

DOCKETED	
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**Valle Undio Coalition Letter in Support of the Southeast Lake
Cahuilla Active Volcanic Cultural District**

Additional submitted attachment is included below.



December 13, 2024

Dear California Energy Commission,

For your reference, please find the below comment letter, which was read into the record by Daniela Flores during the public comment period at the December 9, 2024 public workshop on tribal mitigation for the Morton Bay, Elmore North, and Black Rock geothermal projects.

Thank you,

Jared Naimark, on behalf of the Valle Unido Coalition

<https://www.valleunido.org>

December 9, 2024

Valle Unido Coalition Letter in Support of the Southeast Lake Cahuilla Active Volcanic Cultural District.

Valle Unido por Beneficios Comunitarios (Valle Unido) is a coalition of residents, community-based organizations, unions, and environmental justice advocates fighting for a clean environment, healthy communities, and good, family-sustaining jobs in California's "Lithium Valley." Our platform also calls for Lithium Valley companies to respect the rights of Indigenous Peoples and protect tribal cultural resources. We respectfully submit this letter for your consideration at the December 9 public workshop on tribal mitigation for the Morton Bay, Elmore North, and Black Rock geothermal projects.

Based on extensive documentation and tribal consultation, the CEC staff has found in its Preliminary Staff Assessments (PSAs) for the projects that the Southeast Lake Cahuilla Active Volcanic Cultural District (SELCAVCD) Landscape qualifies as a Tribal Cultural Resource (TCR). Valle Unido strongly supports that finding. We also believe that the record supports that the cultural property also qualifies as a Traditional Cultural Place (TCP). In both instances, the evidence supports eligibility for the California Register of Historical Resources and the National Register of Historic Places.

We urge the California Energy Commission (CEC) to fully analyze, avoid where possible, and mitigate all the projects' impacts to this important TCR/TCP. We also urge the CEC to identify mitigation and culturally-appropriate treatment in consultation with culturally-affiliated tribes. Such measures must benefit the TCR and culturally-affiliated tribes and reflect the values and priorities of those tribes – not those of archaeologists or industry consultants.

In solidarity with the Indigenous Peoples on whose ancestral lands these geothermal plants, and ultimately lithium valley, will be developed, we urge the CEC to retain its TCR finding for the SELCAVCD and consult with culturally-affiliated tribes on all appropriate avoidance and mitigation measures.

Thank you.

Valle Unido Coalition Members:

[Imperial Valley Equity & Justice Coalition](#)

Imperial Valley Equity and Justice, based out of Calexico and Calipatria, is a progressive, community power-building organization formed to advocate and organize for health equity, economic, social, and environmental justice, and civic engagement. IVEJ's vision is for an Imperial Valley where families can live, work, dream, and thrive. IVEJ has spent the past few years spreading information to residents about the lithium developments in the region and is actively working to secure community benefits.

[Comite Civico del Valle](#)

“Informed people build healthy communities”, Comite Civico del Valle (CCV) was founded on this principle and continues to incorporate this mission statement in all partnerships, research studies, and civic engagements initiated or comprised by our organization. CCV’s extensive background and accomplishments date back to our grassroots origins in 1987. In over three decades of serving the communities of Imperial Valley, CCV now serves various California communities through collaborative efforts with other established Environmental Justice organizations and in partnership with researchers, academia, and government agencies.

[Earthworks](#)

Since 1988, Earthworks has helped communities secure protections of their health, land, water, and air from extractive industries. Earthworks is the only national organization in the U.S. to focus exclusively on preventing the destructive impacts of the extraction of oil, gas, and minerals.

[UAW Region 6](#)

United Auto Workers (UAW) Region 6 is the region of over 120,000 active and retired UAW members in Alaska, Arizona, California, Hawai'i, Idaho, Nevada, Oregon, Utah, and Washington, organizing for a just and sustainable future for all. Nationally, UAW represents over 1,000,000 active and retired members and is the union for the American automotive electric vehicle industries.

[Jobs to Move America](#)

Jobs to Move America is a strategic organizing and policy center that works to transform public spending and corporate behavior using a comprehensive approach that is rooted in racial and economic justice. We seek to advance a fair and prosperous economy with good jobs and healthier communities for all.

[ACLU of San Diego & Imperial Counties](#)

The American Civil Liberties Union of San Diego & Imperial Counties (ACLU-SDIC) is a nonpartisan, not-for-profit civil rights organization working to advance equity, freedom and justice through community engagement, policy advocacy and impact litigation. With offices in San Diego and El Centro, the ACLU-SDIC is one of 54 ACLU affiliates in the United States, Washington D.C. and Puerto Rico that works to defend and preserve the individual rights and freedoms guaranteed by the United States Constitution and U.S. laws.

[Becoming Project](#)

The Becoming Project, founded in 2019, is dedicated to removing barriers to success for homeless and low-income communities through direct services in housing, hygiene, financial resources, education, and social justice.