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Comments on the proposed Bull Hill/Whitetail Mine and the Bull Hill and Upton Mills and Section 16's tailings, waste rock and low grade ore storage and Rad-waste storage to occur someplace and any other connected, similar and cumulative actions.

TIMING - CART BEFORE HORSE

We are aware that the CEQ regulations require the Forest Service to start NEPA promptly after the application from the Company has been received. The Forest Service first received a Plan of Operations from Rare Element Resources (RER) in May 2013, but did not begin scoping 9 months ago, but waited till after another Plan of Operations was submitted in Feb 2014. We thus assume that the 5/2013 Plan was deemed inadequate and RER took about 9 months to address the deficiencies identified by the Forest Service (FS). We believe that the 2/2014 Plan remains insufficient; it does not meet the requirements of 36 CFR 228.4 and the Forest Service should have returned it to RER for further re-write and delayed scoping & the next step, which is alternative development, we think.

At the very least it needs to be supplemented with additional data before work on a DEIS proceeds. Thus RER should be required to provide a new Plan or more supplements & appendices & the current DEIS schedule abandoned. You project to develop alternatives in June and release a Draft EIS in a years time, when apparently the Company may have at least another year of baseline data to yet collect before engineering plans can be finished & Alternatives can be even chosen. You need to add at least year to your schedule.

We find these major failures.

1. Baseline water quality monitoring. The Plan does not provide in the Plan or the appendices (as made available on the internet), any baseline data on rare earth element concentrations in air or the soil/bedrock or surface water nor information as to whether any standards exist and if so are met for such pollutants. It only provides minimal baseline data on a only few minerals someone tested for in an Appendix. The company will need to provide the Forest Service (FS) and through them the public, with at least a years worth of testing on these pollution parameters, before designing the pollution containment and mitigation measures. Does the Company have data, which it kept confidential & it has not shared with Forest Service or has it simply not collected the missing data at all? How can RER's engineers, never mind the DEQ's, NRC's ACE's or the Forest Service engineers design mitigations to address a not measured and thus not quantified problem?

As the Upton Plant is a connected action & any off site rad-waste storage will be a connected action, baseline data for those locations (Upton and rad-waste site) are also needed and should be disclosed.

More monitoring sites are needed for additional air, surface and ground water testing. Sites are needed for testing of the chemical and radiological characteristics of exposed waste rock, the "fake lake" sides and tailings.

Testing for minerals alone is not enough and speciation testing is also needed. Please fully discuss & consider the need for speciation tests on identified pollutants. Full disclosure to the public of the methods of testing for radio-nuclides is needed. We do not at all trust that the State or Federal procedures are adequate, and want details.

We question the location of ground water monitoring wells. It seems Company has piggy backed on ongoing monitoring or already dug wells, perhaps to save dollars. Surface & underground water monitoring locations should be reviewed, after study of ground & surface hydrology of area is performed by a disinterested third party hydrologist & his/her review published. Perhaps another year of baseline data in new locations is needed. This applies to Bull Hill and may apply to Upton. I don't think any data is shown on water testing at Upton.

Full disclosure of baseline testing at Upton is also needed, as Upton is a connected action and must be included. If baseline testing at Upton remains inadequate, ditto to the above for Upton.

2. Characteristics of "Waste Rock" & tailings and Mine Lake sides/bottom
The Plan does not provide sufficient information on the chemistry or radiological characteristics of the PUG Plant derived tailings, the low grade ore and overburden to be stored at the "Waste Rock Facility" or the sides of the Pit "Fake Lake". In fact the Plan does not clearly explain that tailings from the PUG plant will be placed at the Waste Rock Facility and how they will be mingled and/or separated from the overburden, low grade ore, top-soil or the 2 buried

springs. Will they have a cover on top or a liner beneath them, how will they relate to buried springs?

