Public Comment Template: Bull Hill Mine / Bear Lodge Rare Earth Project

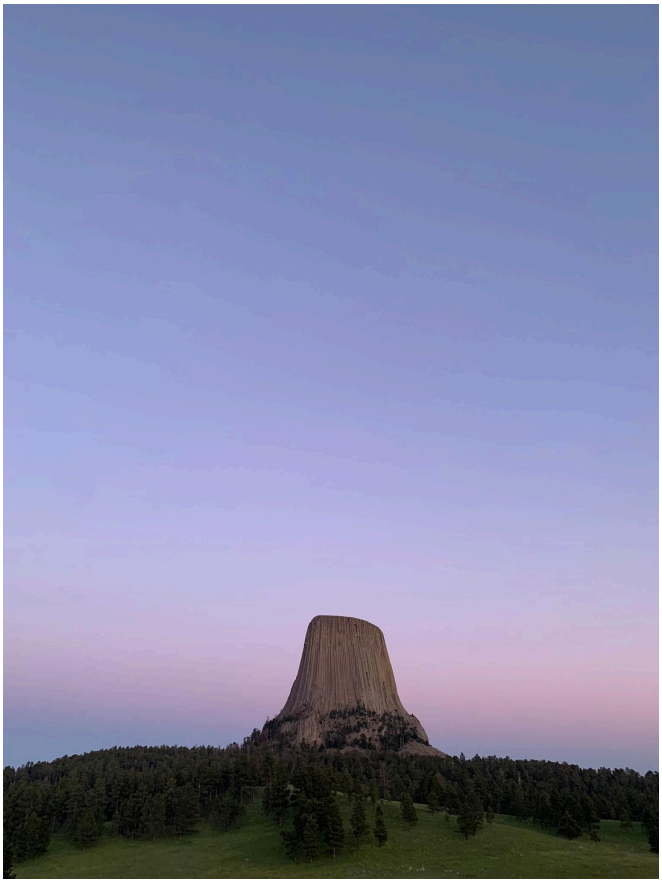
Deadline: 11:59 p.m. Mountain Time, August 28, 2026 (today)
Submit online: https://cara.fs2c.usda.gov/Public/CommentInput?Project=291093
Submit by email: wendy.schuyler@usda.gov
Project ID (PALS #): 291093

How to use this template doc… You can either:

1. Pick from the two templates I have made
2. Make your letter using various pre-made paragraphs
3. For any option, edit as you wish

***Anybody can comment, you do not need to be American or live in the US.**
****Named comments hold more weight than anonymous- your choice which works best for you!**
***** The more issues you bring up now, the more organizations/individuals can use to challenge any decision made in the future.**

In my version of the letter, I included every issue listed in Version 2 and added a personal note about my experience at the mountain and why I am personally opposed to the mine.
Thank you friends so so much for doing this. I am grateful, and I am going to guess the mountain is too :)



Public Comment Template: Bull Hill Mine / Bear Lodge Rare Earth Project **1**
Letter 1: Narrative Version 2
Letter 2: Full Version Letter + Optional Paragraphs to include: 4

Isn't she gorgeous!

To be transparent, for the templates, I both did and included my own research and also used Claude to help with the technical/scientific/legal research and review of the project proposal. I also used it to pull together first draft wording for the templates I am sharing. I edited the templates myself after. Forgive me for where it might sound too AI.
Given the past couple days and the speed I've been trying to get things together, I chose to use the help. <3

Letter 1: Narrative Version

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.

Letter 2: Full Version Letter + Optional Paragraphs to include:

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. Furthermore, I request an extended public comment period to ensure that the public is adequately aware, involved and engaged in decisions affecting American land.

I oppose approval of the Bull Hill Mine and the broader Bear Lodge Rare Earth Project on National Forest System land in the Bearlodge Mountains. This is not a request for a smaller pit, a different mine design, or additional conditions that would make the project acceptable; it is opposition to permitting an open-pit mine at this location at all, given the combination of radiological health risk, unresolved water and air impacts, the project's location in a landscape of deep and ongoing sacred significance to more than twenty Indigenous nations, and the permanent loss of public recreational and scenic use of this land. I ask the Forest Service to deny the Plan of Operations. Where I raise specific technical or procedural issues elsewhere in this comment, those are offered to strengthen the record and hold the agency to the law that governs its own review. Furthermore, I request an extended public comment period to ensure that the public is adequately aware, involved and engaged in decisions affecting American land.

