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Comite Civico del Valle (CCV) Comments on Jobs, Economic Opportunities and Investment

Additional submitted attachment is included below.



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September 30, 2026

California Energy Commission
Docket Unit MS-4
[Docket No. 24-OIIP-02](#)
715 P Street
Sacramento, CA 95814

RE: Informational Proceeding on Lithium Valley Vision: Jobs, Economic Opportunities and Investment

Dear Commissioner Gallardo:

Thank you for inviting Comité Cívico del Valle (CCV) and other grassroots organizations to submit comments to the California Energy Commission on the September 10, 2026, informational workshop on the Lithium Valley Vision: Jobs, Economic Opportunities, and Investment.

For reference, CCV is a 501(c)(3), serving children, students, community residents, and professionals in Imperial County and across California through a variety of programs, including improving access to quality health services, facilitating community-based research, air monitoring, capacity building, and public policy engagement in support of disadvantaged environmental justice communities in Imperial County, California.

In addition to the comments below, CCV is providing links to three related documents, which should be considered part of this submission. These documents, linked in the footnotes and submitted separately, include: (1) copy of CCV's comments to the Imperial County Supervisors on the Lithium Innovation and Competitiveness Program,¹ (2) 2025 report, High Road Training for Lithium Valley: Opportunities and Challenges,² and the recent report, (3) Power With a Purpose: Addressing Critical Gaps in Imperial County's Lithium Valley Specific Plan.³

¹ Comité Cívico del Valle's comments to the Imperial County Supervisors on the Lithium Innovation and Competitiveness Program,

https://drive.google.com/file/d/1wb7qHXs7t46yXGmiUCImnOcYgRiViUo/_view?usp=drive_link

² Martin, Isaac William; Andrews, Abigail; Cooper, Zosia; Kviatok-Dueñas, Andrea; Lopez-Ricoy, Ana; and with assistance by Norris, Emmet. (2025, November). *High Road Training For Lithium Valley: Opportunities and Challenges*. Comité Cívico del Valle.

<https://ccvhealth.org/reports/high-road-training-for-lithium-valley>

³ Comité Cívico del Valle & POWER Coalition. (2026, March). *Power with a Purpose: Addressing Critical Gaps in Imperial County's Lithium Valley Specific Plan*. <https://ivpower.org/reports/power-with-a-purpose>



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Observations and Recommendations

Lithium development in Imperial County is at a crossroads. In one direction is the traditional model of resource development, where resources are extracted, economic benefits and jobs may be limited and communities are left to bear the environmental and public health consequences. The other direction provides a new pathway that builds on community strengths, creates real economic opportunities for industry and locals alike and still takes prudent steps to improve and safeguard the environment from further degradation.

CCV believes an inclusive path forward for Lithium Valley is possible. However, achieving state climate commitments and federal critical mineral defense priorities without sacrificing the host community requires a more comprehensive approach. Solutions to date have focused on boosting the few existing geothermal businesses, without meaningful support for the broader ecosystem.

On its own, Imperial County lacks the authority, financing and statutory tools to ensure Lithium Valley advances while also protecting neighboring communities and the environment from significant, unmitigated harm. Imperial County's optional Good Neighbor Community Benefits Agreement (CBA) Program may be well-intentioned, but it is too flexible and insufficiently enforceable to address these challenges at scale. The County's allocation plan for the Lithium Extraction Tax spreads funding across the county without sufficient focus on those communities most directly impacted by lithium extraction. Furthermore, the County's Lithium Innovation and Competitiveness Program (LiNC Program) lacks minimum performance standards to ground negotiations, giving away money needed for infrastructure and community amenities and services. The LiNC Program fails to address high-priority issues and its structure contradicts the concept of de-risking a project.

A comprehensive, community-forward pathway is needed. The state has an opportunity and a responsibility to play a key role in implementing it through the following policies:

1. **A CEC-Enforced CBA Framework:** Establish a CBA statutory framework tailored to Lithium Valley's documented needs. Require the CEC to certify and monitor CBA implementation, ensuring specific public health, economic development, and environmental commitments are made and maintained. The framework would build on and strengthen the accountability and specificity lacking in the County's lithium producer incentive and optional community benefit program. It would also pilot a CBA framework and certification process that could benefit other communities facing significant energy and mining projects.
2. **Establish a Community Benefits Fund.** Codify the existing county-administered Community Benefits Fund and increase the percentage of funding from 10% to 30% of Imperial County's share of Lithium Excise Tax proceeds. Dedicate the additional funding to projects that provide a primary benefit to Imperial County communities



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directly impacted by extraction activities and California Native American Tribes with ancestral and/or current lands that include Imperial County. This proposal may use the same definition of directly affected communities as the current Imperial County Excise Tax Funding Plan, including the incorporated and unincorporated communities of Bombay Beach, Brawley, Calipatria, Niland, and Westmorland.