The Plan says at page 39:

"Waste rock and pit wall surfaces have the potential to impact water resources due to oxidation and dissolution of a variety of mineral phases under ordinary weathering conditions. RER has conducted and is continuing geochemical characterization of the waste rock to support engineering design, permitting, and impact assessment. Characterization of waste rock from the Bull Hill Resource Area, Whitetail Resource Area, PUG coarse reject, and the Low Grade Ore Stockpile is in progress."

At page 46 Plan says:

"RER has conducted and is continuing a geochemical characterization and geotechnical investigation of the waste rock to support Waste Rock Facility engineering design and permitting." '

3. Loss of Headwaters: The "Waste Rock" facility will cover two springs:, one spring (Allread Spring) has lower flow, but the next one (Davis Spring) has more substantial flow and we believe these are head water springs of Beaver Creeks upper tributaries. There appear to be 3 branches of Beaver Creeks upper tributaries being buried. There is inadequate information as to how this water flow will be delivered out of the waste rock facility, without pollution added, to serve the aquatic & riparian communities, livestock, wildlife & fish.

The Plan says:

"Any water from the Waste Rock Facility will be collected in the underdrain for storage in the sediment trapping pond as shown on Figure 1 (Appendix D)."

We can't find a Figure 1 in Appendix D.

We suspect that some of Whitetail & Whitelaw Creeks' waters will disappear into the Whitetail/Bull Hill Mine pit lake, thus depriving Whitelaw and ultimately Beaver Creek, Cook Lake and Belle Fourche of Wyoming & SD water. Is an appropriation of surface water to occur? SD irrigates from the Belle Fourche. Does RER have a senior or junior appropriation right? The Plan does not adequately address quantitative and qualitative impacts to both tributary headwaters and water supply of downstream surface waters in the impacted area or effects to farms, plant communities & wildlife. We worry about draw down to local aquifers from pit dewatering/lake supply and/or the new well to supply mine.

4. Failure to identify joint lead agency and/or cooperating partners

Pursuant to 40 CFR 1508.25, the Upton plant is a connected action, and as such must be fully discussed in all sections of the DEIS, both in the alternatives, the affected environment, impacts, mitigations & monitoring sections. As the Upton

Plant is a connected & similar action, and as it shares land boundaries with the Thunderbasin National Grasslands; the Medicine Bow Routt National Forest should be a cooperating agency. The wildlife, especially birds of the Thunderbasin will walk or fly over the fence, the wind will blow dust over the fence, gamma radiation will travel over fence and storm water will flow & if excursions occur, both waters will flow into the water/drainage of Coyote Creek which will promptly flow across Thunderbasin lands and pollute their water and soils. As radioactivity & radioactive dust is an issue, radiation can remain in the soil and gamma radiation effect users standing on contaminated lands.

The Upton City leaders and/or the Weston County Commissioners, should be cooperating agencies, but the Forest Service is erroneously telling folks in Upton, that the Upton Plant won't be included in Chapter 3 or 4, so why should they elect to cooperate? FS should change its' spiel & re-invite them.

The NRC may permit the Upton Plant. Rad Waste may be transported from Upton Plant to Hanford Site in Washington (Dept. of Energy). The Upton Plant and storage of waste at Hanford (should such occur) are all connected actions, and Rare Elements Resources, should have submitted a Plan of Operations that clearly explains the functions and actions at Upton, so in late March 2014, the NRC could have known if Upton plant is in their jurisdiction & RER should have a plan for rad-waste, when submitting Plan.

The FS should not have accepted a Plan that was ambiguous on this matter, as the NRC needs to be either a cooperating or joint lead agency if it is involved & participate in Alternative selection.

5. Deficiencies in Rare Earth Regulation

We are not sure if the Wyoming Department of Environmental Quality (DEQ) or the Wyoming Environmental Quality Council have adopted standards, effluent limits/guidelines for Rare Earth minerals - we can't find them in their water regulations. Where are they?

