



January 17, 2024

VIA REGULATIONS.GOV

The Honorable Tracy Stone-Manning
Director
U.S. Bureau of Land Management
1849 C Street NW, Room 5646
Washington, D.C. 20240

Re: BLM-WY Rock Springs Field Office Draft Resource Management Plan Revision and Draft Environmental Impact Statement (DOI-BLM-WY-D040-2011-0001-RMP-EIS)

Dear Director Stone-Manning:

The Essential Minerals Association (“EMA”) writes to provide comments on the Bureau of Land Management-Wyoming (“BLM-WY” or “the Bureau”)’s Rock Springs Field Office’s recently released Draft Resource Management Plan and Draft Environmental Impact Statement (“Draft RMP”).¹ EMA also stands in solidarity and agreement with the Wyoming Mining Association (“WMA”)’s comments and supports WMA’s new proposed alternative contained therein.

Introduction

EMA is the representative voice of more than 80 companies that extract, process, and support a vital and beneficial group of raw minerals that are the essential ingredients for many of the products used in everyday life. Our companies and the people they employ are proud of their industry and the socially responsible methods they use to deliver these beneficial resources.

One such mineral is trona/soda ash, which is extracted and processed in the Rock Springs RMP area by several EMA member companies. Wyoming is the home to over 90 percent of the world’s natural soda ash in the “trona patch” in the southwest portion of the state. Soda ash is the raw material that is essential for the manufacturing of all glass products, including solar panels and the glass used in LEED buildings. It is also used throughout the life cycle of batteries both in the creation and recycling. The soda ash produced in the U.S. is the largest inorganic chemical export and the second largest overall export out of the Port of Portland, Oregon. Over the last three years, the industry has announced plans to invest nearly \$7 billion to increase capacity by 50 percent to meet the growing demand.

EMA’s trona producing members support land use planning efforts that provide appropriate

¹ *BLM-WY Rock Springs Field Office Draft Resource Management Plan and Draft Environmental Impact Statement (“Draft RMP”)*

protections while also ensuring that domestic mining operations on federal lands can continue to be viable, practical, and globally competitive. However, the Draft RMP's Alternative B – which has been selected by BLM-WY as the Preferred Alternative – fails to strike this proper balance and would have significant negative impacts on EMA member companies who operate in the area. This would not only be damaging to the mining industry, but to the regional and national economies as well as run counter to BLM-WY's multiple use mandate.

Further, the primary competitors for the U.S. trona/soda ash industry are Chinese government-sponsored entities who are the current global leaders in Soda Ash production. They use a synthetic form of soda ash that uses three times as much energy to manufacture, emits three times as much carbon dioxide as U.S. domestic natural soda ash, and has historically been shown to be produced with slave labor. By adopting the Preferred Alternative, BLM-WY will force the U.S. and our allies to be further reliant on China for an essential raw material to the detriment of the environment and human rights when very strong domestic alternatives exist.

Accordingly, EMA respectfully requests BLM-WY withdraw Alternative B as the Preferred Alternative and instead implement the new proposed alternative outlined in WMA's comments as the Final Preferred Alternative in the Final RMP.

The Preferred Alternative Would Severely Limit Areas Open to Trona Mining

The Preferred Alternative is highly focused on conservation of natural and cultural resources by imposing stringent restrictions on important development and land uses in the region, including trona mining. Several EMA members operate in the Rock Springs Field Office's Known Sodium Leasing Area (KSLA) where they responsibly extract trona that is essential to a host of applications, including lithium batteries for electric vehicles. The trona deposits in this part of Wyoming are the largest in the world, and access to those resources is crucial to continued domestic production and the green energy transition.

Under the Preferred Alternative, 49,224 acres of the KSLA would be closed to trona leasing, which would be a 101 percent increase from the number of acres closed under the current management practices. As the Draft RMP acknowledges, implementation of Alternative B would result in significant reductions in trona extraction from the region.² This would be highly damaging to not only EMA members who mine trona, but the local Wyoming communities who depend on those companies as an economic lifeblood as well as the plethora of industries – including green energy – which rely on trona as a raw material.

Moreover, denying access to such an abundant resource is contrary to BLM-WY's multiple-use mission under the Federal Lands Policy Management Act (FLPMA).³ FLPMA requires the Bureau to manage the lands under its jurisdiction for sustained yield of multiple uses, which includes mining. The Preferred Alternative's vast reduction of areas open to mining will significantly unbalance the concept of multiple uses by over-prioritizing conservation and preservation at the expense of mining and other activities which have been successfully and responsibly conducted in this region for decades.

