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Comments on the 2026 IEPR Commissioner Two-Day Workshop on California's Geothermal Energy Resources

Additional submitted attachment is included below.



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July 21, 2026

VIA ELECTRONIC FILING
California Energy Commission
Docket No. 26-IEPR-04
715 P Street
Sacramento, CA 95814

**RE: Comments on the 2026 IEPR Commissioner Two-Day Workshop on
California's Geothermal Energy Resources**

Dear Chair Hochschild, Commissioner Gallardo, and Members of the California Energy Commission:

On behalf of Comit  Civico del Valle (CCV), we respectfully submit these comments on the California Energy Commission's two-day workshop on California's geothermal energy resources. CCV applauds the Commission for giving geothermal a central place in the 2026 Integrated Energy Policy Report (IEPR) Update and for including energy equity, environmental justice, Tribal engagement, local capacity, permitting, financing, and workforce development in the discussion. Geothermal can provide valuable low-carbon, firm power, and Imperial Valley's long-standing geothermal industry will play an important role in California's energy future.

Imperial Valley is a testament to endurance and resilience. Its families, farmworkers, Tribal nations, local governments, and community organizations have supported California's agricultural and energy systems while living with serious air-quality, water needs, public-health, and infrastructure challenges. CCV is not opposed to geothermal or lithium development if it is sustainable and equitable for local communities. We support development that includes robust environmental and public-health protections, enforceable implementation, meaningful Tribal consultation, transparent oversight, and community-driven benefits. The IEPR can help establish a statewide framework that makes projects more viable while ensuring that public support produces durable public value.

1. Reduce early-stage risk without reducing public safeguards.

The workshop appropriately highlighted the front-loaded cost and uncertainty of geothermal exploration. The Department of Conservation presentation estimated that exploration can account for approximately 40 percent of total project cost. CCV supports carefully designed tools to de-risk this stage, including grants for baseline studies, risk-sharing or convertible-loan programs for public-private demonstration projects.

We also strongly support the proposed California Geothermal Data Collaborative. California should begin by digitizing and standardizing existing well logs, geophysical surveys, water-quality information, reservoir studies, and other publicly held records, and then make the resulting library broadly accessible in useful formats. Open data can reduce duplicative exploration, lower costs, improve technical, academic and community review, and help regulators identify potential cumulative impacts. Public funding should carry public-interest



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conditions, including timely data disclosure, environmental baseline monitoring, labor standards, financial assurance, and accountability for promised community benefits.

Permitting policies, forms, and technical guidance should be updated to reflect evolving geothermal technologies, and agencies should establish clear roles, coordinated review pathways, and predictable timelines. At the same time, the IEPR should distinguish administrative modernization from weakening environmental review. The Salton Sea case study presented at the workshop found that reducing assumed exploration and permitting time by two years produced only a modest financial improvement, while financing and technology assumptions had much larger effects. Streamlining should therefore focus on coordination, completeness, early consultation, and clear standards, not categorical exemptions, reduced public notice, or the transfer of risk from developers to communities.

2. Address enhanced geothermal systems and California's fracking policy directly.

The workshop devoted substantial attention to enhanced geothermal systems (EGS), and modeling presented EGS as a potentially important clean-firm resource. At the same time, an industry presentation explained that EGS uses technologies developed in unconventional oil and gas production, including engineered fractures and shale-derived drilling techniques. This raises a legitimate policy question in a state that has ended the issuance of new hydraulic-fracturing permits for oil and gas: how will California classify, review, and regulate hydraulic or other reservoir stimulation used for geothermal development?

The IEPR should not assume that EGS stimulation is automatically authorized, automatically prohibited, or environmentally equivalent across technologies. Instead, the CEC should work with CalGEM, water boards, local governments, Tribal nations, seismic experts, and affected communities to explain the governing legal framework and establish technology-specific and performance-based safeguards before supporting commercial-scale deployment. At minimum, those safeguards should include full chemical disclosure; water-source, volume, recycling, and disposal requirements; baseline and ongoing groundwater monitoring; site-specific fault and induced-seismicity analysis; real-time public monitoring; enforceable traffic-light thresholds and automatic stop-work protocols; independent verification; bonding and liability requirements; emergency-response planning; and cumulative-impact review.

CEC modeling should also disclose the parasitic energy requirements of EGS and the source and emissions profile of electricity used for pumping and other auxiliary loads. Closed-loop, hydraulic-stimulation, thermal-storage, and other approaches should be evaluated separately rather than grouped under a single 'next-generation geothermal category. The workshop's public-perception research found groundwater contamination and seismicity to be leading concerns. Those concerns should be answered through transparent data and enforceable protections.

3. Pair Lithium Valley development with oversight and accountability.

The Salton Sea Known Geothermal Resource Area offers a distinctive opportunity because conventional geothermal generation is already established and geothermal brines contain lithium and other minerals. Co-production may improve project economics and contribute to a domestic low carbon energy supply chain. However, the workshop's Salton Sea techno-



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economic analysis described lithium as a potential ‘game changer’ only if extraction technology performs as expected and noted mixed levels of industry optimism. The IEPR should avoid treating future lithium revenue as guaranteed or environmental performance of geothermal lithium development as inherently clean and green.

