As a resident of Pennington County would like to request the following items be considered on mining ordinance. 1) opportunity for meaningful public comment periods before approval of any large-scale mining activity, 2) reclamation bonds in the millions—given the mining industry's tendency to walk away and go bankrupt when they don't want to do cleanup. 3) substantial consultation with tribal THPOs before any mining project is initiated. Please respect our culture.

Thanks

Jean Roach
From: John Hopkins  
Sent: Wednesday, July 10, 2019 11:24 PM  
To: Hennies Holli <hollih@pennco.org>  
Subject: Re: Pennington County Hard Rock Mining Draft Ordinance Online for Public Comment

CAUTION: This email is from an outside source. Use caution before opening attachments, clicking links or providing confidential information.

I am a resident of Rochford and wish to make a couple of comments.  
Please allow plenty of time for public comment.  
Please make sure the tribes are consulted before any permits are issued.  
And please make the bond requirement significant!  
Thank you.  
John L. Hopkins
From: Linda Sandness
Sent: Monday, July 22, 2019 9:34 AM
To: County Commissioners
Subject: Comments on draft of Section 321 on Mining

CAUTION: This email is from an outside source. Use caution before opening attachments, clicking links or providing confidential information.

As a homeowner in the Rochford area as well as a concerned citizen of all of the Black Hills, I would like to share my concerns with you.

- Please allow a generous, appropriate amount of time for public comments.
- Please make certain that the American Indian tribes are consulted and heard before decisions are made.
- If any mining is allowed, please make the bond requirement significant to help hold any work accountable.

Thank you.
Linda Sandness
From: Carol Hayse
Sent: Thursday, July 25, 2019 9:35 AM
To: Hennies Holli
Subject: data regarding hard rock mining

CAUTION: This email is from an outside source. Use caution before opening attachments, clicking links or providing confidential information.

Ms. Hennies—Would you be kind enough to share this data re. the contributions of hard rock mining to the local economy with each Planning Commission member? Thank you so much!

"Effects to the Economic Contributions of Mining"

The Black Hills National Forest and the surrounding area have a long history of mining for locatable minerals. Commercial mining contributes to the local economy with jobs and income generated from exploration and extraction. However, in terms of economic contributions to the local economy, the effects are modest. Mining makes up a relatively small portion of employment in the South Dakota counties in the analysis area but a larger portion in Crook County, Wyoming (table 13). Trends in mining employment vary between counties. Where Crook County, Wyoming experienced a general upward trend since 1998, Lawrence County, South Dakota has seen a steep decline in mining employment in the same time period.

Table 13. Percent of total employment in mining, 2015

<table>
<thead>
<tr>
<th>Geography</th>
<th>Employment in Mining Sector as Percent of Total County Employment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Custer County, SD</td>
<td>3%</td>
</tr>
<tr>
<td>Lawrence County, SD</td>
<td>3%</td>
</tr>
<tr>
<td>Pennington County, SD</td>
<td>1%</td>
</tr>
<tr>
<td>Meade County, SD</td>
<td>0%</td>
</tr>
<tr>
<td>Crook County, WY</td>
<td>18%</td>
</tr>
<tr>
<td>South Dakota</td>
<td>0%</td>
</tr>
<tr>
<td>Wyoming</td>
<td>11%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2017

A model of mining occurring across the entire Black Hills National Forest finds the mineral and energy production resource program contributes an average of less than ten jobs annually to the local economy (USDA Forest Service 2016b). These jobs resulting from the mineral and energy program translate to less than $100,000 in labor income annually. The mineral resource program, relative to other Black Hills National Forest resource programs, has the smallest contribution to the local economy in terms of jobs and income (table 14).
Table 14. Economic contributions of Black Hills National Forest resource programs

<table>
<thead>
<tr>
<th>Resource Program</th>
<th>Employment Contributions</th>
<th>Labor Income Contributions (in 1,000s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recreation by Non-Local Visitors</td>
<td>420</td>
<td>$11,100</td>
</tr>
<tr>
<td>Recreation by Local Visitors</td>
<td>70</td>
<td>$2,200</td>
</tr>
<tr>
<td>Livestock Grazing</td>
<td>200</td>
<td>$7,700</td>
</tr>
<tr>
<td>Forest Products</td>
<td>1,470</td>
<td>$58,500</td>
</tr>
<tr>
<td>Minerals &amp; Energy Production</td>
<td>≤ 10</td>
<td>≤ $100</td>
</tr>
<tr>
<td>Payments to States/Counties</td>
<td>140</td>
<td>$6,100</td>
</tr>
<tr>
<td>FS Resource Management Investments</td>
<td>750</td>
<td>$30,900</td>
</tr>
<tr>
<td>Recreation by Non-Local Visitors</td>
<td>420</td>
<td>$11,100</td>
</tr>
</tbody>
</table>

Note: Employment values are reported as an average annual number per resource program. Labor income contribution values are reported as thousands of 2014 dollars.

Source: USDA Forest Service 2016b"
Hennies Holli

From: NoReply
Sent: Thursday, July 25, 2019 9:48 AM
To: County Commissioners
Subject: WEBFORM: Board Of Commissioners - Section 321 - Comments

Section 321 Comments

Your Name: Carol Hayse

Email Address:

Street Address:

City, State, Zip:

Phone:

Comments: Forest Service figures from 2017 show that hard-rock mining contributes next to nothing to our economy. Mining in Pennington County is responsible for only 1% of our economy, Across the entire Black Hills mining contributes only 10 jobs annually. In contrast, recreation contributes about 490 jobs annually; livestock grazing contributes 200 jobs; and forest products contributes 1,470 jobs. Encouraging hard-rock mining could make only a tiny bump in our economy, while causing destruction of precious natural resources, especially water.

"Effects to the Economic Contributions of Mining"

The Black Hills National Forest and the surrounding area have a long history of mining for locatable minerals. Commercial mining contributes to the local economy with jobs and income generated from exploration and extraction. However, in terms of economic contributions to the local economy, the effects are modest. Mining makes up a relatively small portion of employment in the South Dakota counties in the analysis area but a larger portion in Crook County, Wyoming (table 13). Trends in mining employment vary between counties. Where Crook County, Wyoming experienced a general upward trend since 1998, Lawrence County, South Dakota has seen a steep decline in mining employment in the same time period.

