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Environmental Impact Concerns - Comite Civico Del Valle

Additional submitted attachment is included below.

August 24th, 2022

Commissioner Silvia Paz, Chair
Commissioner Ryan Kelley, Co-Chair
California Energy Commission
Lithium Valley Commission
Sacramento, California

Concerning Issues of Lithium Extraction from Frontline Communities

Frontline communities that border the Salton Sea have endured a significant amount of health impacts due mainly to their proximity to substantial amounts of the exposed playa. Communities such as Calipatria, Niland, Bombay Beach, and Westmorland suffer from numerous amount of obstacles that include but are not limited to, limited access to local healthcare, disproportionate cases of respiratory issues, lack of economic investment, poorly invested infrastructure, and lack of affordable housing development. These underserved communities already tackling a plethora of issues, and all possible health and environmental impacts that may result from lithium extraction must be appropriately addressed and extensively researched by the Lithium Valley Commission.

Environmental Impact Concerns

With lithium extraction pilot projects already underway, it is vital that all potential health and environmental impacts be understood and mitigated to ensure the safety of not only frontline communities, but the overall health of Imperial County. With an increase in geothermal activity and the coupling of the processes for lithium extraction, there is great concern about the implications that would mean for the waste stream and the quantity of the processes' waste. It is vital for the Lithium Valley Commission to consider what an increase in waste production would imply and where this waste would be stored and the contents of such waste. According to the EIR for EnergySource Minerals ATLAS project, 90% of the waste stream is expected to be non-hazardous which will be disposed of in California, and 10% to be hazardedly disposed of in Arizona. If the waste does not meet Arizona standards, it will be disposed of in Nevada. Will the waste streams and disposal process look similar at the other facilities? Also, can the test results of

waste filter cake mineral concentration and totals be available and easily accessible to the public? It would be beneficial for such test results to be available to the communities to gain a better understanding of the impacts near them. Assuming the product of the waste streams would be exported via semi-trucks, this would inevitably mean increased traffic activity and increased vehicle emissions in the areas and impact local air quality levels. Increased traffic will not only result in increased emissions from heavy-duty vehicles but will also worsen air quality through vehicles using unpaved and poorly paved roads that will increase the amount of dust in the air. Rural communities near geothermal sites already experience bad air quality due to the dust coming from exposed playa of the Salton Sea, and increased activity of traffic of these sites would only worsen the conditions for them.

While geothermal companies have claimed that the process of lithium extraction will use a significantly lower amount of water compared to other extraction methods, there are still doubts about how much water allocation the industry will require. With California currently in a drought, and the Imperial Irrigation District negotiating water cuts from the Colorado River, there is doubt about where the geothermal industry will be allocated water from. Suppose lithium extraction through the geothermal sites increases at a larger scale. Where will the industry be supplied water without taking from other water allocations that are currently proposed to be reduced? The ATLLS project estimates an annual use of 3,400-acre feet of water per year which is the approximate equivalent to the amount of water it takes to grow alfalfa for a year in Imperial Valley on 525 acres. Will other facilities use a similar amount of water? What happens when the industry grows and it may exceed the IID allocations for industrial water use? How will planning for water use be carried out in the context of severe drought and climate change? With the Imperial Valley currently battling the issue of reducing our consumption of water for residential and commercial use, it is crucial for the Lithium Valley Commission to take these issues into consideration.

Legislative Report Recommendations

With the legislative report deadline quickly approaching, we ask that the Lithium Valley Commission consider the following recommendations to ensure the report encompasses the concerns and interests of the public and frontline community members:

1. Provide time allotments for public comments earlier in the meeting agenda to allow more opportunities for discussion. Also, as seen in the previous meeting with a panel, open dialogue discussion allotments would be beneficial for the public to voice their concerns.
2. Allow the public and community members to identify their top concerns and priorities regarding lithium extraction and environmental impacts.
3. Clearly state and explain the purpose of the legislative report to the public with a focus on informing the frontline communities.

We urge the Lithium Valley Commission to take into consideration the mentioned recommendations to create transparency between the public and the commission. As the deadline for the legislative report approaches, it is vital that the Lithium Valley Commission ensure that the public's concerns and recommendations are reflected in the legislative report.

Sincerely,

Janira Figueroa

Policy Advocate & Community Engagement

Comite Civico del Valle