Have all the rare earth minerals had adequate biological research to determine their human health risk? Please discuss. Wyoming does not have a quantitative standard for thorium in surface water or ground water. We can't find effluent guidelines for rare earth minerals in their surface water standards. The Forest Service needs to decide what to do, if the State does not adequately regulate pollutants of concern or doesn't do so in a timely manner.

Why should RER test for pollutants the state does not require it to watch? Why should we be cheered by it's assurances it will comply with non-existent or inadequate/vague regulations that miss regulating key pollutants? Thus the Forest Service may need to adopt interim water quality standards to correct the failure of the State to be prepared for a rare earth mine in Wyoming.

This will also apply at Upton.

6. National Historic Preservation Act Compliance

Very little in the way of a NHPA class 3 inventory has been performed at Bull Hill area, thus the FS forward movement to alternative selection in June is premature. Please wait & complete more Class 3 inventories first so that information can effect alternatives.

We also need to know about NHPA compliance at Upton.

7. Disclosure of processes at Upton.

The Plan of Operations needs more information about what will happen at the Upton Plant and baselines data collected there.

CONNECTED ACTIONS AND COOPERATING AGENCIES

The Forest Service should reread and study the Council on Environmental Quality's (CEQ's) section on Scope at 40 CFR 1508.25. It should also reread CEQ sections on Lead & Cooperating Agencies at 40 CFR 1501.5 & 40 CFR 1501.6 and 40 CFR 1508.16 & 40 CFR 1508.5

Connected actions on non-forest service land include:

1. Upton Hydromet Plant and it's tailing pond,
2. The placement of overburden, stockpiled ore, tailings, topsoil, holding ponds, and rerouting of streams on Section 16 (private land)
3. Road building/re-building, road maintenance on non-forest service roads and travel of mine vehicles over such
4. Utility transmission lines off Forest
5. Appropriation of City ground water
6. Private land parking lots
7. Radioactive, hazardous/toxic, solid, or human waste transported away from and stored/buried off Forest

Cooperating agencies should include

1. Medicine Bow-Rhott National Forest - Thunderbasin National Grasslands, (due to contiguous & down-stream/down-wind lands & their knowledge of natural resources in Upton area)
2. Nuclear Regulatory Commission (due to permitting of Upton Site)
3. Dept. of Energy - Hanford Site (due to possible rad-waste disposal)
4. Department of Defense, Ellsworth Air Force Base, (due to nuclear rad waste storage at Warren Peak & their history & knowledge of environmental testing in the area.)
5. Weston County
6. Perhaps Devil Tower National Monument, depending on impacts to it

ALTERNATIVES

The Forest Service should provide at least 2 alternatives that provide more aggressive protections to the air, water, land, plants, animals and humans, than the DEQ/EQC or EPA/NRC would. The Forest Service is a subset of the federal government and as such it has supremacy over the State or County. It is also the landowner for some lands, so it can require more protection than the regulatory agencies and better protection of resources for it's non-mining related resource uses on its land. Why? Because it is the landowner and it must provide for the multiple use of the adjacent land during the mine

operation and multiple use after the company leaves. Mining is not one of the multiple uses.

We are very worried about the inadequacies and apparent shortfall in baseline data provided in the Plan of Operations and fear the DEQ is not yet prepared to regulate a rare earth mine or Upton Plant and tailings pile/lake safely.

These alternatives should have more aggressive standards for pollutants, more test wells & testing stations & more testing/monitoring. They should have more aggressive reclamation goals. They should require a higher bond. The pollution containment structures/designs should be more successful. The impacts to riparian areas should be less & impacts to wildlife & rare plants less and restoration better. The double liner at Upton will be inadequate and better containment ideas need to be put forward.

Market Problems

The Forest Service should also look at other rare earth mining exploration and development efforts in North America. Are there other potential mineral supply sources that would have less impact on publically held resources or the environment? Recycling of rare earths must be evaluated.

