Data Submitted (UTC 11): 8/29/2026 6:00:00 AM
First name: Zoey
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Organization:
Title:
Comments: Dear Forest Supervisor Cochran and everyone reviewing this project,

I am submitting this comment during the scoping period for the Bull Hill Mine, part of the Bear Lodge Rare Earth Project (PALS #291093), on the Black Hills National Forest. I ask that the Forest Service consider the following issues fully, and that it be prepared to deny the Plan of Operations if these concerns cannot be adequately resolved.

I'm writing to oppose the proposed Bull Hill Mine and the broader Bear Lodge Rare Earth Project, and to ask that the Forest Service give it the kind of full, project-specific review the American public deserves, not one shaped by the urgency of a fast-track designation. Furthermore, I believe all the affected parties must be properly consulted, included in decision making and review, and that the national importance of this forest to the American Public as well as specifically the significance to numerous Native American communities be held with high weight.

This is not a request for a smaller pit or a different design that would make me comfortable with mining at this site. I don't think an open-pit rare earth mine belongs in the Bearlodge Mountains, and I'm asking the Forest Service to deny this Plan of Operations. I'm raising the specific issues below that the public deserves answers to, on the record, regardless of what the agency ultimately decides.

Starting with the ground itself, the rock at Bull Hill carries thorium and uranium along with the rare earth elements the company is after. That's not new information; USGS geologists mapped this deposit decades ago using radiation counters, because that's literally how they found it. Thorium levels in the historical samples range from the single digits up into the high hundreds of parts per million, and higher still in some of the richer vein material. The company says exposure will stay near background levels. But "trust us" isn't a monitoring plan, and I don't think the public should have to take an operator's word for it when the alternative, independent, third-party, continuously published monitoring of dust, water, and soil, with real consequences if thresholds are crossed, isn't a complicated thing to ask for. The Forest Service's own scoping notice acknowledges that grazing allotments overlap this exact ground. Real ranching families use this land today. If dust or runoff from this mine touches their forage or their water, that isn't an abstract environmental line item. That's someone's livelihood and also has an impact downstream that can't always be known. And even if every reading stayed within whatever regulatory threshold applies, I don't think that makes this an acceptable risk to introduce here. This is ground that people live on, ranch on, and visit, in a place I get into further below because of how much it means to a great many people well beyond this county, and radiological contamination isn't something that can simply be cleaned up after the fact if the modeling turns out to be wrong. I'd add that no amount of precaution fully removes the possibility of an accident, a spill, a haul-truck incident, a badly timed dust event, and that is a risk I oppose introducing to this landscape at all, not one I think can be engineered away.

Regarding the water, an open pit this size will need constant dewatering for the better part of two decades. I want to know, before anything is approved, what that does to the wells and streams downstream of it, not as a follow-up study once construction is already underway, but as a real baseline completed first. At the outset, this is a significant concern to an already dry area, especially considering an increased risk of wildfire ignition risk, in a highly fire-prone landscape. It is also a considerable risk of contamination to water sources which is an impact that is difficult to mitigate let alone reverse. Even a project running exactly as permitted still puts that risk on the table for the people who live nearby, the visitors who pass through on their way to Devils Tower, and a landscape that matters enormously to far more people than just this county, and I don't think staying within a permit limit erases that. Precautions can lower the odds of a liner failure, a pond overtopping, or a spill along the haul route to Upton, but they don't take that possibility off the table entirely, and that's a risk I oppose introducing to this

place at all.

Furthermore, The mine doesn't even meet the Black Hills Forest Plan's own scenic standards as written. Instead of changing the project, the agency is proposing to change the Plan around it. In open, rolling country like the Bearlodge Mountains, a mine like this won't be tucked out of sight the way it might be in denser forest, it will be visible, and its lights will be visible, from a lot farther away than "point the lights down and reclaim it later" accounts for. That's a real, lasting loss, not a paperwork problem, and rewriting the rules to accommodate it sets a dangerous precedent I don't think the Forest Service should want to set.

Finally, This mine sits in the Bear Lodge Mountains, the same small mountain range that holds Devils Tower, the very first national monument in this country, a place more than twenty Native nations hold sacred under another name: Mato Tipila, Bear Lodge. People have held this forest and this mountain in great reverence for centuries, a tradition today's contemporary America continues in designating it a National Monument and uses for recreation of all sorts. The mine's own name borrows straight from that history. I don't believe a resource extraction project belongs on ground that carries that kind of weight, and I don't believe a handful of counties standing in as "cooperating agencies" is any substitute for real, direct, government-to-government consultation with the tribal nations who hold this place sacred. That consultation should happen now, thoroughly, and it shouldn't be squeezed by a permitting clock built to move projects like this one faster.

Which gets at my other core concern: this project has been designated a FAST-41 priority under an executive order aimed at speeding up domestic mineral production, and I understand the administration's interest in that. It is vital we review and evaluate this proposed project, that too by a foreign company with diligence, specially on public land beside one of the country's most visited and and to many, sacred landmarks. Especially when the health, safety and access rights of the public are concerned. Devils Tower draws roughly half a million visitors a year. The Bearlodge Mountains around it have been open to hunters, ranchers, hikers, and everyone else who values a quiet, forested corner of the northern plains for generations. That land belongs to the American public broadly, not only to the counties it happens to sit in, and I don't think a decision this consequential should be made on an accelerated timeline just because a federal designation says it can be.

My request is to deny this Plan of Operations. If the Forest Service moves forward anyway, I'm asking for a full environmental impact statement built on independently verified, project-specific analysis; a public comment and consultation period substantially longer than the standard 30 days, a rigorous consultation process with the tribal nations with a stake in this decision; and real, enforceable mitigation and monitoring commitments, not general promises to follow best practices. This is a big decision about a small stretch of land that means a great deal to the entire nation, and especially the communities who hold the forest in high regard. It deserves to be treated that way.

Thank you for reading this and for taking it seriously.