

September 10, 2026

Dan Pliley, District Ranger
West Fork Ranger District
Bitterroot National Forest
6735 West Fork Road
Darby, Montana 59829

Submitted by email: Sheep.Creek.Comments@usda.gov

Re: Sheep Creek Rare Earth Exploration Project, Project No. 370721, Request for Environmental Assessment

Dear Ranger Pliley:

The West Fork Neighbors Alliance submits these comments on U.S. Critical Materials Corporation's August 13, 2026 Plan of Operations (the "Plan"). Our members live along West Fork Road, its branches and spurs and within the West Fork Bitterroot watershed. This is our neighborhood. We draw our drinking and household-use water from local wells, springs and surface-water diversions. We use Sheep Creek, the West Fork and the surrounding National Forest lands for our fishing, hunting, recreation and livelihoods. Every day our children board school buses that travel West Fork Road alongside our personal vehicles, the commercial vehicles that service our homes and emergency vehicles.

We ask the Forest Service to prepare an Environmental Assessment before deciding whether to approve the Plan. At face value, USCM's proposal may seem to fit the general description of a short-term mineral investigation and therefore qualify for a Categorical Exclusion under 7 C.F.R. § 1b.4(c), USDA-32(d). The Plan emphasizes that direct surface disturbance would remain below one acre; however, the operational footprint is much larger and carries with it the potential for several significant adverse effects on the environment and human health.

The proposal includes about 3,000 short tons of bulk material from Adit 1, approximately 200 short tons of core from 45 drill holes totaling as much as 18,000 feet, blasting with up to 2,000 pounds of ANFO and 500 pounds of emulsion explosive, water use of as much as 8,800 gallons per day, two seasons of helicopter operations and repeated truck hauling from the West Fork Road staging area. (Plan at 1, 7–8, 12, 16–17; Appendix G at 3–6.)

These activities create potential pathways for significant adverse effects on the environment and human health through water, dust, spills and material handling. The Plan does not provide enough information to determine the degree of those effects, including but not limited to the effects on air quality and water quality. We believe this uncertainty is precisely what the regulation defines as an extraordinary circumstance: a situation in which actions that normally do not have significant impacts "create uncertainty whether the degree of the impact is significant for the relevant resources considered." 7 C.F.R. § 1b.3. Because the Plan leaves that question unanswered for water, air and human health, we believe a Categorical Exclusion is not available and an Environmental Assessment should be conducted. We detail our concerns below.

Sheep Creek Rock Ore Contents Must Be Studied and Characterized Before Being Disturbed, Moved or Placed

Before approving the Plan, the Forest Service should require representative testing of the rock content at Sheep Creek for thorium, uranium, arsenic, lead, asbestiform minerals and other constituents of concern, and it should publicly disclose the results.

Blasting and drilling will turn mineralized rock into bulk samples, drill cuttings, waste rock and dust, creating routes for particles or dissolved constituents to enter the air, water runoff or water seepage. The degree to which this will occur will depend on mineral form, particle size, water chemistry and site conditions. The Plan as written does not provide the representative testing data or information needed to evaluate these pathways and risks.

The potential for radioactive and toxic contamination from the proposed activity poses serious environmental and health risks, especially for our community, which breathes the air downwind of Sheep Creek and relies on local water sources.

What We Know About the Rock Content at Sheep Creek

The currently available information is limited, but our review suggests cause for serious concern and warrants more investigation. In January 2024, USCM posted laboratory results for 164 Sheep Creek rock samples analyzed by Activation Laboratories. The results varied widely and included concentrations as high as 3,830 parts per million thorium, 611 parts per million uranium, 174 parts per million arsenic and 497 parts per million lead.

These results show that Sheep Creek rock contains thorium, uranium, arsenic and lead at concentrations we believe require further evaluation. Some of the thorium and uranium results are also consistent with an earlier description of crystalline material in Sheep Creek adits as “highly radioactive” (Crowley 1960).

