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Title:

Comments: I submit this objection to the proposed Ponderosa Plan of Operations and its April 2025 Amendment, submitted by Solitario Resources Corp., for exploratory drilling on National Forest System lands in the Northern Hills Ranger District. Based on a full review of the Plan and Amendment Letter, I object to the project proceeding without further environmental analysis, consultation, or public engagement. The Plan fails to meet the requirements of NEPA, NFMA, and federal regulations at 36 CFR § 228.

First, the proposal would authorize drill pads up to 50 meters off existing roads, including on closed (bermed) roads. Four of the six amended drill sites are located on roads designated as closed to motorized use. The reopening and industrial use of these corridors directly conflicts with the Forest Travel Management Plan and triggers surface disturbance thresholds under 36 CFR § 228.4(a)(3), requiring additional NEPA review.

Second, the Plan contains no baseline hydrologic data. Drill sites occur in a region of fractured bedrock and shallow groundwater recharge, yet no modeling is provided to assess potential impacts of sump leakage or drilling fluids. There is no mention of sump liners or water quality sampling. This violates the agency's duty under 36 CFR § 228.8(c) to minimize water quality impacts and under NEPA to evaluate reasonably foreseeable harm. Considering our unique hydrology and fractured bedrock, this appears negligent on behalf of Solitario.

Third, the Plan fails to assess impacts on threatened or endangered wildlife, including the Northern long-eared bat and other species of concern in the Black Hills. There is no Biological Assessment, no seasonal restrictions, and no documentation of informal or formal ESA Section 7 consultation. This is a serious legal deficiency given the scope and location of the project.

Fourth, the Plan fails to address tribal or cultural impacts. There is no mention of TCP surveys, or any government-to-government consultation with Oceti Sakowin tribes, despite the project's location in ancestral lands with known cultural sites. This omission violates the intent of Section 106 of the National Historic Preservation Act and Executive Order 13175. Solitario must consult with local THPOs.

Fifth, the Forest Service has not provided sufficient information for meaningful public review. The documents are non-searchable scans with no spatial data on drill pad locations relative to water, trails, or recreational uses. No cumulative impacts are disclosed despite ongoing adjacent exploration under the Golden Crest project. The April 2025 Amendment expands the project footprint without any corresponding update to the NEPA documentation. Lastly, I feel strongly that the Northern Hills district has failed as a steward of National Forest lands by not holding mining companies to the most basic process for such a project (EIS). It appears the forest service has failed to consider what is best for the health of the forest and downstream communities. That the forest service is currently understaffed is not a justification to push through projects, and instead should create an environment that fosters careful consideration of long-term impacts of drilling.

Given the cumulative risks to water quality, wildlife habitat, tribal cultural resources, and public access, I request that the Forest Service prepare a full Environmental Impact Statement (EIS) for the Ponderosa Project. I also request a 60-day extension to the comment period to allow for proper public review of the proposed changes, and lastly, I urge the Forest Service to reject this proposal by Solitario Resources.

Respectfully,

Michelle Stampe

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