² Ibid, Page 4-135

³ 43 U.S.C. Sec. 1701-1787

The Draft RMP even concedes that current practices under have struck a balance between resource use and protection, and simultaneously acknowledges that the Preferred Alternative heavily emphasizes resource protection while constraining resource use.⁴ Given those admissions, it is therefore puzzling that BLM-WY would choose Alternative B as its Preferred Alternative given that it takes a radically different, unbalanced approach to this issue. BLM-WY should continue to support plans for the KSLA that strike a truly appropriate balance rather than the severe bias against trona mining contained in Alternative B. BLM-WYs' charge under FLPMA is to balance the multiple uses of the lands and resources under its management. Alternative B would fall well short of this goal. BLM-WY has a history of striking a better balance than the Preferred Alternative would, and the Bureau should not renege on that past success.

Further, the Preferred Alternative is unclear and contradictory. While the above referenced portion in Chapter 4 states that 49,224 acres in the KSLA will be closed trona leasing, there is no reference to the closure of these acres in Chapter 2's detailed breakdown of each alternative by Management Action (MA). In MA#2408 and 2409, BLM states that under the Preferred Alternative, "The KSLA is open to sodium (trona) exploration and consideration for leasing and development,"⁵ without any qualification or mention of the closed acres. Nor does any other mention of the closed acres appear anywhere else in the Draft RMP other than the singular mention in Chapter 4. These two facts are inherently at odds with one another; BLM-WY cannot on one hand claim that the entire KSLA is ostensibly open to trona leasing as in Chapter 2 yet also claim it will be closing a substantial portion of that same area to leasing and operations. This inconsistency is not acceptable. Further, the Bureau should ensure that both extraction and prospecting activities in the entire KSLA are allowed, as outlined in WMA's proposed alternative under Management Action MA #2408 and 2409.⁶ The Bureau should also strike the contradictory language in Chapter 4 which would close 49,244 acres in the KSLA to trona operations.

BLM-WY should also allow for trona exploration, prospecting, and leasing in the remainder of the Rock Springs planning area, with any necessary resource protections implemented via the National Environmental Policy Act (NEPA) procedures rather than the categorical closures or restrictions that Alternative B utilizes, as outlined in WMA's comments under MA#2411.⁷ Any decisions regarding permits or applications for trona-related activities outside the KSLA should be done on a case-by-case basis after a review of impacts of the particular action and appropriate mitigation measures for protection of other resources, as NEPA requires.

The Preferred Alternative's Rights of Way Exclusions Would Severely Handicap Responsible Trona Extraction

Another significant flaw in the Preferred Alternative is its treatment of Rights-of-Way (ROWs). Under BLM-WY's Preferred Alternative, areas managed for ROW exclusion would

⁴ Draft RMP, Page 2-3

⁵ Ibid, Page 2-40 and 2-41

⁶ WMA Comments to BLM-WY on Rock Springs Draft RMP, Page A-11

⁷ Ibid

increase from 426,709 acres under current management to 2,480,876 acres. This would comprise 68 percent of the planning area and represent a nearly six-fold increase in exclusion areas.⁸ This management change would have a significant, negative impact on EMA's trona producing members. Those companies rely on ROW authorizations from BLM-WY to access mining sites and to transport personnel, equipment, and extracted materials from the mine site to other locations. The vastly increased number of exclusion areas under Alternative B and their locations as detailed in Map 2-22⁹ in the Draft RMP would effectively isolate the KSLA areas where EMA members operate and/or may operate in the future. Such a situation would make continued trona leasing in the KSLA very difficult and costly and will thus harm not only the trona industry itself, but the many industries that rely upon the product, including the green energy and battery sectors.

BLM-WY does not offer any explanation of why such a drastic increase in ROW exclusion areas is necessary, nor does it point out any negative impact of the current ROW exclusion zones except that existing mineral leases and rights limit the ability of BLM-WY to exchange or sell land parcels. This is hardly a sufficient justification for a nearly six-fold increase in ROW exclusion areas. Further, BLM-WY currently manages areas that are closed to mineral leasing, have NSO stipulations, or are otherwise identified as unsuitable for surface disturbance or occupancy as ROW exclusion or avoidance areas. This is an appropriate practice which protects areas and resources which require such protection will still limiting ROW exclusions to only 12 percent of the planning area. But BLM-WY presents no justification for expanding ROW exclusions beyond such areas and encompassing the majority of the planning area in such exclusion zones. Nor does BLM-WY articulate how such an expansion would enhance would provide better protection to any of the resources under its management.

