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Comments:

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Hello,

My name is Mike Forzley, and I am a resident of Darby, Montana.

I am writing in regards to the proposed Sheep Creek Mine. The current proposal is both ambiguous and misleading in many ways. As a Darby resident, I am asking that you reject the USCM Sheep Creek mine proposal. At minimum, I am asking for a

full environmental assessment of the USCM proposal.

1) Misleading Core Sample Stats

USCM has published core sampling results from their exploration of the proposed mining area. These core sample results were published to the USCM website, and I have attached them to this email.

After core sampling, USCM disseminated information about the low amount of potentially toxic and radioactive substances found in their core samples. Currently their own website (link at bottom of email) states "Negligible levels of thorium eliminate the

need for NRC permitting" in regard to the sheep creek mine. However, their summary statistics (including those included in the proposal) are misleading.

When averaging the amount of toxic and radioactive materials in their 425 core samples (thorium, arsenic, lead, and uranium were all found during core sampling), USCM averaged and summarized across

all of their core samples, even the core samples that did not contain high concentrations of rare earth elements. Clearly, USCM will be mining in areas that contain high grade ore over areas of low grade ore. Mountain Pass Mine, the only other REE mine

in the US, mines ore at concentrations around 10 percent rare earth elements. High grade REE ore is generally considered to be at or around that 10 percent threshold.

Therefore, the key metrics of interest are the amounts of toxic and radioactive elements found in core samples with a 10 percent concentration of REE. This misdirection is a clear instance of USCM trying to minimize the perceived impact of their proposal

and should be taken very seriously.

There were 425 core samples published on the USCM website. Of those 425 samples, only 24 had above 10 percent REE. Statistically, they were seeking to obfuscate high levels of toxic and radioactive elements using 400 low-grade samples, 16 times the number

of samples with high grade ore.

The figure below shows Arsenic, Lead, Thorium, and Uranium levels taken directly from USCM core sample data. The black boxes show toxic/radioactive element levels for low grade core samples (<10% REE), and the orange boxes show toxic/radioactive element

levels for high grade samples (>=10% REE). The horizontal line in the middle of each box shows the group median, the top of the box shows the upper quartile, and the bottom of the box shows the lower quartile. This figure exemplifies how misleading their core

sample data are. For arsenic, lead, and thorium (all toxic or radioactive), the high grade ore has much higher concentrations of REE than USCM is reporting when they are averaging across a sample that includes 16 times more low grade ore samples than high

grade.

This table showing summary statistics for high vs. low grade ore also shows the stark difference between the dangerous elements found in each group.

The table shows that, on average, toxic and radioactive elements are much more common in the high grade samples. Median thorium, arsenic, and lead are 36 times, 4 times, and 11 times more concentrated in the high

grade vs low grade samples, respectively.

At best, this is improper scientific methodology, at worst it is purposeful deceit. Either way, these data absolutely show high levels of toxic and dangerous elements in the high grade ore that USCM will be targeting.

This warrants a full environmental assessment.

2) Water quality

The concentrations above mean that USCM will be hauling massive amounts of toxic and radioactive materials through public lands and along the West Fork Bitterroot River. Despite this threatened aquatic communities are never mentioned, despite the presence

of threatened bull trout and sensitive species like Westslope Cutthroat trout and slimy sculpin. One car crash or distracted driver could dump radioactive and toxic material into a watershed already threatened by warming waters, overuse, and climate change.

At minimum, the presence of Bull Trout (a threatened species under the ESA) warrants a full environmental assessment.

The proposed mine site is at an elevation that receives high amounts of snow and precipitation. The Sheep Creek proposal includes no provisions on how they will handle high snow runoff, storms, freezing pipes, and the thousands of opportunities per day

that could easily lead to water contamination. Additionally, the plan provides no detail on the quality of water being hauled in from an unidentified source, how wastewater will be safely managed, or how groundwater contamination will be avoided. Every mine

pollutes, and no mine has completely prevented pollution in perpetuity. The only other REE mine in the USA (Mountain Pass Mine) leaked 600,000 gallons of toxic and radioactive water. The positioning of Sheep Creek at the top of a vast watershed is such that

even minor pollution could have far reaching effects. This warrants a full environmental assessment.

Over 4,000 helicopter flights will transport excavated rock material (ore), equipment, imported water and other mining materials to, from, and within the site. This includes 540 roundtrip flights between Conner and the Headwaters of the West Fork and 3,580

flights from the mining complex to a staging area along the West Fork Road. This warrants a full environmental assessment.

3) Health and Human Safety

Numbers 1 and 2, coupled with the fact that tens of thousands of people live in the Bitterroot watershed, make the proposed mine a threat to health and human safety. Thousands of people float and fish the West Fork each year, and many more float downstream

on the main stem Bitterroot. The valley is heavily irrigated, and just downstream of the mine are thousands of small farms. Any spill, mining truck wreck, or even small amounts of highly toxic materials like arsenic could place thousands of people at risk. This

warrants a full environmental assessment.

4) Risks and tradeoffs

There is no upside for Montana here. There is no upside for the Forest Service. There is ONLY risk. The economic value of the mine is pitiful (a dozen or two temporary jobs) in comparison to the economic value of clean waters, tourism, trout fishing, and

agriculture in the valley. There is ZERO upside that would warrant taking a risk on USCM. This warrants a full environmental assessment.

USCM touts itself as a small, American owned company. In reality, USCM is publicly traded on the Canadian Stock Exchange. I bought one share of USCM this morning. Any assumed association between USCM and the USA/DoD/American endeavors is false. ANYBODY can

buy into USCM. This warrants a full environmental assessment.

5) Lack of Transparency

The Don't Pollute the Root team, public officials, and Bitterroot citizens have consistently asked USCM to meet with us, to share draft plans and data, and to hear our concerns. Our calls continue to go unanswered. USCM materials even advertised that they

are opening an office in Darby, going so far as to rent space on Main Street. That office remains empty and

shuttered, and this was clearly just a PR stunt meant to fool locals.

I have attached a full document detailing summary statistics for the USCM core samples in both .html and .pdf forms. Additionally, I have attached the raw core sample data downloaded from the USCM website.

Thank you for reading and thinking deeply about the entirety of my public comment.

Mike Forzley

[REDACTED PHONE]

[REDACTED ADDRESS], Darby, MT

USCM website:

<https://uscriticalmaterials.com/sheep-creek/>

Information on Mountain Pass Mine pollution:

<https://storymaps.arcgis.com/stories/e3fc81532d94456dbafbff151f2d3851>

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