Before USCM later removed these data from its website, we downloaded and preserved them and examined the relationship between rare earth element concentrations and the radioactive and toxic elements reported. In the 164 rock samples, arsenic and thorium correlate strongly with rare earth element grade (arsenic, $r \approx 0.84$; thorium, $r \approx 0.87$ on a logarithmic basis) and lead correlates moderately ($r \approx 0.5$). Uranium, while present at up to 611 parts per million, does not track rare earth grade in these data. This pattern is consistent with rare earth ores generally, in which higher-grade material tends to carry higher concentrations of associated toxic and radioactive elements. We therefore expect that where rare earth element concentrations are high at Sheep Creek, arsenic and thorium — and to a lesser degree lead — will also be elevated. The underlying data are available to the Forest Service on request.

We strongly believe more testing is required prior to any approval.

The Dangers

Thorium and Uranium

Blasting will create dust containing radioactive thorium and uranium. If inhaled, thorium-bearing dust increases the risk of lung or bone cancer, while uranium exposure can damage the kidneys and inhaled insoluble uranium compounds can damage the respiratory tract (links to EPA and CDC statements are provided in the references). The degree of risk depends on factors including concentration, chemical form, particle size and the amount and duration of exposure. This dust can travel downwind from the site. Furthermore, as these materials are transported along the same roads our community uses, the risk of dust escaping into the air along the West Fork corridor is very real. The Plan identifies “super sacks” for transport but does not provide enough information about their specifications, closure, inspection, weather protection or

handling after a damaged or dropped load, nor does it describe a mitigation plan in the event of a crash.

Asbestos

A prior report concerning the Sheep Creek claims describes “felted actinolite” in and near the carbonatite bodies (Crowley 1960). Felted actinolite may be asbestiform and, if so, would present a threat to our community through dust as outlined above. We do not yet know whether this actinolite is asbestiform. If the dust contains asbestiform actinolite (asbestos), it may persist in the environment, and wind and forest fires can remobilize it, creating a lasting human health hazard.

Arsenic, Lead and Other Heavy-Metal Contaminants

The existing assays identify arsenic and lead in some rock samples. Whether these and other constituents will move into water depends on their concentration, mineral form, particle size, pH, oxidation conditions and contact with water. The current data do not provide the leachability and materials-characterization information needed to rule out surface-water and groundwater contamination.

Summary

Given the potential for significant environmental and health impacts, a comprehensive Environmental Assessment should be conducted before ground-disturbing activities take place, including detailed studies on the mobility and bioaccumulation potential of these elements. Before disturbance, the Forest Service should require:

- Third-party sampling of mineralized rock, waste rock, drill core, cuttings and representative dust, with a sampling design that covers the different rock types, grade ranges and work locations.
- Total and leachable concentrations of arsenic, lead, uranium, thorium and other constituents identified through representative screening.
- Radiological characterization appropriate to the materials and proposed handling methods.
- Mineralogical testing for asbestiform amphiboles by a qualified mineralogist before any blasting, drilling, bagging, helicopter handling or hauling begins.
- Written criteria identifying which materials may remain underground, which cuttings may be returned to sumps and which materials must be removed to an authorized facility.
- Dust controls, secured containers, covered loads, inspection procedures, cleanup requirements and exposure monitoring where testing or field conditions indicate a risk.

Water Use at the Project Site Creates a Real Risk of Groundwater and Surface-Water Contamination

USCM’s Plan anticipates using as much as 8,800 gallons per day for its operational purposes. The Plan says that “most” drilling water will be recycled, but it does not address the methodology of water capture or recycling, nor does it provide any estimate of the amount that will be recycled or what will happen to the non-recycled balance. The Plan does not state the source, withdrawal authority, consumptive use, down-hole loss, evaporation, infiltration or expected volume remaining in each sump. (Plan at 12–13.) These omissions prevent a sound analysis of supply, containment and disposal.

Water that is not recycled could infiltrate into groundwater and surface water. The Plan contains no hydrologic analysis of the pathways by which water could reach surface water and groundwater, or of the relationship among the drill sites, adits, fractures, shallow groundwater, Sheep Creek and household water supplies. Without that analysis, the Forest Service cannot determine the degree of potential effects on these water sources.

The residents of the West Fork use this groundwater and surface water for our drinking water, household use, irrigation and recreation. If this water were to become contaminated, the effects could be devastating to human health and the environment. We believe the potential for groundwater and drinking-water contamination is real, and that it constitutes an extraordinary circumstance requiring an Environmental Assessment. Under 7 C.F.R. § 1b.3(f), the Forest Service must determine whether extraordinary circumstances exist, and the regulation identifies water resources among those relevant to that review (§ 1b.3(f)(1)(iii)).