Such omissions call into question the need or legitimacy of such a policy change. If BLM-WY has a substantive reason for such a restriction, it should, and indeed is required to, articulate it in detail in the Draft RMP. If BLM-WY cannot provide such an explanation, then it should not make the change. This change in policy seems to be a solution in search of a problem, and BLM-WY should reject it by instead utilizing the plan for ROW exclusions currently being employed under Alternative A and endorsed in WMA's proposed new alternative.¹⁰ Specifically, Management Action (MA) # 6201 and 6202 under Alternative A¹¹ would keep the planning area open to granting ROWs with the exception of defined exclusion or avoidance areas as defined by Map 2-21¹² and Table 2-10 of Appendix V for the above-referenced total of 426,709 acres.¹³ The quantity and location of these ROW exclusion areas strikes the appropriate balance of resource protection and utilization, and BLM-WY should adopt it accordingly.

The Big Game Habitat/Migration Corridor Limitations Imposed by the Preferred Alternative are Excessive

The Preferred Alternative contains a number of MAs that impose surface use and/or

⁸ Ibid, Page 4-211

⁹ Ibid, Map 2-22: "Rights of Way – Alternative B"

¹⁰ WMA Comments to BLM-WY on Rock Springs Draft RMP, Page A-27-28

¹¹ Ibid, Page 2-115

¹² Ibid, Map 2-21: "Rights of Way – Alternative A"

¹³ Ibid, Appendix V

disturbance restrictions on many areas on or near habitat for big game species or raptors. While EMA supports tailored, thoughtful approaches to provide necessary protections for species while also allowing mining operations to remain viable, these actions do not strike that necessary balance. For example, MA#4421 and 4422 would “Prohibit surface disturbing or disruptive activities on big game crucial winter ranges, parturition areas, migration corridors and transitional habitats, as identified by [Wyoming Game and Fish Department],” and would manage those areas as “closed to all solid mineral leasing,”¹⁴ which would include trona despite the fact that a large portion of the activities related to the extraction of trona are conducted below the surface in deep underground mines. Thus, there is no reason that trona operations should be completely closed out of regions due to possible surface level impacts, since much of the work will not take place on the surface and will therefore provide no disturbance to big game or other species on or above the surface. Such a level of restriction is both unacceptable and unnecessary. BLM-WY should reject such a broad prohibition and adopt a better approach.

Categorical prohibition on surface disturbance should be replaced with limitations within specific timelines which give predictability and certainty to operators. Further, there should be exceptions, waivers, or modifications that can be utilized for applicable cases. BLM-WY’s current management practices under Alternative A already utilizes these concepts via predictable seasonal limits in MA#4421 in combination with exceptions, waivers, and modifications. BLM-WY should take the approach used in MA#4421 – which is confined to the Jack Morrow Hills Planning Area – and apply it to the entire planning area as appropriate. WMA’s proposed alternative calls for implementing just such a strategy by proposing to enact restrictions on “surface disturbance and disruptive activity on big game crucial winter range between November 15 and April 30 and in big game parturition areas May 1 and June 30,” and would allow exceptions to be “granted case by case if impacts can be mitigated according to Specific Exception/Waiver/Modification criteria Appendix B.”¹⁵ The proposed alternative is a combination of language and concepts from Alternatives A and C, and represents an approach which enables seasonal limitations to provide necessary protection for species and habitat while allowing industry to operate in a predictable, practicable manner. BLM-WY can and should adopt WMA’s proposed alternative in place of Alternative B to more properly carry out the Bureau’s multiple use mandate.

Another example of the Preferred Alternative’s shortcomings on this issue is found in MA#4427, which would “Seasonally close vehicular travel in crucial and important wildlife habitats and during crucial and important periods (important periods are defined in Appendix J).¹⁶” This action is excessively restrictive because it relies on season and use limitations outlined in Appendix J, which includes a two-mile space restriction for raptors. That buffer exceeds U.S. Fish and Wildlife Service (USFWS) guidance¹⁷ for raptors and is thus inappropriate for those species, much less for the big game species that it would also be applied to under MA#4427. BLM-WY should not take an action which exceeds guidance for the species it is meant for and then attempt to impose it upon species that buffer was never meant to address. The Preferred Alternative also does not allow for any application of tailored, case-specific protective measures.

