US Critical Materials proposes rare earth element exploration on National Forest lands. The proposed operating timeline is one year. The latest Plan of Operations describes a smaller surface footprint than earlier versions. It still proposes industrial exploration in the headwaters of the West Fork Bitterroot, including blasting, 18,000 feet of drilling, fuel storage, explosives, drilling chemicals, thousands of helicopter flights, and trucking of 6 million pounds of hazardous material along the West Fork to Conner. The plan relies on a small 'surface footprint' acreage to frame the project, but *total operational footprint* and potential negative impact from this project are huge. The Plan lacks the detail needed to assess whether the things we care about – the health of our community, waters, and wildlife – are at risk.

Presence of Toxins

The Plan focuses on the chemicals that will be brought to the site. It gives no attention to hazards present in the rock itself. It contains no discussion of asbestos, uranium, thorium, radium, radon, or other radioactive or hazardous substances normally associated with rare earth elements. The absence of these topics creates a public safety concern.

USCM has removed a rock sample report from their website, showing that rocks with high concentrations of rare earth elements (9% +) also contain elevated toxin levels - 567 ppm thorium, 81 ppm arsenic, and 105 ppm lead, for example. An 'average rock' contains 11 ppm thorium, 3 ppm arsenic, and 26 ppm lead.

- The plan should characterize waste rock, drilled materials, cuttings, dust, etc. for arsenic, lead, uranium, thorium, nitrate residues, leaching potential, and other contaminants.

- USCM should share all existing test results and mineralogical data; relevant screening for radioactive and hazardous materails must be completed and shared with the public before drilling, waste management procedures, transport, etc. is approved.

Handling Waste & Rock Material

The plan proposes 3,000 tons of bulk material, or 6 million pounds of excavated rock material will be flown around the headwaters mining site and trucked 30-miles along the West Fork of the Bitterroot River to a private Conner property.

Across the proposed 1-year of activity, the plan implies ~343 loaded outbound trips and ~343 return trips for rock movement alone, before crew, fuel, water, supplies, equipment, explosives, portable toilets, and extra trips. The plan also claims Forest Service road use will be minimal.

- The USFS should require disclosure of the off-site destination, handling steps, storage time, processing methods, stormwater controls, dust controls, waste controls, and permits.

- We need to know loads will be securely contained while traveling along the River to Conner.

Water Management

The proposal ignores the two most common threats mine exploration poses to rivers and streams: acid mine drainage and polluted run-off from mined materials left on site. Their plan states surface or groundwater monitoring will occur *only if* a permit requires it - that no monitoring is needed otherwise.

That approach asks the public to put a lot of trust in USCM without baseline data or independent checks.

The plan says water will come from an unidentified source outside the project area. Drilling will require up to 8,500 gallons of water per day.

- The Plan must describe how wastewater will be safely managed, or how groundwater and in-stream water contamination will be avoided.

- The Forest should require baseline, during-operation, post-operation, and post-runoff monitoring - upstream and downstream from work areas. Priority monitoring fields include turbidity, temperature, pH, conductivity, hydrocarbons, nitrate/ammonia from blasting products and metals, arsenic, and fluoride.

Flight Management

The plan 'minimizes' ground disturbance by shifting work into the air. It estimates thousands of in-site helicopter flights and hundreds of transit flights from West Fork Headwaters to Conner. Flights will affect wildlife, recreation, residents, safety, fire response, stock use, hunting, fishing, and public access.

- The plan should include flight caps, flight logs, public reporting, wildlife buffers, seasonal restrictions, goshawk nesting review, limits near residences and recreation areas, and authority for the Forest Service to suspend flights during high-risk conditions.

Reclamation - Clean Up

USCM states that it will be responsible for reclamation performance and bonding. The plan gives no bond amount (funding committed to clean up costs). USCM requested exemption from the Montana State DEQ reclamation planning process, indicating a disregard for the importance of reclamation committment.

Priority Request: Complete Environmental Assessment

It is clear US Critical Materials re-designed their Exploration Plan with one goal in mind: to qualify for a 'Categorical Exclusion' analysis, the lowest level of review available to the Forest Service.

We urge the Bitterroot National Forest to recognize the extraordinary circumstances that warrant this Plan be reviewed with a complete Environmental Assessment. The Plan lacks the detail needed to assess whether the things we care about most - the health of our community, waters, and wildlife – are at significant risk.

The Bitterroot Community is deeply concerned about potential threats this mine at Sheep Creek would create for downstream communities that rely on clean, flowing water for a $30 million agriculture economy, $80 million recreation & tourism economy, and our rich traditions that value Montana fish and wildlife.

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