Table 13. Percent of total employment in mining, 2015

Geography

Employment in Mining Sector as Percent of Total County Employment

Custer County, SD

3%
Lawrence County, SD
3%

Pennington County, SD
1%

Meade County, SD
0%

Crook County, WY
18%

South Dakota
0%

Wyoming
11%

Source: U.S. Census Bureau 2017

A model of mining occurring across the entire Black Hills National Forest finds the mineral and energy production resource program contributes an average of less than ten jobs annually to the local economy (USDA Forest Service 2016b). These jobs resulting from the mineral and energy program translate to less than $100,000 in labor income annually. The mineral resource program, relative to other Black Hills National Forest resource programs, has the smallest contribution to the local economy in terms of jobs and income (table 14).

Table 14. Economic contributions of Black Hills National Forest resource programs

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Forest Products
1,470
$58,500
Minerals & Energy Production
= 10
= $100
Payments to States/Counties
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$6,100
FS Resource Management Investments
750
$30,900
Recreation by Non-Local Visitors
420
$11,100

Note: Employment values are reported as an average annual number per resource program. Labor income contribution values are reported as thousands of 2014 dollars.
CAUTION: This email is from an outside source. Use caution before opening attachments, clicking links or providing confidential information.

Greetings;

The negative environmental and financial impacts of large-scale hard rock mining in the County would outweigh the positive impacts. Water is more valuable than gold in our semi-arid area.

The "Hard Rock Mining Ordinance" should favor recreation, agriculture, cultural/historical sites, and tourism over mining.

At least some public hearings on the proposed Ordinance should be held in the evenings and on weekends, so the general public can comment on the Ordinance.

The Ordinance should clearly state that the County can deny a mining permit application.

Sincerely,

John Dale
Section 321 Comments

Your Name: Wendy M Luedke
Email Address:
Street Address:
City, State, Zip:
Phone:
Comments: Water is Life! Please do not allow the beauty of the Hills to be even more disrupted by allowing Hard Rock Mining to continue. Gold mining has a lasting impact on our environment: its ecosystem, watersheds, wildlife and our unspoiled wilderness. Cyanide and Mercury are released into our environment. Lastly, don't we already have enough eyesores here with the Homestake open pit and Wharf mines? The social-economic impact does not come close to the environmental damage caused by gold mining.
Section 321 Comments

Your Name: Vickie Hauge

Email Address:

Street Address:

City, State, Zip:

Phone:

Comments: Our Lake Pactola is one of our gems in the hills. We know how much pollution can be caused in the processing of gold in the hills. Clean up at Gilt Edge mine that is still after all these years, not done. Our state is a tourist mega center & we cannot risk spoiling such a tourist destination. Pennington County depends on the water also & would be in dire straits if there were to be chemicals leak into the water way. Think hard about company promises. They are not going to cast s bad light when trying to get their gold mine okayed. Please don’t let money blind you into allowing this.

Thank you,
The following information was submitted from a web form on the Pennington County website.

DO NOT click reply. To reply, copy and paste the e-mail address below into the "To" field of an outgoing message.

>>>>>>>>>>>>>>>>>>>>>>>>>>

Submitted Information:

Your name: patricia braun

Your e-mail address:

Your phone number:

Who would you like to send your message to? All 5 Commissioners

Message: As a native of Lead, South Dakota, I have been around mining all of my life. I benefited from my father supporting us through his job with Homestake. I also witnessed, first hand, the destruction of this process and became aware of the archaic 1800’s law that allows this massive destruction. My father was a “company man” but was disturbed by the devastation of mining as he loved the Black Hills.

Please, please, please protect the waters we so desperately need. Protect our public lands. Protect the sacred lands. we have witnessed that, once the water is tainted, the land ravaged, it is forever gone. Mining a: our headwaters (Rochford) is bac (and you know that). make a stand for future generations. Job creation? Tax income? this has never been a sustainable reason for mining as it’s destruction is never re-couped- history attests to this.

Make a stand, Commissioners, make Pennington county a haven for creative thinking, do the right thing- NO MINING IN PENNINGTON COUNTY- precious metals of any kind I leave it alone!
Hennis Holli

From: Therese Furois
Sent: Sunday, September 22, 2019 1:27 PM
To: County Commissioners
Subject: Mining in the Black Hills

CAUTION: This email is from an outside source. Use caution before opening attachments, clicking links or providing confidential information.

I am very concerned about the mining proposed for the Black Hills. My personal experience was of the polluted black creek that meandered through Deadwood. The mining waste from Homestake mine sent tarry black water that ran down through Deadwood and Whitewood Valley and on to the Missouri River. It was a black and unfit to drink or bathe in.

I am even more concerned about uranium mining. It remains radioactive for a long long time and once our waterways are polluted, I don't think they can ever be returned to as clean as they are now. This would be a long term health hazard for both humans and cattle that depend on this water for their existence. We are a semiarid area of the country and need all the water that we have.

Gold mining also has its hazards even though the process of refining is probably somewhat better than in early years. It is not worth disrupting the land for gold. Although it is a precious metal it is hardly essential to life. Water is essential. For the sake of money, and to feed big business, the dollars spent in mining may reap rewards for someone but pollute our earth and water into the future. The earth is sacred to Native Americans and many others. It is unfair to pollute land and water for the benefit of a few people now while future generations will suffer.
Dear County Commissioners,

As you are creating a Hardrock Mining Ordinance for Pennington County, please make certain that it includes the ability to deny a permit and that there will be evening and weekend opportunities for public input.

I hope you will keep in mind that corporations do not die from lack of clean water, and that although people who live nearby will be impacted by noise, dust and road de-erodation, any harmful event to water will extend a long distance in space and time. There are too many examples of accidental releases of polluted water to think that it can be safely stored.

The history and future of land and water are essential to life. It would be immoral to put life that has no control over these decisions at risk. Earth and water are required for life; money and mined materials are not.

Thank you for your work.

Sincerely,

Carol Merwin
Dear commissioners,

For more than 40 years, the Black Hills has been a vacation destination for my family. Just this summer we had an extended family reunion there with 25 family members from 7 states. It was wonderful. The Black Hill are our state's treasure, and must be protected.

Nearly 3 decades ago, my wife and I were among the many citizens who worked to protect the Hills from exploitation by hard rock mining. We lost that fight, and numerous open pit mines wreaked devastation and left a giant mess for taxpayers to clean up. Please, let's not repeat that mistake.