The Case for State Intervention: A Reframing of Responsibilities

As Erik Stokes pointed out in his presentation during the workshop, in an unusual alignment of interests, federal and state governments are supporting the use of Imperial County's geothermal power and lithium resources to advance their particular and shared strategic objectives:

- **State Mandates:** Accelerating California's transition to a low-carbon economy.
- **Federal Priorities:** Establishing a secure, dependable domestic supply of lithium for national security and supply chain independence.
- **Shared Goal:** Ensuring a reliable and affordable source of energy and battery materials.

However, achieving these state climate and national security goals must not come at the expense of sound land use planning, community health, economic opportunity for current residents and environmental protection. CCV is committed to rewriting the narrative that there is a zero-sum choice between achieving macro-level security and sustainability on one hand and the protection of local ecosystems and communities on the other.⁴

A key step in reframing this false choice is intentional and structured intervention by the State of California. Significant new funding is required to support alignment and capacity of workforce training, as well as technical and capital assistance for local entrepreneurs. Most significantly, large-scale infrastructure investments (wastewater, stormwater, broadband, and transportation) need to benefit neighboring communities, as well as business and industrial development.

Just as the state is gathering economic resources to help companies overcome obstacles and view Imperial County as a good place to invest and grow, it must make equal, if not greater, efforts to ensure that local benefits and protections are in place for already overburdened communities directly impacted by this proposed development.

Unaddressed Issues: Jobs and Economic Opportunities

⁴ Riofrancos, T. (2022). The Security–Sustainability Nexus: Lithium Onshoring in the Global North. *Global Environmental Politics*, 1–22. https://doi.org/10.1162/glep_a_00668



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Given the Salton Sea region's history of unfulfilled commitments, community members are naturally concerned that Lithium Valley will be another broken promise, leaving the community worse off in terms of public health, jobs, and the environment.⁵

A mandated, state-supervised CBA framework can be tailored to a disadvantaged community's unique needs and a project's specific requirements.⁶ Below is a list of core benefit categories along with examples of potential benefits.

- **Governance** - A CBA can allow communities to set the terms and manage CBA oversight and outcomes, ensuring ongoing community engagement. For example, in a CBA covering the site of a new Major League Soccer stadium in Nashville, Tennessee, a provision established a six-member Community Advisory Committee to help track implementation.⁷
- **Financial** - A CBA can negotiate provisions that go beyond token donations to local causes and create functioning community benefits funds and annual contributions to key community projects. For example, through Morongo Transmission LLC, the Morongo Band of Mission Indians is a part-owner of a transmission line. The utility makes direct payments to the Tribe, expanding the Tribe's capacity to build, own, and deliver solar, wind, and battery power to the Southern California Edison (SCE) electricity grid.⁸
- **Labor & Economic** - A CBA can support real career pathways for local residents and require local purchasing to bring lasting economic development to communities. "Buy Local," "Hire Local," and "Project Labor Agreements" are examples of items commonly included in a CBA, but a CBA can also include very unique provisions.

⁵ Cantor, A., & Knuth, S. (2019). Speculations on the postnatural: Restoration, accumulation, and sacrifice at the Salton Sea. *Environment and Planning A: Economy and Space*, 51(2), 527–544.

<https://doi.org/10.1177/0308518X18796510>

Britton, A., Olmedo, L., Torres, C. A., & Blair, J. J. A. (2024). Hydrosocial imaginaries of green extractivism: Water-energy transitions and geothermal lithium development at the Salton Sea in Imperial Valley, California. *The Extractive Industries and Society*, 20, 101567.

<https://doi.org/10.1016/j.exis.2024.101567>

Mulvaney, D., Blair, J. J. A., & Cantor, A. (2025). Sunrise at the Salton Sea: Environmental justice, land use change, and hydrosocial dynamics of solar energy transitions in the Imperial Valley, California. *Sustainability Science*, 20, 1433–1452.

<https://doi.org/10.1007/s11625-025-01698-4>

⁶ Blair, J. J. A., Hopkins, E., Koester, T. K., Berry, K., Cantor, A., Mulvaney, D., Symonds, T., Vineyard, N., Sprauer, B., Turley, B., Bui, T.-K., Butensky, R., & De la Puente Burlando, L. (2025). *Building Community Power: Community Benefits Agreements Across the Global Energy Supply Chain*. Climate and Community Institute. <https://climateandcommunity.org/research/cbas>

⁷ Nashville MLS Soccer Community Benefits Agreement, Nashville, Tennessee, 2018.

