

DOCKETED

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**QUECHAN INDIAN TRIBE CULTURAL COMMITTEE
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LITHIUM VALLEY COMMISSION DRAFT REPORT COMMENTS

Reiterate prior comments from the Quechan Tribe - meaning Government to Government consultation has not occurred with the Quechan Tribe on the proposed projects.

No consultation with the lead agency officials and the Quechan Tribe on sacred sites and landscapes that will be impacted by these projects.

Comments from the Quechan Tribe were not represented accurately in the Draft Report of the Blue Ribbon Commission regarding Lithium Extraction in California (referred to as the Lithium Valley Commission (LVC)).

Draft Report of the Blue Ribbon Commission on Lithium Extraction in California (LVC) - Comments should reflect the Tribe who made them and include the specific comments of the Tribe not a summary of the comments.

Draft Report of the Blue Ribbon Commission on Lithium Extraction in California (LVC) - Tribal perspectives and concerns should be listed separately and not included with the community perspectives and concerns section.

Quechan Tribe has provided specific cultural concerns such as protection of cultural features, sites and landscapes, but this was not included in the draft report.

Draft Report of the Blue Ribbon Commission on Lithium Extraction in California (LVC) - fails to provide equal representation of Tribal Concerns with other stakeholders.

Draft Report of the Blue Ribbon Commission on Lithium Extraction in California (LVC) - lacks findings for the concerns raised by the Quechan Tribe - perhaps Tribes should provide their recommendations so they are reflected accurately in the report.

How does the Blue Ribbon Commission plan to enforce the recommendations provided. (e.g. Chapter 3, recommendations 1, 2, 4, and 5) in the Draft Report of the Blue Ribbon Commission on Lithium Extraction in California?

Draft Report of the Blue Ribbon Commission on Lithium Extraction in California - Final Report should fully and accurately reflect tribal comments, findings and recommendations. To ensure this occurs, Tribes should have the opportunity to review the report before it is made public.

Draft Report of the Blue Ribbon Commission on Lithium Extraction in California - the benefits of lithium extraction are discussed more than the social/cultural/environmental concerns or impacts this process would create.

Quechan Tribe has posed numerous questions about the lithium projects in meetings and via letters, but these questions have not been answered by the agencies.

Adverse effects of lithium mining have not been analyzed and information on this analysis was not provided to the Quechan Tribe for further analysis was not provided to the Quechan Tribe for further consultation.

Cumulative impacts have not been fully analyzed and provided to the Quechan Tribe for further consultation.

Draft Report of the Blue Ribbon Commission on Lithium Extraction in California (Figure 1 : Map of the Salton Sea and Surrounding Region with nearby Known Geothermal Resources Areas) denotes several areas for lithium exploration outside of the Salton Sea area that have not been previously provided in any format to the Quechan Tribe - expansion of the lithium extraction process should be completely discussed in this report and should have been discussed during the years long commission process - Cumulative impacts of additional facilities and infrastructure require full consultation with the Quechan Tribe.

Any expansion of the lithium extraction process needs to include consultation with the Quechan Tribe.

New legislation passed to expedite lithium projects that were not consulted with Tribes.

How will lithium extraction projects align with and support the Salton Sea Management Plan goals and objectives?

How does the CEC plan to implement and oversee the Public Resources Code 25540.5 (delegation of CEC permitting authority) for lithium projects to ensure that counties enact robust environmental review of these projects?

Project review under CEQA has not currently adequately reviewed Tribal Cultural Resources and engaged Tribes in consultation on TCR's.

How will coordination of NEPA and NHPA be conducted for projects that require federal review and coordination with CDFW is implemented? These processes should be fully detailed in the report?

Imperial County has been extremely deficient in conducting mandated CEQA consultation. How will this improve with the implementation of lithium valley projects?

Finding Section does not adequately address specific impacts to Tribes concerns regarding sacred sites, landscapes, view sheds and cultural resources.

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