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**Subject:** Public Comment to be added to the Records  
**Date:** Thursday, April 18, 2024 2:20:07 PM  
**Attachments:** [Public Comment on Q&A.pdf](#)

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Please have the attached PDF added to the record of the Plumas County Zoning Administrator Hearing regarding US Copper's claim to vested rights and the Plumas County Board of Supervisors.

All the Best,

Dan

Response to public comments submitted to Plumas County by James DeCarolis, of EnviroMine, on behalf of US Copper, April 4, 2024.

I would like to point out that nothing in the public comment submitted by Mr. DeCarolis is relevant to the fact-finding legal determination of the vested rights for the Engels and Superior mines. The public was reminded to stay on point with their comments, it is clear that US Copper, EnviroMine and their associates need this reminder as well.

A determination of vested rights requires that the applicant (US Copper) provide proof that mining operations were ongoing prior to and at the vesting date. In this case the vesting date for Plumas County is July of 1958. To be clear, even the application submitted by EnviroMine on behalf of US Copper does not provide this proof. Below is a screen shot of the "Summary of Supporting Facts" from the application itemizing the activity occurring on the properties up to and including the vesting date. Notice that there is not one activity involving the extraction of material is mentioned for these years.

<b>1950</b>	In 1950, the United States Geological Survey ("USGS") produced the Kettle Rock Quadrangle California 15 Minute Series Topographic Map. The map includes two mining symbols within the Mining Property and identifies the Engel Mine Upper Camp within the Engels parcel. (Exhibit 16)
<b>1951-1959</b>	Indian Valley Chemical Company leased the mines in 1951 in hopes of continuing production and possibly making use of the tailings onsite. Paul Schwartz, president of CEMCO at the time, invested \$25,000 into developing a new method to process the tailings. (Exhibit 17)
<b>1958</b>	On July 8, 1958, the Plumas County Board of Supervisors adopted its first comprehensive zoning ordinance. Section 61312.a.3 allowed mining in any zone by acquiring a use permit. The Mine Property was

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Source: Page 21/460, <https://www.plumascounty.us/DocumentCenter/View/47729/Request-for-Vested-Rights-Determination-Engels-Superior-Mine---Full-Package?bidId=>

To be clear then, it is the professional opinion of US Copper, EnviroMine and their associates that:

- maps with symbols,
- hopes of continuing production and
- Plumas County adopting an ordinance which US Copper is currently attempting to avoid -

each constitute proof that the extraction of minerals was occurring on the properties at the time of vesting.

The use of distracting, baiting concoctions of reality is a valuable tactic when all the relevant facts of the case refute one's version of reality. **After Reviewing the facts, two independent, highly respectable law firms have come to the same conclusion: the request submitted by US Copper and EnviroMine contains not a single bit of evidence to support a finding of vested rights, despite its 460-page girth.** The public does not appreciate having their time, their tax dollars and the incredibly valuable time of Plumas County staff wasted on colorful fancies.

Additionally, US Copper, EnviroMine and their associates demonstrate a clear intent to deceive the county and the public regarding the facts relevant to vested rights and the extreme dangers associated with mining these locations.

The newspaper Q&A submitted on behalf of US Copper, provides perfect examples of US Copper and EnviroMine submitting irrelevant and untrue facts to this hearing. The deceitful nature of the answers in some of Mr. Dunn's responses must be pointed out in the name of common decency, public safety, morality and ethics.

Below are Plumas Sun questions in **bold black**, Mr. Dunn's responses in plain black, my comments in **red**. To view the entire Q&A document see:

[https://plumascounty.us/DocumentCenter/View/48717/Public-Comment-Submission\\_US-Copper-Corp?bidId=](https://plumascounty.us/DocumentCenter/View/48717/Public-Comment-Submission_US-Copper-Corp?bidId=)

The following are US Copper CEO Steve Dunn's responses to questions from the Plumas Sun. Plumas Sun questions are in **bold black**, Mr. Dunn's responses are in black, refuting evidence is in **red**.

**1. Please list your full name, title, and affiliation, as you would like them to appear.**

Steve Dunn, CEO, US Copper Corp

**2. Can you share with us a little about US Copper Corp? What is the organization's mission and business model? What have been some of your notable past projects?**

US Copper Corp (USCU) is a relatively new junior mining exploration company. The role of a junior mining company is to identify and advance mineral deposits, through exploration and engineering studies, to the point where economic viability can be demonstrated.

Parent company Rykala Resources, started in 2007 according to the Company History on the US Copper website, <https://uscoppercorp.com/company/>.

Our shareholders tend to be small retail investors that understand the need for commodities in today's economy and are prepared to risk their capital in the hope that US Copper can attract further investment to develop a mine.

When US Copper CFO Rich Morris worked for MagIndustries (<https://www.poandpo.com/who-is-promoted/magindustries-appoints-chief-financial-officer/>), MagIndustries became the 3<sup>rd</sup> largest mining company on the TSX stock exchange (<https://en.wikipedia.org/wiki/MagIndustries>). After being investigated for bribing government officials in the Republic of Congo and insider trading, MagIndustries sold a controlling majority of its shares to the Chinese owned Evergreen Holding Company before it succumbed to its problems. See again, <https://en.wikipedia.org/wiki/MagIndustries>. While I am not alluding to the guilt of Mr. Morrow in any criminal activity, these historical facts do not mesh with the picture Mr. Dunn is trying to paint. Small retailers don't sell controlling share amounts to Chinese mega-corporations nor generally engage in potential bribery and insider trading.

