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Comments: Thank you for the opportunity to comment on the Sheep Creek Exploration Project proposed by US Critical Minerals. I preface my comments by saying that I am a geologist, having served on the faculty at the University of Montana for nearly 20 years. I have expertise in how water, sediment, and contaminants move through landscapes of the northern Rockies; mining impacts; and rare earth mineral supply chains.

If the United States is to develop domestic sources of rare earths and other critical minerals, developing social license and maintaining high environmental standards is essential. This will involve transparency, monitoring, incorporating the best available science and management practices, and adaptive management. These principles should be required and essential components of the Sheep Creek project.

There are considerable public fears about the potential for impacts from a headwaters mining project to affect downstream portions of the Bitterroot River. As such, an essential component of evaluating this project should be a quantitative assessment of potential contaminant and sediment transport and hydrological changes to assess the connectivity between exploration activities in Sheep Creek and downstream areas. What is the current knowledge of hydrologic, geochemical, and sediment connectivity; of the mediating effects of Painted Rocks Reservoir; and of seasonal and interannual variability? How would extreme events of the type that can be expected in this landscape, such as wildfire, flood, drought or seismic activity alter upstream to downstream connectivity? Do past disturbances (e.g. wildfire) in the headwaters of the West Fork of the Bitterroot offer insight into connectivity (i.e., have such disturbances propagated downstream in a measurable way that produced impacts to the Bitterroot River)?

Addressing these types of questions, by bringing the best available science and analytical tools to the table, is needed to evaluate pathways for a Sheep Creek project that minimizes downstream impacts and whether such pathways are feasible.