Points of Concern and Opposition:

1. Scope and rigor of the EIS

The Forest Service has stated its intent to prepare a full environmental impact statement for this project rather than a lower-level environmental assessment. I request that the agency honor that commitment and reject any later effort to narrow the analysis to an environmental assessment or a finding of no significant impact. Given the significant scale of surface disturbance (approximately 260 acres of National Forest System land, including a roughly 132-acre open pit, plus a 13-mile transmission line and access roads), the presence of radioactive elements in the ore body, and the project's location in an area with unresolved Forest Plan conflicts, a full EIS with independently verified analysis is warranted. If that level of rigor cannot be met on the current permitting timeline, I request the project be denied rather than approved on an incomplete record.This is important for safeguarding National land, health and wellbeing of those that live in the region, American or other visitors, the environment and ecosystems.

2. Range of alternatives

I oppose this project and want that opposition on the record regardless of design. Separately, NEPA requires an EIS to evaluate a genuine range of reasonable alternatives, not merely "proposed action" versus "no action" — an analysis limited to those two options is legally deficient on its face, and I am flagging that deficiency now so it is part of the record. I am not proposing that a redesigned mine — smaller footprint, underground, or otherwise — would be acceptable to me; I raise this only because an inadequate alternatives analysis is one of the most common grounds on which courts have struck down federal approvals, and I want the Forest Service on notice that the current scoping notice does not meet that bar.

3. Forest Plan amendment and scenic integrity standards

The proposed mine does not comply with the Black Hills Forest Plan's scenic integrity standards. Rather than modifying the project to meet those standards, the Forest Service intends to amend the Forest Plan to exempt this project from them. I oppose that exemption. A visual impact analysis limited to reclamation and downward-directed lighting sets a bare-minimum bar, not a serious one: reclamation of an open pit typically cannot restore the original landform, and in the open, rolling terrain that surrounds Bull Hill — unlike a densely forested site where nearby ridgelines would screen a similar operation — a mine of this scale is likely to be visible, and mine lighting visible as skyglow, from a much wider radius and from more public vantage points than the applicant's mitigation plan appears to assume. I request that the EIS include a full seen-area/viewshed analysis from public roads, trails, and viewpoints, treat this as a significant Forest Plan amendment requiring its own full public process, and treat "reclamation plus lighting direction" as insufficient mitigation on its own. If the mine cannot meet the Forest Plan's existing scenic standards without adequate mitigation, the plan should not be rewritten around it, the project should be denied.

4. Precedent set by exempting this project from Forest Plan standards

Beyond the specific visual impacts, I am concerned about the precedent of amending an existing, duly adopted Forest Plan specifically to accommodate one company's project rather than requiring the project to meet the plan. I request that the Forest Service explain, in the EIS, why this project should be treated as an exception rather than a signal that any future proposal can seek the same treatment, and I request that any approval include findings that this exemption will not be treated as precedent for other projects in the Black Hills National Forest.

5. Radioactive materials and public health

Historical U.S. Geological Survey sampling of the Bear Lodge deposit (USGS Professional Paper 1049-D) found thorium concentrations ranging from about 9 to 990 parts per million across 341 samples, with richer vein material running considerably higher. This is not a purely abstract health question: the Forest Service's own notice for this project acknowledges that grazing allotments overlap the proposed mine area, meaning livestock actually graze this ground today. Contamination of forage, soil, or water from dust, waste rock, or runoff would not only pose a direct health question for the ranching families who depend on those allotments, it would threaten their livelihoods directly, through contaminated or unmarketable livestock, restricted grazing access, or reduced land value, in a way separate from and in addition to any risk to human health from the mine itself. I request that the EIS explicitly quantify these livelihood and livestock impacts, not fold them into a general grazing-allotment line item. I oppose introducing this level of risk to a working agricultural landscape, and I request that the EIS include independent, third-party (not applicant-funded or applicant-reviewed) baseline and ongoing monitoring of radiological exposure pathways, including airborne dust, groundwater, surface water, and uptake in game animals and livestock. General assurances that exposure will remain "near background levels" are not a substitute for a transparent, peer-reviewable monitoring plan with defined thresholds and automatic consequences if those thresholds are exceeded. If such a monitoring and enforcement framework is not built into the decision, I request denial of the Plan of Operations. Logistically forcing changes to the families and livelihoods in the area, even if compensation is provided is not a viable option given that families have been in the area for decades and have build their own livelihoods and culture around the land.