The World Trade Organization will be forcing China to ship out internationally more rare earth minerals. How will that action or development of competing new or old mines in North America or world wide, affect the profits and longevity of the mine? Also hybrid cars may switch to lithium batteries - thus markets may change as alternate products used.

The Forest Service should also prepare an alternative that allows for intermittent & interrupted functioning of the mine. Given fluctuations in markets or problems with capital, the mine may stop & start and/or never process the stored low-grade ore &/or never mine lower grade ores. The Forest Service should do an alternative allowing for intermittent functioning or early & unplanned closure of the mine or at very least discuss this as a future scenario.

EXPLORATION/SUPPLEMENTAL EIS

The mine proposes 43 years of exploration, which is a connected, cumulative and/or similar action and thus must be considered in this DEIS. However 43 years of exploration is too long a time, over way too large an area and the discussion of impacts and mitigations will be too generic to be meaningful in one DEIS. Further more under 36 CFR 228 rules, the Company will ask for and get confidentiality on it's past and future exploration history and annual plans/reports. Thus this DEIS/FEIS will be all the public oversight of 43 years of exploration in over 8,000 acres of land. Annual reports will be filed, but public can't see or read. This is just unacceptable.

The Forest Service needs to come up with an alternate plan, such as schedule supplemental EISs periodically, such as every 3 years have a new an SEIS or EAs tiered to this FEIS, NEPA documents that look at exploration again.

We hope and pray, that in the interest of multiple use & mitigating the budget deficit, that Congress ditches the 1872 Mining Law sometimes in the next 43 years and that a

Canadian Company will no longer explore and develop mines on our public lands, with only such tiny fees paid to the Treasury. We hope this 43 year exploration plan, will become obsolete & outside the law in the very near future.

PURPOSE & NEED

The purpose & need should not be so limited & narrow that only the Plan of Operations submitted by the Company can meet it. It should allow that an alternative that might make the company spend more on mitigations, do more reclamation, develop mine at smaller footprint and/or different rate/timing & have more oversight of exploration might also work & be approved.

OTHER SPECIFIC ISSUES

General concerns:

We want a "hard look" at the below list of values. We want aggressive research, monitoring of, mitigations to protect & disclosure about impacts to:

1. Ground & surface water quality & quantity
2. Exposure of humans, livestock, plants/food & wildlife to radioactivity & radionuclides
3. Air quality
4. Riparian areas, lakes, ponds, springs, seeps, wetlands
5. Native American treaty, cultural, spiritual & economic interests
6. Plant communities & especially rare plants & rare plant communities, with special attention to montane grasslands
7. Wildlife populations, including invertebrates, with special attention to at risk species such as: American dipper, northern long eared bat, black backed woodpecker & Black Hills mountain snail
8. Range & use by livestock & wildlife; look to health impacts to livestock
9. Old growth trees, large snags, burned areas
10. Scenic values both in fore-ground, mid-ground & far distance views
11. Recreation, both backcountry, semi-primitive, non-motorized & motorized
12. Adequacy of reclamation goals & reclamation bonding
13. Any out-sourcing of RER Corporate Expenses to tax payers or rate payers,
14. Health impacts to human public, animals & plants. Impacts to health care costs.
15. Loss of revenue/value of minerals to USA treasury

PUG PLANT & TAILINGS

The reject material after processing at the PUG mill is not overburden (waste rock) it is gangue (tailings). The Plan is disingenuous & by copying its' language the Forest Service also becomes disingenuous. You have to read very carefully to find any references to gangue or tailings or "reject material."

The PUG plant will chop up rock & we thus assume will chop some "reject material" to the size of gravel or base coarse. It will be crushed, filtered in screens and with magnets. The plan says at page 18:

"The PUG process is designed to produce a rare earth oxide pre-concentrate by a sequence of crushing, washing, screening, solid/liquid separation, magnetic separation, gravity classification, and dewatering.'