The Plan also states that, apart from monitoring required by another permit or authorization, no surface-water or groundwater monitoring is necessary. (Plan at 13.) That conclusion is unsupported. Members' household use and the West Fork watershed create a practical need for baseline data. Monitoring performed only after a permit requires it would not provide the record needed for the Forest Service's future decisions or for response to releases.

Before ground disturbance, the Forest Service should require:

- **A water-source and water-balance disclosure.** Identify every source and withdrawal authorization. Quantify daily and total withdrawals, recycling, consumptive use, evaporation, infiltration, down-hole loss, storage capacity and discharge for each location and operating phase.
- **A hydrologic conceptual model.** Map surface drainage, shallow groundwater, adit drainage, faults and fractures, likely flow paths, domestic wells, springs, surface diversions and the relationship of the work sites to Sheep Creek and the West Fork.
- **A public monitoring plan.** Use an independent laboratory and documented quality controls. Establish upstream and downstream surface-water stations and appropriate groundwater or spring locations. Sample before operations, during active work, after major runoff events and through at least two spring runoff periods after reclamation. Analyze field parameters, turbidity and suspended sediment and the metals, radionuclides and other constituents identified by representative rock and drilling-material characterization.
- **Response thresholds.** Tie numeric triggers to baseline conditions and applicable standards. Require prompt reporting, work suspension, source control, confirmatory sampling, downstream notice, protection of water intakes and replacement household water when project-related effects are reasonably suspected.

The Materials Transport Plan Does Not Include a Road Safety Plan

The Forest Service must evaluate the effects of the full materials transport program. West Fork Road is used by residents, school buses, service vehicles, recreation traffic and emergency responders. The Plan does not provide a final hauling schedule, loaded vehicle weights, a route and bridge analysis or procedures for maintaining emergency access during a crash, spill, fire or road closure.

Some of the Plan's own figures also need reconciliation. Appendix G allows about 35,000 pounds of bulk material to leave the staging area per day in as many as two loaded pickup-and-

gooseneck-trailer trips. Moving 3,000 short tons at that stated daily amount would require about 172 hauling days. The Plan gives a bulk-sampling period of 120 to 180 days. At 120 days, the required average would be 50,000 pounds per day. These figures do not agree. The Forest Service should require USCM to reconcile them and disclose any stockpiling, additional trips, larger vehicles or extended schedule needed to move the full quantity. (Plan at 7; Appendix G at 3–4.)

The final Plan and environmental review should include:

- A complete material-flow table showing daily and total tonnage, number and type of vehicles, legal payload, gross and axle weights, operating days, loading and unloading procedures, interim storage and final destinations for bulk material, waste, core, cuttings, used fluids and contaminated cleanup material.
- A route-specific road and bridge assessment, including turning movements at the staging area, sight distance, pullouts, pavement and shoulder condition, bridge and culvert capacity, seasonal restrictions, maintenance responsibility and protection of resident and emergency access.
- Enforceable operating hours, covered-load requirements, driver and contractor requirements, speed controls, trip logs and coordination with Ravalli County, law enforcement, fire and emergency medical services and every other road authority on the final route.
- An incident plan for a traffic crash, spill, dropped load or fire, specifying agency contacts, downstream and household notification, intake protection, emergency sampling, cleanup authority, medical response and alternate water supplies.

The Materials Staging Area and Hazardous-Material Controls Introduce Additional Risk and Need Site-Specific Review

The private materials staging area off West Fork Road is the transfer point for water, fuel, equipment, materials, bulk rock and truck traffic, concentrating fuel transfer, helicopter refueling, equipment storage, bulk-rock handling, truck loading and traffic on one private parcel. The Plan provides no scaled site plan for it. Without one, the Forest Service cannot evaluate spill containment, stormwater controls, fire separation, dust management, site security or emergency access.

These omissions leave several foreseeable failures unaddressed. Leaks and spills during refueling could move through surface drainage toward a well or waterway before they are contained. Poor separation of fuel, equipment and combustible materials could allow a vehicle or equipment fire to spread. An unplanned loading area could obstruct emergency access or expose workers and residents to machinery and dust. Unclear command authority could delay decisions about containment, fire response or evacuation.

