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Rapid City Legal & Finance Committee
Rapid City, SD, 57701

Dear Rapid City Legal & Finance Committee members and Pauline Sumption,

We are writing to you to ask you to support the draft resolution (or one similar to it), which states that Rapid City opposes mining in the Rapid Creek drainage. We believe a draft resolution is being offered with hopes it will move through the approval process, so that Rapid City can send a letter before Wednesday, February 5th. We hope you will move this issue forward to the full Council meeting on Monday.

We also request you assign staff to create a scoping letter that asks the Forest Service a lot of tough questions about potential mine exploration and subsequent potential mine at Jenny Gulch F3. We hope the City will at least asks the Forest Service to provide geo-chemical data and details on eventual mining system planned. Ask them to collect a lot of base line data on weather, water, air quality, underground hydrology, soil, historic/cultural properties and biodiversity values. We hope you will ask for the Forest Service to do an extensive and thorough Environmental Assessment or Environmental Impact Statement.

Here is a link to the Forest Service Web page on the Jenny Gulch F3 project
<https://www.fs.usda.gov/project/?project=57428>
link to map on this page
https://www.fs.usda.gov/nfs/11558/www/nepa/112923_FSPLT3_5213879.pdf
Instructions on Scoping process
https://www.fs.usda.gov/nfs/11558/www/nepa/112923_FSPLT3_5213880.pdf

WHY WORRY:

We suggest that you should be worried as there is exploration currently associated with Mineral Mountain Resources south of Rochford and the new exploration proposal pending north of Silver City and Pactola (Jenny Gulch-F3). The 1872 Mining Law, does not permit the Forest Service to say no to “hard-rock” mining - they can only impose mitigations.

Why you should be concerned about gold mining near Rapid City's water supply (Pactola Reservoir)?

Kuiper's data on miserable performance of mines at protecting water quality in America.

You will learn from this report (scroll down for links) about the failure of NEPA studies to identify and predict problems with mines and their effect on water quality. We hope reading it scares you. Some quotes from Kuiper's short article "Mine Water Quality: Predictions Versus Reality" are just below:

"A subset of 25 "case-study" mines (see table) for which operational or post-operational water quality data could be obtained was selected to compare predicted and actual water quality. The subset was selected for characteristics with similar distribution as the 183 mines in terms of location, commodity, mining methods, climate, proximity to water resources, and acid drainage and contaminant leaching potentials"

Most case-study mines predicted no impacts to surface water or groundwater quality after mitigations were in place, but in the majority of these mines, impacts have occurred" ...

"Based on analysis of the 25 mines, the lack of adequate geochemical characterization is the single most identifiable root cause of water quality prediction failures. Poor hydrologic characterization and mitigation failure are additional causes. The results also showed that the combination of proximity to water resources and moderate to high acid drainage or contaminant leaching potential increases the risk of water quality impacts and is a good indicator of future adverse impacts" (http://www.swhydro.arizona.edu/archive/V6_N3/dept-ontheground.pdf)

KUIPER's REPORT

PHAS also provides you with this link to 2006 Kuiper's report on their study of the history of mines in US on meeting water quality goals/predictions. This is a long report 228 pages without appendices - "Comparison of Predicted and Actual Water Quality at Hardrock Mines".

https://earthworks.org/publications/comparison_of_predicted_and_actual_water_quality_at_hardrock_mines/

"The overall purpose of this study is to examine the reliability of pre-mining water quality predictions at hard rock mining operations in the United States."

Here are much shorter summary versions:

2007 Article-" Mine Water Quality: Predictions Versus Reality")
http://www.swhydro.arizona.edu/archive/V6_N3/dept-ontheground.pdf

& 2005 Conference Document

<https://www.asmr.us/Portals/0/Documents/Conference-Proceedings/2006/1122-Maest.pdf>

We hope you realize that Kuiper's was studying mines that were existing within the regulatory reality before President Trump started "cutting red tape", which "cutting" has resulted in huge negative impact to regulation of environmental impacts in America. His administration has created a huge risk to the security of future generations to drink water, breath air and experience biodiversity and nature in the USA.

We refer you to this New York Times Article on "95 Environmental Rules Being Rolled Back Under Trump"

<https://www.nytimes.com/interactive/2019/climate/trump-environment-rollbacks.html>

We advise you that the Council on Environmental Quality (CEQ) regulations that enforce the National Environmental Quality Act (NEPA) are being revised by the Trump administration right now. So, the rules we are accustomed to for evaluating mining and other projects on Forest Service lands are also a moving target. Government information on this rollback:

<https://www.whitehouse.gov/wp-content/uploads/2020/01/20200122FINAL-Denver-Public-Hearing-Press-Release.pdf>

<https://www.whitehouse.gov/wp-content/uploads/2020/01/20200110FINAL-FACT-SHEET-v3.pdf>

New York Times on the NEPA Roll back:

<https://www.nytimes.com/2020/01/09/climate/trump-nepa-environment.html>

We are an environmental group, a SD non-profit corporation, whose members reside mostly in western SD. We are a chapter of the National Audubon Society.

Thanks,



Nancy Hilding
President

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