

DOCKETED

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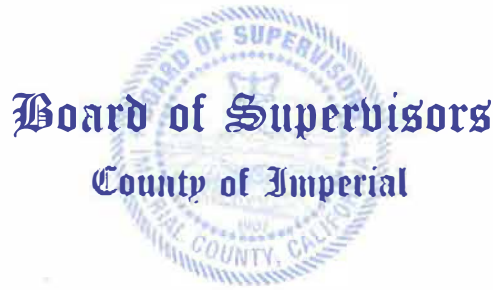
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July 25, 2023

California Energy Commission
1516 9th Street
Sacramento, CA 95814

RE: Black Rock, Elmore North and Morton Bay Geothermal Projects in Imperial County, CA

Dear Commissioners:

On behalf of the Imperial County Board of Supervisors, I am writing to express support of the proposed Black Rock, Elmore North and Morton Bay geothermal power projects that BHE Renewables, LLC submitted Application for Certification requests (Docket numbers 23-AFC-03, 23-AFC-02, and 23-AFC-01) to the California Energy Commission on April 18, 2023.

Imperial County strongly supports the development of geothermal power stations because they provide clean, base-load power in California, while also providing an economic benefit to the community where they are located. This is due to the living wage jobs and property tax revenues that they provide. Moreover, the fluid from the Salton Sea Known Geothermal Resources Area used in these specific power facilities contains many critical minerals, including lithium, which if captured, can provide even greater significant economic benefit and jobs to benefit Imperial County and California. Imperial County is committed to supporting development of these sustainable, clean resources.

If Imperial County led the permitting process of these facilities, there are specific issues that the Imperial County would expect to be addressed beyond the standard land use and environmental review. Imperial County asks the California Energy Commission to consider, in particular, the following:

1. Fiscal Analysis - A fiscal analysis that evaluates economic impacts to Imperial County is important as the location where the activity will occur. We would expect such a study to include impacts to Imperial County infrastructure and impacts to Imperial County governance costs associated with increased population.
2. Sales Tax Impacts - Provisions maximizing sales tax credited to Imperial County is appropriate as it is the central location where the tax will be generated. Imperial County established a

policy applicable to projects developed in the county to require, to the maximum extent possible, the purchase of products in Imperial County or purchase items so that use and sales tax is credited to Imperial County as the generating source of the taxable activity.

3. Agricultural Land Impacts - Preservation of statewide importance and prime agricultural lands are important where reasonably possible; however, this area and resource are critical to Imperial County's geothermal overlay. Imperial County is actively working on a programmatic environmental impact report that would result in geothermal and lithium recovery facilities being exempt from mitigation of prime and statewide importance agricultural lands. Imperial County requests similar treatment of these projects under the California Environmental Quality Act review process. Imperial County has significant experience in balancing geothermal power facility development and land preservation.

For these reasons, the County of Imperial supports the three aforementioned projects and we would be pleased to work with the Commission to assist in permitting these projects. We appreciate your consideration of these important projects. If you have any questions, please contact Deputy County Executive Officer Rebecca Terrazas-Baxter at (442) 265-1014 or via email at RebeccaTerrazas-Baxter@co.imperial.ca.us.

Sincerely,



Ryan E. Kelley

Chairman, Board of Supervisors
County of Imperial

cc: Senator Steve Padilla
Assemblymember Eduardo Garcia