The Plan states that a second fuel tank will be maintained at the staging area for helicopter refueling, but it gives no capacity for that tank. Table 4 lists a 200-gallon double-walled diesel fly tank for the project sites, 15 gallons of gasoline, maintenance products, explosives, detonators, drilling additives and about ten combined-product deliveries per month. The 1,000-gallon tank mentioned elsewhere is an example water tank, not a listed fuel tank. (Plan at 3, 12, 16–17.)

The Forest Service should require a scaled staging-area plan identifying property boundaries, residences, wells, waterways, drainage patterns, tanks, secondary containment, loading areas, material storage, fire separation, security, lighting, access controls and spill equipment. The

Plan should disclose the refueling tank's capacity and design, document stormwater and land-use compliance, establish inspection and recordkeeping requirements and identify who has command authority during a fire, spill or evacuation.

Reclamation and Financial Assurance Must Cover the Operation's Full Risks

The reclamation section describes drill-hole plugging at Locations 2 through 4, but its sump-reclamation provision names only Locations 2 and 4. Location 3 also has a proposed sump. (Plan at 18.) That omission must be corrected.

For a winter suspension, the Plan calls for removing outdoor-sump liners and backfilling the sumps to grade, and it proposes only two years of annual revegetation review. These measures do not address post-snowmelt settlement, erosion, drainage, water-quality changes or the mobility of material returned to the sumps.

The final reclamation plan should cover every sump, drill hole, platform, staging feature, access impact, adit modification and material placement. It should require testing before cuttings or waste remain on site; inspections after major runoff and through at least two spring snowmelt periods; corrective work for settlement, erosion, drainage or water-quality changes; and public reporting of monitoring and reclamation results.

Financial assurance under 36 C.F.R. § 228.13 should at least equal the Forest Service's cost to hire a third party under reasonably foreseeable adverse conditions. The calculation should include helicopter mobilization, removal and lawful disposal of unsuitable material, spill response, road and staging-area repair, water monitoring, post-runoff inspection, revegetation, contractor overhead and agency administration.

The Relevance of Other Bodies' Rulings Should Be Taken into Account

The Montana Department of Environmental Quality advised USCM on July 23, 2026, that the Montana Metal Mine Reclamation Act applies to its proposed exploration at Sheep Creek. Before any surface-disturbing work begins, the Forest Service should require USCM to furnish documentation of the applicable state exploration license and financial assurance, water and stormwater authorizations, explosives approvals, waste-handling approvals and local approvals for the staging and receiving properties.

The Limits on Scope of Work Should Be Made Clear

In the unfortunate event the Forest Service chooses to grant a Categorical Exclusion, that decision should state that it authorizes only the work, quantities, duration, routes and facilities analyzed in this review. A later exploration phase, processing proposal or mine-development proposal would require its own plan and environmental review. A material change in tonnage, drilling, flights, hauling, water use, staging, destination or schedule should trigger further review before implementation.

Conclusion

USCM's Plan of Operations provides minimal operational detail and does not address or resolve the potential significant adverse effects on human and environmental health described above. The present record does not support the finding of no extraordinary circumstance required under 7 C.F.R. § 1b.3(g). We therefore ask the Forest Service to decline to apply a Categorical

Exclusion, conduct an Environmental Assessment, make the supporting technical documents available for public review and include enforceable monitoring, response, reclamation and financial requirements in any authorization.

Please include these comments and the cited materials in the project record and address each material issue in the environmental review and decision. The West Fork Neighbors Alliance welcomes direct consultation on any of the topics addressed here.

Sincerely,

West Fork Neighbors Alliance

REE Correlation Charts

[Insert the correlation charts here.]

Sources Cited

Plan page references use the Plan's printed page numbers. Appendix G references use that appendix's own page numbers. Online authorities were checked September 2, 2026.

U.S. Critical Materials Corp., Sheep Creek Exploration Project Plan of Operations, updated August 13, 2026; available on the Forest Service project page.

