localized at drill sites and potential new access roads. I agree with this assessment. Water quality impacts are limited in scale and duration. The recent approval of Solitario's Golden Crest POO which documented potential water quality effects and included mitigation measures to minimize those effects proves the existing USFS NEPA process works in protecting water quality and does not necessitate nor support a proposed mineral withdrawal.

The WRR notes water quality impacts could be greater from actual mine development, but that "a full investigation of water quality impacts from mine development would occur as part of the permitting process." The USFS cannot simultaneously speculate effects of mineral exploration and support the Proposed Action while also saying effects are evaluated during permitting and to trust the permitting process. I fully support the existing USFS, BLM, and SD Dept. of Agriculture and Environment requirements for both mineral exploration drilling (including plugging and abandonment regulations) and mine development are adequate to protect the water quality of the proposed mineral withdrawal area or any future exploration drilling on USFS land.

The Draft EA also fails to even speculate on impacts of the No Action Alternative or Proposed Action Alternative on water quality and quantity to the cities of Rapid City, Box Elder, and Ellsworth Air Force Base. It also appears neither Box Elder nor Ellsworth were consulted regarding their needs and concerns about the proposed mineral withdrawal. The Proposed Action cannot be protective of regional water quality supplies when it fails to even speculate on impacts from a hypothetical exploration project. The Draft EA fails to adequately summarize water quality of the affected environment and existing sources that impact or may impact water quality or quantity to downstream users.

The WRR notes that new access roads could provide a route for invasive species seeds. However, current conditions and existing roads already expose USFS lands to invasive species and weeds. For example, a recent special species vegetation survey conducted in the southern Black Hills found weeds and invasive plants at slightly higher densities on USFS land as compared to adjacent private lands. Furthermore, Solitario's recent POO had mitigation requirements imbedded in the POO and FONSI to reduce and minimize the introduction of additional invasive species seeds.

I also request the USFS extend the public comment period on the Draft EA to allow for adequate review time of the Draft EA and associated resource reports.

The US Dept. of Energy and Dept. of Defense should be consulted prior to a final decision so that those agencies may provide their input on restricting the development of critical resources that may be necessary for national security and economic development.