



November 22, 2023

Eric Beightel
Executive Director
Federal Permitting Improvement Steering Council
1800 M Street NW
Suite 6006
Washington, DC 20036

Dear Eric,

GreenMet is a private company working to develop American critical mineral and green energy supply chains. Our efforts serve to reduce U.S. over-reliance on foreign imports of critical minerals and metals—particularly from our adversaries—thereby strengthening U.S. national security. As of 2020, certain mining projects that supply the materials needed for the energy, communication and transportation infrastructure in the U.S. may be eligible for environmental review under FAST-41. It appears that FAST-41 was instituted for mining and related projects in January of 2020, or almost four years ago. The first mining project submitted under FAST 41 was the Texas Minerals Round Top Rare Earth Project in 2022. The Round Top nomination was accepted by the White House Council on Environmental Quality and forwarded for final consideration and approval for streamlined permitting under FAST-41.

CEQ should begin considering all mining projects on federal lands that are or will produce any of the minerals and metal on the USGS List of Critical Minerals published in 2022—for which an environmental review is needed. That may seem like a large number of projects but not when taking into account the amount of critical mineral imports into the U.S. each year, many of which, are being imported from China. In September of this year, the Hermosa manganese and zinc project in southeastern Arizona was also submitted under FAST-41. Both the Round Top and the Hermosa projects involve minerals listed on the U.S. Geological Survey List of Critical Minerals. Round Top and Hermosa are examples of mining projects that should receive automatic consideration under FAST-41 because they are set to produce minerals on the list and the U.S. is over-reliant on other countries for these three key commodities—rare earth from China, manganese from Africa, and zinc from Peru.

One example of mining-related projects that deserve a rapid review and approval are those mining projects that employ in situ recovery as opposed to open pit or underground mining. Another example would be mining projects that are focused on “mining” or gathering tailings or refuse piles from previous mining operations for processing if they were dug ore—and do contemplate reentering or building a new mine at the site.

A third category of mining-related projects for fast-track approval is mineral processing and metallurgical operations that may or may not be co-located with the mine of origin. These



activities, if they are not considered as part of the overall mining project, should be brought in under FAST-41 because they are a vital part of the critical mineral supply chain that is deficient in its ability to supply the country's needs domestically as opposed to imports, many of whom are from countries adversarial to the U.S. Mineral processing and metallurgy are choke points of metal production for which FAST-41 might be a best solution. For the aforementioned reasons, CEQ should begin considering all mining projects on federal lands that will or produce any of the minerals and metal on the USGS List of Critical Minerals.

Sincerely,

Ned Mamula
Chief Geologist
GreenMet