In your current deliberations, please include the maximum protections possible from this destructive exploitation of our land and water. Please do all you can to prevent yet another wave of foreign companies from ripping us off and leaving us with devastation and bills to pay.

Thank you,
Jerry Wilson
Retired managing editor, South Dakota Magazine
Retired county commissioner, Cay County
CAUTION: This email is from an outside source. Use caution before opening attachments, clicking links or providing confidential information.

I'm asking to: Provide protection from the potential impacts of mining exploration by putting in place a strong exploratory drilling permitting process.
Also to Protect cultural and historical resources by enforcing meaningful consultation with Tribal Governments and information from other local specialists.
Protect the public interest by limiting the locations and conditions under which mining would be allowed. For example, it's not in the public interest to allow mining near streams and lakes.
Kathy durrum, sd

Sent from my iPhone
Subject: FW: WEBFORM: Planning and Zoning - Contact Us

-----Original Message-----
From: NoReply
Sent: Thursday, September 26, 2019 11:28 AM
To: plz <plz@pennco.org>
Subject: WEBFORM: Planning and Zoning - Contact Us

The following information was submitted from a web form on the Pennington County website.

DO NOT click reply. To reply, copy and paste the e-mail address below into the "To" field of an outgoing message.

>>>>>>>>>>>>>>>>>>>>>>>>>

Submitted Information:

Your name: Kathy Durrum

Your e-mail address:

Your phone number:

Message:

I'm asking to: Provide protection from the potential impacts of mining exploration by putting in place a strong exploratory drilling permitting process.

Also to Protect cultural and historical resources by enforcing meaningful consultation with Tribal Governments and information from other local specialists.

Protect the public interest by limiting the locations and conditions under which mining would be allowed. For example, it’s not in the public interest to allow mining near streams and lakes.
Section 321 Comments

Your Name: Wendy M Luedke

Email Address:

Street Address:

City, State, Zip:

Phone:

Comments: Provide protection from the potential impacts of mining exploration by putting in place a strong exploratory drilling permitting process.

- Protect cultural and historical resources by enforcing meaningful consultation with Tribal Governments and information from other local specialists.

- Protect the public interest by limiting the locations and conditions under which mining would be allowed. For example, it's not in the public interest to allow mining near streams and lakes.

- Broaden public participation by providing public notices in more newspapers and requiring reasonable public comment opportunities.

This is our drinking water, our source of life, it is not for sale/profit.
To Whom it May Concern,

Regarding Hard Rock Mining Operations —

As a 4th generation summer resident in the Black Hills I urge you to cautiously consider any drilling in Pennington County because of the possibility of contaminating the water supply. Water is a precious commodity that should be protected.

In addition, please have a transparent process with all members of the public so that people are aware of what is being allowed on the land. In particular, please take the interests of the indigenous communities into account by collaborating with Tribal Governments who have a historical and cultural interest in protecting the beautiful Black Hills.

Thank you for your time.

Best,

Caitlin
Section 321 Comments

Your Name: Richard Bell

Email Address:

Street Address:

City, State, Zip:

Phone:

Comments: Protecting the Black Hills from mining is important to me personally because all rivers and streams proceed downstream from the Black Hills. So if mining occurs in the central Black Hills, it will also affect waters to the east, including Rapid City. We all share the responsibility to protect clean water. So in that light, here are my comments about the draft Section 321 - Hard Rock Mining Operations:

1) PROVIDE PROTECTIONS FROM THE POTENTIAL IMPACTS OF EXPLORATION

Add a section to the proposed ordinance that would protect our County from the potential impacts of mining exploration. The permitting process for exploratory drilling should include a complete environmental and socioeconomic study, site plan, operation plan, bond, and reclamation plan. Prohibit exploratory drilling within two miles of a recreation area, research natural area, cultural or historical site, riparian area, designated indigenous sacred site, national monument, or conservation easement.

2) PROTECT CULTURAL AND HISTORICAL RESOURCES BY ENFORCING MEANINGFUL CONSULTATION WITH TRIBES

The current draft Ordinance provides only for notice to Tribal Historic Preservation Officers (THPOs) in a couple of situations. Tribal governments that have a historical connection to the area for which mining is requested should have adequate opportunity to participate in meaningful government-to-government consultation. Other local specialists in cultural and historical resources, such as local Historical Societies and librarians, should also be asked to give input on locations and items that require protection.
3) PROTECT THE PUBLIC INTEREST BY LIMITING THE LOCATIONS AND CONDITIONS UNDER WHICH HARD ROCK MINING WOULD BE ALLOWED

In the “Purpose” section, add “protection of the public interest” to the purposes of the Ordinance. Define “public interest” throughout the Ordinance to include the following information. It is not in the public interest to permit mining:

A. That requires perpetual care of any type.

B. Within two miles of a recreation area, research natural area, cultural or historical site, riparian area, designated indigenous sacred site, national monument, or conservation easement.

C. On land zoned for agriculture.

D. Unless the citizens of the County are protected from subsidizing the mining. The individual or company that wants to do the mining will show how it will bear 100% of both direct and indirect costs of the mining in the short- and long-term before any permit is considered.

E. Unless the individual or company that wants to mine can identify five similar operations at which water was completely reclaimed to its baseline condition.

F. If the individual or company requesting a permit, their predecessor, a subsidiary of the company, or a parent company has ever been cited for a violation of any county, state, federal, or international laws relating to exploration, mining, or reclamation.

4) BROADEN PUBLIC PARTICIPATION BY PROVIDING PUBLIC NOTICES IN MORE NEWSPAPERS AND REQUIRING REASONABLE PUBLIC COMMENT OPPORTUNITIES

Providing for public notice in several newspapers that serve people who have a stake in what happens in Pennington County, not just in one newspaper. At least three public comment hearings should be held at different times and days, with at least one of them held either after 5:00 pm or on a weekend to allow broad opportunities for public participation in such decisions that have the potential for permanent impacts like hard rock mining.

5) PROTECT THE PUBLIC FROM THE REAL COSTS OF HARD ROCK MINING

After mining companies (often foreign) have historically taken all the profits, gone bankrupt, and left the area, then the real costs of hard rock mining occur which include decades of cleanup paid by government funds—our tax payer dollars! Therefore, it is extremely important that this ordinance also include the requirement of setting bonds sufficient to cover reclamation costs that will avoid the need for government funds to pay for cleanups that typically go on for decades.
Thank You.
Good morning. Thank you for the opportunity to address the county’s draft hard rock mining ordinance. While there are many things to say, I want today to focus on two. First, the actual costs of hard rock mining, and your powers under SDCL to protect the water supply of your constituents.