<https://climateandcommunity.org/wp-content/uploads/CBAToolkitFiles/Resources/SampleCBAs/11-Nashville-MLS-Soccer-CBA-2018.pdf>

⁸ Morongo Band of Mission Indians. (2021, July 19). *Morongo Becomes First Native American Tribe to be Approved as a Participating Transmission Owner in Nation*.

<https://morongonation.org/news/morongo-becomes-first-native-american-tribe-to-be-approved-as-a-participating-transmission-owner-in-nation/>



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For example, In Morro Bay, California, Castle Wind, the developer of a proposed offshore wind farm, signed a CBA with two local fishermen's associations. Under the Agreement, the fishermen's associations were given the right of first offer to provide certain qualified services to Castle Wind during construction and operation of the offshore wind project.⁹

- **Environmental and Public Health** - A CBA can serve as a backstop for environmental or community health issues that were not addressed during permitting. For example, the CBA for the Los Angeles World Airport (LAWA) expansion required the LAWA to fund a study to measure and investigate upper respiratory system and hearing loss impacts of LAX operations.¹⁰

A state CBA framework should also require a baseline, metrics, and reporting, creating a transparent and publicly accountable process. According to testimony at the September 2026 hearing, the state has invested over \$250 million in developing Lithium Valley. Yet, no single public accounting of these investments is available. This was evident in the presentation by Berkeley Lab, in which Dr. Haddad analyzed high level data on the feasibility of large-scale lithium production at the Salton Sea. A significant limitation of this study is its reliance on "analogous numbers" from other lithium developments elsewhere without considering actual prices and costs of operation in California. Take, for example, the considerable expenses of constructing and maintaining extra equipment that Jon Trujillo of Berkshire Hathaway Energy Renewables discussed candidly in the hearing - costs that would not be required in other locations due to the extraordinary volume of dissolved solids, corrosion and scaling at geothermal plants near the Salton Sea. Given the fact that there is no other existing real world example of operational direct lithium extraction of lithium from geothermal brine at scale, such analogical reasoning is an interesting academic exercise, but its findings would be greatly enhanced with increased access to localized brine samples, economic data, and reporting.

Economic studies from the RAND Corporation¹¹ and the UC San Diego Labor Center¹² (UCSD) and CCV - the latter drawn upon briefly in the hearing by Dr. Martin - highlight that Imperial County's real wealth-generation opportunity lies in capturing manufacturing and

⁹ The proposed wind farm never came to fruition as Castle Wind was outbid for an offshore wind lease with the Bureau of Ocean Energy Management in an auction for the call areas. City of Morro Bay, & Castle Wind LLC. (2018, November 29). *Community Benefits Agreement Castle Wind Morro Bay Offshore Wind Farm Project*.

<https://climate.law.columbia.edu/sites/climate.law.columbia.edu/files/content/CBAs/08.%20Morro%20Bay%20Executed.pdf>

¹⁰ Provision A of Article VIII of the 2004 CBA between the Los Angeles World Airport and the LAX Coalition,

Appendices. <https://www.lawa.org/lawa-our-lax/settlement-agreements/cooperation-agreement>

¹¹ RAND Corporation. (2025). *Empowering Imperial County: A Comprehensive Workforce and Economic Development Strategy for Harnessing the Lithium Opportunity*. Imperial County Development Department. https://www.rand.org/pubs/research_reports/RRA3836-1.html

¹² Martin, Isaac William; Andrews, Abigail; Cooper, Zosia; Kvietok-Dueñas, Andrea; Lopez-Ricoy, Ana; and with assistance by Norris, Emmet. (2025, November). *High Road Training For Lithium Valley: Opportunities and Challenges*. Comité Cívico del Valle. <https://ccvhealth.org/reports>



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related logistics activities. This is true for the lithium industry as a whole, with most revenue opportunities in the value chain in producing battery components (27%), cell manufacturing (30%), and pack manufacturing (18%), as well as in EV manufacturing itself. Only about 9% of total revenue potential along the battery value chain is expected to be captured at the extraction stage, with another 13% in refining.¹³

These additional links in the value chain are important for community-wide job creation. For every job in lithium extraction and processing, as many as four or more jobs may be created in battery manufacturing.¹⁴ Beyond the jobs created at each stage, jobs also support building, servicing, and supplying both the geothermal plants that extract lithium and the manufacturing plants that use it to produce lithium-ion batteries.¹⁵

