

Nancy Hilding, President
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August 28, 2026

Wendy Schuyler, Project Manager
Black Hills National Forest, Supervisor's Office
1019 N 5th Street, Custer, SD 57730
Submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=291093>

Re: Scoping Comments of Prairie Hills Audubon Society — Bear Lodge Rare Earth Project / Bull Hill Mine (Project #291093) — TRANSMITTAL OF ATTACHMENTS AND DOCUMENTS FOR THE ADMINISTRATIVE RECORD; SUBSTANTIVE COMMENT LETTER TO FOLLOW THIS EVENING

Dear Ms. Schuyler:

This letter starts the transmission of attachments and record documents in support of the scoping comments of Prairie Hills Audubon Society (PHAS) on the above project. As I am not sure of how many mega bytes of data the portal can handle, I will be submitting these attachments in sequence (not all at once).

PHAS's substantive comment letter will follow in a separate submission through this same portal before the 11:59 p.m. MST deadline tonight. Because of file sizes and internet limitations, PHAS is uploading its materials in multiple submissions this evening. PHAS requests that all submissions received from PHAS today be treated together as one integrated scoping comment, and that every document transmitted be placed in the administrative record for this project and considered in the EIS.

The documents transmitted with this and accompanying submissions include:

- E-mail of the Forest Environmental Coordinator to PHAS, August 21, 2026, stating that the 2016 Draft EIS, the Newmont EA, and the NRC documents will not be posted on or linked from the project web page.
- PHAS Scoping Comments on the Bear Lodge Project, April 30, 2014 (this same project, prior NEPA process);
- Rare Element Resources, Plan of Operations Map A-1, Upton Hydromet Facility (Feb. 27, 2014), and an area map showing Bull Hill, the Bearlodge Mountains, and Devils Tower National Monument;
- The 2016 Bear Lodge Project Draft Environmental Impact Statement, U.S. Forest Service, Black Hills National Forest (Project #37875);
- Newmont Mining Corporation Sundance Exploration Project Environmental Assessment (Feb. 2009), covering exploration that preceded this mine proposal;
- Rare Element Resources, Rare Earth Element Separation and Processing Demonstration Project Environmental Report (April 2022), submitted to the U.S. Nuclear Regulatory Commission in support of its source material license application for the Upton facility, and related NRC environmental review documents;

PHAS submits the 2016 DEIS, the Newmont EA, and the NRC documents itself because the Forest Service has declined PHAS's requests to post these documents or their URLs on the project page. These documents concern this same deposit, this same mine site, the exploration that shaped the current landscape, and the processing facility that will receive this mine's ore. Whether or not the Forest Service

chooses to rely on them, they are directly relevant to scoping, to the baseline, and to the issues PHAS raises, and PHAS relies on them. They must be part of the record.

If any upload fails due to portal limitations tonight, PHAS will attempt to transmit the remaining materials by e-mail to the Project Manager before the deadline, with a note identifying them as part of this comment. I am not sure of size limitations on sending large documents by e-mails

Sincerely,

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

Nancy Hilding, President
Prairie Hills Audubon Society