First, let’s look at the ACTUAL costs of mining. As you know, mining operations across the country have been going bankrupt for some time. A recent sad case in Wyoming was when the Blackjewel mine closed its doors and left 600 miners without their pensions. It has also left residents with the predicament as to cleanup and reclamation. Millions were made by the owners of Blackjewel, but it will cost taxpayers millions to reclaim what was abandoned.

A case closer to home is the Gilt Edge mine near Lead. On a recent tour of that mine I learned that they have been trying to clean it up for about 20 years, and it will take another 10-20 still. Since it is a superfund site, the Feds have been picking up most of the cost, but SD taxpayers have been paying about 10%, plus the portion of their Federal taxes that goes to that cleanup.

Importantly, on that tour personnel from the SD Department of Environment and Natural Resources said repeatedly that they are looking very carefully at SD DENR’s tendency to lowball reclamation bonds that are required before mining. A similar case in SD is the scandal of the abandoned gas wells in Harding County. SD is suing the company for 15.5 million dollars, but with little hope of recovering the cost of plugging the wells.

What does this mean, since you are not State personnel, but County personnel? This means more than you think! As I read Pennington’s regulations related to zoning I find this: (Section 101) “Whereas Chapter 11-2, SDCL, 1967, as amended, has delegated the responsibility...of each county to adopt AND ENFORCE regulations designed for the purpose of promoting the health, safety, morals, and general welfare of the County,” and so on.

Now, since your eyes have probably glazed over, let me rephrase this.

YOU, THE COUNTY COMMISSIONERS OF OUR COUNTY, HAVE THE STATUTORY POWER TO PROTECT OUR WATER SUPPLY BY IMPOSING REALISTIC RECLAMATION BONDS ON POTENTIAL MINING PROJECTS. And as I read County zoning regs, you also have the opportunity to impose realistic reclamation bonds on EXPLORATORY drilling projects.

So this question of reclamation bonds is very much in front of DENR and the Board of Mining and Minerals right now. They have dropped the ball in ways that endanger the residents of the Black Hills, residents of Harding County, and most of all, our precious water supplies. More than that, they are admitting it. Do not replicate their mistakes. Add language to the hard rock mining ordinance that gives authentic protections to our water supplies.
From: Sherry Thurston
Sent: Tuesday, October 1, 2019 4:16 PM
To: County Commissioners
Subject: Public Comments on Draft 321

CAUTION: This email is from an outside source. Use caution before opening attachments, clicking links or providing confidential information.

To whom it may concern:

I am writing you to make an appeal for Pennington County to provide protection from the potential impacts of mining exploration by putting in place a strong exploratory drilling permitting process. It is important to protect cultural and historical resources by enforcing meaningful consultation with Tribes and information from other local specialists.
We also need to protect the public interest by limiting the locations and conditions under which mining would be allowed. For example, it's not in the public interest to allow mining near streams and lakes.

Please remember that whatever is left over from out of state mining companies remains forever to be our issue to deal with, whatever the impacts be. Please help us protect the beautiful Black Hills for many generations to come.

Thank you
Sherry Thurston
Section 321 Comments

Your Name: Jerry Munson

Email Address:

Street Address:

City, State, Zip:

Phone:

Comments: My strong desire is for the planning commission and ultimately the County Commission to put strict protections in place for the stewardship of Rapid City's water supplies. Not only is surface water in jeopardy, but also the recharge mechanisms for the Madison aquifer are compromised if contamination is allowed at any level.

the City of Rapid City has multiple hundreds of millions of dollars invested in treatment facilities, pipelines, galleries, and deep well infrastructure. If contaminated, the two main sources of Rapid City's water could be dramatically more expensive to bring into EPA and State of SD compliance for its citizens and business community to be able to use.

That is not good business, and lax regulation would be disastrous for our area's economic development future.

The public deserves to know what's going on, and 70% (+or-) of the dollars the County receives are from the people of Rapid City. Public notification is crucial so the people affected may weigh in at every proposal's consideration.

When considering the public's water supply, good regulation IS good business.

Thank you for your consideration.
October 2, 2019

Pennington County Commissioners
130 Kansas City Street, Suite 100
Rapid City, SD 57701
pcboc@penco.org

Dear Pennington County Commissioners,

Thank you for requesting public comments on draft section 321 of the hard rock mining operations ordinance. Please protect the public interest by keeping in mind the potential impacts of mining exploration on drinking water sources.

Another gold exploration company has come to the Black Hills. It is named Big Rock Exploration, and it is from Minnesota. This is an inexperienced company that wants to prove it can explore by looking for gold in the Black Hills. The site where they want to explore is right by the inlet to Pactola Reservoir, which Rapid City uses for its water and many people use for recreation.

F3 Gold is the company that holds the mining claims where Big Rock Exploration wants to explore for gold in the central Black Hills. There are 2,485 active F3 Gold mining claims in the Black Hills in Lawrence, Custer, and Pennington Counties. Big Rock Exploration wants to explore by Silver City and they may not control all F3 Gold claims.

There are 14 claims within the section (1 mile square) that includes Silver City. These claims are to the west of and include the area where Rapid Creek forms the inlet to Pactola Reservoir. This poses a major threat to Pactola, if exploration occurs. And Pactola Reservoir is where Rapid City gets its water, as well as being a popular recreation site.

Along the north side of Pactola Reservoir, there are 53 claims in the sections that touch the water, within 1 mile of the lakeshore.

Along Rapid Creek and just above the inlet (within 4 or 5 miles), there are another 79 claims. Some are clearly very close to the Creek.

Given the high level of interest of exploring for gold in Rapid City's watershed, it is vitally important to protect the public interest by limiting the locations and conditions under which mining would be allowed. For example, not near streams, lakes, housing, and agricultural land. Please help keep Rapid City's water clean and to protect a precious recreational resource.

Thank you for your service to our great community!

Gena M. Parkhurst
CAUTION: This email is from an outside source. Use caution before opening attachments, clicking links or providing confidential information.

Please see that our waters are protected, now and far into the future. I ask that you make strong exploratory drilling regulations. My more detailed comments are on the web site. Thank you.