6. Water resources

I request a full analysis of the project's effects on groundwater and surface water in the Bearlodge Mountains, including drawdown from pit dewatering, contamination pathways from waste rock, and downstream effects on water users in Crook and Weston Counties, including any streams subject to Clean Water Act Section 404 jurisdiction. This analysis should include a hydrogeologic baseline completed before any approval, not during or after construction, and should specifically address dewatering effects on nearby wells and livestock water sources. I request that the Army Corps of Engineers' jurisdictional determination and any Section 404 permitting be completed and made public before the Forest Service issues a final decision, not treated as a parallel process that can catch up later. I am deeply concerned about the impact on water in the area and the resounding effects it can have for time to come on humans, animals and livestock in the area,

7. Air quality and dust

Given the radiological and heavy-metal content of the ore, modeling and monitoring dust transport under the area's prevailing wind conditions would help characterize the risk to nearby residences, grazing land, and livestock forage, but characterizing a risk is not the same as accepting it. Even with rigorous modeling and monitoring in place, I remain opposed to introducing this level of airborne radiological and heavy-metal risk to this landscape at all, and I do not consider a well-designed monitoring plan to be a sufficient basis for approval on its own. If the agency approves this project despite that opposition, I request site-specific dust modeling, continuous air quality monitoring, and enforceable, monitored dust-suppression requirements with real penalties for exceedance, not general commitments to "best practices."

8. Cumulative effects

I request that the EIS analyze cumulative effects in combination with other past, present, and reasonably foreseeable mining and mineral exploration activity in the Black Hills region — including RER's own ongoing exploration drilling and trenching outside the mine pit itself — rather than evaluating the Bull Hill Mine in isolation. A single-project analysis understates the combined impact on regional water resources, wildlife habitat, air quality, and visual character.

9. Tribal consultation and sacred land

The Bull Hill Mine sits within the Bear Lodge Mountains, the same small mountain range that contains Devils Tower National Monument, America's first national monument, established in 1906. Devils Tower is known to the Lakota and other Northern Plains peoples as Mato Tipila, "Bear Lodge," the very name this mining project borrows. According to documentation compiled by the National Park Service, more than twenty Northern Plains tribes hold a documented cultural and spiritual affiliation with this landscape, which has been used for centuries by these communities in deeply meaningful ways. This is not a narrow, site-specific concern, it is a landscape-scale sacred place whose significance extends far beyond the reservations and tribal nations located nearest to Wyoming, to Indigenous communities across the country who trace their history and ceremony to this ground.

Public reporting on this project indicates that no tribal nation currently appears among the formal cooperating agencies for this review. That gap matters on its own terms, and it matters more given the project's own timeline: the Forest Service expects to publish the full EIS by late 2027, and the Advisory

Council on Historic Preservation is separately advancing a proposed rule, announced in July 2026, that would narrow Section 106 of the National Historic Preservation Act to exclude large, "noncompact" natural landscapes, mountains, valleys, and sacred landscapes without discrete physical boundaries, from protection, even where their significance rests on continuing religious practice and oral tradition rather than visible structures. If that rule is finalized while this EIS is still in progress, a landscape-scale sacred site like this one could lose protections partway through its own review. I therefore request that the Forest Service formally initiate Section 106 consultation and identify all affiliated tribes as consulting parties now, under the standard currently in force, rather than deferring that process to later in the EIS timeline.

Given the scale and depth of this cultural and spiritual significance, my strong position is that the Forest Service **decline to approve this mine**. If the agency nonetheless proceeds with the review, I request, at minimum: (1) formal government-to-government consultation with all tribal nations that have a documented cultural or historical affiliation with the Bear Lodge/Devils Tower area, not only tribes with reservations nearest to Wyoming; (2) a complete Section 106 review under the current, strong regulations, including identification of traditional cultural properties that would not be visible through a standard archaeological survey; (3) a substantially extended comment and consultation period specifically dedicated to tribal input, separate from and longer than the standard 30-day public scoping window; and (4) direct, ongoing partnership with affected tribal nations throughout the EIS process and all reviews, not a single consultation meeting treated as sufficient, as well as throughout the course of project.

10. Wildlife and threatened/endangered species

I request updated, project-specific surveys and habitat analysis for the northern long-eared bat and any other species of concern in the project area, including how construction, blasting, night lighting, and 22 years of operation would affect roosting, foraging, and movement corridors. Mitigation should be specific and enforceable, not a general commitment to comply with the Endangered Species Act.

11. Transmission line, wildfire, and light pollution

The project includes a roughly 13-mile, 69kV above-ground transmission line, most of it off National Forest land but with about 1.5 miles crossing NFS lands. I request analysis of wildfire ignition risk associated with this new line in a forested, fire-prone landscape, along with vegetation management and maintenance commitments over its operating life. I also request analysis of night-lighting impacts on the area's dark skies, which are part of its recreational and visitor value, including for stargazing near Devils Tower, and enforceable dark-sky-friendly lighting requirements if the unfortunately project proceeds.

