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*Comment Received From: Leadership Counsel for Justice and Accountability
Submitted On: 9/4/2024
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**Public Workshops and Engagement Related to the Salton Sea
Known Geothermal Resource Area**

Additional submitted attachment is included below.



August 26, 2024

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

[Sent via Email]

RE: Public Workshops and Engagement Related to the Salton Sea Known Geothermal Resource Area

Dear Presiding Member Gallardo,

Leadership Counsel for Justice and Accountability, in partnership with residents from Riverside County's unincorporated communities of Thermal, Oasis, Mecca, and North Shore in the Eastern Coachella Valley, advocates for meaningful inclusion in decision-making processes, the prevention of further environmental harm, and the promotion of investments and policies that align with community priorities. Specifically, Leadership Counsel has worked alongside community members living in the Eastern Coachella Valley on the issue of lithium extraction. For example, we participated in the Lithium Valley Commission Proceedings, provided public comments on various lithium-related Environmental Impact Reports, and most recently participated in the CEC-led Lithium Valley Workshop. A primary goal of our work in this area is to ensure proper education and engagement of communities near the Salton Sea, both regarding lithium extraction efforts and the Salton Sea Known Geothermal Resource Area more broadly. In this context, Leadership Counsel for Justice and Accountability submits the following feedback regarding public engagement related to projects within the Salton Sea Known Geothermal Resource Area (SSKGRA).

We appreciate the extension of the public comment period for the Elmore North, Morton Bay, and Black Rock Geothermal Projects to September 2, 2024, and the scheduling of a second General Topics Workshop on September 18, 2024. However, it is troubling that these changes were made only after multiple requests from organizations, including the Imperial Valley Equity and Justice Coalition; Jobs to Move America; the United Automobile, Aerospace, and Agricultural Implement Workers of America; and the San Diego & Imperial Counties Labor Council. These organizations requested that the CEC reschedule the July 31-August 1 Staff Workshop due to inadequate notice and provide an extension and consolidation of the Preliminary Staff Assessment (PSA) comment deadlines to allow adequate time to review the

voluminous and technical PSAs, and to respond to any new information presented during the workshop.

While we acknowledge the CEC's efforts to address these concerns, it is troubling that the project schedule did not originally account for sufficient public engagement. This oversight is concerning given historic and ongoing advocacy from residents in the Salton Sea region for meaningful engagement opportunities.

To enhance public participation, Leadership Counsel requests that the CEC and project applicants adopt the following recommendations:

1. Implement a minimum 45-day public comment period for projects within the Salton Sea Known Geothermal Resource Area (SSKGRA).
2. Provide a proposed schedule for public proceedings and deadlines for all future projects within the SSKGRA as soon as a PSA is released. This schedule should ensure that the public receives at least 30 days' notice of any public hearing or other public engagement opportunities.
3. Host public hearings well in advance of the PSA comment deadlines to allow ample time for the community to review and respond to new information. A minimum of two weeks should be provided between a public hearing and the PSA comment deadline.
4. Schedule proceedings during hours that are accessible to affected communities, preferably after 5 p.m.

In summary, we urge the CEC to enhance its community engagement practices by providing more adequate notice for workshops, extending comment periods, and ensuring that scheduling accommodates participants. The approach to public participation is crucial and should be handled with greater consideration to genuinely involve affected communities.

Thank you for considering these concerns.

Sincerely,

Krystal Otworth
Policy Advocate
Leadership Counsel for Justice and Accountability