Jean Katus
From: Mary Cook
Sent: Sunday, October 6, 2019 5:20 PM
To: County Commissioners
Subject: Public comment re: Draft Section 321 Hard Rock Mining Ordinance

CAUTION: This email is from an outside source. Use caution before opening attachments, clicking links or providing confidential information.

This email is to urge the Commission to PROTECT THE WATERSHED AND THE SACRED BLACK HILLS FROM MINING. This is important to me personally as a resident with grandchildren who I want to be able to have clean drinking water and to enjoy Rapid Creek and various fishing locations during their lifetimes, as well as THEIR children and grandchildren. They have a right to clean water and unspoiled mountains and our cultural sites known to our people since time immemorial. If you’re about deciding the common good then prove it. PROTECT THE PUBLIC INTEREST! No mining interest or corporation should be given permits that endanger those rights, don’t give permits to profit-prioritizing activities that cause negative impacts to water quality, and they do endanger clean water, they do endanger that right by their greed and private profiting overshadowing the rules and regulations once they are operational; in fact, they have proven their carelessness over and over. The ordinance should acknowledge the rights and claims of the Lakota, Dakota and Nakota people over the sacred Black Hills region, as well as the other tribes who worship in the region, and the ordinance should provide for a consultation process with tribal Historic Preservation Officers. There has to be more than one check on these corporations, we know what happens when they are regulating themselves and getting by on bribes to officials who aren’t even from here either. The ordinance must make sure the process is open and transparent, with meetings provided on evenings and weekends so all can attend. Protect the public from having to clean up the messes of these “businessmen”, who go straight to the most sacred areas and the most vital locations for the watershed, only to destroy it for greed and then claim through their lies that the land and water can be reclaimed. Why should WE ever allow that????

Thank you.

Sent from Mail for Windows 10
Section 321 Comments

Your Name: Randy Olsen
Email Address:
Street Address:
City, State, Zip:
Phone:
Comments: I am absolutely against any drilling or disrupting the natural water and ground in those areas. This will affect the drinking water for tens of thousands of people. I can’t believe any decision makers are even considering this. Once you open this can of worms it’ll only allow more of this insanity.

RO
Section 321 Comments

Your Name: 

Email Address: 

Street Address: 

City, State, Zip: 

Phone: 

Comments: The negative environmental and financial impacts of large-scale hard rock mining in the County would outweigh the positive impacts. Water is more valuable than gold in our semi-arid area. I am completely against anything that will contaminate our beautiful clean water.
-----Original Message-----
From: Bolstad Cassie
Sent: Monday, October 7, 2019 8:03 AM
To: Conover PJ <pj.conover@pennco.org>; Molitor Brittney <brittneym@pennco.org>
Subject: FW: WEBFORM: Planning and Zoning - Contact Us

This came into the P&Z inbox.

Cassie

-----Original Message-----
From: NoReply
Sent: Sunday, October 6, 2019 7:36 PM
To: plz <plz@pennco.org>
Subject: WEBFORM: Planning and Zoning - Contact Us

The following information was submitted from a web form on the Pennington County website.

DO NOT click reply. To reply, copy and paste the e-mail address below into the "To" field of an outgoing message.

>>>>>>>>>>>>>>>>>>>>>>>>>

Submitted Information:

Your name: Kathy Durrum

Your e-mail address: kathydurrum@comcast.net

Your phone number: 16057492236

Message: Provide protection from the potential impacts of exploration. protect our County from the potential impacts of mining exploration. Provide for a permitting process for exploratory drilling that includes a complete environmental and socioeconomic study, site plan, operation plan, bond, and reclamation plan. Prohibit exploratory drilling within two miles of a recreation area, research natural area, cultural or historical site, riparian area, designated indigenous sacred site, national monument, or conservation easement.
Below are four areas where Pennington County can do to improve the draft Hard Rock Mining Ordinance.

1. Provide protection from the potential impacts of exploration.
2. Protect cultural and historical resources.
3. Protect the public interest.

Please consider the health and well being of the people who live and work in the Black Hills and those who visit here to enjoy our beautiful area. Protect our water and our health.

Thank you for your time and consideration.

Juli Ames-Curtis
CAUTION: This email is from an outside source. Use caution before opening attachments, clicking links or providing confidential information.

Good morning, Holli --

The electronic submission system wouldn't take my comments, because they were too long. Your e-mail wouldn't take them as an attachment. So I am incorporating them into this e-mail. Please be sure that my Commissioner, Mr. Rosskneckt, gets these comments. Let me know if you or any of the Commissioners have any questions. Thank you.

COMMENTS ON SECTION 321 – DRAFT HARD ROCK MINING OPERATION ORDINANCE – 10/6/19

Greetings, Planning Commission and Board of Commissioners:

These are my comments on the draft Hard Rock Mining Operation Ordinance, Section 321. I am providing this information as someone who has a great deal of experience dealing with mining issues and mining companies. I also have a PhD in Political Science with a focus on Environmental Policy. As a result of these experiences, I have identified both some specific comments and some more general comments on the draft Hard Rock Mining Operation Ordinance.

The general comments are:

1. First, the Planning Commission and the Board of Commissioners should add a section that would protect Pennington County’s water resources, cultural and historical resources, communities and land from the potential impacts of mining exploration by providing for a permitting process for exploratory drilling that includes a complete environmental and socioeconomic study, site plan, operation plan, surety, and reclamation plan. Before any drilling begins, groundwater monitoring should be done (as described in Sec. H:2, with changes indicated below). This will, first, insure full monitoring before drilling for uranium, which can spread radioactive materials, and, second, help protect Pennington County citizens and water from companies like Mineral Mountain Resources, which has a history of spilling exploration materials into a creek.

Exploratory drilling should be prohibited:

   a. Within two miles of a recreation area, research natural area, cultural or historical site, riparian area, designated indigenous sacred site, national monument, or conservation easement.

   b. On land zones for agriculture.

   c. Without providing written notice of at least 45 days and an opportunity for meaningful government-to-government consultation to the Tribal Historic Preservation Officers (THPOs) whose tribal governments have a historical connection to the area in which exploration is requested, as evidenced in U.S. Forest Service NEPA records. (Note that the draft Ordinance says “Historical,” but the proper term is “Historic.”)
d. Unless the citizens of the County are protected from subsidizing the exploration drilling, including reclamation and expenses, directly or as local, state, or federal taxpayers. The individual or company that wants to explore will show how it will bear 100% of both direct and indirect costs of the exploration before any permit is considered. As there have been abandoned drilling sites in Harding County and hear Wasta in recent years, costing taxpayers tens of thousands of dollars, this provision is particularly important.