Processed material will be washed with water. Washing dust or certain substances with water can result in turbidity and suspended and/or dissolved solids (pollutants). A flocculent (polyacrylamide) will be applied at the PUG plant to some subset of processed material; we suspect it will be applied to the material to be shipped to Upton (pre-concentrate). All water is recycled, thus we assume water with flocculent will be recycled & reapplied to other crushed or broken up rocks, which may end up "reject material".

Both the chemical and radiation risk to the environment, in air and water and soil, will be different for chopped up gravel than large boulders. The Operating Plan makes no differentiation between the overburden and the tailing as to either's long term & permanent placement on Section 16.

We want health & environmental risks of tailings, stored ore and waste rock fully understood & multiple engineering solutions studied, before Alternative selection.

ARTIFICIAL WATER CHANNELS

Water diversion channels will surround the waste rock facility & may have rip-rap along sides & bottom. Industrial water channels with rip-rap in no way resemble natural streams with riparian vegetation, terraces and flood plains. The headwater springs of Beaver Creek will be buried under waste rock and the headwater creek bed diverted to an artificial channel.

Will at the end of the mine (in 43 years) the upper reaches of Beaver Creek be made to look like a forest perennial stream or an industrial storm water drain in a city-scape? Will any of the water diversion and containment structures look natural or like an industrial landscape? Rip-rap never can be made to look like a natural stream bed and it quite often is made with different color rock than the natural streams have & provides a permanent scar to natural appearing landscape (severe modification)

Will the hydric soils from the industrialized former springs and streams be stored? Will riparian shrubs and trees be planted and soil and sand and wetland plants, be placed in recovering stream beds/channels? Will recovered and restored streams be in straight lines or will they meander?

Sometimes these fake streams will be on Forest Service land. Please do the best you can for recovery & reclamation. Rip rap always looks unnatural.

Appendix D at page three says about pond capacity:

The HEC-HMS model parameters are included as Attachment A and calculated 100-year frequency, 6-hour duration and 10-year frequency, 24-hour duration peak flows are included as Tables 3 and 3a respectively.

We object to this size & find it too small. The FS on it's land can require larger sized ponds & downstream, on land it owns require "fail safe" secondary ponds.

FAKE LAKE

As we understand it, the company admits the water in the lake will not be in compliance with water standards. Please fully explore why the DEQ, EPA and/or Forest Service, would allow creation of a toxic/hazardous water filled lake on public land. Under what loopholes does that happen? Please fully disclose how such loopholes came to be, if they exist. If toxic lake is planned, please fully discuss impacts to birds, wildlife and livestock.

Please explore alternatives in which the lake pit is filled in partially or fully with waste rock and/or the mine does not dig as deep, so as to avoid going below or too far below the water table. Also explore different shapes of side slopes and potential for docks, isthmus and/or islands in lake.

Explore alternatives, in which the Company has to post a perpetual bond, a capital deposit that will pay for PERPETUAL chemical treatment of the Lake from the interest earned off of the perpetual bond. Please explore alternatives in which both the water quality and the shape of the Lake, allow for the public, aquatic communities, livestock and wildlife to use it and bathrooms are left at mine site.

If the steep slopes & terraces are chosen as the landscape of lakesides, please require intermittent patches of soil in the terraces that could support bushes & native vines such as native grape (not poison ivy!). Please put aquatic life & fish in Bearlodge's "Fake Lake"

Please fully explore the impacts to aquatic communities, wildlife (including birds) and livestock of allowing a toxic lake.

RECLAMATION

On private land, reclamation will be limited by Wyoming law, but on Forest Service Land you can require return to original contours (sort of). One alternative should have such as well as replanting with trees & bushes, not just seeds.

