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To the Honorable District Ranger Pliley,

Thank you for the opportunity to provide comments on the proposed Sheep Creek Rare Earth Exploration Project's initial draft Plan of Operations (Plan) in the West Fork of the Bitterroot River in Ravalli County, Montana. I understand that

it has been determined that this project does not individually or cumulatively have a significant effect on the human environment and a formal review is not required. It is my hope that you will consider my comments among others submitted and find that extraordinary

circumstances do, in fact, exist and that finding will precipitate a requirement for an Environmental Assessment and or an Environmental Impact Statement with full public engagement.

I am grateful to be able to contribute my thoughts and expertise to this process as a member of the local community and look forward to future findings and discussions.

Comments by Lee Wollrab, Corvallis, MT, 12 Sep 2026

1.

US Critical Materials is a registered corporation whose parent company, US Critical Metals (stock OTCPK: USCMF) is traded on the TSX Venture Market and the OTC Exchange market in Canada. USCMaterials is not regulated by the US Securities

& Exchange Commission and appears to be a subsidiary/shell company for USCMetals. USCMaterials needs to provide complete documentation explaining how they intend to finance the exploratory operations including bonding to cover all potential impacts (detailed below), to the surrounding environment and all human and wildlife inhabitants.

2.

Documentation by USCMetals, the parent company of USCMaterials, states the following relative to mining risks on Pg 16 in their Management's Discussion and Analysis For the Year ended September 30, 2024 (

<https://www.otcmarkets.com/file/company/financial-report/420437/content>

), which appears applicable to USCMaterials' desire to conduct exploratory mining in Sheep Creek Plan, given the close business relationship between USCMetals and USCMaterials:

Risk Factors

There are numerous and varied risks, known and unknown, that may prevent the Company from achieving its goals. If any of these risks occur, the Company's business, financial condition or results of operation may be adversely affected. In such cases, the trading price of the Company's common shares could decline, and investors could lose all or part of their investment. The following is a summary of risks that could be applicable to the business of the Company:

Exploration risks

Mining operations generally involve a high degree of risk. The Company's operations will be subject to all the hazards and risks normally encountered in the exploration, development and production of minerals, including unusual and unexpected geologic formations, seismic activity, rock bursts, cave-ins, flooding and other conditions involved in the drilling and removal of material, any of which could result in damage to, or destruction of, mines and other producing facilities, damage to life or property, environmental damage and possible legal liability.

The exploration for and development of mineral deposits involves significant risks which even a combination of careful evaluation, experience and knowledge may not eliminate.

While the discovery of a mineral-bearing structure may result in substantial rewards, a few properties which are explored are ultimately developed into producing mines.

Major expenses may be required to locate and establish mineral reserves, to develop metallurgical processes and to construct mining and processing facilities at a particular site. It is impossible to ensure that the exploration or development programs planned by the Company will result in a profitable commercial mining operation. Whether a mineral deposit will be commercially viable depends on a number of factors, some of which are: the particular attributes of the deposit, such as quantity and quality of mineralization and proximity to infrastructure; mineral prices which are highly cyclical; and government regulations, including regulations relating to prices, taxes, royalties, land tenure, land use, importing and exporting of minerals and environmental protection. The exact effect of these factors cannot be accurately predicted, but the combination of these factors may result in the Company not receiving an adequate return on invested capital.

There is no certainty that the expenditure made by the Company towards the search and evaluation of minerals will result in discoveries of commercial quantities of minerals.

Limited operating history

The Company does not have any history of earnings or profitability. The likelihood of success of the Company must be considered in light of the problems, expenses, difficulties, complication and delays frequently encountered in connection with the establishment of any business particularly in the junior mineral exploration sector. The Company will have limited financial resources and there is no assurance that additional funding will be available to it for further operations or to fulfill its obligations under applicable agreements. There is no assurance that the Company will be able to generate revenues, operate profitably, or provide a return on investment, or that it will successfully implement its plans.

Substantial capital expenditures required

Substantial expenditures are required to (i) establish mineral reserves through drilling, (ii) develop metallurgical processes to extract metal from the ore and, (iii) in the case of new properties, develop the mining and processing facilities and infrastructure at any site chosen for mining. Although substantial benefits may be derived from the discovery of a major mineralized deposit, no assurance can be given that minerals will be discovered in sufficient quantities to justify commercial operations or that the funds required for development can be obtained on a timely basis. The commercial viability of a mineral deposit once discovered is also dependent upon a number of factors, some of which relate to particular attributes of the deposit, such as size, grade and proximity to infrastructure, and some of which are more general factors such as metal prices and government regulations, including environmental protection. Most of these factors are beyond the control of the Company. In addition, because of these risks, there is no certainty that the expenditure to be made by the Company on the exploration of its mineral property, as described herein, will result in the discovery of commercial quantities of ore.

