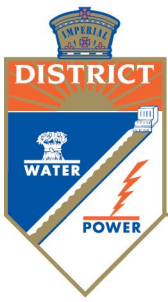


DOCKETED	
Docket Number:	23-AFC-03
Project Title:	Black Rock Geothermal Project (BRGP)
TN #:	260522
Document Title:	Imperial Irrigation District Comments - Imperial Irrigation District's Comment on the Proposed Obsidian Butte Conservation Easement
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*Comment Received From: Imperial Irrigation District
Submitted On: 12/6/2024
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Imperial Irrigation District's Comment on the Proposed Obsidian Butte Conservation Easement

Additional submitted attachment is included below.



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December 5, 2024

California Energy Commission
Docket Unit, MS-4
Dockets No. 23-AFC-01; 23-AFC-02; 23-AFC-03
715 P Street
Sacramento, CA 95814-6408

SUBMITTED VIA CEC'S E-COMMENT SYSTEM

Re: Written Comments of the Imperial Irrigation District on the Proposed Obsidian Butte Conservation Easement for the Proposed Morton Bay, Elmore North, and Black Rock Geothermal Projects

Dear CEC Commissioners and Staff:

In advance of the Tribal Mitigation Workshop scheduled for December 9, the Imperial Irrigation District ("IID") would like to formally acknowledge and conceptually support the proposal recently put forth by the Morton Bay ("MBGP"), Elmore North ("ENGP"), and Black Rock ("BRGP") Geothermal Projects (together, the "Project") to explore the potential establishment of a conservation easement over some portion of Obsidian Butte as a cultural resource preservation and mitigation measure.

The Project developer (subsidiaries of BHE Renewables, LLC (collectively, "BHER")) stated in its Preliminary Staff Assessment Comments docketed on September 4, 2024¹, that it believes an Obsidian Butte conservation easement will "create the most balanced outcomes for all interested parties" and can be tailored to accomplish preservation, protection, and management priorities into the future. The County of Imperial's Project comment letters docketed on September 25, 2024², and the Kwaaymii Laguna Band of Indians' Project comment letters docketed on August 1, 2024³, and September 5, 2024⁴, further support BHER's conservation easement approach.

IID is the fee title landowner of the Obsidian Butte property. Although specific conditions and terms have not yet been discussed, IID is amenable to engaging in further conversations with

¹ See Docket TN Numbers 258975, 258976, and 258977.

² See Docket TN Numbers 295284, 259285, and 259294.

³ See Docket TN Number 258270.

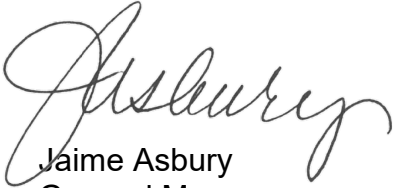
⁴ See Docket TN Numbers 259012 and 259013.

December 5, 2024

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BHER, the Indigenous peoples of Imperial Valley, and the CEC to further explore the conservation easement proposal, with the express condition that any ultimate conservation easement framework is mutually acceptable to all parties involved and any future conveyance is conditional on the CEC's formal approval of the Projects.

Very truly yours,



Jaime Asbury
General Manager