Data Submitted (UTC 11): 5/17/2025 12:38:26 AM First name: BRUCE Last name: ELLISON Organization: Title:

Comments: Comments: I am writing to most strongly urge the Forest Service to reject the proposed Pete Lien and Sons Rochford Mineral Exploratory Drilling Project, proposed amidst the Rapid/Castle Creek Watershed.

The Applicant proposes to drill at multiple sites in close proximity to the North Fork of Castle Creek and mainstem Castle Creek. There is much history of exploratory drilling which leads to the conclusion that there would be a high likelihood it would contaminate critical water resources (surface and subsurface), due to the extreme infiltration rate of the proposed project areas high mountain geo-hydrologically important water resource areas, with the real threat from drilling fluid spills and blow-outs, as well as increased erosion and sedimentation of surface waters due to heavy equipment traffic.

The North Fork and mainstem Castle Creek waters form and feed some of the best cold water fisheries in the Black Hills. They also flow into the South Fork of Rapid Creek which flows into the Pactola Reservoir, whose acre-feet are owned by Rapid City. There is a federal mineral claims withdrawal protecting the Jenny Gulch portion of Pactola. Pactola is a major recreational area including fishing. The protection of a major water resource flowing directly into the Reservoir remains at this point with the US Forest Service. Flowing out of Pactola Reservoir, Rapid Creek continues to flow down to and past Rapid City and into the Cheyenne River. Prior to reaching Rapid City, Rapid Creek becomes a major recharge resource of the major aquifers, which flows east out of the Black Hills providing domestic and agricultural water resources for the people in the area, including Rapid City and Ellsworth Air Force Base. This water resource downflow and downstream cannot be truly protected without protecting the waters upstream.

The Forest Service is well aware of this. As shown by a review of the recently-scoped Sawbuck Forest Management Project, the proposed exploratory drilling operation overlays the very same area. As an Opportunity to Comment (Jan 2025--attached) document notes, "Rapid Creek is the only municipal watershed in the project area. These watersheds are currently rated as "functioning at risk," based on eleven key factors, such as water quality, forest cover, and forest health. The area presents opportunities to improve the watershed conditions for aquatic organisms, riparian wetland plants, and aquatic habitat, which currently vary from poor to good condition across the area.

Not only did the Sawbuck Project document state that the Upper Rapid/Castle Creek Watershed was currently functioning at risk, it further described the degraded conditions on the project area, "Over time, stream channels and riparian wetland communities in adjacent grassland meadows and aspen stands have been degraded due to conifer encroachment and the absence of beavers on the landscape. This degradation has resulted in reduced fish habitat quality, lower forage productivity in aspen stands and meadows, increased erosion and sedimentation, a loss of plant species diversity, drying of wetlands and riparian areas, decreased water storage across the landscape and stream channel incision."

Enhancement efforts, not further degradation-producing mineral operations, requires the Forest Service to reject the proposed exploration permit application. Pete Lien & amp; Sons proposed drilling project would likely only exacerbate conditions like loss of plant diversity, introduction of invasive species, drying of wetlands and riparian areas, increasing erosion and sedimentation, and reduction of fish habitat quality. Common sense would dictate doubt that introduction of heavy equipment, traffic, noise, and disruption will beckon what few beavers we have in the upper watershed to consider resettling the North Fork of Castle Creek.

The Applicant's existing mining operations are well known to those of us in the region. Common knowledge and complaints surround the massive open pit areas, creating dust and water contamination in the surrounding areas.

Exploration has only one purpose. It is to geologically study a particular area believed to contain minable quantities of the desired ore - in this case graphite.

Additionally, the proposed exploratory drilling project threatens a critical tributary and recharge area that the North Fork of Castle Creek represents. The proximity of some of the proposed drilling sites, would involve loud drilling engines, and similar noise from heavy truck and other vehicle traffic, together with dust and local waters used for ceremonial purposes. It would cause substantial interference with the religious rights to the ceremonial use of Pe'Sla area owned and historically and currently used for ceremonial purposes by regional Lakota Tribal members. It was only last year that the Black Hills National Forest Service signed an Memorandum of Understanding (MOU) with the Tribes, established a framework for co-stewardship of the Black Hills National Forest, fostering collaboration and shared responsibility."

As the MOU observed:

"Pe'Sla, a sacred site for the Sioux Tribes, lies at the heart of the Sawbuck project area. In a significant step toward honoring this heritage, the USDA Forest Service, Rocky Mountain Region, Black Hills National Forest, recently signed a Memorandum of Understanding (MOU) in 2024 with the Oceti Sakowin Great Sioux Nation Tribes."

My wife and I purchased timber and rangeland on the southwest side of Deerfield Reservoir some four years ago, across from Pe'Sla. We were horrified to learn that a proposed emergency cell tower only a few hundred feet from our property line might involve a constantly blinking red light, totally disrupting our peace and the natural beauty of the night skies. We understood that through negotiation with the Tribes who steward Pe'Sla, the tower was shortened just enough so that it fulfilled its necessary public safety function, but the light was no longer necessary.

We were incredibly thankful, but are now greatly alarmed to learn that now instead of the quiet and natural beauty we get to enjoy because of their negotiation, that Pe'Sla would likely be assaulted by an industrial project in clear view (and hearing, and smelling of diesel and lubricant fumes) of Pe'Sla's boundary. It's an outrage. How does this proposal "honor that heritage," and "foster collaboration and shared responsibility"?

Lastly, as property owners in the area, we are concerned about the hazards of additional heavy traffic in the area. The roads throughout the Deerfield/Rochford area are traveled over three seasons by UTVs, RVers, logging, cattle-hauling, and other trucks, and all manner of local and tourist traffic. In the winter months, they are less traveled, but can be extremely treacherous. Adding additional industrial traffic on these roads undermines the public safety and the recreational value of the entire area. The way machine noise travels in the area, we will also be negatively impacted by the sounds created by the drilling machines.

In summary, please review the Forest Service's own work and analysis of the management needs of the proposed drilling project area and surrounding region, as well as the clearly stated need to repair and protect the Rapid/Castle Creek Watershed for the benefit of plant and animal communities and downstream users. Consider also what responsibilities and agreement the Forest undertook in signing the MOU with Oceti Sakowin Tribes.

Please reject the proposed Pete Lien and Sons Rochford Mineral Exploratory Drilling Project. Thank you.