

# CALIFORNIA LEGISLATURE

STATE CAPITOL  
SACRAMENTO, CALIFORNIA  
95814

May 5, 2026

Ms. Lauren Sanchez  
Chair, California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Subject: Importance of Boron and Request to Revisit CO<sub>2</sub> Benchmark Methodology for Industrial Production**

Dear Chair Sanchez and Members of the Board,

We are writing to emphasize the critical importance of Searles Valley Minerals Inc. (SVM) to the small town of Trona, CA and the surrounding region, and to respectfully request that the California Air Resources Board (CARB) revisit the current methodology used to establish CO<sub>2</sub> emissions benchmarks for SVM's unique boron oxide equivalent production.

SVM has been mining continuously for over 153 years, but has recently reduced its workforce by nearly 300 people with the collapse of the soda ash market and inability to compete on the global market. SVM is the major employer in the town of Trona, with a population under 2,000 people. Further layoffs would be truly devastating for the region. SVM needs CARB's help immediately to preserve the remaining 250 jobs in Trona. We are requesting that CARB to give SVM a chance to recover and rebuild to focus on critical minerals like boron. Given the urgency of the situation, I urge CARB to act now, even if it means revisiting the benchmark periodically as SVM develops its new post-soda ash business plan.

In addition to protecting the local workers and the survival of our communities, the U.S. Geological Survey (USGS) added boron to its list of Critical Minerals in 2025, making it even more important to protect this important resource. Boron is a strategically essential mineral with applications across a wide range of industries, including glass manufacturing, agriculture, advanced materials, and—most notably—energy transition technologies. Boron compounds are integral to lithium-ion batteries, fiberglass insulation, wind turbine blades, and solar energy systems. As California continues to lead in decarbonization and electrification efforts, ensuring a reliable and competitive domestic supply of boron is increasingly important.

However, the current CO<sub>2</sub> per production benchmark used within California's cap-and-invest framework do not fully reflect the operational realities and technical constraints of SVM's unique boron extraction and processing. These processes are energy-intensive by nature, often requiring high-temperature operations that presently have limited commercially viable low-carbon alternatives. Applying generalized or outdated benchmarks risks placing boron producers at a structural disadvantage relative to both international competitors and producers in countries with less stringent regulatory frameworks.

This misalignment may have unintended consequences, including:

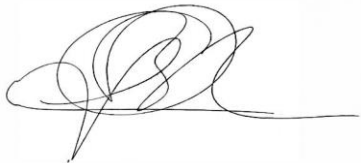
- **Carbon leakage risk:** Production may shift to regions with less stringent emissions standards, resulting in higher global emissions.
- **Supply chain vulnerability:** Reduced domestic production could weaken U.S. access to a critical mineral essential for clean energy technologies.
- **Investment deterrence:** Uncertainty or misaligned regulatory signals may discourage capital investment in efficiency improvements or emerging low-carbon technologies within California.

We respectfully urge CARB to consider the following actions for SVM:

1. **Reevaluate CO<sub>2</sub> intensity benchmarks** for boron-related industries to ensure they are based on current, facility-level data and reflect best achievable performance metrics given existing technological constraints.
2. **Incorporate sector-specific considerations** that recognize the unique process emissions and energy requirements of boron production.
3. **Engage directly with industry stakeholders** to better understand operational realities and identify pathways for emissions reduction that are both technically and economically feasible.
4. **Provide transitional flexibility or credit mechanisms** that incentivize innovation while maintaining the competitiveness of in-state production.

SVM needs fair and predictable future for CO<sub>2</sub> allowances in the cap-and-invest program to survive and attract new investment. We appreciate your consideration of this critical issue and welcome the opportunity to engage further or provide additional data and insights.

Sincerely,



ROSILICIE OCHOA BOGH  
Senator, 19<sup>th</sup> District



THOMAS LACKEY  
Assemblymember, 34<sup>th</sup> District



SHANNON GROVE  
Senator, 12<sup>th</sup> District