



**ZERO EMISSION
TRANSPORTATION
ASSOCIATION**

May 31, 2024

Bureau of Land Management
United States Department of the Interior
1848 C St NW
Washington, DC 20240

RE: Public Comment on Rhyolite Ridge Draft Environmental Impact Statement
Submitted electronically via [BLM NEPA Register Submission Page](#)

The Zero Emission Transportation Association (ZETA) is an industry-backed coalition of member companies advocating for 100% electric vehicle (EV) sales. ZETA is committed to enacting policies that drive EV adoption, create hundreds of thousands of jobs, dramatically improve public health, and significantly reduce emissions. Our coalition spans the entire EV supply chain including vehicle manufacturers, charging infrastructure manufacturers and network operators, battery manufacturers and recyclers, electricity providers, and critical minerals producers, among others. ZETA's membership includes Ioneer Rhyolite Ridge LLC ("Ioneer").

We thank the Bureau of Land Management (BLM) for the opportunity to comment on the Draft Environmental Impact Statement (EIS) on Ioneer's proposed Rhyolite Ridge Project. Mineral and refining projects such as Rhyolite Ridge will be crucial to reducing dependence on foreign supply chains, fueling the continued expansion of clean energy both at home and abroad, and creating good-paying jobs. Thoughtful analysis under the National Environmental Policy Act (NEPA) plays a crucial role in ensuring that new domestic mineral and refining projects are developed in a sustainable and environmentally conscious manner.

ZETA Believes the BLM's Draft EIS is Comprehensive

We believe that the North and South Overburden Storage Facility Alternative proposed in the Draft EIS thoroughly examines potential environmental impacts. The project will provide significant economic benefits in Nevada and strengthen U.S. economic competitiveness and supply chain security.

Economic Development Benefits

Rhyolite Ridge will provide significant economic benefits to the local region, the State of Nevada, and the United States economy. According to Ioneer's projections, the project will create 500 construction-phase jobs over a two-to-three construction period. Once operational,

Rhyolite Ridge will be able to support approximately 350 direct jobs.¹ This type of economic development will sustain families across rural Nevada and positively impact rural and Tribal communities, injecting \$38 million of income into the region annually. The project is expected to generate between \$13 and \$31 million in annual tax revenue for state and local governments, funding crucial public services across Nevada.²

Ioneer has focused its efforts on engaging with local, regional, Tribal, and state businesses to execute the Rhyolite Ridge project, and is committed to doing business locally, as demonstrated by its decade-long presence in the Fish Lake Valley region.³ Also, Ioneer has conducted outreach with multiple Tribal Nations to discuss community benefit opportunities, workforce development opportunities, and economic development partnerships.⁴ This engagement will ensure that the benefits of the Rhyolite Ridge project are felt both locally and nationally.

National Security Benefits

The vast majority of lithium extraction and processing occurs outside of the United States, with over half of global battery-grade lithium coming from China. Lithium is a crucial component of electric vehicle (EV) batteries, smartphones, battery storage systems, and many other advanced technologies. Demand for lithium will only grow as the clean energy expansion continues. Reliance on foreign sources of lithium, especially geopolitical adversaries such as China, presents significant national security risks. Without intervention, and the cultivation of projects such as Rhyolite Ridge, those risks will only grow.

Once operational in 2026, Rhyolite Ridge will quadruple domestic lithium output. The project will produce and refine 22,000 tons of lithium chemicals annually, sufficient to power 400 thousand EVs per year for decades to come.⁵ Rhyolite Ridge will onshore a key segment of the EV supply chain and increase manufacturers' ability to meet domestic content requirements for tax credits such as the New Clean Vehicle Credit (30D). This combination will further drive consumer adoption of EVs and grow the broader U.S. economy.

Conclusion

ZETA appreciates the opportunity to comment on BLM's Draft EIS. Ensuring that domestic mineral and processing projects meet high environmental standards will help position the United States as a responsible leader in the clean energy expansion while ensuring that benefits accrue to local communities. The Rhyolite Ridge project will benefit U.S. supply chain security, expand

¹https://eplanning.blm.gov/public_projects/2012309/200540745/20075692/250081874/20230327_Rhyolite_Ridge_Lithium_Boron_Project_EIS_Public_Scoping_Report_508.pdf

² Ibid.

³ <https://www.ioneer.com/rhyolite-ridge-project/community/>

⁴ <https://rhyolite-ridge.ioneer.com/wp-content/uploads/2024/05/RR-Quarterly-Newsletter-May-2024.pdf>

⁵https://eplanning.blm.gov/public_projects/2012309/200540745/20075692/250081874/20230327_Rhyolite_Ridge_Lithium_Boron_Project_EIS_Public_Scoping_Report_508.pdf

the growth of the U.S. electric vehicle industry, and create good-paying jobs in rural Nevada. We encourage BLM to finalize the Rhyolite Ridge Draft EIS as proposed.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'AG', written in a cursive style.

Albert Gore
Executive Director
Zero Emission Transportation Association (ZETA)