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First name: AJ
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Organization: South Dakota Backcountry Hunters and Anglers
Title: Secretary
Comments: To whom it may concern,

On behalf of the South Dakota Chapter of Backcountry Hunters & Anglers (SD BHA), we submit the following comment regarding the proposed Ponderosa Exploration Drilling Project by Solitario Resources, currently under consideration by the Black Hills National Forest - Northern Hills Ranger District.

Our organization exists to protect the outdoor heritage of hunting and fishing in a natural setting, and we do so through active stewardship of the wild public lands, waters, and wildlife that make these traditions possible. As such, we are deeply concerned about the potential impacts that this project poses to the ecological, recreational, and cultural integrity of the northern Black Hills.

While the Forest Service is currently considering this proposal under a Categorical Exclusion (CE), we believe that the scope, location, and potential consequences of the project constitute extraordinary circumstances that warrant the preparation of a full Environmental Assessment (EA).

The proposed drill sites are located directly above the Pahasapa(Madison) Limestone and Deadwood Formation-karst aquifers that supply clean water to springs, streams, and wells throughout the region, including the city of Spearfish. Karst terrain is highly porous and unpredictable, making it particularly vulnerable to vertical and lateral contamination. No baseline or active groundwater monitoring has been proposed, and the current project lacks sufficient mitigation measures to address the risk of aquifer degradation. For a region so dependent on clean, functioning water systems, this omission is unacceptable.

The project area is also home to sensitive wildlife that dependon undisturbed habitat for survival. No current species surveys or mapping of home ranges, migration paths or seasonal roostshave been disclosed, and reliance on discovery-based mitigation offers little confidence in compliance with Endangered Species Act protections. We urge the Forest Service to complete and release all relevant biological surveys before any decision is finalized.

In addition to water and wildlife, this project directly intersects with the backcountry recreation experience. Several drill sites are adjacent to high-use public trails, including Trails 8150, 8151, and 8154. These areas are routinely used by sportsmen, hikers, and off-road enthusiasts seeking the solitude and challenge that the Black Hills offer. The introduction of industrial equipment, road modifications, 24-hour drilling operations, and heavy vehicle traffic-even temporarily-threatens the character of these lands and the quality of the public's recreational opportunities.

Finally, this proposal follows closely behind other projects-including Solitario's Golden Crest Exploration effort-and adds to a growing industrial footprint across the northern Black Hills. These projects must not be considered in isolation. A landscape-level analysis of cumulative impacts is necessary to ensure that incremental development does not irreparably harm the region's natural resources and recreational values.

For all these reasons, we respectfully urge the Forest Service to reject the use of a Categorical Exclusion and initiate a full Environmental Assessment. This should include hydrogeological review and monitoring plans, completed biological and cultural surveys, cumulative impact analysis, and a transparent process for public and tribal consultation.

The Black Hills represent one of the last remaining strongholds for wild, huntable habitat in South Dakota. They

support clean water, healthy wildlife, and world-class backcountry experiences. These values must not be sacrificed in the name of speculative mineral exploration without the most rigorous environmental review.

Thank you for your time and consideration.

Cody Grewing, Chair
South Dakota Backcountry Hunters & Anglers