



4201 Wilson Blvd. • Suite 700 • Arlington, VA 22203

T 202.457.0825 • F 202.463.0474 • www.aradc.org

January 23, 2025

Barry Myers
BLM Project Manager
U.S. Department of the Interior
Bureau of Land Management
Idaho Falls District Office
1405 Hollipark Drive
Idaho Falls, Idaho 83401

Attention: Caldwell Canyon Revised Mine and Reclamation Plan EIS

Dear BLM Project Manager Myers:

On behalf of the Agricultural Retailers Association (ARA), I am submitting comments in support of the Caldwell Canyon Revised Mine and Reclamation Plan Environmental Impact Statement (EIS). ARA is a national not-for-profit trade association representing agricultural retailers and distributors who supply farmers and ranchers with products and services. ARA's members sell seed, nutrients, crop protection products, feed, equipment, and technology, including crop input materials, *i.e.*, seeds, crop protection products, and fertilizer, used to nourish and protect a wide variety of crops, from major row crop commodities such as corn and cotton to specialty crops such as fruits and vegetables. ARA's members also provide consultative services such as crop scouting, soil testing, field mapping, development of nutrient management and conservation plans. Importantly, ARA's members provide custom ground and aerial in-field application of nutrients and crop protection products.

ARA has over 200 members, including Bayer CropScience, who operate in all 50 states. Its agricultural retail members are responsible for the sale of over 70 percent of all crop input materials sold to farmers in the United States. ARA's membership is diverse, ranging from small, family-run businesses of 10 or fewer employees to farmer cooperatives and large corporations with thousands of employees.

ARA's members have a unique and direct interest in the Caldwell Canyon revised mine and reclamation plan EIS. Its members are agricultural retailers who sell registered pesticides to their farmer customers in addition to providing commercial ground and aerial application services that are a vital part of their business operations.

To produce glyphosate-based Roundup® herbicides, the process begins with phosphate ore that is mined near Soda Springs, a town in southeast Idaho in the United States. For decades, Bayer's operations have been a key economic driver for the community, region, and State. The phosphate ore is refined into elemental phosphorus at their Soda Springs plant; elemental phosphorous is the basic building block for glyphosate.

Bayer's current phosphate mine, the Blackfoot Bridge Mine, is approaching the end of its economic life. In 2019, following a comprehensive evaluation by the U.S. Department of the Interior's Bureau of Land Management (BLM), BLM issued a permit for the development of a new phosphate mine, the Caldwell Canyon Mine, which contains an estimated 40 years of phosphate ore reserves.

Agricultural retailers and their farmer customers rely heavily on the use of glyphosate to control weeds in an environmentally responsible way. Glyphosate is a broad-spectrum, non-selective, herbicide registered for use on many agricultural crops, in non-crop areas, in residential areas, for aquatic weed control, and in commercial settings.¹ Glyphosate is one of the most widely used herbicides which regulates plant growth and manages weed control. Homeowners use it for cost effective landscape management, farmers use the herbicide to maximize crop yield, and it can also be used for weed control along highways or railroads.

After adopting the use of glyphosate-based herbicides, farmers began to utilize the practice of "conservation tillage". Previous attempts to utilize conservation tillage often failed due to inadequate weed control. Using conservation tillage allows for less disturbance to the soil and conserves using equipment; thus, this practice is estimated to reduce soil erosion by ninety percent and reduce the carbon footprint by decreasing use of fossil fuels in field preparation. Glyphosate allows farmers to leave crop residue standing, so roots can hold the soil in place while controlling weeds, so the next crop can grow clean.

"If we are going to feed 10 billion people by 2050, we are going to need all the tools at our disposal, which includes the use the glyphosate, USDA (United States Department of Agriculture) applauds EPA's proposed registration decision as it is science-based and consistent with the findings of other regulatory authorities that glyphosate does not pose a carcinogenic hazard to humans."- Sonny Purdue, former U.S. Secretary of Agriculture ²

In addition to phosphate being utilized to produce glyphosate, it is also an important mineral used in the production of fertilizer. Phosphate fertilization of soils has always been important as it helps support high yield crops and contributes to feeding a growing global population. If Bayer is prohibited from operating the Caldwell Canyon Mine to produce phosphate minerals, it would create supply shortages to help in the production of glyphosate and place additional supply shortages of phosphate to produce essential fertilizers.

¹ <https://www.epa.gov/ingredients-used-pesticide-products/glyphosate>

² "Perspective: Trial Lawyers Are Once Again Coming for U.S. Farmers." AGDAILY, 14 May 2019, www.agdaily.com/livestock/trial-lawyers-coming-u-s-farmers-dairy-producers/.

ARA urges the BLM to support Bayer's ability to develop and operate the new Caldwell Canyon mine as outlined in this revised plan. Thank you for your review and consideration of this important issue for America's agricultural production.

Sincerely,



Richard D. Gupton
Senior Vice President and Counsel
Agricultural Retailers Association
4201 Wilson Blvd., Suite 700
Washington, D.C. 22203
Tel. (202) 595-1695
richard@aradc.org