

Date submitted (UTC-11): 10/5/2018 12:00:00 AM

First name: Bob

Last name: Wood

Organization: NVH Project LLC

Title:

Official Representative/Member Indicator:

Address1: United States

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country: United States

Email:

Phone:

Comments:

My comment concerns the permit process and the amount of time it takes to go from exploration to operations. Having a permit process for a mining operation that can take up to 10-15 years is way to long. No other industry has such a lengthy process. If one is in the age range of 40-55 years old, one "may" see their efforts take place. If one is in the age range of 55 and older, it is a possibility that they will never see their operation of a new mine take place in their lifetime.

The point of me bringing this to the forefront is to point out that the permitting time frame can be and in some instances is "age discrimination"... I know many well known miners who have extensive backgrounds in mining that are at an age where their new projects will never see the light of day, due to their age. Large mining companies can handle this due to the fact that others take over the reins when a corporate individuals becomes incapacitated or deceased. Not for the small mining company or individual miners. Permitting is necessary but, not if it takes so long that the permitting process takes longer than the individuals statistical life span. I have talked to some legal experts and they have said that if this issued was pushed, it could result in an age discrimination legal challenge. Let's look at an expedited process...in many countries, it takes only 3-5 years.

If one has any of the governments strategically listed minerals/elements, that permit process should be escalated. Considering the current world trade status, elements that we need in our arsenal, can be cut-off at anytime leaving our country vulnerable. An example is W (tungsten). The U.S. produces around 4% of the the worlds tungsten...China produces 85-90% of the world's tungsten. Efficiency is productivity and does not need to compromise the goals of regulations.

Bob WoodNVH Project LLC