NATIVE AMERICAN & CULTURAL ISSUES

Full discussion of Native American concerns is needed. Native American spiritual reverence & enjoyment of Devils Tower & Inyan Kara should be discussed and the harm posed by the mine/mill, waste rock storage and hydromet plant to Native American cultural and spiritual values needs discussion.

Please discuss air quality effects of dust from the mills/mines on views to and from Devils Tower, Inyan Kara and Warren Peak. What is the air quality class of the area? Please discuss the view-shed impacts on these places, on a clear day, will they be able to see the mine, waste rock facility, PUG mill, the new roads and/or the plant at Upton? Will the noise of blasting or trucking carry? Sound tests are needed at Devils Tower and Inyan Kara.

More thorough compliance with NHPA is needed before the FEIS issued and the ROD is signed. Please fully discuss & fully comply, in a timely way, with all laws, regulations & executive orders to protect Native American concerns/issues.

Native American (Lakotas) and Supreme Court have disagreement over what is justice about failed treaty promises and thus treaty rights should be discussed. Ownership disputes over the Black Hills/Bear Lodge should be discussed as part of environmental justice review. Some tribes believe they have financial interest in the forest's products, such as mined ore and such disputes should be disclosed. Some reservations should be considered part of affected communities, as some they claim ownership of Black Hills (and thus the minerals) and some may worship in affected areas.

RECREATION

Bird watching, nature study & photography should be added as recreational use. Adverse impacts to recreation should be disclosed, which should include exclusion of public from any area (short term, long term or in perpetuity), scenic impacts, noise, changed character of landscape, dust & number people/machines/vehicles using area, & reduced wildlife.

Prairie Hills Audubon appealed the scenery section of the 1996 Forest Plan Revision. We incorporate our appeal by reference and will eventually send you a copy of it. The scenery section of the 1996 Plan was so poorly done, it provides very little valuable guidance.

An indirect impact of plowed winter roads will be to increase recreation in Bearlodge in winter & thus loss of habitat security will occur for some wildlife.

WILDLIFE

We are worried about loss of access to or supply of waters and riparian areas and we worry about toxicity in surface waters (both at Bull Hill and Upton) and effects of less water and toxic water, to wildlife (including birds) and livestock. We worry about background radiation increases in air from crushed and exposed rocks - how will wildlife and livestock be affected by increased radiation? What are effects of dust to them, or chemicals to reduce dust? We are worried about disturbance to wildlife from activities, noise and blasting and actual destruction of their habitat.

The northern long eared bat is likely to be listed under the ESA this fall, many bats have been seen in area, but it's Bearlodge winter hibernacula (caves) not found yet, if such exist.. The Company with all it's machines & rock moving, might seek in 43 years (or sooner) to create & leave bat winter caves, on purpose. Some bats use old adits. Don't bring in bat diseases from other mines/caves.

Fully disclose all aquatic communities & fishes (especially rare ones) that could be impacted.

Please fully disclose impacts to wildlife and provide alternatives with aggressive pro-wildlife solutions.

At Upton, the issues and species may be different, such as greater sage grouse may be an affected species. However full disclosure of impacts to wildlife and habitat on the Thunderbasin is also needed.

MONTANE GRASSLANDS

Special provisions are needed for activities on montane grasslands. Does the Forest Service of the Company own grass/forb seed to replant such areas, consistent with the existing species? If soil is scarified will it be invaded by species that harm the rare plant community. What has happened thus far on the areas where the Company has scarified the montane grassland? Did it recover with the rare native plants that comprise it, and if not, what is the Forest Service and the Company doing to repair this problem. Can it be repaired?

MINING CLAIMS

The map on page 6 of the Plan of Operations, shows no claims in parts of sections 9, 10, 11, 13 and 14 (the NE corner of Project Area).

If the RER has no mining claims in this area, why is it included in the Project Area? Will the 43 year exploration apply to it? Please explain this.

Does the company having milling or mining claims at PUG mill?

