



January 25, 2023

Transmitted via Electronic/Email

U.S. Department of the Interior
The Bureau of Land Management
Mr. Scott Distel, BLM Project Manager
Rhyolite Ridge Lithium-Boron Project
50 Bastian Road
Battle Mountain, Nevada 89820

RE: Scoping Comments for BLM's Environmental Impact Statement for the proposed development of the Rhyolite Ridge Lithium-Boron Project, Esmeralda County, NV Federal Register Vol. 87, No. 243

Dear Mr. Distel:

The Women's Mining Coalition (WMC) is submitting these comments in response to the Notice of Intent (NOI) that the U.S. Bureau of Land Management (BLM) published in the above-noted Federal Register seeking comments on the issues to be considered in the BLM's Environmental Impact Statement (EIS) for the proposed Rhyolite Ridge Lithium-Boron Mine Project (Rhyolite Ridge Project) to be developed by Ioneer Rhyolite Ridge LLC (Ioneer USA Corporation, Ioneer) in Esmeralda County, Nevada.

As you will readily see from our comments, WMC supports the development of Ioneer's Lithium-Boron Project because this project will reduce our nation's dependence on our ever-growing need for lithium to be used in energy transition technologies. Presently, there is only one producing lithium mine in the U.S., one which is located in Nevada approximately 15 miles from Rhyolite Ridge, and its production is only approximately 5,000 tons of lithium carbonate per year. The lithium from the Rhyolite Ridge Project is expected to quadruple domestic production of lithium by producing approximately 20,000 tons of lithium carbonate/hydroxide per year. Boric acid produced by the Rhyolite Ridge Project will result in the production of 170,000 tons of boron per year, thereby reducing our annual import needs.

The BLM should move forward with an expedient preparation of the EIS for this project which will:

- Produce the critical mineral lithium with a boron co-product, reducing our need for importing both of these critical/important minerals. Lithium is a critical mineral used in battery storage technologies, and boron is an important mineral used in many products such as glass and steel;

- Process the minerals in Esmeralda County in an environmentally sensitive way so that more economic value is not just captured domestically, but also locally in Nevada;
- Create roughly 250-300 well-paying direct mining jobs and many indirect and induced jobs;
- Become an economic engine creating widespread benefits for west-central Nevada and the U.S.; and
- Pay substantial sums of local, state, and federal taxes for the 26-year life of the project.

About the Women's Mining Coalition (WMC)

WMC is a grassroots organization with over 200 members nationwide. Our mission is to advocate for today's modern domestic mining industry, which is essential to our Nation. WMC members work in all sectors of the mining industry including hardrock and industrial minerals, coal, energy generation, manufacturing, transportation, and service industries. WMC holds annual Washington, D.C. Fly-Ins to meet with members of Congress and their staff as well as with federal land management and regulatory agencies to discuss issues of importance to both the hardrock and coal mining sectors.

WMC members have extensive experience with disciplines related to all aspects of mineral production and permitting for extraction/reclamation required by the National Environmental Policy Act (NEPA), the U.S. Mining Law, and BLM's surface management regulations governing locatable minerals and mining activities pursuant to the U.S. Mining Law. We have provided comments on numerous NEPA documents for proposed locatable mineral projects on public lands administered by BLM and on National Forest system lands administered by the U.S. Forest Service. Some WMC members also have expertise in preparing third-party NEPA documents.

Ioneer has submitted the Mine Plan of Operations with all the necessary documents required by the NEPA process, allowing for an expeditious review by the BLM.

- Baseline studies and associated field work for 14 different resources present in the Rhyolite Ridge Project area (e.g. but not limited to, air quality, biology, cultural resources, groundwater, recreation, socioeconomics, soils, and rangeland);
- The required Plan of Operations (PoO), includes measures to be implemented to prevent unnecessary or undue degradation of public lands by operations authorized under the Mining Act (1872) in compliance with BLM's 43 CFR 3809 surface management regulations. It describes all aspects of the project including construction, operations, reclamation, and environmental protection measures; and

- Engineering for the Project includes water usage; recycling of water to reduce water demand; processing of the rock which hosts the lithium and boron minerals will not require tailings dams or evaporation ponds; processing facility will produce sufficient carbon-free electricity with no need for electricity from the power grid.

The Mine Plan includes mitigation measures for protection of a protected plant species.

The protection and conservation of Tiehm’s buckwheat is a key component in Ioneer’s environmental stewardship and is incorporated into all aspects of Ioneer’s planning and permitting activities. The location of the quarry for extracting the mineralized rock avoids all sub-populations of Tiehm’s buckwheat. Ioneer has demonstrated its commitment to protecting Tiehm’s buckwheat by taking time to revise the Plan of Operations submitted to BLM (July 2022) and by incorporating additional key commitments relating to the buckwheat’s conservation including:

- Avoiding direct impacts to all Tiehm’s buckwheat sub-populations;
- Minimizing and mitigating indirect impacts utilizing standard operating measures; and
- Minimizing disturbance within designated critical habitat.

The development of this project will provide opportunities for the local population of Esmeralda, Mineral, and Nye Counties.

Joni Eastley, former Nye County Commissioner and current member of the boards of directors of both Nevada Rural Housing Authority and Rural Nevada Development Corporation, notes that development of the Rhyolite Ridge Project will address some of the challenges facing rural central Nevada, such as quality education, healthcare and housing, and will provide a development that will increase local economic activity. She states the project will help “the surrounding communities by creating hundreds of quality family-sustaining jobs, promoting local spending by Ioneer employees and fostering a rich environment for business start-ups.”

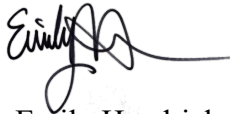
The Rhyolite Ridge Project supports our Nation’s goal for energy transition by securing a domestic supply of the critical mineral lithium and the important mineral boron.

- Lithium is on the critical minerals list developed by the USGS and is presently a mineral for which the U.S. is too dependent upon imports;
- The lithium mined at the Rhyolite Ridge Project will be processed (refined) on site into the material (lithium carbonate) electric vehicle (EV) automakers require – it will not require offshore processing;

- Developing our own resources of lithium reduces environmental impact of importing from across the planet;
- Ioneer has binding lithium offtake agreements with Ford Motor Company, Prime Planet Energy and Solutions (a joint venture between Toyota and Panasonic), and EcoPro Innovation to provide Nevada lithium for U.S. electric vehicles; and
- Memorandums of Understanding have been entered into with several Nevada-based battery companies which will use lithium from the Rhyolite Ridge Project to manufacture lithium-ion batteries and thus become domestic sources for lithium batteries.

Thank you for allowing WMC the opportunity to submit comments for the Rhyolite Ridge Lithium-Boron Project, an extremely important domestic resource which will reduce our Nation's dependence on imports for lithium and boron, support our Nation's goals of energy transition, and develop economic opportunities for the state of Nevada and the U.S..

Respectfully submitted,



Emily Hendrickson
WMC President



Wanda Burget
WMC Manager