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<b>Document Title:</b>	Comments from Leadership Counsel for Justice and Accountability
<b>Description:</b>	Comments submitted by the Leadership Counsel for Justice and Accountability regarding public engagement and outreach efforts related to lithium extraction and the proposed development of Lithium Valley.
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<b>Organization:</b>	California Energy Commission
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April 26, 2024

Commissioner Noemi Gallardo  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**RE: Public Workshops and Engagement Related to the Proposed Development of Lithium Valley and Lithium Extraction**

Dear Commissioner Gallardo,

On behalf of community residents, we submit this letter with feedback regarding public engagement and outreach efforts related to lithium extraction and the proposed development of Lithium Valley, as gathered from conversations with residents across Thermal, Oasis, Mecca, North Shore, and Salton City.

Firstly, we extend our gratitude for organizing the Lithium Valley Symposium and the Workshop on the Lithium Valley Vision. Building on these events, and previous public comments made throughout the Lithium Valley Commission's efforts, we offer the following feedback aimed at improving existing public engagement and access. As you plan for future workshops, we wish to share community-identified outreach methods that residents have found effective in engaging with other entities. These methods may prove beneficial for the commission's future outreach efforts.

Residents have emphasized the importance of timely and comprehensive publicity for meetings. This includes publicizing meeting details, agendas, and dates at least two weeks to one month in advance across various platforms. These notices should provide a concise overview of how the public can participate, their potential impact, and the benefits of participation, all of which can aid in planning and promoting attendance.

Recommended forums for promoting future meetings include virtual communication platforms like Whatsapp, Facebook Groups, Instagram, Tik Tok, and text messages to reach diverse age demographics effectively. Additionally, advertising on local news media channels, radio, newspapers such as the West Shores News, and distributing flyers at community hubs like the Coachella Public Library, Galilee Center, Mecca Library, and local parks such as Veterans Park, Bagdouma, Dateland, Thermal Ball Park, Huerta de Mecca Park, North Shore Park, Reyes Market, as well as social establishments like North Shore Yacht Club and Skip Store can enhance outreach efforts. In Desert Shore and Salton City, key locations such as Salton City's library, schools, churches, and stores are also recommended for outreach activities.

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Secondly, we are glad to see that the first public workshop offered Spanish interpretation; however, some accessibility barriers that persist are the inaccessibility of meeting times and Spanish material. To address this concern, we propose hosting workshops during evening hours to facilitate optimal attendance, especially for individuals with daytime work commitments. Given the high percentage of Spanish speakers, we also recommend that all information and spaces should be made accessible in Spanish including all flyers, agendas, and all of the documents and information within the California Energy Commission webpage.

Lastly, the questions below offer insight into what residents are interested in hearing about and can be helpful in determining what information needs to be shared throughout the public workshop conversations with the public. We hope these insights aid in improving future public engagement efforts and fostering meaningful dialogue within the community.

### **Infrastructure**

- How can we ensure that the allocation of funds and resources for infrastructure projects is transparent, holding decision-makers accountable, while also actively involving the community in the decision-making process? This could involve methods such as participatory budgeting, public consultations, and [community-developed land use scoring rubrics](#).
- How will officials at the local, state, and federal levels prioritize funding and development of infrastructure projects to ensure direct community benefits, promote social equity and inclusion, and avoid solely focusing on industry interests?
- How will transportation infrastructure be expanded or modified to support the transportation of lithium products and materials, and what measures will be taken to mitigate potential transportation-related impacts on local communities, such as traffic congestion or road infrastructure strain?
- What are the anticipated public health and environmental impacts of all proposed and anticipated infrastructure, including complementary facilities related to the battery supply chain, on communities?