BURNED AREAS/MPB/SNAGS

Please discuss all burned areas or Mountain Pine Beetle kill areas, that might provide habitat for Black Backed Woodpecker and impacts to the woodpecker & it's habitat..

Please identify the density of large snags in area before cutting forest and impacts to snags & associated species. Please discuss all designated old growth stands and impacts to them.

Please provide alternatives with better outlook for these rare habitat values.

SPECIAL AREAS

Please discuss proposed RNAs in the Bearlodge, both by Forest Service & Biodiversity Conservation Alliance. I think the Forest Service proposed 2 RNAs in Bearlodge and chose to protect only one as RNA. I think BCA proposed at least one, with Beaver in the name, which the Forest Service did not agree with. I will try to find a BCA proposed RNA map & send it later.

Please Discuss the Nature Conservancies special designation in Bearlodge area. I will try to find reference for you to their book on Black Hills Eco-region.

Please discuss all management areas in the exploration area and provide special attention to those that are a small percent of the forest.

ROADS/TRANSMISSION LINES

Please fully discuss all impacts from building roads, dust, noise, wildlife & other issues associated with roads & traffic. Same for Transmission lines, which may result in visual & plant community impacts.

SOCIO-ECONOMIC IMPACTS

In your section on socio-economic impacts, please evaluate all out-sourcing of Company's expenses to the public, either as taxpayer expense, rate-payer expense, or public as purchaser of newly needed things, such as a new health care expense that may be forced on public by environmental impacts of company.

Please discuss impacts to character of community, community schools, housing, real estate prices (depending on location), taxes and hospitals and/or health care providers. If new jobs happen, how many employed will be locals or imports?

Please fully disclose the cost to the Forest Service, DEQ, NRC and other state, federal county and city agencies of watching, reviewing, monitoring, permitting and servicing the proposed mine. How does the Company pay those costs back? What are it's taxes & licensing/permitting/monitoring fees?

How will the cost of the FEIS be paid? How will Forest Service time to prepare the FEIS be paid, will other resource planning suffer, while mine plan is written?

Please fully disclose the value of the minerals to be dug and how much the Company will have paid the treasury for such minerals.

STRATEGIC DEFENSE

Please fully discuss the Canadian ownership of the Rare Element Resources and it's USA subsidiary. We believe the USA subsidiary company, RER act through, is a fully owned subsidiary. Please confirm who owns what and to what degree Canadians own this mine and how Canada or USA receive taxes on it's profits?.

Will you have a section on strategic minerals and the value to USA of having a rare earth mine in the USA? If so, please discuss how (short of nationalization of the Mine), American's can compel Canadians to keep & sell their ore in America? If the USA nationalized the Candian owned mine/ore, would the taxpayer (given the 5th amendment) have to pay the Candians for the ore, the Canadians mined with no financial consideration given to the taxpayer? Please discuss the cost to US of giving Canadians strategic minerals.

How does allowing Canadians to mine our precious resources for free, help our national security? Please also disclose any federal or state grants or incentives that may have been given by State or Federal sources to help promote the development of a Canadian owned mine, that can export our minerals?.

Please discuss weather the next step after Upton is to ship ore out of the country for the next chemical treatment. Have US companies learned how to do the next step in

processing, or will the Upton product be shipped overseas? How does ore shipped overseas contribute to strategic defense?

Please discuss the USA budget deficit & how lost revenue from mine relates to that.

THIRD PARTY CONTRACTOR

Who pays the third party contractor to write the FEIS? If the Company pays most of cost, how is the third party truly neutral, as they must in future curry favor with other companies to be chosen to do their EISs? To what degree does or did the RER Company have a vote or veto in choice of contractor? What happens if FEIS is delayed or grows in size/scope? Did you contract for third party contractor, while believing Upton would not be discussed in impacts section?

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Hilding", with a stylized flourish at the end.

Nancy Hilding
For Self & Society