<https://www.fs.usda.gov/r01/bitterroot/projects/370721>

Bitterroot National Forest, Sheep Creek Rare Earth Exploration Project scoping letter and news release, August 14, 2026. The scoping letter states the Plan is being analyzed under categorical exclusion 7 C.F.R. § 1b.4(c), USDA-32(d), and identifies the September 13, 2026 comment deadline and the project email address.

<https://www.fs.usda.gov/r01/bitterroot/newsroom/stories/sheep-creek-rare-earth-exploration-project>

7 C.F.R. Part 1b, USDA National Environmental Policy Act procedures, including categorical exclusion USDA-32(d) at § 1b.4(c), the definition of extraordinary circumstance and the extraordinary-circumstances review and finding at § 1b.3(f)–(g).

<https://www.ecfr.gov/current/title-7/subtitle-A/part-1b>

36 C.F.R. Part 228, Subpart A, Forest Service locatable-mineral regulations, including plan content, environmental protection, access and financial assurance.

<https://www.ecfr.gov/current/title-36/chapter-II/part-228/subpart-A>

Crowley, F.A., 1960, Columbian-rare-earth deposits, southern Ravalli County, Montana: Montana Bureau of Mines and Geology Bulletin 18, p. 47.

Activation Laboratories analyses of 164 USCM rock samples, posted by the company in January 2024 and later removed from its website; downloaded and preserved by the West Fork Neighbors Alliance. The summary statistics and correlation analysis described above were performed by the Alliance on these data; the correlation charts are included above and the data are available on request. These are solid-rock data and are not treated here as water-quality measurements or as a representative bulk-sample average.

Montana Department of Environmental Quality, letter to USCM, July 23, 2026, concluding that the Montana Metal Mine Reclamation Act applies to the proposed exploration.

Agency for Toxic Substances and Disease Registry (CDC), Public Health Statement for Uranium. <https://wwwn.cdc.gov/TSP/PHS/PHS.aspx?phsid=438&toxid=77>

U.S. Environmental Protection Agency, Radionuclide Basics: Thorium. <https://www.epa.gov/radiation/radionuclide-basics-thorium>

U.S. Rare Earths, Inc., amended registration statement (Form S-1/A) filed with the Securities and Exchange Commission, 2015; the Sheep Creek property description identifies “felted actinolite” among the principal vein minerals. <https://www.sec.gov/Archives/edgar/data/1098881/000104746915000410/a2222792zs-1a.htm>

Sheep Creek Exploration Project deficiencies

Summary

USCM proposes rare earth element exploration on National Forest System lands in the West Fork Ranger District of the Bitterroot National Forest. The plan describes bulk sampling and surface drilling to explore for several minerals including gallium and rare earths. The proposed operating window runs from July 1, 2026, through June 30, 2027, including reclamation (p2-4, table 1). The revised Plan of Operations describes a smaller surface footprint than earlier mining proposals. It still proposes industrial exploration in the headwaters of the West Fork Bitterroot, including blasting, drilling, fuel storage, explosives, drilling products, sumps, helicopter flights, truck hauling, and trucking 6 million pounds of radioactive material down the West Fork Road to Conner.

The plan will use blasting or drilling to explore 4 locations. At Adit 1 the plan proposes bulk sampling in the existing adit. Activities would include entrance enlargement; ground support; ventilation; underground sump; controlled blasting along a carbonatite vein; mineralized rock placed in sacks. (p7.) This is the core industrial activity. It involves blasting, muck handling, waste rock, mineralized rock, and water recirculation. Most of the bulk of the material would be taken from adit 1. The proposed volume is 1,500 tons in 2026 and 1,500 tons in 2027, for 3,000 tons total (6 million pounds). Bulk sampling would occur for 60-90 days in each season.

For the other locations, the plan proposes drilling cores. The plan estimates 45 bore holes, 3.8 inches in diameter, with about 16 per location, average depth 400 feet, and up to 18,000 feet total drilling (p9). The plan proposes to build drill pads, laydown areas, 10 x 10 x 6 foot sumps, helicopter platforms (p8).

Drilling will require 8,500 gallons per day. Some water is expected to be recycled. Bulk sampling will use 300 gallons per day. Water would be trucked in from outside the project area and be slung to sites by helicopter. The plan addresses products brought to the site more than hazards inherent in ore, waste rock, cuttings, and dust.