2. Second, the Ordinance should provide additional protection for cultural and historical resources. Many cultural and historical resources are located in Pennington County, and the County should prioritize protecting them. For example, the current draft Ordinance provides only for notice to Tribal Historic Preservation Officers in a couple of situations. Tribal governments that have a historical connection to the area for which mining is requested, as identified in U.S. Forest Service NEPA records, should have adequate opportunities to participate in meaningful government-to-government consultation. Involving THPOs should be more than something that is “checked off” in the permitting process. In addition, other local specialists in cultural and historical resources, such as local Historical Societies and librarians, should also be given notice and asked to give input on locations and items that require protection.

3. In Section B, Purpose, add “and protect the public interest” after “Best Management Practices.” Define “public interest” throughout the Ordinance to include the following requirements:

   It is not in the public interest to permit mining:

   i. That requires perpetual care of any type.

   ii. On land zoned for agriculture.

   iii. Within two miles of a recreation area, research natural area, cultural or historical site, riparian area, designated indigenous sacred site, national monument, or conservation easement.

   iv. Using lights, which disturb wildlife and human residents.

   v. Unless the citizens of the County are protected from subsidizing the mining directly or as local, state, or federal taxpayers. The individual or company that wants to do the mining will show how it will bear 100% of both direct and indirect costs of the mining in the short- and long-term before any permit is considered. Calculations of the short- and long-term costs of mining will be calculated using data from the life cycles of similar mines in western South Dakota. As there is a local mine whose owners declared bankruptcy, that is on perpetual care, and that has been designated a Superfund site — and as this type of situation is not unusual in the United States -- this provision is clearly necessary to protect us as citizens and the County as regulator.

   vi. Unless the individual or company that wants to mine can identify five similar operations at which water was completely restored to its baseline condition. Similarity will include — but not be limited to — size of operation, type of mining, type of processing, type of reclamation, resource(s) mined, geological setting, socioeconomic conditions, pre-mining water characteristics, population within the impacted watershed, and intended use of mined resources.
vii. If the individual or company requesting a permit, their predecessor in interest, a subsidiary of the company, an officer of the company, or a parent company has ever been cited for a violation of any county, state, federal, or international law related to exploration, mining, or reclamation.

viii. Until the applicant's mining claims have been audited for the accuracy of each claim's location by a bonded surveying company with expertise in federal claims.

ix. Unless there is scientific evidence that there is a reasonable guarantee that the mining will not contaminate the area's water.

4. Public participation in the exploration and mining application processes should be broadened. The Ordinance should provide for public notice not only in the three newspapers of record, but also in Native Sun News Today, which is a major area newspaper, and through the South Dakota Newspaper Association's West River classified advertising services and Facebook page. Note that the waters that arise in Pennington County flow eastward across the Plains and that a mining accident 4 years ago on Colorado had impacts that were felt 150 miles downstream. Notice should be posted on the County's website and through its social media. At least three public hearings should be held at different times and days, with at least one of them taking place either after 5:00 pm or on a weekend to permit broad opportunities for public participation in decisions that have the potential to have permanent impacts on the County.

My specific comments include the following:

1. The definition of "Hard Rock Mining Operation" is too limiting. The definition only includes operations "located on the land described in the application for a mining permit." This allows operations on adjacent – or even non-adjacent – lands that include mining operations to be excluded from the definition. It is increasingly common for mining operators to apply for a mining permit on one parcel of land and locate related operations on another parcel of land – for example, mine on Forest Service land and put waste on non-adjacent private land. This definition should be broadened to include all of a mining operation.

2. The following terms are not defined, but should be: Tribal Historic Preservation Officer, Milling, Public Interest, Processing, Riparian Area, Mining, Stockpiling, Waste, Sedimentation Pond (does this, for example, include radium settling ponds?), Mine Spoil, "Meet" and "All Applicable Federal and State Regulations" (Sec. F:2:c:vi(ii)), Groundwater, Reclamation, Population Base, Employment Base, Blast, Buffer Zone, Drawdown Test, Qualified Third-Party Professional, Material Alteration, Reasonable Time, Compliance, and Substantially Different and Adverse Impact.

3. Section E:1, paragraph two: All property owners within at least one mile should be notified regarding an application. We're talking blasting, heavy equipment, large truck traffic, and dangers to water. People need to know.

4. Section F:2:b:i – Range, Township, and Section should also be included. Mining companies have often made maps that appear to be purposely vague about the locations of their operations.
5. Section F:2:b:vii, viii, and xi – Distance should be at least one-half mile.


7. Section F:2:c:ii – add “materials” to information needed about types of things to be used.

8. Section F:2:c:viii – The text in parenthesis is very vague, and this will cause problems down the line. What is meant by “Meet” regulations – reach the lowest possible point for compliance? Reach a safe level? Meet regulations for what water use (does it just have to meet industrial use levels, or must it meet swimmable/fishable levels)? Must it meet regulations as they were defined when the mine permit was issued, or can they be changed? This last is important because federal and state authorities often allow uranium companies to meet looser standards at a later time when they don’t want to meet the original, tighter standards required by their original permits. Similarly, what are the “applicable” Federal and State regulations for this Ordinance?

9. Section F:2:c.ix – This section is not appropriate to in situ leach uranium mining, which always occurs in groundwater. ISL uranium mining requires more protections for water.

10. Section F:2:d – This section fails to talk about water reclamation. This should be added to the section. Also, this section includes the vague language about “all applicable” laws, rules, or regulations.

11. The Socioeconomic Impact Study definition apparently includes environmental impacts (“the cumulative impacts”), but some critical common environmental impacts are not included, such as wildlife, cultural and historical resources, environmental justice issues, wild plants, and agriculture. Subsection a should include the population within the relevant watershed. Subsection h should specify both surface and groundwater. The last paragraph about small-scale applications should require impact data for surface and groundwater – small-scale operations can do a lot of damage to riparian areas and water.

12. Section G:5:b:ii should set a maximum limit of 90 dB at the location of any dwelling of habitable structure, and this should also be the limit allowed under the calculation method. This limit would already be damaging to human hearing. As someone who grew up at the end of a runway, I know that high levels of noise can be damaging to many things other than hearing, including basic family life and relationships.