**3. What attracted the organization to the Engels mine property, and what makes it a good fit for the business?**

Mining exploration and development is a very risky business as economic deposits are very difficult to find. If a junior mining company can acquire a project that has historic production and resources still available, then that company has just eliminated a large portion of the risk in exploring for an economic deposit.

A finding of vested rights would allow US Copper to bypass the completion of an Environmental Impact report (EIR). The information that would come out in an IER is "risky" for US Copper to say the least. The sulfide

deposits within the project area are precisely the types of deposits which are prone to produce acid mine drainage. See: **The Vested Rights Doctrine: How a Shield Against Injustice Became a Sword for Opportunistic Developers @ <https://digitalcommons.law.uw.edu/faculty-articles/125/>**

The Engels Mine property is part of the Moonlight Superior Project which includes 2 historical copper mines: the Engels Mine and the Superior Mine.

Abandoned and defunct mines which have not operated for over 80 years. See:

<https://www.plumascounty.us/DocumentCenter/View/48618/2024-03-20-SMW-Letter-re-Engels-Superior-Mines-Vested-Rights-Petition-with-Attachments?bidId=>

There are two other known copper deposits, Moonlight and Lamb's Ridge, that are within the project. In total, it is estimated that there is over 3 billion pounds of copper in the 4 deposits identified.

To be clear then, US Copper **does** intend to mine deposits outside of the properties it is claiming vested rights to (including a deposit formerly named "Sulfide Ridge"). US Copper is only requesting vested rights to privately owned portions of the claimed area, because vested rights only apply to private property. US Copper still controls roughly 13 square miles of federal claims in the area. See slide 9: <https://uscoppercorp.com/wp-content/uploads/2024/03/InvestorPresentationTSXvUSCU.pdf>

This project only became available in 2012 after the global financial crisis that began in 2008 caused major weakness in the commodity and investment markets. USCU was attracted to this project because very few deposits of this size ever become available, and the financial crisis meant few companies were then looking for opportunities. The project also had a number of other very attractive features: it offered secure title because it was in the USA along with vested mining rights on property which has always been used for mining and exploration;

There are no vested rights to the properties in question. (See again

<https://www.plumascounty.us/DocumentCenter/View/48618/2024-03-20-SMW-Letter-re-Engels-Superior-Mines-Vested-Rights-Petition-with-Attachments?bidId=>) This is why we are in the process of a vested rights hearing. The title of US Copper's petition to Plumas County, prepared by EnviroMine, is: "**VERIFIED REQUEST FOR DETERMINATION OF VESTED RIGHTS FOR THE ENGELS-SUPERIOR MINES**". See the cover page of <https://www.plumascounty.us/DocumentCenter/View/47729/Request-for-Vested-Rights-Determination-Engels-Superior-Mine---Full-Package?bidId=>.

Mr. Dunn Continues: ...there was adequate infrastructure nearby which helps the project economics; the deposits are at surface which keeps engineering straightforward; and the rock is metallurgically attractive in that the copper is easily recoverable and the **base rock (and tailings) do not generate acid runoff.**

**This last statement is utterly and completely false. Here is the proof:**

To understand more about acid mind drainage, please see:

- <https://earthworks.org/issues/acid-mine-drainage/>
- [https://www.savetheboundarywaters.org/sites/default/files/attachments/sulfideorecopperminingandt\\_heboundarywaters\\_final\\_20170718.pdf](https://www.savetheboundarywaters.org/sites/default/files/attachments/sulfideorecopperminingandt_heboundarywaters_final_20170718.pdf)
- [https://en.wikipedia.org/wiki/Berkeley\\_Pit#See\\_also](https://en.wikipedia.org/wiki/Berkeley_Pit#See_also)

The Technical Report and Preliminary Economic Assessment for the Moonlight Deposit, Moonlight-Superior Copper Project, California, USA (Moonlight PEA) was prepared for Crown Mining by Tetra Tech in 2018. The Moonlight PEA may be viewed at [lostsierralightworks.org/uploads/1/4/2/7/142729421/moonlight\\_pea.pdf](https://lostsierralightworks.org/uploads/1/4/2/7/142729421/moonlight_pea.pdf). US Copper and EnviroMine officials have repeatedly tried to downplay the significance of the Moonlight PEA in Plumas County, all the while using it as the cornerstone for world-wide investor recruiting (<https://uscoppercorp.com/>). The reason why is about to become clear.

The Moonlight PEA is significant enough to be mentioned in the first paragraph on the US Copper home page, <https://uscoppercorp.com/>. The Moonlight PEA is also the source for the majority of the data US Copper shares its most recent investor presentation, <https://uscoppercorp.com/wp-content/uploads/2024/03/InvestorPresentationTSXvUSCU.pdf>.