Adequate infrastructure may not be available to develop the Properties

Mining, processing, development and exploration activities depend on adequate infrastructure. Reliable roads, bridges, power sources and water supply are important determinants, which affect capital and operating costs. Unusual or infrequent weather phenomena, sabotage, government or other interference in the maintenance or provision of such infrastructure could adversely affect or inhibit the operations at the Properties in respect of which the Company holds an interest, which may result in a material adverse effect on the Company's profitability, results of operations and financial condition and the trading price of its securities.

Given these stated risks, it is important that all federal agencies involved in the permitting process weigh these risks against any potential gains to be made by the proposed exploration activities and present the findings to the public prior to permitting any exploratory activities in Sheep Creek.

In addition, a 30 Jun 2026 MorningStar report on USCMetals revenue lists 0\$ CAD, which must be investigated further to determine if USCMetals can viably support USCMaterials and if USCMaterials has the financial resources to realistically cover the risks associated from mining exploration in Sheep Creek given the aforementioned business relationship between these two companies.

From the US Critical Materials Corp. Business Summary, Winter 2024 (<https://uscriticalmaterials.com/wp-content/uploads/2023/12/US-Critical-Materials-Business-Summary-2023-2024.pdf>),

Page 6 states that:

?These adits were tunneled-in and developed during the late 1950's in pursuit of niobium (otherwise known as columbium), but had not been evaluated for rare-earth mineralization. These tunnels have been sealed since the 1960's.?

This is evidence that any existing permits and platting for the sites identified in the Sheep Creek Plan should be

re-evaluated relative to

existing conditions given that the original permitting process is over 75 years old and numerous laws relative to environmental regulations and local regulations have been put in place that were not previously given consideration.

The document also states on Pg 10:

?CAPITAL MARKETS FUNDING

Based on the unprecedented demand, and limited supply of critical minerals, the Company is currently exploring many options regarding funding, and sale of mineral rights. US Critical Materials has been approached by funding sources and continues to seek the best scenario for the Company and its shareholders.

? OFFTAKE CONTRACTS

The Company is confident that it will be able to execute forward offtake contracts based on the imbalance in the marketplace, and activity of competitors. The contracts

could be broad or targeted to each of the Company's many critical minerals. Rare earths projects with significantly lower critical mineral levels are currently negotiating and signing contracts with major end users. The contracts are long term, and do not require production for a few years.?,

which indicates that USCMaterials may at some unspecified time in the future, not be the entity doing the exploration work in Sheep Creek and therefore, may not

be responsible for ensuring proper mitigation to the community and the environmental resources. Therefore, there must be some mechanism in place to ensure that novation occurs, including all successor liabilities, for all aspects of the exploration activities.

The potential to sell USCMaterials at some point in the future is also reiterated on Pg 10 as:

?SALE OF US CRITICAL MATERIALS

Based on the ever-increasing need for rare earths, US Critical Materials believes that it will become a desirable takeover target for the end users of critical minerals. At some point in the foreseeable future, a possible sale of the Company may be up for consideration.?

Page 15 of the same USCMaterials Business Summary document indicates they have calculated a Total Inferred Value of the Sheep Creek resources at \$43,433,852,000, therefore a bonding for the exploration permit of approximately 4% of the inferred value (\$873

M) would seem to be appropriate as a minimum reclamation bond (a.k.a. a mining performance bond or surface management bond) given that there are approximately 21,292 homes at an estimated median value of \$476,600 each (<https://www.census.gov/quickfacts/fact/table/ravallcountymontana/HSD310223>

) in Ravalli County and an approximate real estate loss can be estimated using 8.6% using the Hedonic Pricing Method explained in this article:

<https://www.sciencedirect.com/science/article/abs/pii/S0264837717304556>

4.

US Critical Materials registered with the Montana Secretary of State to do business in Montana on 21 Jan 2026 and since it is an LLC, financial documents useful in evaluating the potential for profitability do not appear to exist. Since

the ore processing is proposed to occur in Idaho at the Idaho National Laboratory, a financial projection demonstrating the financial impacts (profit/loss) to Montana should be required prior to any exploratory activities and adequate funding to offset these potential negative impacts should be included in an

appropriate reclamation/mining
performance/surface management bond.

5.

Should there be local investments, i.e. building new schools in Montana or other facilities, an assessment and mitigation plan to determine who or what entity will pay for the future upkeep once USCMaterials scales back exploration activities

and or leaves the area. It is unacceptable to expect existing taxpayers to fund social infrastructure burdens caused by the USCMaterials project, which include but are not limited to increased school attendance/overcrowding, additional ambulance, fire and

law enforcement protection, additional and or expanded road maintenance and upkeep, affordable housing, healthcare including substance abuse and mental health cases, increased electricity costs, air pollution, soil and water pollution, and noise pollution.