Even after the publication of the RAND and UCSD reports, we see no real plans or actions to drive this extended value chain, which links energy and extractive industries to more labor-intensive industries along multiple supply chains. Unfortunately, the September 10 hearing uncovered no new ground on this issue. The difference between Imperial County being exploited for its resources and left with externalized costs, and Imperial communities freely participating in expanded economic opportunities, lies in how this value chain is developed. In fact, a McKinsey report cautions against limiting an economic strategy to economic viability and recommends a holistic approach that addresses the broader, admittedly complex challenges of industrialization and scaling the battery industry.¹⁶

At the heart of a successful community benefits strategy is ensuring current community members gain economic opportunities from the renewable energy and lithium extraction hub, either directly or within the broader value chain. With only 76,300 people in the Imperial County labor force,¹⁷ limited formal education beyond high school, inadequate training capacity, inconsistent wireless connectivity, and slow internet speeds, establishing a pipeline of qualified workers in an emerging industry is challenging. The stakes are

¹³ Hanicke, Michael. (2023, January). *Battery 2030: Resilient, sustainable, and circular*. McKinsey and Company.

<https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/battery-2030-resilient-sustainable-and-circular#/>

¹⁴ Benner, C., Jones, M., Lee, R., Mohanty, P., Slattery, M., Zabin, C., Dhar, V., & Hamilton, C. (2023), *Powering Prosperity: Building an Inclusive Lithium Supply Chain in California's Salton Sea Region*, New Energy Nexus. UC Santa Cruz Institute for Social Transformation, and UC Berkeley Goldman School of Public Policy, pp. 45-47. <https://transform.ucsc.edu/publication/powering-prosperity/>

¹⁵ Benner, C., Jones, M., Lee, R., Mohanty, P., Slattery, M., Zabin, C., Dhar, V., & Hamilton, C. (2023), *Powering Prosperity: Building an Inclusive Lithium Supply Chain in California's Salton Sea Region*, New Energy Nexus. UC Santa Cruz Institute for Social Transformation, and UC Berkeley Goldman School of Public Policy, pp. 45-47. <https://transform.ucsc.edu/publication/powering-prosperity/>

¹⁶ Hanicke, Michael. (2023, January). *Battery 2030: Resilient, sustainable, and circular*. McKinsey and Company, p. 6.

<https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/battery-2030-resilient-sustainable-and-circular#/>

¹⁷ Employment Development Department, Labor Market Information Division, Civilian Labor Force for El Centro MSA (Imperial County), Not Seasonally Adjusted, released September 18, 2026, covering August 2026. [https://labormarketinfo.edd.ca.gov/file/lfmonth/ecen\\$pd\\$](https://labormarketinfo.edd.ca.gov/file/lfmonth/ecenpd)



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especialmente alta para las comunidades locales por dos razones principales. Primero, el cambio hacia nuevas actividades industriales implicará la re zonificación de miles de acres de tierra actualmente designada para uso agrícola, lo que potencialmente eliminará una fuente significativa de empleos del sector privado. Segundo, si los trabajadores locales no pueden cubrir las vacantes en las nuevas instalaciones de energía renovable y minerales críticos, entonces los trabajadores externos tomarán esos empleos.

Finalmente, debemos prestar más atención al apoyo de las escuelas locales y los maestros para construir rutas profesionales constructivas. ¿Cómo se aumentará el logro en STEM para que haya una cadena de estudiantes calificados que satisfagan la necesidad de químicos, electricistas y otros técnicos? ¿Dónde están los datos y los informes que pueden impulsar las inversiones educativas y de capacitación profesional necesarias para calificar a los estudiantes para programas de pre-aprendizaje? ¿Cómo se necesitan los programas existentes y nuevos para escalar para satisfacer las futuras necesidades de empleo para las empresas clave en el centro de energía renovable - y las empresas relacionadas, proveedores, restaurantes, proveedores, y maquinistas - para nombrar solo un few? ¿Dónde está el informe de la junta de la fuerza de trabajo o del colaborador K-16 sobre las habilidades actuales en la economía local y las necesarias para acceder y avanzar en las escalas de energía y extensión profesional?

Mientras que el taller proporcionó una oportunidad para listar diferentes actividades de fuerza de trabajo, no parece haber un plan coordinado o entidades asignadas responsables. Se necesita un plan dinámico, detallado y transparente que sea al menos un nivel mínimo de compromiso con los padres del Valle Imperial, los estudiantes, y los potenciales empleadores futuros.

Comite Civico del Valle agradece la oportunidad de presentar comentarios en el taller de información del 10 de septiembre de 2026 sobre la visión del Valle de Litio: Oportunidades, Empleo Económico e Inversión.

Respectfully,

Luis Olmedo
Executive Director
Comite Civico del Valle (CCV)