Extracted materials will be hauled from the mine to Conner. Up to 35,000 pounds of bulk sample per day will be hauled by pickup and gooseneck trailer, in up to two loaded outbound trips per day (Appendix G). Where the materials go from there is not specified. In season 1 the company expects 300 roundtrip transit helicopter flights from Conner to Sheep Creek along a route that will follow the river. There will also be 1,900 internal hops from the staging area to the drill pads. In season 2 there would be 240 roundtrip transit flights and 1,680 internal hops (Appendix G). The small surface footprint comes with thousands of aircraft movements.

The plan is vague or silent regarding water handling, mine-waste handling, aircraft loads, truck loads, geochemistry, radioactive materials and asbestos. The Forest Service should require baseline data, independent monitoring, corrected technical calculations, and enforceable safeguards before approving this work. The agency should also make clear that exploration approval gives no approval for a future mine.

Priority Requests

- Require baseline, active-operation, post-operation, and post-runoff water monitoring, with results posted publicly.
- Require geochemical and mineralogical characterization of ore, waste rock, drill cuttings, dust, and bulk samples, including screening for radioactive materials and asbestos-form minerals.
- Require a complete mass balance, water balance, helicopter load table, truck-trip table, and road-use analysis before approval.
- Require a clear waste rock versus mineralized rock classification protocol before any blasting or muck handling.
- Correct the drill-hole specifications and provide a drill-hole table, sample protocol, and core handling plan.
- Revise reclamation to cover every sump, including Location 3, and set inspection requirements after spring runoff.
- Set enforceable conditions for helicopter flights, hazardous-material storage, refueling, spill response, wildlife protection, and weather shutdowns.
- Set a reclamation bond that covers worst-case cleanup, monitoring, road repair, and agency oversight.
- State that approval of exploration would authorize only this exploration work and would grant no approval for a future mine.

Deficiency descriptions

1. The plan relies on a small acreage number to frame the project.

USCM estimates 11,873 square feet of surface disturbance, or 0.3 acre, and states that the project would disturb less than one acre. That number does not capture the full operational footprint: blasting, drilling, water movement, truck hauling, helicopter flights, fuel storage, explosives, off-site sample handling, noise, wildlife disturbance, road use, and monitoring needs.

- Ask the Forest Service to analyze the complete operational footprint, not just acres of disturbed ground.

2. The plan leaves water-quality monitoring to other permits.

The plan proposes drilling, blasting, sumps, fuel storage, drilling additives, drill cuttings, and bulk-sample handling in a headwaters drainage. It then states that surface-water or groundwater monitoring will occur only if a permit or authorization requires it, and 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 forest service should require baseline, during-operation, post-operation, and post-runoff monitoring upstream and downstream of the work areas. The most important

monitoring items should be turbidity, suspended sediment, temperature, pH, conductivity, hydrocarbons, nitrate/ammonia from blasting products and metals, arsenic, and fluoride.

3. The water source and logistics are vague.

The plan says water will come from a source outside the project area and will be slung to sites by helicopter. The access section says fuel, water, equipment, and materials will be trucked to the interim staging area off West Fork Road and flown to the sites. Appendix G says no long-line loads are scheduled from Conner airfield. Read together, the plan suggests water would be hauled by road to the staging area and then flown by helicopter to the drill sites. The plan never names the water source, the truck capacity, the tank capacity, the helicopter payload, the make-up water rate, or the number of water flights.

- The plan needs a water logistics table that identifies source, route, legal supply, truck capacity, tank capacity, helicopter sling capacity, number of flights, initial fill, daily make-up water, expected losses, and water loss contingencies.

4. The sump capacity and water balance need engineering support.

The plan says drilling at Locations 2-4 may require up to 8,500 gallons per day, with most water recycled through lined 10 x 10 x 6 foot sumps. A 10 x 10 x 6 foot sump holds 4,488 gallons before subtracting liner folds, sloped sides, sediment, drill cuttings, and freeboard (gap between the top of the water and the top of the sump that helps prevent overflow). With one foot of freeboard, capacity falls to 3,740 gallons. The daily water-use number may represent a recirculating flow rather than storage volume, but the plan does not show the water balance needed to confirm that.