¹⁴ Ibid, Page 2-69

¹⁵ WMA Comments to BLM-WY on Rock Springs Draft RMP, Page A-15

¹⁶ Draft RMP, Page 2-71

¹⁷ USFWS Wyoming Ecological Services Field Office March 9, 2022 Guidance Document, Table 1

Again, BLM-WY has an opportunity to reject such a prohibitive approach and adopt a new one which will provide necessary protections as well as access for EMA members and other public land users. Under WMA's proposed alternative "Vehicular travel in crucial and important wildlife habitats and during crucial and important periods (strutting grounds, spawning beds, big game ranges, calving/fawning periods would be allowed to gain access to surface facilities needed for trona production in the KSLA, including rights of way for pipelines, powerlines, and roads)." This alternative would also allow for specific protection measures to be developed on a case-by-case basis in cooperation with FWS and Wyoming Department of Environmental Quality.¹⁸

The Preferred Alternative's Surface Occupancy and Timing Restrictions for Raptors are Overly Restrictive

The Preferred Alternative contains several provisions relating to surface occupancy and disturbance restrictions near raptor nests. Specifically, under MA#4428, BLM-WY would "Protect occupied nests and historic raptor nesting sites and associated feeding areas for continued nesting activities." The Preferred Alternative would also "Determine case by case the appropriate level of protection depending on species, topography, line of sight distances (Appendix J).¹⁹" This is problematic because, as previously mentioned, the distances described in Appendix J include a two-mile buffer from historic and active nests for all raptors. This exceeds USFWS' science-based guidance of 0.25 to one-mile buffers – which are meant to vary by species as opposed to Alternative B's categorical two-mile buffer for *all* raptor species – and is therefore arbitrary and unsupported. Furthermore, the ubiquitous two-mile buffer does not give any consideration to specific locations, geography/topography, line of sight distances to nests from human activities, specific human activities in question, and individual raptor species' toleration of those activities.

BLM-WY should provide itself with the ability to tailor protection measures based on circumstances such as – but not limited to – those described above. This can enable raptors to receive necessary protections at the proper time and in the proper manner while still allowing activities that do not actually harm or deter raptors from using nests to continue. The Bureau should adopt a more measured approach as outlined in WMA's proposed alternative which would utilize language from Alternative C but without the contradictory references to "active" nests utilized in Appendix J for that Alternative. This alternative would protect occupied nests, while determining the appropriate level of protection depending on species, topography, line of sight distances. Additional protective measures to ensure future nesting will be determined on a case-by-case basis. WMA's proposed alternative would also require USFWS distance guidance and definitions of active and historic nests to be followed, rather than exceeded as Alternative B proposes.²⁰

Another problematic aspect of the Preferred Alternative regarding raptor nests is found in MA#4430 which would prohibit surface occupancy within one mile of occupied and historic raptor nests and feeding grounds. Under Alternative B, those areas would be managed as closed

¹⁸ WMA Comments to BLM-WY on Rock Springs Draft RMP, Page A-16

¹⁹ Draft RMP, Page 2-72

²⁰ WMA Comments to BLM-WY on Rock Springs Draft RMP, Page A-17

to sodium prospecting and avoidance area for new rights of way. Facilities with potential to cause direct avian mortality would follow USFWS recommendations to locate structures away from high avian use areas.²¹ While EMA supports the location of surface facilities in such a way to minimize raptor impacts, the one-mile buffer is excessive.

BLM-WY should instead implement WMA's proposed alternative which would permit surface occupancy "within the identified buffer of occupied and historic raptor nests subject to adequate mitigation of impacts following BLM mitigation policies. This includes permanent and high-profile structures (e.g. buildings, tanks, powerlines, roads, well pads, etc.)." Buffers for raptor nests would be specific for different raptor species ranging from 0.25 miles for Golden Eagles, Burrowing Owls, and General Raptors, to 0.5 miles for Ferruginous Hawks, and one mile for Bald Eagles, with the ability for BLM-WY to modify a buffer on a site-specific or project-specific basis based on field observations and conditions. USFWS guidance would be followed regarding the locations of buildings and structures to keep them from high raptor-use areas, while making allowances "...in the KSLA for site-specific and project-specific mitigation and monitoring plans in consultation with USFWS, BLM, [Wyoming Game and Fish Department], and [Wyoming Department of Environmental Quality -Land Quality Division] to protect present and future raptor nesting success in areas where surface facilities are needed for leasable trona."²²

Finally, MA#4431 under the Preferred Alternative would "Restrict surface disturbing and disruptive activities seasonally within a 2-mile radius of occupied and historic raptor nesting sites and associated feeding grounds to protect nesting raptors."²³ As previously discussed, this radius is excessive for occupied nests. It is also unnecessary for historic nests. Further, the Preferred Alternative makes no allowance for site or case-specific situations where mitigation measures could be enacted to provide necessary protection for the raptors without blanket restrictions on surface activity. This approach is excessively broad and does not strike a proper multiple use balance.