6.

Require a US Fish and Wildlife Service Section 7 (a) Consultation since the following Threatened species exist in Ravalli County, MT per the Montana Natural Heritage Species Of Concern database (

<https://mtnhp.org/SpeciesOfConcern>): 1) Grizzly Bears (*Ursus*

arctos); 2) Wolverines (*Gulo gulo*) and 3) Bull Trout (*Salvelinus*

confluentus). Recent court decisions (*Center for Biological Diversity v. Burgum*, No. 24-cv-04651 (N.D. Cal. Mar. 30, 2026)) have reset key Endangered Species Act Section 7 Consultation Standards to the pre-2019 language, therefore a USFWS

Consult should be conducted.

7.

The Sheep Creek Rare Earth Exploration Project's initial draft Plan of Operations (Plan) does not address the loss of recreational opportunities and/or the potential acres of closure to hunting and fishing during exploratory operations

and there needs to be a financial analysis of the impact such restrictions will have on the local and state economy that includes offset compensation to the state and local businesses who rely on these resources for income. Failure to do so in advance of

exploratory activities would result in loss of baseline data with which to assess real impacts once operations are initiated. Public lands are intended to be multiple use and excluding existing recreational uses in lieu of exploratory use should require prior

mitigative plans to address the reduced and or lost opportunities.

8.

Impacts of vehicular and helicopter traffic on wildlife were evaluated during the Riley Ridge project in western Wyoming (Exxon's LaBarge Chute Creek field development a.k.a Pinedale Anticline / Jonah Field:

https://upload.wikimedia.org/wikipedia/commons/6/68/Riley_Ridge_natural_gas_project%2C_Exxon_LaBarge_project_-_elk_wildlife_study_report%2C_1979-1987_%28IA_rileyridgenatura00unse_0%29.pdf)

in the mid-1980s and that study cited literature which determined that helicopter flights of <150 m elevation caused significant disruptions to elk (in

Ward, A.L. 1984. The response of elk to seismograph activity in the Little Snake River Known Recoverable Coal Resource Area of Southcentral Wyoming. USDA Forest Service, Rocky Mtn. For. and Range Exp. Sta., Laramie, WY.) Therefore, all flight plans

should maintain all horizontal flights above 150 m to avoid disturbing elk and other ungulate species found in the Plan area.

9.

The Sheep Creek Plan states:

During helicopter approach, if wildlife is observed in the project area, the approach will be conducted slowly and cautiously to avoid disturbance and will avoid landing if wildlife is near any of the project's helicopter landing locations.

This is not acceptable because it means the impact already occurred and is analogous to installing seat belts in a vehicle after experiencing a head-on collision. Also, expecting a pilot to observe wildlife while flying is similar to texting and driving a car simultaneously and is unacceptable. The negative impact to wildlife will have already occurred and flight schedules must be set to avoid impacts, not continue until after the impacts occur.

10.

Section 106 of the National Historic Preservation Act (<https://www.gsa.gov/real-estate/section-106-of-the-national-historic-preservation-act>)

) mandate that the government consider the cultural and historical impacts of federal projects. Under Section 106, each federal agency must consider public views and concerns about historic preservation issues when making final project decisions.

Definition of a Federal Undertaking

i. The Advisory Council on Historic Preservation has defined a federal undertaking in 36 CFR 800.16(y) as a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including:

1.

those carried out by or on behalf of a federal agency;

2.

those carried out with federal financial assistance;

3.

those requiring a federal permit, license or approval;

and

4.

those subject to state or local regulation administered pursuant to a delegation or approval by a federal agency.

The Plan does not address the impacts to personal property (e.g. real estate) values from implementing the project. It is recommended that the USCMaterials determine and present results that project the potential real estate losses and must include plans to mitigate such losses. It is recommended that a Hedonic Price Method model be used to calculate this determination.

The Estimation of external effects from the quarrying sector using the hedonic pricing method

(<https://www.sciencedirect.com/science/article/abs/pii/S0264837717304556>)

) estimated external effects that decreased property values from a quarry mine at 8.6% and covered other environmental impacts including:

the effects of the environmental factors (e.g., noise, air quality, proximity to a park, pollution, etc.) on prices of tradable goods (e.g., house prices),

Therefore, this particular or an analogous methodology should be employed prior to permitting any exploratory activities in the West Fork of the Bitterroot.

Regarding exploratory impacts to water sources in the proposed exploratory area, the following study (

https://www.researchgate.net/publication/366692314_Blasting_Quarry_Operations_Land_Use_Compatibility_Issues_and_Potential_Property_Value_Impacts) states:

“But, it is also recognized that a quarry blasting below the water table is one of the most noxious, toxic and destructive uses of land, with no reasonable prospect of post-extraction-rehabilitation.