Crown Mining changed its name to US Copper in 2021, [https://ceo.ca/@newsfile/crown-mining-announces-completion-of-name-change-to#google\\_vignette](https://ceo.ca/@newsfile/crown-mining-announces-completion-of-name-change-to#google_vignette). 6 out of 7 Managers of Crown Mining are now management for US Copper, including Stephen Dunn. Compare the “Management” and “Board of Directors” sections of <https://uscoppercorp.com/company/> to the Crown Mining management listed on at <https://www.nafinance.com/zGetCompanyProfile.aspx?tradedSymbol=Cwm&langCd=En#%E7%AE%A1%E7%90%86>

As the CEO and Director of both US Copper and Crown Mining, it is hard to believe that Mr. Dunn is unaware of the Moonlight PEA or the information it contains. However, there is a potential reason for Mr. Dunn and his associates’ desire to distract the County and the public from the information in the Moonlight PEA.

**Given that sulfides produce acid mine drainage and given that the Moonlight PEA contains information which is currently broadcast from the US copper website, consider that the Moonlight PEA refers to the presence of sulfides at these mines at least ten times. Here are some examples:**

(All page numbers refer to the PDF page number, not the document page number)

- Page 25/235, section 1.10, 2<sup>nd</sup> paragraph states: “Crown Mining provided material identified as **Moonlight Sulfide**, Moonlight Oxide, and **Superior Sulfide**.”
- Page 51/235, 1<sup>st</sup> paragraph, 3<sup>rd</sup> sentence from the end states: “Preliminary drilling was completed on the **Sulfide Ridge** (now Lambs Ridge) geochemical anomaly.”
- Page 58/235, 7.2.1, 3<sup>rd</sup> paragraph states: “Copper mineralization at **Engels** is strongly oxidized to depths of 230 ft. Primary copper oxide minerals are malachite with lesser chrysocolla and azurite. Bornite and chalcopyrite are the principal **sulfide minerals**.”
- Page 92/235, section 13.1, 3<sup>rd</sup> paragraph states: “Most studies were focused on the copper leach extraction of copper oxide mineralization at the Moonlight deposit, oxide mineralization at the Engels Mine, and **sulfide mineralization** at the **Superior Mine**.”
- Page 94/235, 13.2, 1<sup>st</sup> paragraph states: “The material provided by Crown Mining was identified as follows (as identified by the shipping documents and sample bags): **Moonlight Sulfide**, Moonlight Oxide, and **Superior Sulfide**. The intention of the test program was to confirm effective flotation reagent conditions and demonstrate the recoveries and concentrate quality that can be achieved with the tested material.

Of particular interest is the fact that “**Sulfide Ridge**”, part of the Engles deposit, has been changed to “Lambs Ridge” and that metallurgical tests were done on “sulfide” deposits. What was the reason for changing the

name of the ridge from “Sulfide” to “Norm’s”? How Could the CEO of US Copper and Crown Mining not know that metallurgical testing of sulfide ores occurred?

Additionally, in her Master’s Thesis, <https://scholarworks.calstate.edu/downloads/xp68kg77g>, Kara E. Scheitlin states on page 61/197 that Figure 17. shows Bornite ore sample from No. 5 Level of the Superior Mine. Bornite is a type of sulfide.

It appears that US Copper is ignoring facts that could hurt them while pointing to irrelevant information when asked to provide facts. The following research illustrates, in the US, how poorly modern mining infrastructure protects against contamination.

Please see THE TRACK RECORD OF WATER QUALITY IMPACTS RESULTING FROM PIPELINE SPILLS, TAILINGS FAILURES AND WATER COLLECTION AND TREATMENT FAILURES at:

[https://earthworks.org/assets/uploads/2012/08/Porphyry\\_Copper\\_Mines\\_Track\\_Record\\_-8-2012.pdf](https://earthworks.org/assets/uploads/2012/08/Porphyry_Copper_Mines_Track_Record_-8-2012.pdf).

#### **4. What will be the next steps for US Copper if the vested rights application currently under consideration is approved in May?**

Once vested rights are confirmed, US Copper would begin to develop a mine plan for Superior and Engels Mines.

There are no vested rights. Us Copper has failed to bear the burden of proof that mining operations were ongoing at the time of vesting, July of 1958. See again:

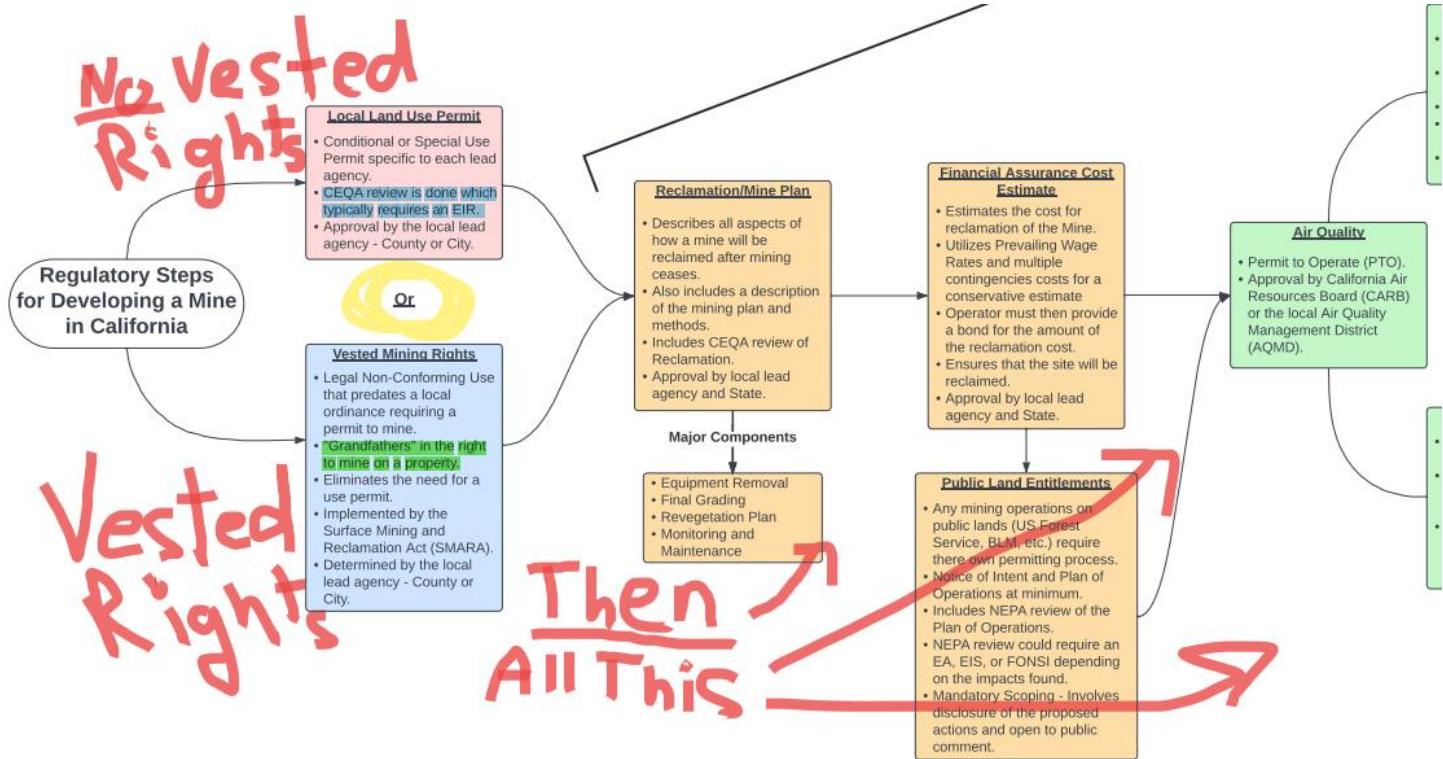
<https://www.plumascounty.us/DocumentCenter/View/48618/2024-03-20-SMW-Letter-re-Engels-Superior-Mines-Vested-Rights-Petition-with-Attachments?bId=>

This mine plan is needed to prepare applications for the additional permits that are required, as well as the mandatory Reclamation Plan.

The Q&A contains a chart which perfectly illustrates the significance of vested rights, for miners and land developers and all who live downstream of their project areas. See last page of:

[https://plumascounty.us/DocumentCenter/View/48717/Public-Comment-Submission\\_US-Copper-Corp?bId=](https://plumascounty.us/DocumentCenter/View/48717/Public-Comment-Submission_US-Copper-Corp?bId=)

A zoomed in portion of the diagram is presented below (highlights added by Dan Kearns):



Note that to develop a mine in California, one would start by either:

1. Follow the intent of current County and State laws designed to safeguard the health, safety and wellbeing of all living things by:
  - Applying for a County Use Permit, which would require a:
  - CEQA Review, which generally includes an:
  - Environmental Impact Review (EIR), which is then included in the:
  - County Approval of the application, which would include:
  - **PUBLIC HEARINGS in which the Mine Application, CEQA Review and EIR would be shared with the public and County Staff**
  - The rest of the process

**OR**

2. Secure a finding of vested rights and skip to the rest of the process.

The significance of this is:

If a plan to mine sulfide deposits (not to mention the creation of chemical lakes and leach pads saturated with cyanide, sulfuric acid, arsenic and the like) in an area which floods every ten years, is prone to earthquakes and is at the headwaters of a watershed which supplies drinking water to over 20 million humans was subjected to an Environmental Impact Review, the conversation would be over. No one, in their right mind, would want to be responsible for approving an operation with this much potential for severe, permanent ecological damage.

The avoidance of a publicly reviewed EIR, along with increased profit margins (saving time and money on permits, studies, litigation) is likely why US Copper seeks vested rights for these properties. The intent to deceive the public and County officials regarding dangers of this project is likely why US Copper is playing down the relevance of the Moonlight PEA in Plumas County.

## **5. If the zoning administrator denies vesting, will you appeal to the county board of supervisors?**

Our review of the facts and applicable law supports the existence of a vested mining right at this site.

In all 460 pages, the verification request submitted contains **not one fact** which support the existence of vested rights.

We are hopeful the Zoning Administrator will agree with us. If not, we will consider our options at that time. It is important to remember that the matter before the County is only an evidentiary proceeding to determine the existence of vested rights based on historical mining activities.

**Why is US Copper submitting a newspaper Q&A in the public comment section of an “evidentiary proceeding”?**

## **6. If the supervisors deny your appeal, will you file a lawsuit?**

It is premature to consider legal options in response to future County actions that may or may not happen. We believe that the vested rights exist and that there is a path forward through administrative channels.

So, it is possible then, that US Copper could attempt to sue Plumas County for financial losses.