EMA recommends that BLM-WY adopt WMA's proposed alternative for this MA, which would avoid surface and disruptive activity within one-half mile of occupied raptor nests whenever possible, with variances granted on a case-by-case basis in cooperation with BLM-WY, USFWS, and WGFD. WMA's alternative would also facilitate the development of mitigation and monitoring measures for occupied and future nests in areas of the KSLA where surface facilities are necessary for trona leasing and production.²⁴ This measured and adaptable approach is far more in keeping with BLM-WY's multiple use mandate and will strike a far better balance between protection of raptors and responsible development of essential trona resources in the KSLA and other parts of the Planning Area.

The Preferred Alternatives Management of National Historic Trails is Problematic

The Preferred Alternative takes an excessively restrictive approach to its handling of

²¹ Draft RMP, Page 2-73

²² WMA Comments to BLM-WY on Rock Springs Draft RMP, Page A-18

²³ Draft RMP, Page 2-74

²⁴ WMA Comments to BLM-WY on Rock Springs Draft RMP, Page A-19

National Historic Trails (NHTs) in the RMP area. BLM-WY needs to reevaluate the boundaries of the NHTs consistent with guidance. BLM Technical Reference 6280-1 states that “inventory, assessment, and monitoring (IAM) is guided by Bureau of Land Management (BLM) Manual 6280—Management of National Scenic and Historic Trails under Study or Recommended as Suitable for Congressional Designation—and is the responsibility of BLM staff to carry-out.” In addition, it states that “IAM results can be used to establish a National Trail Management Corridor.”²⁵ The Draft RMP needs to be revised to use the IAM results to establish a proper National Trail Management Corridor.

Additionally, Section 7(a)(2) of the National Trail System Act (as Amended in 2019)²⁶ states that “Pursuant to section 5(a), the appropriate Secretary [of the Interior] shall select the rights-of-way for national scenic and national historic trails and shall publish notice thereof of the availability of appropriate maps or descriptions in the Federal Register; Provided, That in selecting the rights-of-way full consideration shall be given to minimizing the adverse effects upon the adjacent landowner or user and his operation. Development and management of each segment of the National Trails System shall be designed to harmonize with and complement any established multiple-use plans for the specific area in order to insure continued maximum benefits from the land. The location and width of such rights-of-way across Federal lands under the jurisdiction of another Federal agency shall be by agreement between the head of that agency and the appropriate Secretary. In selecting rights-of-way for trail purposes, the Secretary shall obtain the advice and assistance of the States, local governments, private organizations, and landowners and land users concerned.” In accordance with this, the BLM-WY needs to obtain the advice and assistance of the State, local governments, private organizations, and landowners and land users concerned when establishing the alternative rights-of-way for the national scenic and national historic trails.

Also, the broad ROW exclusion and avoidance areas prescribed in MAs 7002 and 7003 could make it impossible for private landowners to exercise their rights for access and development, which could include EMA’s trona producing members attempting to access operational areas. Specifically, both MAs would designate areas ranging from 5-15 miles on either side of a NHT as Trail Management Corridors. Those areas would then be subject to numerous restrictions including closure to mineral leasing, closure to mineral material sales, pursuit of withdrawal, and exclusion areas for ROWs.²⁷ These exclusions and avoidance areas should be replaced with case-by-case assessment in the checkerboard ownership areas which is consistent with current successful management practices in the RMP area.

Further, MAs 7017-7022 incorrectly apply restrictions intended for NHTs to non-NHT trails.²⁸ This is both excessive and contrary to the nature of the designation of an NHT in the first place. If any trail can be designated with the same restrictions as NHT irrespective of whether the trail actually is an NHT, then the designation is effectively meaningless. This is not what Congress intended in the National Trails System Act. BLM-WY should respect Congress’ intent

²⁵ National Scenic and Historic Trails Inventory, Assessment, and Monitoring Volume 2: Field Guide, BLM Technical Reference 6280-1

²⁶ 16 U.S.C. Section 1246

²⁷ Draft RMP, Pages 2-143 and 2-144

²⁸ Ibid, Pages 2-148 through 152

and apply NHT restrictions to only those trails that actually are NHTs, and adopt case-by-case, collaborative management for other trails in conjunction with state and local stakeholders.

