

DOCKETED	
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Organization:	San Diego & Imperial Counties Labor Council
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July 25, 2024

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

Dear Presiding Member Gallardo:

On behalf of the San Diego and Imperial Counties Labor Council, I respectfully ask that you consider postponing the upcoming Technical and Mitigation workshop and extend the deadline to submit comments on the Elmore North Geothermal Project (ENGP) Preliminary Staff Assessment (PSA).

On Friday, July 19, 2024, near the close of the business day, the California Energy Commission (CEC) posted to the above entitled 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 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 PSA are due on Monday, July 29, which is two days before the workshop in which ENGP will be discussed. Due to the timing, the public will not be able to provide written comment 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 to make arrangements to participate in an extensive two-day workshop on issues important 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.

As a community organizer born and raised in Imperial County, I am worried that meaningful resident turnout may be suppressed by the short notice, further compounding an already complicated situation—the extreme heat our region is currently experiencing during the peak summer months and the distance between the workshop to the communities most directly impacted in the North End of the county, where these proposed projects will be built.

Therefore, we respectfully request the following:

- 1) Move the Technical and Mitigation Workshop to give more notice to the public to attend the meeting. We suggest the week of August 5th.
- 2) Extend the deadline to submit written comments on the ENGP PSA until after the Technical and Mitigation Workshop.

Thank you for your consideration.

Kim Palacio
Field and Campaign Organizer
San Diego and Imperial Counties Labor Council