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First name: Casey

Last name: Hammond

Organization:

Title:

Comments: Forest Service and Department of Agriculture Friends,

The U.S. Forest Service has the opportunity to expeditiously move the Stibnite Gold Project not only for the benefit of local jobs, but to take a major step towards the promise of mineral security. The current administration has rightly renewed the call of the previous administration to tackle our critical mineral dependence challenge head on. I encourage USFS and Department of Agriculture leadership to seize this moment and make this project the priority it ought to be.

Looking through the public record, I note that the project proponent has pursued this mine for at least a decade and with the USFS since at least 2017. While the scope of such projects is vast, riddled with unique variables as one would expect to encounter, now is the time to embrace the countless years of expertise engaged in this effort and recognize the improvements that have been made to this plan.

In my experience, mining projects like this aren't typically "like this." This is a plan that not only provides a product beneficial to our community as Americans, but also leaves a cleaner environment behind. Critics of domestic mining rightly highlight past practices that operated with much less regard for impacts and without the layered laws, regulations, and oversight the industry of today complies with. In past professional roles, I was able to witness the precision within which modern miners operate. This generation has learned that the future of the industry is only hopeful to the degree they are successful in proving that the net benefit of their development is beyond dispute. Here we have just such a project.

It is to be expected that a project like this will enter with a plan for excellent reclamation and habitat considerations. What reviewers at the USFS should also weigh is the restoration of land and water that currently enshrines a negative legacy of the past. It isn't often the public is presented with an opportunity that not only heals past damage but does so without direct investment from the taxpayers.

We have come to enjoy many everyday conveniences through the development of personal electronic devices. But this isn't limited to cellular phones, televisions, and computers. Our electronic society is growing rapidly into the personal vehicle space and creating new demands for local storage of electricity. All these products share a need for critical minerals. The public has become increasingly aware of not only the necessity for these minerals, but our lack of domestic production. I suspect many could explain why cobalt and lithium are important and will increase in importance according to projections. We have also come to realize that our production is not and will not keep up with our demand if we do not act quickly to invigorate our decimated mining capabilities.

Antimony is not a mineral that is widely known to Americans, even though they encounter it every single day. It has automotive purposes, it is found in batteries, semiconductors, and a range of flame-retardants. While each of these are individually important, consider that it also plays a critical role in our national defense. Military purposes are too lengthy to list, but a few examples include nuclear weapons, night vision goggles, even bullets themselves. Clearly this is not the element we should be dependent on any other nation for.

Unfortunately, we aren't moderately dependent on any country, we are totally at the whim of others because we have no mining production of our own. For better or for worse, China produces the majority of the antimony worldwide followed by, and perhaps unsurprisingly, Russia. How we arrived in this position is a history discussion for another day, but we have done ourselves a disservice by becoming inhospitable to mining. As a nation we must support domestic production and enable a stable industry.

The Department of Defense has recognized the problem and is again ready to partner with industry at the Stibnite Gold Project. In just the last few days, DoD announced that it has awarded nearly \$25 million to the project to complete the review process and obtain the needed permits. To my knowledge, this is a historic move in the modern era of domestic critical minerals and screams how much we need this mine. Readers and reviewers must understand loud and clear that timing matters with this effort.

I am encouraged to see this level of cooperation and investment not only because it will ultimately help the project move forward, but also because it signals to the public the immediate need for this administration to become actively engaged to address our mineral dependency. Sourcing raw materials for defense products isn't something that we can afford to leave to chance.

Congress has also weighed in on this challenge through a variety of oversight hearings, bipartisan legislation and through incentives in the recent "Inflation Reduction Act." Policymakers have slowly come to understand this, and the country is ready to embrace a modern mining industry revitalization. For this reason, my attention has been drawn to this project in Idaho that has otherwise flown under the radar. The criticisms, while not novel, nevertheless deserve to be addressed. Through the EIS and the supplemental draft, many of those concerns raised have been accounted for and the resulting product, through engaging cooperation, now leaves us to review a better product.

This has all led us to the important public comment period. Ideally, leadership at Agriculture and the Forest Service are reviewing these comments as they roll in. They should prepare responses and consider ideas sustaining the modifications to the alternatives or even further refinements. However, at this point after many years of study and evaluation, and this supplemental, it is reasonable to expect that the Forest Service has the capability to move to the final EIS and soon after, a record of decision.

I would like to stress to the reader, the author of the responses, reviewers and deciding officials that they take each comment into consideration and build on a solid record. This should not be taken to mean that vast amounts of additional time are necessary. Working through dozens of these EISs on similar projects, albeit at a different agency, I found that priorities make all the difference. If this administration is serious about moving away from dependence on foreign sources for critical minerals, here is an opportunity to set an example for the entirety of the federal government. Here is an opportunity for the Chief of the Forest Service to demonstrate leadership by making sure the final is expeditiously reviewed and prepared. Here is an opportunity for the Secretary of Agriculture to demonstrate leadership by taking an active role, assuring the Chief that this is a priority for the department, that senior officials will actively participate and quickly review the final EIS.

Inside the bureaucracy, priorities make all the difference. I was surprised to discover any one of numerous officials can bring a process to a screeching halt, no matter how big, or how small. This cannot happen when leadership directs their subordinates at the department and at the Forest Service to act.

So, what does this look like in practice? The appropriate assistant secretary should schedule a personal review of the comments as they come in, as well as the responses crafted by the Forest Service. Any modifications should be quickly discussed, briefed up the chain, then made or rejected. This does not take a year, half a year, or even several months. If this is a priority for the department, as it should be, the final should be ready for the public this Spring with a record of decision several weeks later.

The Forest Service has been at this for long enough, and I'm confident they have anticipated issues that could throw this off. At this point careful cooperation with the Fish and Wildlife Service must have occurred and any mitigation measures should be near the final stages. Again, none of these steps are a surprise and can be checked off responsibly when leadership is engaged and working closely to keep the project progressing towards a decision.

This project on its own is important to the country but will also serve as an opportunity to get it right moving forward on critical minerals. After more than five years of process within the Forest Service and the delay through this supplemental, lessons should be shared across the department so that these EISs are completed in one to two years. Unfortunately, the supplemental alone has occupied that time, but I expect that this was done to make the project rock solid with an impenetrable record.

I've hiked in this area of Idaho, and it is as impressive as words can describe. Every effort to protect the natural beauty and water quality should be evaluated. Let's take the win that is dangling in front of us. This is a chance to clean a neglected watershed, perhaps appropriately by a modern mining project, and make an incremental step towards addressing a glaring national security risk. I urge the Department of Agriculture to commit the resources, but most importantly the attention to completing this phase of the project and quickly releasing the final EIS. At that point, if the project is to proceed, make this a final agency action with the approval of the Secretary.

Sincerely,

Casey Hammond