

To Whom It May Concern,

I am writing to provide formal comment on the proposed Ponderosa Exploration Drilling Project (Project #64551) by Solitario Resources, currently under review by the Black Hills National Forest, Northern Hills Ranger District. I appreciate the opportunity to engage during the scoping process and respectfully submit the following concerns and recommendations.

While the Forest Service has indicated intent to consider this project under a Categorical Exclusion (CE), I believe there is sufficient cause to initiate a full Environmental Assessment (EA), based on the presence of extraordinary circumstances:

First, regarding the Potential Impact to Karst Aquifers and Groundwater. The proposed drilling will penetrate the Pahasapa (Madison) Limestone and Deadwood Formation, both critical aquifers supplying water to regional springs, streams, and private wells. Karst terrain is inherently unstable and difficult to predict; voids and interconnecting fractures may allow for vertical or horizontal migration of drilling fluids or contaminants. No baseline or ongoing groundwater monitoring is proposed. Without such data, the Forest Service and public cannot evaluate the potential for aquifer degradation.

Request: Require a hydrogeological review and install groundwater monitoring wells before drilling begins. An EA should assess worst-case contamination and establish mitigation protocols.

Second, Risks to Sensitive Wildlife and Habitat. The drilling will take place in areas known to host bats and other sensitive species. While the Plan mentions discovery-based mitigation, no current surveys or mapping of bat roosts or hibernacula are available to the public. Work in proximity to hibernacula and seasonal use areas may threaten reproductive success and violate protections under the Endangered Species Act (ESA).

Request: Conduct bat and sensitive species surveys prior to approval and publish results for public review.

Third, Cumulative Impacts on Recreation and Access. The project intersects with multiple public trails (e.g., 8150, 8151, 8154), which are used by hikers, hunters, and off-road vehicle users. Temporary noise, truck traffic, and drill rigs will diminish backcountry experience for the public. Use of gates and temporary closures may affect motorized trail users and organized recreation events.

Request: Include a Recreation Impact Assessment in the environmental review process. Consult with local user groups and coordinate activity timing around major events.

Fourth, Tribal and Cultural Resource Consultation. While tribal consultation under NHPA Section 106 is mentioned, there is no public documentation confirming that government-to-government consultation has occurred or is underway.

Request: Disclose the status of tribal consultation and any cultural site findings in the project area. If any tribal representatives raise concerns, suspend the CE pathway and pursue a full EA.

Fifth, Cumulative Industrial Footprint in the Area

This proposal follows closely behind other Solitario and related projects (e.g., Golden Crest) in the Black Hills. While each project may appear modest in isolation, the cumulative footprint of multiple exploration zones deserves a landscape-level analysis.

Request: Include cumulative impact review across all Solitario-related exploration efforts in the region.

In light of these concerns, I respectfully urge the Forest Service to Deny the use of a Categorical Exclusion for the Ponderosa Project, Prepare an Environmental Assessment to fully analyze the hydrological, biological, cultural, and recreational impacts; and Ensure full public transparency and consultation before advancing this project.

The Black Hills are an ecological, recreational, and cultural treasure. Any activity that risks degrading their integrity should be evaluated with the highest possible environmental scrutiny.

Thank you for your consideration and commitment to public engagement.

Sincerely,

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