If permitted and established in the wrong geographic location, a blasting quarry operation can result in significant deleterious impacts on the environment and local inhabitants and can disrupt short and long-term land use planning objectives.”

These exploratory activities should be constrained to avoid another Berkley Pit Super Fund site, therefore, any and all uses of surface or subsurface waters water as proposed during exploratory activities needs objective scientific and independently verifiable

documentation about exactly where the operational use water will come from, the potential impacts to the existing water sources and what water rights will be impacted and must include mitigation plans for any interruptions to water availability and or contamination as a result of exploratory activities.

The plan does not address community impacts during and post-exploratory activities such as, but not limited to: affordable housing, changes in student school populations due to incoming personnel, increased traffic, increased road and bridge maintenance costs, additional needs for increased law enforcement and fire protection, increased need to address substance abuse caseloads, increased demand for power that will likely lead to increased costs to residents. These issues need to be addressed by mitigation steps laid out in the Plan prior to exploratory activities and costs should be borne by USCMaterials, not Ravalli County nor any other Montana or US taxpayers.

There is no plan presented for winter operations and what those projected impacts are nor what the community impacts and or costs would be (snow plowing by the county, increased land and air traffic, human and wildlife disturbances, and noise pollution), therefore a Plan of Operations must include impact estimates and mitigation measures to minimize and or eliminate such impacts.

Critical Metals Business plan futures:

<https://www.otcmarkets.com/file/company/financial-report/420437/content>

Pg 16:

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facilities, damage to life or property, environmental damage and possible legal liability.

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deposit, such as quantity and quality of mineralization and proximity to infrastructure; mineral prices which are highly cyclical; and government regulations, including regulations relating to prices, taxes, royalties, land tenure, land use, importing and

exporting of minerals and environmental protection. The exact effect of these factors cannot be accurately predicted, but the combination of these factors may result in the Company not receiving an adequate return on invested capital.

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to justify commercial operations or that the funds required for development can be obtained on a timely basis.

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costs. Unusual or infrequent weather phenomena, sabotage, government or other interference in the maintenance or provision of such infrastructure could adversely affect or inhibit the operations at the Properties in respect of which the Company holds an interest, which may result in a material adverse effect on the Company's profitability, results of operations and financial condition and the trading price of its securities.

This is relative because it provides insights into the risks that will likely be similar to those USCMaterials will experience in the current business climate and such statements need to be evaluated relative to USCMaterials and weighed against any potential benefits to Ravalli County and its residents prior to the exploratory permit being issued.

Coal ash and Rare Earth Elements. There is documentation that Rare Earth Elements are available from alternative sources and should be considered prior to permitting exploratory activities in Sheep Creek. This article (

<https://news.utexas.edu/2024/11/19/enormous-cache-of-rare-earth-elements-hidden-inside-coal-ash-waste/>) states:

??new research led by The University of Texas at Austin has found that the national coal ash supply contains enough rare earth elements to significantly bolster the national supply without any new mining.? And

?Even though the level of rare earth elements in coal ash is relatively low when compared with those mined from geological deposits, the fact that the ash is readily available in large quantities makes it an attractive resource??

Research from

<https://link.springer.com/article/10.1007/s40789-024-00710-z> ??estimate[s] coal ash resources and potential for extraction of rare earth elements?? and therefore coal ash sources should be considered as a viable alternative to exploration in Sheep Creek.

Montana has coal ash (Colstrip) and it along with other sources in the US should be considered ahead of mining Sheep Creek due to availability and the potential to convert a toxic waste product into the products USCMaterials is seeking, thus an overall positive outcome for those impacted by existing waste and USCMaterials operational success.

17.

Under the Federal Land Policy and Management Act (FLMPA), the Secretary of the Interior has the authority to withdraw and preclude specified uses of federal lands to foster resource protection among other reasons. Per <https://www.congress.gov/crs-product/IF13009>,

FLPMA defines withdrawal as:

withholding an area of Federal land from settlement, sale, location, or entry, under some or all of the general land laws,

for the purpose of limiting activities under those laws in order to maintain other public values in the area or reserving the area for a particular public purpose or program; or transferring jurisdiction over an area of Federal land ... from one department,

bureau or agency to another department, bureau or agency (43

U.S.C. ?1702(j)).

Sheep Creek and the West Fork of the Bitterroot River represent significant public values as has been demonstrated by the amount of public participation in the review process and

I would encourage you to recommend it be withdrawn under all defined law categories (1) public land laws, (2) mining laws, and (3) mineral leasing laws and that it be pursued through the appropriate channels for review by the Secretary of Interior prior to

any advancement of exploratory permitting. The water and recreational resources are too valuable to our community to permit profits over our quality of life, liberty and property rights.

Thank you again for your time and consideration.

Regards,

Lee Wollrab

Corvallis, MT