ALLIANCE FOR INNOVATION AND INFRASTRUCTURE

January 10, 2023

3033 Wilson Blvd
Suite 700
Arlington, VA 22201
(703) 574-7376
BMcCown@Aii.org

Payette National Forest All Units
800 West Lakeside Ave, McCall, ID, 83638-3602
brian.d.harris@usda.gov

RE: Perpetua Resources Stibnite Gold Project Supplemental Draft Environmental Impact Statement, Idaho

Dear Review Committee:

Thank you for allowing me to share my perspective on Perpetua Resources' proposed Stibnite Gold Project. This interest stems from areas encompassing my professional competencies: national defense, energy security, and regulatory policy. This project has come to my attention as a perfect example of a project required to buttress our national and energy security. Within the confines of NEPA, docket comments have not identified any significant adverse environmental concerns. On balance, the proposed action should be approved.

Perpetua Resources' Stibnite Gold Project will primarily produce valuable quantities of gold. Still, the importance of this project is in the production of antimony, a by-product of the extraction process that could amount to as much as 35 percent of the needed U.S. supply over the next six years. On the Administration's top 50 list of critical minerals, antimony is both scarce and critical. Because no current domestic antimony production exists, it is essential to point out that China, Russia, and Tajikistan overwhelmingly dominate world supplies of this critical element. Together these three countries represent approximately 90 percent of the current world supply and given the adversarial relationship with most of these countries, its importance should not be understated.[1]

Certain countries will always lead the way in exporting certain materials, but when considering the use-case applications of antimony, finding a reliable domestic solution for the U.S. is not a preference; it is a requirement.

Antimony is an unheralded lifeblood of military equipment. Found in munitions and military-grade equipment – such as night-vision goggles, warships, laser sighting and optics, nuclear weapons, ammunition, and fire retardant equipment – it is a lesser-known yet critical component, and even has its own National Defense Stockpile held by the Pentagon.[2]

[1] https://www.mining.com/how-a-gold-stibnite-restoration-in-idaho-could-add-antimony-to-us-supply-chain/
[2] https://www.washingtontimes.com/news/2020/mar/2/domestic-mining-of-antimony-is-key-to-us-defense-a/

Relying on China and Russia to supply our military with the ingredients needed to maintain an effective fighting force is ill-advised and undermines our national security.

Recognizing the shortcomings of our positioning on critical mineral supplies, the 2022 Congressional Session saw bipartisan and bicameral efforts to begin a pivot from our dependence on China and Russia for national defense-oriented minerals, chiefly antimony. Both the House Defense Appropriations Subcommittee and the Senate Armed Services Committee expressed their concern about our domestic antimony supply chain, leading to funding and directives of acquiring goods for and keeping tabs on the status of the national stockpile for awareness and planning purposes.[3]

Similarly, underscoring the national importance of the progression of Perpetua Resources' Project, the Department of Defense (DoD) has administered a $24.8 million grant to Perpetua under the Defense Production Act during its Supplemental Draft Environmental Impact Survey (SDEIS) period. Upon announcing the grant issued by the Air Force Research Laboratory, the DoD has publicly stated that "[the] investment is essential to ensure the timely developments of a domestic source of antimony trisulfide" and that "[t]his action reinforces the Administration's goals to increase the resilience of our critical mineral supply chains while deterring adversarial aggression."[4]

Though the DoD's grantmaking action in no way interferes with or directly influences the project's current review process to guide it to completion, ultimately, it reveals the synergy across the government on how vital the timely development of Stibnite is in America's interests.

In the vein of American energy interests, antimony and other critical minerals can enable a clean transition to technologies such as long-term battery storage. Antimony's ability to facilitate innovation beyond lithium-ion batteries is being taken seriously by private companies like Ambri – a Bill Gates-backed battery manufacturer with a supply agreement with Perpetua Resources upon production – and will be crucial to securing long-term energy transition solutions needed to store variable energy such as wind and solar. The industry is hyper-focused on maximizing current battery chemistries and other EV support mechanisms, but the next generation of technologies should also be a strategic focus.

Jumpstarting a domestically-sourced supply chain of the 50 critical minerals should be prioritized to enable such innovation, and the timeliness of Stibnite's permitting process would be a perfect example of environmental considerations in the long-term being exemplified by environmental propositions in the near term. Congressional witnesses have shared this sentiment over the past year, but it falls to our lawmakers and agencies to convert these expert opinions into action.[5] Acting in accordance with these ideals and

[3] https://www.metaltechnews.com/story/2022/06/22/tech-metals/russias-war-heightens-antimony-concerns/980.html
[4] https://www.defense.gov/News/Releases/Release/Article/3249350/dod-issues-248m-critical-minerals-award-to-perpetua-resources/
[5] https://science.house.gov/imo/media/doc/Amanchukwu Testimony.pdf

intelligence would substantiate and reinforce the Administration's intention to achieve their listed energy security goals.

Outside of the focus on critical minerals specifically, it is apparent and evident that broad energy sector objectives by the Administration will require a dramatic upstart in U.S. mining operations. Those pointing at long-ago mining industry practices are out of date and irrelevant for discussing new, state-of-the-art projects that consider all environmental regulations. In other words, today's mining industry is very different from that of our parents and grandparents. Incremental and overall progressions are essential to reach sustainability targets of the future. With that in mind, and centered on the facts, respectful engagement by all stakeholders should result in this project moving forward, as objections raised to date in the record do not realistically reflect critical factors for which alternatives or inaction would be appropriate. Commentators seem to equate subjective positions or various concerns as an equivalent to agency inaction. This is not the bar established by NEPA.

Placing aside various hyperbole, this project should move forward on its own merits, keeping in mind that the potential costs associated with any decision to delay or suspend the application would not be consistent with the NEPA framework, especially when weighed against the backdrop of benefits conferred by Perpetua Resources' Stibnite Gold Project. Thank you for the opportunity to comment.

Sincerely,

Brigham A. McCown
Chairman

Alliance for Innovation and Infrastructure
National Infrastructure Safety Foundation
Public Institute for Facility Safety