### **Water Usage**

- What are the anticipated water usage variations among proposed technologies for lithium extraction, and from which sources will this water be obtained?
- What actions have been taken to mandate and finance the water study outlined in the Lithium Valley Commission Recommendation 10, specifically regarding the Imperial Irrigation District (IID)?
- With Western states renegotiating water allocations from the Colorado River, how will the heightened demand for freshwater impact allocations for lithium extraction, residential usage, and agriculture? What effect will these allocations have on the recession rate of the Salton Sea?

### **Education and Workforce Development**

- How will local, state, and federal officials collaborate with private and public entities to ensure the creation of accessible job opportunities with high-quality standards and safety measures? What specific strategies will be employed to achieve job sustainability, and how will officials ensure continuous community engagement throughout this process?

- Considering the interest of various labor union groups in this sector, what measures will be implemented to make tools and resources accessible to local employees, taking into account their financial needs and documented status?
- What plans are in place to proactively address potential workforce impacts, such as job displacement or changes in labor markets, resulting from shifts in industry focus due to lithium extraction and related infrastructure development?

### **Community Benefits, Leadership, and Communications**

- How can we ensure that the allocation of funds and resources for community initiatives and projects is transparent, holding decision-makers accountable, while also actively involving the community in the decision-making process? This could involve methods such as participatory budgeting and public consultations.
- Which governmental agencies are actively involved in the development of Lithium Valley, and what specific roles do they play? How are these agencies ensuring transparency and accountability to the public in decision-making processes and promoting active public engagement?
- How will existing issues and information be documented, recorded, and effectively shared with the public in a manner that is accessible and easily understandable?
- How will state and local permitting agencies collaborate with the public to establish clear communication standards, providing communities with accessible information about geothermal power plant and DLE facility applications, permitting processes, and post-approval monitoring as proposed in the Lithium Valley Commission recommendation 14?
- What potential impacts are anticipated on the cost of living for residents as a result of lithium extraction, and what measures are in place to address or mitigate these impacts?
- Residents are concerned about the neutrality of local, state, and federal officials due to competing interests and potential conflicts. How can the Commission ensure that community input and opinions are meaningfully considered and influential in the evaluation of lithium extraction, addressing concerns of neutrality and conflicts of interest?

### **Technological Innovation and Market Access**

- What is the long-term stability and profitability outlook for the lithium market?
- How are potential market challenges, like price fluctuations, being addressed to ensure the accessibility and stability of the lithium market?

### **Sustainability, Circular Economy, and Recycling**

- What is the projected timeline for the entire lifecycle of lithium extraction, including extraction, processing (such as battery manufacturing and recycling), and what are the plans for the area post-depletion of the lithium resource?

### **Environmental Impacts and Restoration**

- What are the specific health impacts associated with lithium extraction and geothermal activity in Lithium Valley, including groundwater contamination, air pollution, and public health concerns? How do these effects vary with distance from the facilities?
- What strategies will be employed to monitor, mitigate, and address these environmental hazards, arising from the extraction and processing of lithium and the operation of

associated infrastructure?

- Will lithium extraction affect land structure and ground leveling? What potential hazards are associated with chemicals used in the extraction process leaking into the brine and impacting the environment, including the Salton Sea?
- How will the increase in truck traffic and transportation of waste materials, including heavy metals and other impurities, impact noise levels, dust, roadway safety, and environmental hazards during transportation, disposal, and at the extraction site? Additionally, where are these materials being trucked to and disposed of, and what hazards do they pose to the community and environment throughout the process?
- What waste materials are generated from lithium extraction, how will they be managed, and what happens to other minerals in the brine?
- What are the potential seismic effects of increasing fluid brine volume in Lithium Valley, and how have industry or government historically regulated the volume of extracted/injected fluids?
- How will emergency response and preparedness plans address potential risks such as chemical spills, fires, and other industrial accidents related to lithium extraction and infrastructure development?

If you have any questions or would like to further discuss this letter contact Krystal Otworth at [kotworth@leadershipcounsel.org](mailto:kotworth@leadershipcounsel.org).

Sincerely,

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