12. Reclamation and long-term financial assurance

Given the mine's projected operating life, reported at 17 to 22 years depending on the source, and the presence of radioactive waste material, I request that the EIS require a detailed reclamation plan and a bond sized to the full cost of long-term closure, water treatment, and radiological monitoring, including scenarios where the operator becomes insolvent before reclamation is complete. Public land users and Wyoming taxpayers should not bear the cost of incomplete reclamation.

13. Loss of customary public recreational and scenic use

For decades, the Bearlodge Mountains have been open to hunting, grazing, hiking, and dispersed recreation as part of the public's traditional and customary use of National Forest System land. By the applicant's own description, the mine area will not be open to public recreation during operation, and the project will alter the scenic character of a landscape adjacent to one of the nation's most visited natural landmarks and likely also introduce significant health and safety risks. I oppose this mine in light of such an intrusion upon American land use. I also request that the EIS quantify this loss of long-standing public access and scenic enjoyment, not just to nearby residents but to the broader American public for whom National Forests and this particular landscape hold recreational, aesthetic, and heritage value built up over generations, and evaluate whether excluding public access from this scale of area is consistent with the multiple-use mandate governing National Forest System lands.

14. Highway and infrastructure impacts

The proposed mine would be accessed via a route across County Roads 208, 266, and 8 and Forest Service Roads 854 and 851, with processed ore hauled roughly 45 miles to a processing facility near Upton. Much of this route uses the same rural highway corridor, including Wyoming Highway 24, locally known as the Bear Lodge Highway, that already carries substantial seasonal traffic from Devils Tower National Monument's roughly 500,000 annual visitors and has experienced visitor-driven congestion in recent years. I urge you to reject this mine in light of the sever disruption this would have on existing transport infrastructure, the significant incursion and disruption new transportation infrastructure would have, whether a new road or a widening of existing infrastructure. I request that the EIS include a full traffic and road-safety impact analysis covering construction traffic, ongoing ore-haul truck trips over the mine's full operating life, road wear and maintenance cost burden on county and state infrastructure, and safety effects on tourist traffic headed to the monument, and that any approval include binding commitments for road maintenance and improvement funded by the operator, not the counties or the state.

15. Socioeconomic claims

The applicant has projected substantial private investment and roughly 240 construction and 120 operational jobs. I request that the EIS independently evaluate these projections, including how many jobs are likely to go to local residents of Crook and Weston Counties versus outside contractors, and that it weigh these economic benefits against long-term costs to local water resources, property values, road infrastructure, and the recreation- and grazing-based economy that depends on this landscape remaining intact, all of which are rather irreversible impacts or at the very least, incredibly difficult to mitigate.

16. Process concerns — Fast-41 designation and expedited review

This project's Fast-41 designation and its connection to Executive Order 14241 are intended to speed federal coordination and permitting, and this review is occurring alongside a broader Forest Service effort to streamline mineral operations regulations nationally. I recognize the administration's stated interest in domestic mineral production, but I ask the Forest Service to affirm, in writing, in the EIS, that this designation will not be used to shorten or narrow the substantive environmental, cultural, and public health analysis required by NEPA, the National Forest Management Act, the National Historic Preservation Act, and the Endangered Species Act. Procedural speed should not come at the expense

of a genuinely thorough environmental and cultural review of a landscape this significant to America, the land and communities this forest is meaningful to for generations before and generations to come.

17. Comment period and public hearing

Given the technical complexity of this project, radiological, hydrological, cultural, and Forest Plan amendment issues all at once, I request that the Forest Service hold at least one in-person public hearing in the affected counties, and separately extend the comment period beyond the initial 30 days, particularly for tribal consultation and for public review of technical documents as they become available.

18. National heritage significance

Devils Tower National Monument was the first national monument designated in the United States, in 1906, and draws roughly half a million visitors a year from across the country and around the world. The Bull Hill Mine would sit within the same small, distinctive mountain range, the Bearlodge Mountains, one of the few forested "island" ranges rising out of the surrounding grasslands of the northern Great Plains, that gives this monument its setting and its name. This is not simply a local land-use decision. National Forest System land is held in trust for the entire American public, and this particular stretch of it sits directly beside a landmark of recognized national significance. I request that the EIS treat the surrounding National Forest land, not just the monument boundary itself, as part of the heritage landscape the American public has a stake in preserving, and that it weigh the mine's impact on that broader setting, not only the narrow legal boundary of the monument, as a matter of national, not merely local or regional, significance.

I ask that the Forest Service take these concerns seriously and ensure that any decision on this project reflects a complete, independently verified record — including real tribal consultation and an honest accounting of what will be lost — rather than the timeline pressures created by the project's expedited federal designation. Thank you for the opportunity to comment.