## **7. We have found no public information that describes specific plans for mining at the Engels and Superior mine sites. Please tell us about the size of the pits, how you plan to extract copper and other minerals from ore, how you will handle tailings, and what routes you will use to transport minerals out of the mine area.**

We have not yet developed any mining plans for either the Engels or Superior deposits based on current economic conditions. We are currently defining the oxide resource at Engels and doing some metallurgical tests. These studies are needed before we can begin planning any possible mining options

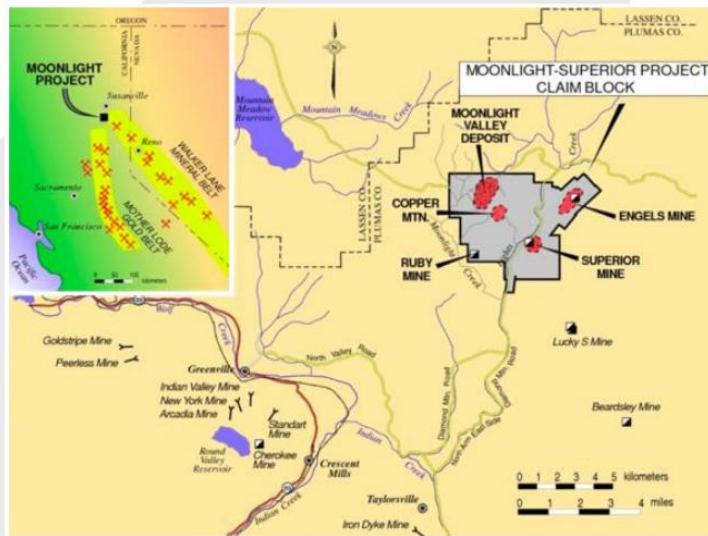
Refocus on the Moonlight PEA. While Mr. Dunn is correct that it is not a mine plan, it is the most recent and all-encompassing report done for the project area. **The Moonlight PEA is the source for the data currently displayed on the US Copper website** and in the Investor presentation from the US Copper website. The Moonlight PEA is a fascinating document – it discusses all of the information Plumas Sun was requesting of Mr. Dunn in this interaction and more. See the Moonlight PEA at:

[lostsierralightworks.org/uploads/1/4/2/7/142729421/moonlight\\_pea.pdf](http://lostsierralightworks.org/uploads/1/4/2/7/142729421/moonlight_pea.pdf)

It is possible that any mining operation would eventually include adjacent USFS lands, and it would then be necessary to obtain approval of a Plan of Operations (permit) from the US Forest Service before that could happen. This process for the federal portion of the project would be subject to NEPA and a host of other regulatory requirements and permits.

Mining the 4 deposits (Moonlight, Engels, Superior, Copper Mountain) is US Copper’s plan. See Mr. Dunn’s answer to question 3 of this Q&A and the slide from the US Copper Investor Presentation below:

## MOONLIGHT-SUPERIOR COPPER PROJECT



## Significant Mineral Potential

- US Copper controls ~13 square miles of mining claims.
- The Superior and Engels mines operated from 1915 to 1930 producing over 161 Mlbs of copper from 4.7 million tons of rock containing 2.2% copper.
- Silver and gold made up almost 20% of mined value at current commodity prices.
- Initially described as porphyry copper deposits, but recent work suggests iron oxide copper gold (IOCG) ore deposits.
- Focused on three deposits – Moonlight, Superior and Engels.
- Several partially tested and untested exploration targets.

## HISTORIC PRODUCTION FROM SUPERIOR &amp; ENGELS MINES

	Amount	Unit	Grade
Copper	161,500,000	pounds	2.20%
Silver	1,900,000	ounces	0.500 opt
Gold	23,000	ounces	0.005 opt

Source: slide 9, <https://uscoppercorp.com/wp-content/uploads/2024/03/InvestorPresentationTSXvUSCU.pdf>

This is precisely why the public is concerned about mining operations at this project area extending beyond the boundaries of the Engels and Superior properties. The County should be concerned about this too.

Clearly mentioned in the Moonlight PEA is the need for lands additional to the 13 square miles US Copper already controls. See Below:

Crown Mining Corp.  
Technical Report and Preliminary Economic Assessment  
for the Moonlight Deposit, Moonlight-Superior Copper Project,  
California, USA

5-2

704-MIN.VMIN03123-02

Exploration and mining could be conducted year-round, due to the established roads and the Project's proximity to nearby towns. The Property has sufficient surface rights for future exploration or mining operations, although there may be a requirement to lease nearby flat land available within a 6 mi radius for potential waste disposal areas, heap leach pads areas, and potential process plant sites.

Source: Moonlight PEA, Page 49/235,  
[lostsierralightworks.org/uploads/1/4/2/7/142729421/moonlight\\_pea.pdf](http://lostsierralightworks.org/uploads/1/4/2/7/142729421/moonlight_pea.pdf)

As US Copper points out, vested rights cannot be applied to federal claims. So long as the remainder of the claims are not patented, this holds true. If the federal claims adjacent to the private properties in question were to be patented, for example: as mining operations slowly expanded out from the Engels and Superior deposits, then the vested rights could be transferred to these adjacent properties, as the patenting process would convert them to private property.

Mr. Dunn Continues: In addition, a Reclamation Plan will need to be approved by the County and will be subject to CEQA review. In California, SMARA requires that any metals mine must be backfilled with the overburden that is removed from the mine to extract the ore. The public will be involved in each of these proceedings.

True. However, the EIR that would be conducted prior to the county approving a permit to mine is precisely what US Copper is trying to avoid. SMARA and CEQA compliance are irrelevant to this point.

