

Nevada Mineral Exploration Coalition

The “Voice” of Nevada Exploration

May 28, 2024

Rhyolite Ridge Lithium-Boron Mine EIS
c/o BLM Battle Mountain District Office
50 Bastian Road
Battle Mountain, NV, 89820

Submitted via email: BLM_NV_BMDO_P&EC_NEPA@blm.gov

Comments on Rhyolite Ridge Draft EIS

Dear Mr. Distel:

Introduction

The Nevada Mineral Exploration Coalition (NMEC) is submitting this letter in response to the BLM’s solicitation for comments on the Rhyolite Ridge lithium-boron project’s Draft EIS, proposed by Ioneer. These comments highlight three positive impacts to be afforded by the project: contributing to the establishment of a robust, domestic lithium supply chain; stimulating the economy of nearby local communities through job creation and public revenue impacts; and facilitating the conservation of the endangered Tiehm’s Buckwheat plant as evidenced by the North and South OSF Alternative considered within the Draft EIS.

For background, The NMEC is a grassroots coalition of individuals and small businesses who make up the exploration, research, and development segments of the mining industry. Our goal is to promote and preserve the natural resource exploration industry of Nevada and the Western US. NMEC members use state-of-the-art science and technology to search for and develop the natural resources in the areas where we work, and we generate jobs, economic activity and considerable tax revenues for local and state governments. We bring in new capital, commonly from out of the country, all of which is spent domestically. We find the mines of the future, ensuring the long-term economic well-being of Nevada and the Western US.

Rhyolite Ridge will Bolster the United States’ Critical Mineral Supply Chains

Although the demand for lithium, a critical mineral used in the manufacturing of lithium-ion batteries, is set to increase 500% by 2050¹, the only current production of this commodity in North America is from Albemarle’s Silver Peak brine operation in Esmeralda County, Nevada². While domestic projects in the production pipeline have been beset by legal challenges and permitting delays, the United States remains a net importer of lithium², posing a serious hurdle to the Biden administration’s goals of curtailing carbon pollution and emerging as a global leader in clean

¹ <https://www.whitehouse.gov/wp-content/uploads/2022/02/Capstone-Report-Biden.pdf>

² <https://pubs.usgs.gov/periodicals/mcs2022/mcs2022.pdf>

vehicle manufacturing¹. As the second lithium-producing operation in the United States and the first Boron producing operation in Nevada, the Rhyolite Ridge project will contribute greatly to strengthening domestic supply chains and facilitating the renewable energy transition.

According to the U.S. Geological Survey’s 2022 Mineral Commodity Summaries², the United States relied on imports for >25% of lithium consumption between 2017 and 2021, a dependency on foreign products that can only be expected to increase as the demand for lithium quintuples by 2050. Eight percent of lithium imports over this period came directly from China or Russia, and 91% came from Chile or Argentina, where the importance of Chinese trade and magnitude of Chinese investment have increased exponentially in recent decades³. Thus, virtually all lithium imports into the United States came from competing global superpowers or regions decidedly within their sphere of influence, constituting a serious supply chain concern that can only be resolved by advancing domestic lithium deposits, such as Rhyolite Ridge, into production.

As one of the two known major lithium-boron deposits that exist on Earth⁴, Rhyolite Ridge is a unique geological occurrence that affords a remarkable value proposition to the American people. Lithium-boron mineralization is hosted within ancient lake beds that were deposited in an enclosed basin within a tectonically active region, a set of conditions that is only preserved at specific times and locations within the geologic record, and very rarely results in the formation of economically valuable ore deposits. According to the Draft EIS Section 2.1.3.1 (Section 2-3), the Project will produce “approximately 26,800 tons per year (tpy) of lithium carbonate and 219,000 tons per year of boric acid.” When viewed through a geological lens, such a deposit is a veritable needle in a haystack, and through a societal lens, a prolific natural resource capable of delivering the United States into an era of reduced carbon emissions. To mineral exploration geologists who truly appreciate the value and scarcity of deposits like Rhyolite Ridge, we believe it is imperative that the Project receive an affirmative Record of Decision.