13. The Ordinance should specify that the County may set maximum peak velocity for ground vibration at a level lower than shown in the Ordinance, at its discretion.
14. Section H:1: a and b – Buffer zones should be set at at least 1000 feet. Again, we are talking blasting and the operation of heavy equipment.

15. Section H:2:a – This subsection needs to consider the potential impacts of uranium mining, as there has been uranium exploration in the County. Baseline measurements need to include Gross Alpha, Gross Beta, Radium-226, and Uranium levels at the least.

16. Section I:3:b – This subsection should be deleted. A major problem with in situ leach uranium operations is that they fail to reclaim the water according to the original timetable. In some cases, “reclamation” has continued for years without any progress in returning water to baseline.

17. Section N:4 – This subsection should require full notification of landowners, THPOs, and the public before action is taken, in line with information provided above. Mining operations are not the only ones who should receive due process in this situation.

18. Section O:1 – In the second paragraph, the Planning Director should not be limited in the types of people who can be contacted. This sentence should include “and others” or “mining-related organizations,” or something that broadens the people who may be contacted, so the Planning Director can request full information from all appropriate sources.

19. Section P – The fees for large-scale hard rock mining applications are laughable. Considering the amount of work that the County will need to put into working with these often-giant, often international companies, the fees should be much higher. The fees should also be higher because these companies make in the hundreds of millions of dollars per year. I would suggest increasing the Application fee to $100,000 and the Amendment fee to $20,000.

20. And last, I’m hearing that people are being told by County employees that the County cannot deny a mining permit. That is clearly not the case. If the County can grant a permit, it can also fail to grant a permit. State law appears to me to back this up. I also spoke with one of the leading mining attorneys in western states, and he assured me that you have the power to deny permits.

A few weeks ago, a SD DENR employee stated that his agency has never denied a mining permit. We need this County Ordinance to protect us from operations that threaten our health, well-being, economy, water, way of life, public welfare, and communities. We need you to act to create a strong Ordinance. I stand ready to help in the process however I can. If I have created questions and you need more information, please let me know.

Thank you for your efforts on behalf of the County’s citizens –

Lilias Jarding, Ph.D.
On Wed, Oct 2, 2019 at 10:51 AM Hennies Holli <hollih@pennco.org> wrote:

Good morning Ms. Jarding!

Here is the direct link for you to access the proposed draft. We welcome your feedback!
http://docs.pennco.org/docs/BOC/Section321.pdf

Here is the link for the form to submit your comments. Or you can email them to me directly at pcboc@pennco.org

Please let me know if you have any questions or concerns and I encourage you to forward this email to anyone you feel may also be interested!

Thank you!

Holli Hennies
Commission Office Manager
Pennington County Administration Building
130 Kansas City Street, Suite 100
Rapid City, SD 57701
Phone: 605-394-2171
hollih@pennco.org

-----Original Message-----
From: NoReply
Sent: Tuesday, October 1, 2019 11:24 AM
To: plz <plz@pennco.org>
Subject: WEBFORM: Planning and Zoning - Contact Us

The following information was submitted from a web form on the Pennington County website.

DO NOT click reply. To reply, copy and paste the e-mail address below into the "To" field of an outgoing message.

>>>>>>>>>>>>>>>>>>>>>>>>>

Submitted Information:
Your name: Lilias Jarding
Your e-mail address
Your phone number:
Message: Hi --
Please send me the link to the draft Hard Rock Mining Ordinance. I can't find it on your website.

Thanks much.

This e-mail, including any attachments, is confidential, may be legally privileged, and is covered by the Electronic Communications Privacy Act, 18 USC §§ 2510-2521. If you are not the intended recipient, you are hereby notified that any retention, disclosure, distribution, or copying of this information is strictly prohibited. If you are not the intended recipient, please reply to the sender that you have received this message in error and then delete it and any attachments.
Section 321 Comments

Your Name: Matt Olsen

Email Address: 

Street Address: 

City, State, Zip: 

Phone: 

Comments: My family and I drink the water from Rapid Creek and we are opposed to any further mining or drilling upstream. Regulations and permits are a good thing, but accidents always seem to happen with minimal fines or enforcement. I feel like that Black Hills have been exploited far enough and we need to try to keep things as natural as possible. Thank you!
From: Carla Rae Marshall <
Sent: Sunday, October 6, 2019 10:08 PM
To: County Commissioners
Subject: Comment on Hard Rock

CAUTION: This email is from an outside source. Use caution before opening attachments, clicking links or providing confidential information.

Please accept my public comment as attached on the Hard Rock Mining Operations Section 321

Respectfully,

Carla Marshall
10/6/19

Pennington County Commissioners
130 Kansas City St
Rapid City, SD 57701

To the Pennington County Commissioners

Greetings.

My name is Carla Marshall. I am Lakota and a resident of Rapid City, SD in the Black Hills Region. I thank you for allow me to comment on this draft zoning ordinance (section 321). My comments are as follows.

- **The Ordinance should state there is substantial consultation with Tribal Historic Preservation Officers from those Indigenous nations who view this area being a sacred site.**

As you know the HeSapa (Black Hills) are very sacred for us as they tell of our creation and hold stories of traditional teachings and historical events. The HeSapa also holds spaces for our spiritual ceremonies, and it provides us with our natural medicines and wildlife; which still hold true today. Since time immemorial, these lands have been our Churches, our Temples, and together, as a whole, are known as Wamaka Ognake Icante - "The Heart of Everything That Is." The HeSapa holds eons of memory in our DNA and Water is our main entity – Mni Wiconi; Water is Life. Water is Alive. Water is Sacred. Says so in the Christian Bible also.

The Black Hills is Treaty Territory and I was pleased to see that South Dakota State recognize this fact; **2018 S.D. Senate Resolution No. 1 – “Confirming the legitimacy of, and South Dakota’s support for, the 1868 Treaty of Fort Laramie.”**¹ The Black Hills, including our creeks like Rapid Creek, our precious aquifers, like the Mnilusa and Madison, and our sacred sites like Pe’sla are within these treaty boundaries. Any toxic hard rock mining or exploration, such as gold mining, will have a negative impact on those who not only live close proximity of those areas, but also remember that our water travels all the way across the plains and into the Missouri River. Any toxic contaminates will also be deposited into all the tributaries along the way which will directly effect generations of people in the path.