Reclamation comes after the mining is done. More often than not, mine operators declare bankruptcy and leave an un-reclaimed superfund site. See Canadian mining and ill health in Latin America: a call to action: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6964541/>

Perhaps with some examples of open pit copper mines, particularly ones which operated in sulfide ore deposits, that are properly reclaimed would be useful, if they exist.

## **8. Do the public descriptions of mining at the Moonlight site represent the processes you plan for Engels and Superior?**

This is a complicated question. The mining descriptions you refer to are in a document titled “Preliminary Economic Assessment on the Moonlight deposit”. It is not a full-fledged mine plan, but an economic study to establish whether an ore body might be profitable at certain commodity price levels. The mining plan within that study itself is preliminary and subject to major changes such as mining methods and volumes. Anything specific to Moonlight is not necessarily applicable to Engels-Superior either because of differences in deposit size, ore characteristics, location, and other assumptions.

Again, it appears that US Copper relies on the Moonlight PEA to bolster their plans when it serves them, then pretends like it is insignificant when it contradicts the claims they are making in our County. **The presence of sulfides and the inherent dangers which come with open pit mining them will not change with economic conditions.**

## **9. It's fair to say that the response to the proposed project has been mixed, with some community members advocating against the project. Has the public response come as a surprise?**

We were not surprised at the level of interest in the mining plans at our property but we have been surprised at how the issue of vested rights has been misrepresented.

Mr. Dunn is now going to explain how the public is misrepresenting the issue of vested rights. Perhaps providing evidence for his own claims should be a higher priority for him than making attempting to show “misrepresentation” of facts which have been corroborated by two highly respectable law firms.

We believe there is a misconception on the scope of vested rights and specifically what our application has asked the county to review. We've asked for an acknowledgement of vested mining rights on the Engels and Superior mine parcels.

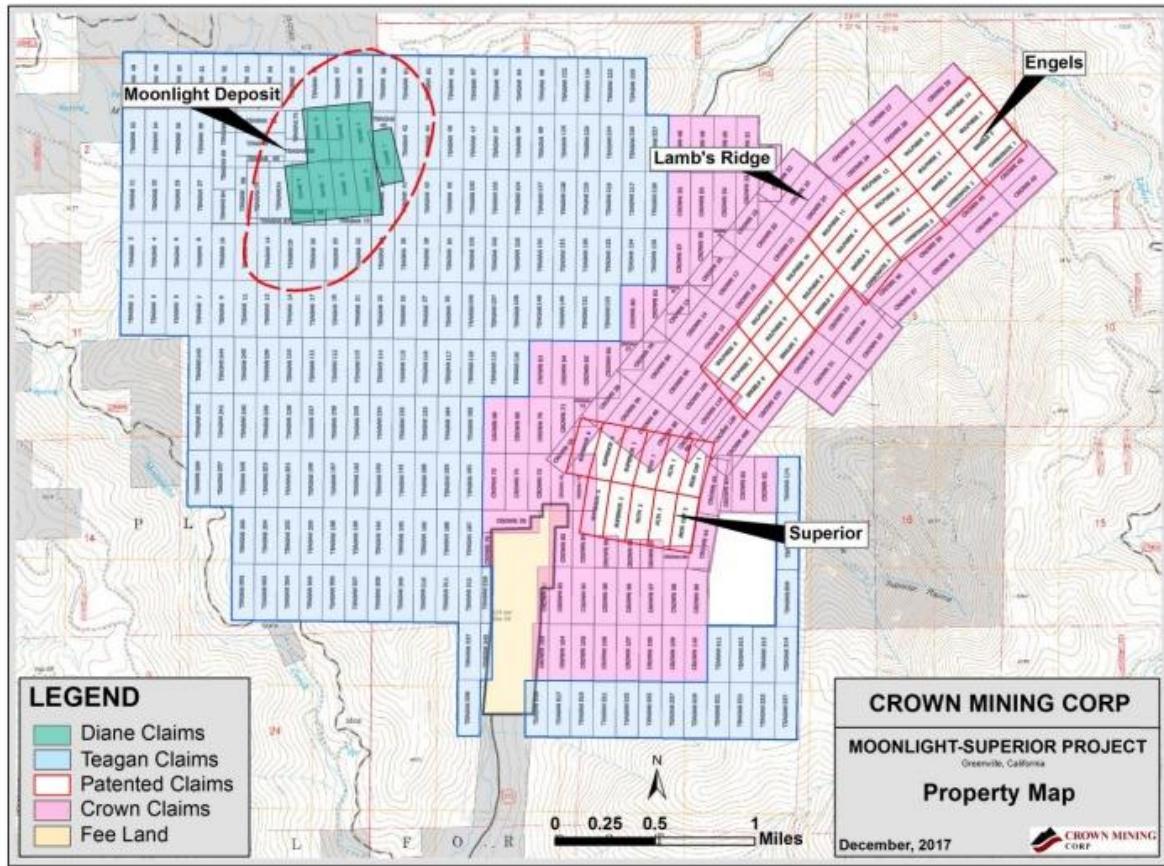
Let's go over this again, US Copper is requesting that Plumas County determine whether or not vested rights exist to the Engels and Superior mines. US Copper bears the burden of proving that there were ongoing mining operations on both of these properties at the vesting date. US Copper has not demonstrated this. Perhaps that is why US Copper representatives continue to provide misdirecting, irrelevant and untrue comments instead of facts in this public hearing – because all the facts point to no vested rights existing.

