

DOCKETED	
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Project Title:	Black Rock Geothermal Project (BRGP)
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Document Title:	IVEJC Request to CEC for Delayed Workshop and Public Comment Period July 2024
Description:	N/A
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Organization:	Imperial Valley Equity Justice Coalition
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July 24, 2024

RE: Docket Nos. 23-AFC-01, 23-AFC-02, and 23-AFC-03

Dear Presiding Member Gallardo:

Imperial Valley Equity and Justice Coalition (IVEJC) is a community-based organization engaged in advocacy, organizing, and community engagement around public health equity, environmental and social justice, and community oriented economic development since our inception in 2020. Since May 2022 to date, IVEJC has engaged with and provided education to over a thousand residents and stakeholders in the cities of Calipatria, Westmorland, Bombay Beach, Holtville, Ocotillo, Imperial, El Centro, Calexico, and the Quechan Community. Our coalition has also facilitated outreach to support community's participation at County and industry-hosted lithium community meetings as well as facilitated the submission of nearly 200 public comments during the County's public scoping period which was extended to 75 days by the County of Imperial in recognition of the amount of time necessary for proper community engagement. Given our experience seeing the benefits of more appropriate public comment periods and meeting notices, we are writing to the California Energy Commission (CEC) to formally request for the Notice of Preliminary Staff Assessment Technical and Mitigation Workshop Review Period be given at least a 35 day notice and for the public comment period for the three (3) different geothermal projects be extended from 45 days to 75 days. The rest of this letter provides additional information to support our request.

On Friday, July 19, 2024, near the close of the business day, the California Energy Commission (CEC) posted to the dockets a "Notice of Preliminary Staff Assessment Technical and Mitigation Workshop July 31–August 1, 2024." This workshop is for three different AFCs for the Elmore North "Geothermal Project (ENGP), Morton Bay Geothermal Project (MBGP), and the Black Rock Geothermal Project (BRGP). We are concerned about the timing of the workshop and its public notice. First, written comments for the ENGP Preliminary Staff Assessment (PSA) are due on Monday, July 29, which is two days before the workshop in which ENGP will be discussed. Due to the timing, and our past experience understanding that wider periods to support authentic and meaningful community engagement, we believe that the public will not be able to provide written comments on any new information and discussions that may occur during the workshop on the same level as the other two projects.

Our second concern is about the public notice provided. As the notice was posted on Friday, July 19, the public is only allotted 11 calendar days (7 business days) to make arrangements to participate in an extensive two-day workshop on issues of critical significance to the public. Previously, the CEC posted a "Hold-the-date August 31 2023 Geothermal AFC event" on August 4, 2023. The public was given 26 calendar days to make arrangements to participate.

Finally, at every community meeting that our coalition has hosted over the past 12 months across the County of Imperial, residents and stakeholders expressed a desire to participate in these processes but felt that they had not heard of these yet or knew where or how to provide their input. We are concerned that residents, who are some of the most significantly disadvantaged communities by environmental hazards, are not being meaningfully considered during this comment period or in the planning of this workshop.

An adequate public comment period of 75 days and advanced workshop notice of at least 35 days that gives residents the proper time to become aware of this workshop, make necessary arrangements to attend, to review the thousand page staff report and to become familiar with the process to submit written comments is necessary to ensure a responsible Preliminary Staff Assessment for all three (3) geothermal project processes. We look forward to a formal response with your response to our request prior to the end of the week.

Sincerely,

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Executive Organizer



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