Rhyolite Ridge will Create High-Wage Jobs and Substantial Public Revenues

Beyond strengthening American critical mineral supply chains, mining at Rhyolite Ridge will revitalize Esmeralda County and 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. According to the Draft EIS the Project would generate a “construction workforce of 500 people for four years, plus 113 indirect and induced jobs, and there would a quarrying and processing workforce of 350 people for 14 years, plus 79 indirect and induced jobs.” (Section ES-5).⁵

According to the “Social and Economic Values Supplemental Environmental Report”⁵ⁱ for the Rhyolite Ridge Lithium-Boron Project, Esmeralda County had a population of 729 in 2020. This number of new jobs will be a major contributor in revitalizing an area that has seen consistent population decreases and limited public revenues, and will thus benefit considerably from the uptick in economic activity resulting from the Project. This Environmental Report also correctly

³ <https://rb.gy/ewv9pw>

⁴ <https://www.sec.gov/Archives/edgar/data/1896084/000114036121040692/filename5.htm>

⁵

https://eplanning.blm.gov/public_projects/2012309/200540745/20108267/251008267/Rhyolite%20Ridge%20DEIS%20-%2020240415_508.pdf

indicates that “average weekly mining wages are among the highest for any industry in the Nevada non-metro counties”. Jobs within the mining industry produce family-supporting careers, and Esmeralda County’s residents and their families will benefit considerably. ⁶

And as evidenced by letters of support approved by three Nevada County Boards of Commissioners (Mineral, Nye, Esmeralda), Ioneer has done an exemplary job to ensure that they are engaging and actively listening to the nearby local communities to ensure that the Project brings positive benefits to this area of Nevada and its citizens.

Mining at Rhyolite Ridge will Facilitate the Conservation of the Endangered Tiehm’s Buckwheat Plant

Over the course of mineral exploration and development activities at the Rhyolite Ridge project, Ioneer has demonstrated great commitment to the responsible management of the Tiehm’s buckwheat population, as well as flexibility in the wake of evolving government mandates surrounding it.

As an indication of the Project’s commitment to responsibly developing this important resource while simultaneously protecting the populations of Tiehm’s buckwheat, the proposed quarry in the North and South OSF alternative, has been developed to ensure there will be no direct impacts to any of the plants on site. We commend Ioneer for working with experts and regulators to design their Project responsibly and are supportive of this alternative presented in the Draft EIS.

Beyond these revisions to the Project’s Plan of Operations, Ioneer has also demonstrated their commitment to ensuring the Tiehm’s buckwheat is uplifted as evidenced by their construction of a dedicated greenhouse and the hiring of experts, including a full-time botanist, to oversee the operations which will continue to increase the numbers of plants and seeds to be banked to ensure that the species is protected in perpetuity. These efforts and required expenditures of resources would be unlikely to be replicated in a similar manner by any other party, and as such we believe that Ioneer’s efforts will be invaluable and irreplaceable in the preservation of this species.

Conclusions

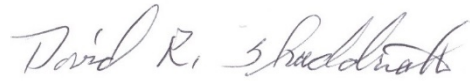
In closing, Rhyolite Ridge will provide significant benefits to the local population and the country, including: the strengthening of critical mineral supply chains by vastly increasing the domestic production of lithium, invigorating the local economy by creating jobs, and facilitating the conservation of Tiehm’s buckwheat. Many of the vocal opponents to mine development, who are undoubtedly well-intentioned, view the situation in a purely environmental light without sufficiently considering the benefits Rhyolite Ridge will provide to citizens of the Fish Lake Valley region and the United States. It is clear to the members of the NMEC that the Rhyolite Ridge project will have a decidedly positive impact and that, for the benefit of the general public, its development is an important concern worthy of prioritization.

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https://eplanning.blm.gov/public_projects/2012309/200540745/20108276/251008276/11_rr_ser_social_economic_values_20240415_508.pdf

Thank you for this opportunity to submit these comments on the Rhyolite Ridge project. Please do not hesitate to contact me if you have any questions.

Sincerely yours,

A handwritten signature in cursive script that reads "David R. Shaddrick".

David R. Shaddrick
NMEC President