- The plan should include design drawings and calculations for sump volume, freeboard, storm capacity, liner specifications, cuttings volume, drill-fluid volume, expected water losses, recycling rate, and emergency overflow prevention.

5. The bulk-sample haul math only works under favorable assumptions.

The plan proposes 3,000 tons of bulk material, or 6,000,000 pounds. At 35,000 pounds per day, that requires 171 active hauling days. The plan also says bulk sampling would occur 60-90 days in each of two seasons, or 120-180 total days. The 35,000-pound-per-day figure works only near the 180-day end of that range. If USCM uses two 60-day seasons, the project would need to move 50,000 pounds per day.

USCM says up to 35,000 pounds per day may leave the site in up to two loaded outbound pickup and gooseneck trips per day. That means 17,500 pounds of rock per loaded trip, plus sacks and rigging as applicable. Across the project, the plan implies roughly 343 loaded outbound trips and roughly 343 return trips for bulk sample movement alone, before crew, fuel, water, supplies, equipment, explosives, portable toilets, and extra trips. The plan also says Forest Service road use will be minimal.

- Information needed: Truck model, trailer model, GVWR, empty weight, legal payload, axle loads, tire ratings, brake capacity, trip count, trip timing, and road-condition measures for West Fork Road and other access routes.

- We need to know the loads will be covered while hauling them to Conner.

6. The helicopter load math lacks detail.

Appendix G estimates 300 roundtrip transit flights and 1,900 internal hops in Season 1, with a similar number of flights in Season 2. The plan says many internal hops will move bulk sample from Adit 1 to the staging area, while the same hops also support fuel, water, equipment, and materials. If 1,500 tons are moved over 90 days, bulk sample movement averages 33,333 pounds per day. At 16 internal hops per day, that equals 2,083 pounds per hop if every hop carries bulk sample. If bulk sampling runs 60 days, the average rises to 3,125 pounds per hop.

- The plan gives no helicopter model, long-line rating, elevation/temperature load adjustment, sack weight, turn time, or daily load table.
- USFS should require a flight-load table for each season and phase, with separate counts for bulk sample, water, fuel, equipment, personnel, portable toilets, and supplies. Set enforceable flight caps and reporting requirements.

7. The plan does not explain how waste rock will be separated from mineralized rock.

The Adit 1 section says blasting will generate waste rock and mineralized rock. It then says waste rock will be placed in an existing void or used as road base inside the adit, while mineralized rock will be hauled out in sacks. The plan gives no cutoff grade, visual criteria, field-screening method, face mapping protocol, muck-pile sampling plan, geologist sign-off, or assay requirement. After blasting, the muck pile will be mixed. A rough visual separation may work for some vein material, but the plan gives no method that protects against mineralized rock containing high levels of arsenic, lead, radioactive materials or asbestos being left as waste or being shipped as sample.

- Require a waste/mineralized rock classification protocol, including geologist marking before blasting, muck-pile control, field screening, representative assays, chain of custody for sacks, and testing before any waste rock is left underground or used as road base.

8. The plan leaves ore, waste rock, drill cuttings, and dust under-characterized.

The hazardous-materials section focuses on the chemicals that will be brought to the site. It gives no attention to hazards inherent in the rock itself. The plan should characterize mineralized material, waste rock, drill cuttings, adit material, and dust for arsenic, lead, uranium, thorium, nitrate residues, leaching potential, and other contaminants before material is left underground, moved off site, dried in sumps, or used as road base.

- Testing and public disclosure should be required before approval of blasting, drilling, waste placement, and off-site transport.

9. The plan omits asbestos and radiological screening.

The plan contains no discussion of asbestos, asbestos-form minerals, uranium, thorium, radium, radon, or radioactivity. The absence of these topics creates a public-safety concern.

- USCM should disclose existing assays or mineralogical data, conduct screening for uranium, thorium, radium, radon potential, gross alpha/beta activity, and asbestos-form minerals.

10. The drill-hole description needs clarification.

The plan image describes 45 NQ-sized drill holes with a 96 mm outside diameter, an average depth of 400 feet, and up to 18,000 feet total drilling. The plan also describes a goal of 45 core samples, which makes core handling sound much simpler than a 400-foot core program usually requires.