MAs 7017 and 7022 should be removed from the Draft RMP entirely because they do not follow current rules, regulations, policy, and guidance, as discussed above. Moreover, non-NHT trails are adequately covered by MAs 5000-5004.²⁹ For non-NHTs BLM-WY should follow the current protocol agreed upon between BLM-WY and the Wyoming State Historic Preservation Officer (SHPO) and determine the impact to historical properties (including non-NHTs) on a case-by-case basis. Section 106 of the National Historic Preservation Act³⁰ recognizes the reality that some projects may unavoidably have conflicts due to siting, location, and/or logistical considerations. In such instances, the applicable rules, guidance, and practice is to minimize the impact and imposition of administrative requirements. The Draft RMP's approach of placing blanket restrictions or prohibitions of activities in those vicinities ignores this guidance.

Section V(D) of the State Protocol Between BLM and SHPO (Wyoming) signed August 25, 2014, states "A determination of effect is made after avoidance and minimization through standard treatment measures and/or best management practices (BMPs) have been integrated into the project design."³¹ The protocol clearly dictates that the effect of a project cannot be established until best management practices have been integrated into an individual project. Therefore, BLM-WY's approach of applying standardized buffers to all sections of non-NHT trails found in management actions 7017-7022 goes against the Protocol already established between the BLM and Wyoming SHPO for management of cultural resources.

Finally, before implementing any management actions related to the designated, but not historical trails, BLM-WY must accurately map the trails and then provide an opportunity for public comment. The Quad maps used by BLM-WY to map the Overland Trail in the KSLA are known to be inaccurate for the location of the trail. Actual experience with location of the Overland Trail, in consultation with SHPO, has shown its actual location to be several miles away on many of the segments compared to what is shown on the maps provided by BLM-WY in the Draft RMP. Without an accurate map of location, it is unreasonable to propose and apply any management actions that are not case-by-case.

Conclusion

BLM-WY's Preferred Alternative does not meet the goals of BLM's core mission nor the goals of FLPMA or the Mineral Leasing Act (MLA)³² which regulates the leasing and extraction of trona. The Bureau is required to manage the lands under its jurisdiction for the maximum sustained yield of multiple uses, not manage it for one use – in this case "conservation of resource values"³³ – to the severe detriment of other uses as the Preferred Alternative would do. The Proposed Alternative goes to considerable effort to close vast acres to any form of trona

²⁹ Ibid, Page 2-87

³⁰ 54 U.S.C. Section 306108

³¹ Programmatic Agreement Among The Bureau of Land Management, Advisory Council on Historic Preservation, and The National Conference of State Historic Preservation Officers Regarding the Manner in Which BLM Will Meet Its Responsibilities Under the National Historic Preservation Act

³² 30 U.S.C. Sect 181-287

³³ Draft RMP, Page 2-3

production and/or ROWs which are vital to current production. This renders the Preferred Alternative incompatible with FLPMA. The KSLA was established specifically to facilitate the extraction of trona, but the above-discussed aspects of Alternative B would make such operations extremely difficult or impossible to maintain or continue in the future.

Not only would this deny the government and the American people of the revenue which would be derived from continued trona leases in the KSLA under MLA but would also deprive them of an essential domestic mineral resource. If BLM-WY were to implement the Preferred Alternative as currently constructed, our country be forced to depend on synthetic trona produced by China – a foreign adversary – in a manner far more detrimental to the environment and worker health and safety than the natural trona mined and extracted in the KSLA. This will undermine many of the Biden Administration's goals for mineral supply chains and a transition to a green energy economy.

BLM-WY should and must avoid this unnecessary error by adopting WMA's proposed alternative which will strike a better balance by ensuring that responsible trona production can continue in a manner which is practicable, predictable, and ensures the domestic trona industry will remain globally competitive while also providing necessary protections for other resources. By doing so, BLM-WY will not only be fulfilling its mission as Congress intended in FLMMPA and MLA but will also enable the continued existence and expansion of an economically and strategically vital industry for both Wyoming and the nation.

Please do not hesitate to reach out if we can be helpful in any way on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Greissing". The signature is fluid and cursive, with the first name "Chris" being particularly prominent.

Chris Greissing
President
Essential Minerals Association
chrisgreissing@essentialminerals.org