Some community members have concerns that if those vested rights are acknowledged, we would be able to "extend" the vested rights beyond the property boundary onto neighboring USFS mining claims that we own.

Again, the source of concern is not that vested rights could be extended to USFS or BLM land, that is impossible. What is possible, however unlikely, is that should patents be attained for the Federal claims that surround and are adjacent to the Engels and Superior mines, the claims would then become private property. Vested rights are allowed to transfer to adjacent private property. This illustrates a mechanism that is possible and legal for vested rights that are granted to these 2 properties could be transferred to additional lands surrounding them. Figure 1.2 below, from the Moonlight PEA below is a map of the claims:



Figure 1.2 Moonlight-Superior Project Property Map



The 2 blocks of adjoining white claims are the private properties in question. The colored rectangles are claims on Federal land. One can see how attaining patents for the claims surrounding the Engels and Superior properties would allow the vested rights so spread. Also note that some of the claims associated with the Lamb's ridge area are labeled "SULFIDE" claims. These are the claims associated with Sulfide Ridge, now Lamb's Ridge, as previously discussed.

Mr. Dunn continues: We've heard some worries that this would increase the size of our project from 735 acres (Engels and Superior properties) to over 13 square miles.

The intent of US Copper to mine the entire 13 square miles is not up for debate. We have already been over this. To reiterate, for example, US Copper bolsters to potential investors about controlling "13 square miles of mining claims". Check out slide 9, again, of the Investor Presentation from US Copper's website shown below:



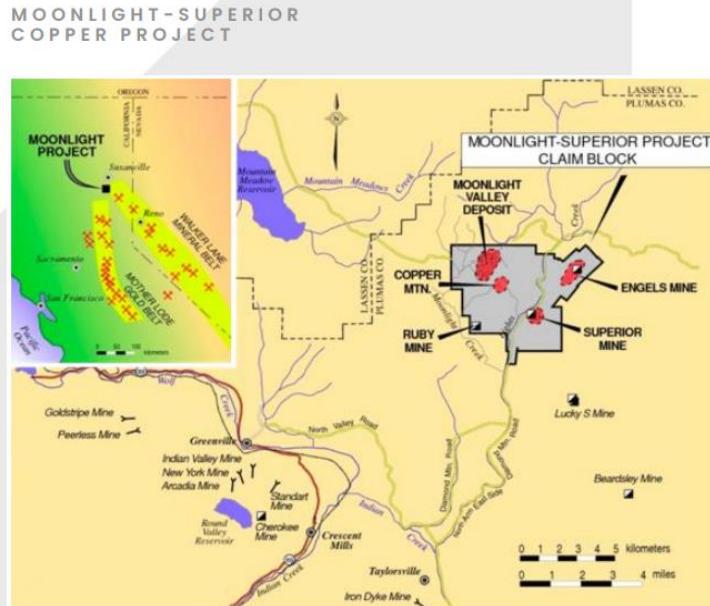
TSX.V: USCU | OTCQB: USCUF | FRA: C73

## Significant Mineral Potential

- US Copper controls ~13 square miles of mining claims.
- The Superior and Engels mines operated from 1915 to 1930 producing over 161 Mlbs of copper from 4.7 million tons of rock containing 2.2% copper.
- Silver and gold made up almost 20% of mined value at current commodity prices.
- Initially described as porphyry copper deposits, but recent work suggests iron oxide copper gold (IOCG) ore deposits.
- Focused on three deposits – Moonlight, Superior and Engels.
- Several partially tested and untested exploration targets.

### HISTORIC PRODUCTION FROM SUPERIOR & ENGELS MINES

	Amount	Unit	Grade
Copper	161,500,000	pounds	2.20%
Silver	1,900,000	ounces	0.500 opt
Gold	23,000	ounces	0.005 opt



Additionally, when Mr. Dunn gives the total estimated amount to copper that will be mined, he gives the number of pounds to be extracted for all 4 deposits combined, not just Engels and Superior. Again, the concern is not that vested rights will spread to the entire claimed area (though it has been demonstrated how it could).

**The concern is with the inconsistencies in the messages received from US Copper.** When advertising this project to potential investors, US Copper talk about mining all of the deposits. Then, when the public merely points this out, US Copper portrays them as "misinformed" because they are only requesting vested rights on two claims. You can't have your cake and eat it, Mr. Dunn. If you're not planning on mining all four deposits, then why does your website say so?

Mr. Dunn continues: The vested rights on the privately-owned Engels and Superior properties would have no effect on the permitting process for mining on the adjacent USFS lands. Furthermore, vested rights do not

mean that we can avoid various state and federal permits required to mine on the Engels and Superior property, nor can we avoid filing an acceptable Reclamation Plan with the County.

Again, while this statement appears to be true, a fact which is **omitted** from this statement is that vested rights **do** provide a bypass for completing an Environmental Impact Report. US Copper does not want to have to do an IER because of all the evidence that has been previously discussed. If an EIR is done and the presence of sulfides is brought to light, the volumes of ground and surface water that are prone to the area are taken into account, the flood history, proximity to active fault lines etc., this project will not even make it before the state and federal regulatory boards. US Copper knows this. This is why vested rights are so important to them.