- **The negative environmental and financial impacts of large-scale hard rock mining in the County would outweigh the positive impacts. Water is more valuable than gold in our semi-arid area.**

Under the United Nations it is a human rights violations to deny access to clean water for human consumption. And based on past history of mining in the Black Hills, it’s not if a toxic damns will break, BUT WHEN. Extractivism’s long history has plagued our precious ecosystems; from boom to bust, since General Custer found Gold in our precious HeSapa and the General Mining Law of 1872 that allowed for inadequate insurance or bonds to hold these mining companies accountable for toxic spills whenever they happen. So who is left with the water contamination and clean up of hundreds of abandon mines? The Citizens of South Dakota that’s who – The Good ole’ hardworking, tax-paying citizens and voters like you and me.

- The "Hard Rock Mining Ordinance" should favor recreation, agriculture, cultural/historical sites, and tourism over mining.

There are many South Dakotans who also have a special connection and appreciation for the Black Hills; ranchers, farmers, anglers, and tourists from all walks of life have made a special bond with this land and the many waterways such as Rapid Creek, which 75,000 Rapid City citizens pay for through our municipal services.

- The Ordinance should clearly state that the County can deny a mining permit application, especially if that mining company, and/or its subsidiaries, who may have or had a mining operation that had environmental violations in the past, regardless of where these violation occurred.

For example: The parent company of the Wharf Gold Mine in the Northern Black Hills violated EPA laws at their Kensington Mine in Alaska;

*The U.S. Environmental Protection Agency (EPA) has reached three settlements with Coeur Alaska, Inc., over discharge violations from its gold mining operation at Kensington Mine, located 45 miles northwest of Juneau.*

*As part of the agreement, Coeur Alaska will pay three separate penalties totaling $534,500: a $240,000 penalty for violations of their individual National Pollutant Discharge Elimination System permit for industrial wastewater discharges; a $210,000 penalty for violations of the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity; and an $84,500 penalty for failure to report releases of nitrate compounds under Section 313 of the Emergency Planning and Community Right to Know Act, more commonly known as the Toxics Release Inventory.*

It would be my wish to see that Pennington County's Ordinance takes a stand on companies that have a black eye, so to speak, and adopted the Bad Actor law, which a group of Montanans uses against a mining company and won.

*A Montana judge has dismissed a lawsuit from an Idaho mining company that's fighting to overturn its designation by Montana regulators as an industry bad actor because of pollution tied to its CEO.*

Now, ask that question of rather these extraction companies really can be trusted if they are only getting a slap on the wrist for violating environmental protection laws, rather it's Federal, State, or County, or another Country. They have to be held accountable and denied any mining business in Pennington County. Let their history speak for their integrity.

Please do take into consideration, with the highest importance, the Superfund site's we have/had; Guilt Edge mine, which has a toxic mining pond that no one knows what to do with. There's Whitewood Creek, a previous Superfund Site, where 18 miles of that creek’s water was monitored for toxicity for 12 years. “The tailings and tailings contaminated soils are also a source of dangerous levels of arsenic. On October 23, 1981, an 18-mile stretch of Whitewood Creek from Whitewood to the Belle Fourche River was proposed for inclusion.

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2 https://www.epa.gov/newsreleases/opa-and-coeur-alaska-settle-over-alleged-kensington-mine-pollution-discharges

3 https://billingsgazette.com/business/montana-judge-dismisses-mining-company-s-bad-actor-lawsuit/article_dbea05c6-d6b3-59c1-666a28e08b02e.html
on the National Priorities List.\textsuperscript{4} Over the years, however, the EPA raised the PPM/PPB “safe” toxic levels, so who knows what’s coming down the creek from Up the Creek.

\textbf{LET OUR HISTORY BE OUR LESSON AND WHY WE MUST PROTECT OUR WATER.}

I believe that Pennington County can be on the forefront and a trailblazer to enact our own water quality standards and make them beyond the national norm. Water can Heal and recharge. But we need to care for it in a respectful manner and hold dear for the next 7th generations.

And last but not least - take into consideration all the hardworking taxpayers who may want to come to these meeting but can’t due to work. Hold general public meetings on the ordinance in the evening or on a weekend may help with participation. Perhaps having community action groups host a meeting with a light meal, as Food is the mainstay of any good meeting.

Thank you.

\begin{center}
\textit{Carla Marshall}
\end{center}

Carla Marshall

\footnote{https://denr.sd.gov/des/gw/superfund/Sites_Deleted_From_Superfund.aspx}
Section 321 Comments

Your Name: Sylvia Lambert

Email Address:

Street Address:

City, State, Zip:

Phone:

Comments: To permit any mining, the public interest must be protected by ensuring that the individual or company that wants to explore and mine can show five similar operations where the water was completely reclaimed to its baseline condition. This includes determining that the individual or company (or subsidiary or parent company) requesting a permit has never violated any county, state, federal, or international laws relating to exploration, mining, or reclamation. The individual or company requesting a permit must agree to bear all the costs of any direct and indirect costs of all aspects of the exploration and mining and reclamation. The Ordinance should clearly include these to show that the public interest is protected.
Hello,

I hope that these comments will still be considered, even though I am a few minutes past the deadline.

I'm from Sioux Falls and I live in Rapid City now. There are a number of ways I think this ordinance could be improved:
- stronger exploratory mining regulations. Exploratory companies like to distinguish themselves from mining companies, but they are part of the same industry! The county should have language in the ordinance which requires some kind of environmental review or assessment prior to the exploratory process beginning.
- I appreciate that the ordinance requires notification of Tribes on the Black Hills National Forest mailing list, but I would like to see something more meaningful than notification required. Consultation with and consent from Tribal Nations with connections to these lands must take place before any projects can go forward.
- there should be some reasonable way that the County can deny a mining permit if it's clear that the proposed project is not in the interest of the people who call this place home. Mining shouldn't be allowed in proximity to a sacred site and shouldn't be allowed if the company (or its parent company) has been cited for violations elsewhere.

Basically, it is within the County's power to take a stronger stance to protect against potential harms from mining projects, and I believe it should take a stronger stance. We are in a headwaters area - what happens here affects people downstream, and I think we should take this responsibility seriously.

Thanks,
Julie

--

Julie Santella
PhD candidate - Department of Geography, Environment and Society
University of Minnesota
Currently based in: Rapid City, SD