

Wyoming Native Plant Society
P.O. Box 2449, Laramie, WY 82073

Mr. Shawn Cochran, Supervisor
Black Hills National Forest
1019 N. 5th Street
Custer, SD 57730

Re. Bear Lodge Rare Earth Project #291093 Mine
Plan of Operations

Federal Register 91(144) 47803-47805, of 29 July
2026

22 August 2026

Dear Mr. Cochran,

We support economic growth in Wyoming while maintaining vital natural resources including native plant species diversity and landscape integrity. In this vein, we are commenting on the proposed Bear Lodge Rare Earth Mine at Bull Mountain in the Bearlodge District of Black Hills National Forest (BHNF).

The Bull Mountain project area is in a headwater position where both soils reclamation and expanded meteorological analyses are needed. The proposed creation and retention of a 300 foot fenced off hiwall as a final structure is an invitation to runoff problems and off-site dust problems such that reclamation provisions are needed to avoid a legacy of severe erosion and habitat impacts. It identifies that Threatened, Endangered and Sensitive Plants warrant attention in planning. However, it fails to identify the two Sensitive plant species and six BHNF Plant Species of Concern that are in or within 3 miles of the proposed project area (listed at the end), or a plan for evaluating and ameliorating impacts. These are all appropriate to address as Issues.

This proposal includes the immediate road system near the project area as part of assessing potential impacts of the mine, a worthwhile element. The road system identified in the Plan runs along the ridge network of Warren Peaks in both Black Hills National Forest (BHNF) and a contiguous private land inholding. The portion on BHNF has been identified as one of the few known Northwest Black Hills Montane Fescue Grassland sites in the Forest (Marriott 2013), an undescribed grassland type for BHNF and in general. It also encompasses an array of other grassland types that support high diversity in this study that was part of expanded montane grassland research across the Forest (Marriott et al. 2016). As such, expansion of the road corridor and right-of-way passing through this locale are to be avoided so that the project roadwork does not reduce grassland or increase weeds.

The 2013 study mentioned that the Warren Peaks area on BHNF warrants more complete study. We also note that a large private inholding is on the Warren Peaks ridge where a conservation easement and baseline study would complement current and potential conservation measures on BHNF. These two measures – the expanded BHNF study as documenting all major grassland types that warrant conservation and management on the Forest, plus a baseline study on private segments of the Warren Peak landscape and ensuing easement - would be significant ways to further mitigate mine development.

The information presented in this letter points to the incompleteness of the “Preliminary list of substantive issues and expected impacts” in the Federal Register Notice of Intent.

We appreciate this opportunity to comment on plans having significance to Black Hills National Forest, Wyoming and our region.

Sincerely,

Bonnie Heidel, Chair of Conservation Committee

BHNF Plant Species of Concern that are in the proposed project area or within 3 miles of it

Species Name (Scientific)	Species Name (Common)	USFS Status
<i>Carex alopecoidea</i>	Foxtail sedge	Sensitive
<i>Cypripedium parviflorum</i>	Greater yellow lady's slipper	Sensitive
<i>Botrychium multifidum</i> (<i>Sceptrium multifidum</i>)	Leathery grapefern	Species of Concern
<i>Botrychium pallidum</i>	Pale moonwort	Species of Concern
<i>Lycopodium annotinum</i> (<i>Spinulum annotinum</i>)	Stiff clubmoss	Species of Concern
<i>Lycopodium dendroides</i> (<i>Dendrolycopodium dendroideum</i>)	Treelike clubmoss	Species of Concern
<i>Mitella pentandra</i> (<i>Pectiantia pentandra</i>)	Fivestamen mitrewort	Species of Concern
<i>Polystichum lonchitis</i>	Northern hollyfern	Species of Concern

References

Marriott, H. 2013. Survey and Mapping of Black Hills Montane Grasslands in the Black Hills in Wyoming. Prepared for the Wyoming Natural Diversity Database, University of Wyoming, Laramie, WY.

Marriott, H., D. Faber-Langendoen and D. J. Ode. 2016. Finding the Best Remaining Black Hills Montane Grasslands, the First Step in Conservation. *The Prairie Naturalist* 48:102–105.