Community involvement, which does include opposition and support, is a given with any mining project, no matter how small. We understand this project will have impacts on the community, both positive and negative. We also understand that the community deserves to be involved in the planning and monitoring stages, and to be protected by the regulators against any and all risks.

This is a really interesting statement, given everything that has been brought to light and the behavior US Copper and EnviroMine have demonstrated thus far in this process.

In our experience, one of the most challenging aspects of the public process for a mining project is public education.

Given the fact that US Copper has not made any effort whatsoever to inform the public of plans and intentions (while broadcasting them far and wide over the internet to attract investors), one would imagine that education would be challenging for them. Perhaps US Copper could create a public meeting and give the public a chance to have our questions answered and create an opportunity for them to set the record straight **OUTSIDE** of a public hearing in which none of this is relevant.

It is not uncommon for fears and misinformation to overwhelm the facts surrounding a mining project. US Copper remains committed to getting the real facts out to the public to allow for a meaningful and honest dialogue about our project.

The public would have loved for this to happen.

**10. Please respond to the general community concern over long-term environmental degradation, particularly to streams and the water table.**

We have detailed the various permitting requirements that extend beyond SMARA in our submissions, and I have enclosed two of those submissions here for your review.

We are living with a heritage and reputation that stems from time periods when there were no mining regulations or environmental restrictions, and when major environmental damage did occur. I would respectfully point out that current environmental controls over mining operations in the USA are mandatory, thorough and all encompassing.

If current environmental controls are mandatory, thorough and all encompassing, then why did the US Department of the Interior release a document entitled “Biden-Harris Administration Report Outlines Reforms Needed to Promote Responsible Mining on Public Lands” last year? See:  
<https://www.doi.gov/pressreleases/biden-harris-administration-report-outlines-reforms-needed-promote-responsible-mining?fbclid=IwZXh0bgNhZW0CMTEAAR0kx->

[NYCa5Xpylqktn7GiuAw9ZNtQKhpqHM7mpiquP3C3zihXcwixwGEVi\\_aem\\_ATInEYvi-Lp33nIAY5n4i4eP\\_8g4ing9iyxynGMINpVsXHHRoBixnEXvUNPKhqjXQdFYw1fmDQzFk69wirgM0p](https://www.nps.gov/articles/aps-v13-i2-c8.htm)

If current environmental controls are mandatory, thorough and all encompassing, then why is the US National Parks service so concerned with the Long-term Risk of Tailings Dam Failure? See:

<https://www.nps.gov/articles/aps-v13-i2-c8.htm>

If current environmental controls are mandatory, thorough and all encompassing, then why is our country littered with examples of unreclaimed, abandoned pit mines which become superfund sites? See:

[https://en.wikipedia.org/wiki/Berkeley\\_Pit#See\\_also](https://en.wikipedia.org/wiki/Berkeley_Pit#See_also)

If current environmental controls are mandatory, thorough and all encompassing, then why are studies finding that “the need to improve the existing models and create a comprehensive EIA technique applicable in all open-pit copper mines to decrease the copper production’s environmental impacts per kg and achieve a cleaner environment.” See:

[https://www.researchgate.net/publication/369913488\\_Environmental\\_Impact\\_Assessment\\_Footprint\\_in\\_Open-Pit\\_Copper\\_Mining](https://www.researchgate.net/publication/369913488_Environmental_Impact_Assessment_Footprint_in_Open-Pit_Copper_Mining)

If current environmental controls are mandatory, thorough and all encompassing, then why do some copper mine sites will generate pollution in perpetuity:

<https://earthworks.org/issues/copper-sulfide-mining/>

Mr. Dunn continues: This is even more so the case in California which has a reputation for being overregulated in most aspects. I believe they ensure that any impacts are limited to the mining site itself and reclamation plans ensure the mining site is also restored as best possible.

Then why is California’s Copper Bluff Mine being added to the superfund priority list?

<https://www.mining-technology.com/news/us-epa-adds-abandoned-copper-bluff-mine-to-superfund-priority-list/?cf-view>

**If we are beyond the days of irresponsible mining and in the days of grand environmental oversight then how are mines abandoned in the first place? Aren’t CEQA and NEPA and SMARA and Reclamation Plans supposed to prevent these catastrophes?**

Let’s not forget that US Copper is currently attempting to bypass the most critical and basic environmental reviews for this project by requesting vested rights.

## **11. How does US Copper plan to mitigate the community’s concerns?**

As USCU begins preparing a mine plan for the various deposits we will engage with the public to address future concerns. These areas of concern would include, but not be limited to, impacts on water, streams, noise, air quality, traffic, employment, housing, taxation, reclamation. When USCU has prepared a final mine plan and begins the permitting process, the public will also have an opportunity to participate in the public hearings that are part of the permitting process.

Why is mining sulfides not an area of concern? Can we have real, honest conversations about how this mine could operate without poisoning the streams and ground water with acid mine drainage caused by the presence of sulfides? If we are, then denying the existence of sulfides while their own documents confirm the existence of sulfides is a bad start for US Copper and EnviroMine.

**12. Can you share with us a little about your larger vision for mining in Plumas in the longer term?**

Our hope is that the project that includes the Engels/Superior/Moonlight deposits becomes the largest employer in Plumas County for decades to come, providing large direct and indirect benefits to the entire community.... something that the entire community can be proud of.