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Meg Slattery Comments on Lithium Valley Draft Report

Additional submitted attachment is included below.

To the members of the Blue Ribbon Commission, CEC staff, and members of the public who have participated over the past two years:

I am submitting these comments on my own behalf and not as a representative of any organization.

First, I would like to express my gratitude for the work of this commission. It has provided a forum for transparent, public conversations about resource development to take place before the development happens. This is simultaneously extremely important and challenging given the early stages of the direct lithium extraction (DLE) industry, and I hope it will inspire similar efforts in other regions.

I want to highlight that by holding recorded meetings, the commission created a source of information that will be immensely useful moving forward, both in this region and in other locations where new industries are proposed to support the clean energy transition. In my own research about the life cycle and value chain of lithium-ion batteries, these meetings have provided a citeable source of data that documents community concerns, which has helped me create more relevant research questions. I also think the lessons learned during this process will be very helpful in the future; for example, the way the final community workshops were conducted demonstrated receptiveness to community feedback and will provide a good model to build on. While most of the time during the initial community forum was taken up with presentations, the final workshops were based on facilitated dialogue and listening to community members.

Discussion of environmental impacts is limited by the nascency of the technology, putting this commission in a challenging position. On the one hand, the potential to reduce the impact of EV production and create a domestic source of lithium generates excitement for policymakers, industry, and the public. On the other hand, it is a new technology, so third-party research about the impacts and how exactly it works has yet to be readily available. This inevitably makes it difficult to answer residents' questions and has led to understandable frustration for some people. In the absence of robust research, the report relies heavily on the EnergySource Minerals Draft EIR. The summaries and excerpts from the DEIR on pages 48 and 49 are helpful, as is the section summarizing traffic impacts on page 52. However, in other sections, it would be good to include more specific results from the Draft EIR, and/or state that the information is still under investigation. For instance, the section on air quality impacts does not describe the impacts of the project; instead, it is mainly a list of the agencies required to approve a project. I think it is necessary and relevant to point to these agencies and regulations as measures that will protect air quality. Still, they should not be presented as information about the air quality impact of the DLE process. It would also be helpful to provide more information about the different thresholds and how they are monitored.

Moving forward, I think it would be helpful for the State to establish a dedicated body that would hold regular meetings and workshops as a continuation of this commission, which is consistent with multiple recommendations throughout the report sections that point to the need for continued tribal consultation and community engagement. To synthesize these recommendations, this body could do the following:

- Provide regular updates on the status of development for geothermal and lithium extraction facilities, particularly related to CEQA permitting (E1)
- Disseminate findings from environmental and health impact reports and third-party research, ideally through in-person workshops as well as printed and virtual materials with graphics, and provide opportunities for people to ask questions and give feedback
- Oversee the program described in E2 and disseminate information from impact monitoring
- Present information about the additional value chain infrastructure envisioned to build out Lithium Valley before these developments occur. The different steps (i.e., LiCO_3 or LiOH synthesis, precursor cathode and cathode active material manufacturing, and cell production) should be explained, along with an idea of what it would mean to have this type of manufacturing in the region. For example, workshops and materials could provide pictures and videos of existing facilities, clear explanations of water use, emissions, and environmental protection measures, and the number of jobs created with position and training descriptions. Since these facilities exist elsewhere in the world, it could be a bit more straightforward compared to DLE.
- Facilitate participatory workshops to identify community priorities regarding infrastructure, workforce development, and public investment (D1, D3).

Thank you for the opportunity to comment and for all your work throughout this process, and congratulations on this report.

Sincerely,

A handwritten signature in purple ink that reads "Meg Slattery". The signature is written in a cursive, flowing style.

Meg Slattery
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