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Comments: I am writing with concerns regarding the Ponderosa Exploratory Drilling Project.

First, I would like to request that the comment period for this proposed project be extended to at least 60 days. This is a large project which will impact many different user groups in the upper Spearfish Creek Watershed. Additionally the number of potential drill pads has increased from the initial version of this proposal.

Second, as a non-Indigenous resident of Spearfish, SD I am disappointed by the lack of meaningful Tribal engagement with this project including the denial of sacred and culturally important locations within the project boundaries (SWPPP, page 74). As a federal agency the USFS should uphold Article XI of the US Constitution and honor our country's treaty obligations.

Third, I request that the USFS require a full Environment Impact Statement for the Ponderosa Project that takes into consideration the cumulative impacts this project will have alongside of Solitario's adjacent and already approved Golden Crest Project. This project covers so large of an area and with two different focused drilling areas it should not be granted a categorical exclusion.

Fourth, the 4/23/25 amendment to this project adds an additional six proposed drill pad locations and states that "all other project components and procedures would be identical to those described in the Ponderosa Plan of Operations." These newly proposed sites are in a different part of the forest, accessed by different roads, with different geology, recreation impacts, wildlife concerns, nearby residences among many other differences. The USFS should require a complete Plan of Operations for these new sites in addition to a full Project EIS. The 4/23/25 amendment does not even include a list of claims or a full map that shows the scope of the additional impacted area for citizens to make robust and accurate comments regarding. How will Solitario access Limestone Road? Will they have an additional staging area? Was a cultural survey completed for these new sites? The public should be given the opportunity for an additional comment period after this information is made available.

Fifth, Ponderosa Plan of operations mentions an Environmental Assessment and Biological Assessment on Page 19 but those do not seem to be included in publicly available materials. What are the opportunities for public engagement around potential impacts to the fauna, flora and funga communities by this proposed project? A full EIS of the entire project should be conducted to adequately identify and protect federal and state listed endangered, threatened and sensitive species, as well as the ecological communities on which these species depend. The section of Solitario's Storm Water Pollution Prevention Plan about ESA compliance on pages 71-72 is wholly insufficient. Stating that the current Forest Management Plan has standards for managing species of concern in no way communicates how/if this proposed exploratory drilling will follow those standards, let alone meet the objectives of conserving or enhancing habitat.

Please deny this permit for the proposed Ponderosa Project and instead place the entirety of the Spearfish Creek watershed as well as the rest of the Black Hills National Forest into a Mineral Withdrawal.