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*Comment Received From: Controlled Thermal Resources
Submitted On: 1/17/2025
Docket Number: 23-AFC-02*

**Controlled Thermal Resources Letter in Opposition of the
Southeast Lake Cahuilla Volcanic Cultural District**

Additional submitted attachment is included below.



January 14, 2025

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: *Proposed Southeast Lake Cahuilla Active Volcanic Cultural District and Application to Registers of Historic Places*

On behalf of Controlled Thermal Resources ("CTR"), I am writing to formally oppose the formation of the proposed Southeast Lake Cahuilla Active Volcanic Cultural District ("District"). While CTR undoubtedly supports the preservation of tribal cultural areas of significance, we do not support the method in which these areas are being proposed to be preserved, and we do not support the District's nomination to the California State or National Historic Registers. The nomination of this District and potential management by the National Parks (if successfully nominated) would significantly impact the responsible development, and potentially any further development, of clean energy projects within the Salton Sea Known Geothermal Resource Area ("SSKGRA"), which has been a critical clean energy production region in California for over forty years.

If the majority of the SSKGRA were to be included in this proposed District, it would create yet another layer of significantly complex permitting and entitlement processes that could indefinitely delay, if not cause to cease, the development of geothermal energy, geothermally derived critical minerals facilities, solar energy, and energy storage projects essential to the clean energy transition.

Furthermore, if clean energy and other clean energy related projects within the SSKGRA are subject to further roadblocks and delays, investment in these crucial developments will not be viable. Aside from California's clear mandate to transition to clean energy, destroying responsible investment opportunities in this region would have devastating impacts on the communities and Sovereign Tribes living in Imperial County who stand to lose significant tax revenue funded by SB 125's excise tax and community benefits, including good-paying jobs and educational opportunities, small business economic development, and additional tax revenue for Salton Sea restoration efforts.

Respectfully, many of the concerns raised in support of this designation are actively addressed through existing state and federal permitting processes. Designating a majority proportion of the Salton Sea Known Geothermal Area in the National Register of Historic Places will put incredible burdens on vital emerging industries and negatively impact climate change innovation in the region.

As stated above, CTR recognizes the value of protecting sensitive cultural resources, which is also recognized by existing federal and state policies that must be followed by all permittees for federal and state regulatory compliance.

Geothermal energy is one of the cleanest and most responsibly produced power globally. Delaying or halting development within the SSKGRA, one of the world's most significant geothermal regions, will not only impact environmental restoration efforts at the Salton Sea and economic advancement for Imperial



County, but it will also negatively impact the communities and Sovereign Tribes living here for generations to come.

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We strongly urge the California Energy Commission to consider these comments and act in the best interests of Imperial County, California, and the United States.

Sincerely,

James T. Turner
President

jim.turner@cthermal.com

CC: Governor Gavin Newsom, State of California
Senator Steve Padilla, California Senate, District 18
Assemblymember Jeff Gonzales, California State Assembly, District 36
David Hochschild, Chair, California Energy Commission
Siva Gunda, Vice Chair, California Energy Commission
Noemi Otilia Osuna Gallardo, Commissioner, California Energy Commission
J. Andrew McAllister, Commissioner, California Energy Commission
Patty Monahan, Commissioner, California Energy Commission
Secretary Wade Crowfoot, California Natural Resource Agency
Secretary Yana Garcia, California Environmental Protection Agency
Charlton H. Bonham, Director, California Department of Fish and Wildlife
Meredith Williams, Director, Department of Toxic Substances Control
Dee Dee Myers, Senior Advisor to Governor Newsom and Director,
Governor's Office of Business & Economic Development
Lauren Sanchez, Senior Climate Advisor of Governor Newsom
Alice Reynolds, President, California Public Utilities Commission
Senator Alex Padilla, United States Senate
Senator Adam Schiff, United States Senate
Congressman Raul Ruiz, California's 25th District
Tracy Stone-Manning, Director, Bureau of Land Management
Chuck Washington, Chair, Riverside County Board of Supervisors
Christopher Erikson, Chairman, International Brotherhood of Electrical Workers
Chris Hannan, President, State Building and Construction Trades Council of
California
Gina Dockstader, Chairwoman, Imperial Irrigation District
Gina Dockstader, President, Salton Sea Authority
Board of Regents, University of California
Kim A. Wilcox, Chancellor, University of California Riverside
Pradeep K. Khosla, Chancellor, University of California San Diego
Dr. Adela de la Torre, President, San Diego State University
Lennor M. Johnson, President, Imperial Valley College