State assistance for geothermal-lithium projects should require project-specific disclosure and monitoring of freshwater demand; process chemicals and reagents; air emissions; brine chemistry; energy use and parasitic loads; reinjection performance; induced seismicity; and the volume, toxicity, transport, treatment, and final disposition of filter cake, scale, sludge, and other solid or hazardous wastes. Requirements should cover construction, operation, maintenance, closure, and post-closure. Basic environmental performance data should be available through a public dashboard and annual independent reports, with clear enforcement responsibilities and financial assurance sufficient to address failures or abandonment.

Public investment should also be tied to measurable outcomes: local and Tribal hiring, apprenticeship completion, local procurement, pollution reduction, infrastructure delivery, and compliance with community-benefits commitments. Where public subsidies or risk-sharing mechanisms are used, agreements should include reporting, audit rights, corrective-action procedures, and proportionate penalties for material nonperformance.

4. Plan and fund regional infrastructure, beyond project-by-project mitigation.

Many geothermal resources are in rural regions where existing infrastructure and agency capacity are limited. In Imperial Valley, additional industrial development will affect regional air quality, scarce water supplies, wastewater systems, hazardous-waste management, local roads and truck routes, rail needs, emergency response, fire services, transmission, housing, and broader public-health concerns for fenceline communities near the Salton Sea. A per-project mitigation model alone will not efficiently address these cumulative needs.

The IEPR should support a coordinated regional accountability infrastructure and cumulative-impact planning process for the Salton Sea and Lithium Valley area, with participation from the CEC, CalEPA, CalGEM, Imperial County, the Imperial Irrigation District and other air and water agencies, as well as Tribal governments, community-based organizations, labor, and educational institutions. Lithium Valley visioning may identify project sequencing, capacity thresholds, responsible entities, funding sources, and contingencies if a proposed special district or other financing mechanism is delayed. Impact fees, state and federal matching funds, bond or loan programs, and developer contributions should be structured so that infrastructure serves nearby communities as well as industrial users and does not postpone urgently needed protections until after buildout.

5. Establish statewide floors for community and Tribal benefits.

CCV supports a statewide framework for geothermal community benefits agreements (CBAs), building on precedents, such as the CEC Opt-In Certification Program. The framework should establish minimum expectations and a credible engagement process while allowing communities to negotiate stronger place-specific terms. A CBA should supplement, not replace, CEQA mitigation, regulatory compliance, prevailing-wage and labor obligations, and government-to-government Tribal consultation. Appropriate provisions may include local hiring



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and procurement, union apprenticeship pathways, transportation and childcare supports for trainees, community air and water monitoring, public-health investments, emergency services, anti-displacement measures, infrastructure funds, grievance procedures, public reporting, and enforceable remedies.

The workshop correctly emphasized that community-based organizations and Tribal nations shape priorities while local governments control many implementation tools, and that limited institutional capacity can delay even well-funded initiatives. The state should therefore provide sustained technical assistance and participation funding for Tribal nations, community organizations, and local governments, not only for developers. Durable community and Tribal support can reduce uncertainty and improve project design, but engagement should not be treated merely as a strategy to overcome opposition. It must provide real decision-making power, accessible information, adequate time, and the ability to say no or require changes.

Tribal governments must be engaged as sovereign governments and, where appropriate, as project owners or implementing partners. The IEPR should support separate Tribal benefit-agreement guidance, early government-to-government consultation, protection of Tribal cultural resources and cultural landscapes, funding for Tribal technical capacity and monitoring, and pathways for potential ownership, revenue sharing, workforce development, and energy sovereignty.

Recommended IEPR actions

- Create and fund the California Geothermal Data Collaborative, beginning with digitization, standardization, and public release of existing state data.
- Establish an early-stage geothermal de-risking program tied to open-data, environmental-monitoring, labor, community-benefits, and financial-assurance conditions.
- Improve permitting, guidance, and interagency coordination while preserving project-specific environmental review, public notice, and meaningful consultation.
- Direct CEC and CalGEM to develop a transparent EGS policy and regulatory framework that addresses California's oil-and-gas fracking policy, induced seismicity, groundwater, chemical disclosure, water use, auxiliary energy loads, monitoring, liability, and shutdown standards.
- Develop a Lithium Valley regional infrastructure and cumulative-impact strategy covering air, water, wastewater, hazardous waste, transportation, emergency services, transmission, public health, and Salton Sea protection.
- Adopt statewide CBA and Tribal benefit-agreement guidance with enforceable floors, participation funding, reporting, audit rights, and remedies.



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- Create a public geothermal and Lithium Valley accountability dashboard and require annual reporting on environmental performance, public investments, jobs, procurement, community benefits, enforcement, and project status.

CCV appreciates the Commission's attention to geothermal resources and the opportunity to contribute to the 2026 IEPR. California can advance responsible development by reducing genuine early-stage barriers, enhancing regulation, and investing in shared infrastructure. Success should be measured not only in megawatts, minerals, or private investment, but also in cleaner air and water, protected Tribal cultural resources, good local jobs, and enforceable benefits for host communities. We welcome continued collaboration.

Sincerely,

Luis Olmedo
Executive Director
Comite Civico del Valle (CCV)