- The plan should include drill specification, drill-hole table, drilling angle and azimuth plan, core interval protocol, core logging plan, sample splitting plan, sample storage plan, and chain-of-custody procedure.

11. The off-site destination and handling plan remain vague.

The main plan says bulk samples will go to a lab for testing. Appendix G says bulk sample material will go to a private location in the Conner/Darby area. The plan does not say whether the private location is a temporary storage yard, a transfer point, a sample preparation site, a crushing/splitting location, or a lab staging area. It does not describe stormwater controls, dust controls, traffic, waste handling, or permits for the private site.

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

12. The hazardous-materials and spill plan needs site-specific detail.

The plan lists a 1,000-gallon diesel tank at the interim staging area, a 200-gallon diesel fly tank, gasoline, oils, oily solids, explosives, detonators, lime, polymer additive, bentonite, and cement. It commits to drip pans, visual contact during fueling, a 300-foot setback from waterways, and cleanup within 24 hours. Those commitments need site-specific maps and enforceable procedures because the staging area, helicopter refueling, and exploration sites sit in a steep headwaters setting.

- The USFS should require secondary containment drawings, inspection logs, fueling procedures, spill kits at every active site, weather shutdown triggers, spill reporting within one hour, public incident reporting, and a stop-work requirement for releases.

13. The road-use claim needs support.

The plan says Forest Service road use will be minimal and will not cause surface disturbance beyond existing conditions. That claim conflicts with the proposed haul program unless USCM provides a complete traffic table. Bulk sample transport alone could involve hundreds of loaded and return trips, before fuel, water, equipment, materials, explosives, crew, portable toilets, and waste removal.

- The USFS should require a traffic analysis that covers trip number, vehicle type, load, timing, dust, road drainage, sediment delivery, road maintenance, public access, emergency access, and effects on the West Fork corridor.

14. Helicopter disturbance deserves its own analysis.

The plan minimizes ground disturbance by shifting work into the air. Appendix G estimates thousands of internal helicopter hops and hundreds of transit flights across two seasons. That flight will affect wildlife, recreation, residents, safety, fire response, stock use, hunting, fishing, and public access. General statements about minimizing disturbance do not provide enforceable limits.

- 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.

15. The wildlife measures rely on crew observation rather than enforceable buffers.

The plan says workers will notify the Forest Service if species such as Canada lynx, grizzly bear, or wolverine are seen near work areas. It also says pilots will approach cautiously if wildlife is observed. These measures depend on chance observation by crews and pilots. They do not provide pre-work surveys, seasonal restrictions, species-specific buffers, or stop-work triggers.

- The plan should include wildlife surveys, species-specific avoidance distances, raptor and denning-season review, flight buffers, and stop-work rules for sensitive wildlife encounters.

16. The plan needs stronger underground safety detail.

Location 1 work includes enlargement of an existing adit, ground support, ventilation, jack-leg drilling, blasting, muck handling, and an underground sump. Location 4 includes enlargement and gating of the Adit 3 entrance. The plan lists potential MSHA and OSHA approvals, yet the public version gives limited detail on ground-control procedures, gas monitoring, blast plans, ventilation calculations, emergency rescue, or worker access in an old adit.

- USFS should review or obtain the ground-control plan, ventilation plan, blast plan, gas-monitoring protocol, emergency response plan, rescue access plan, and MSHA-related approvals before work begins.

17. The reclamation bond and inspection program need detail.

USCM states that it will be responsible for reclamation performance and bonding. The plan gives no bond amount in the reviewed text. The work involves helicopter platforms, adit gates, drill holes, sumps, waste rock, cuttings, pads, laydown areas, and revegetation. A small surface area can still require expensive cleanup if a sump fails, a spill occurs, waste rock requires removal, or revegetation fails.

- USCM should post full-cost financial assurance, acceptable to both the Forest Service and Montana DEQ, before any ground disturbance. The bond should cover the agency's cost to complete reclamation, remove waste and materials, repair road or staging-area damage, clean up reasonably foreseeable spills, conduct required water monitoring, correct revegetation failure, and oversee the work if USCM defaults, becomes insolvent, or abandons the site. The Forest Service and DEQ should disclose the bond amount, bond

calculations, bond holder, release criteria, inspection schedule, and whether the bond will be a joint state-federal bond.