



Community Engagement Phase 2 Summary

October 2023

Prepared For:



Prepared By:

Rick Engineering Company



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1. Executive Summary

This document includes a summary of the initial community engagement efforts specifically related to the Lithium Valley Specific Plan and Programmatic Environmental Impact Report (PEIR), including the Community Workshops, Land Use Alternatives Design Charette, Technical Advisory Group Meetings, Academic Task Force Meeting, and Environmental Justice Working Group Meeting. The following summary describes the key themes that emerged from these engagement activities. Table 1 provides the chronology of phase two community engagement activities:

A. Table 1: Phase 2 Engagement Activities

Phase 2 Engagement Activity	Date
Land Use Alternatives Design Charette	Wednesday, May 24, 2023
Academic Task Force Meeting #2	Tuesday, July 11, 2023
Environmental Justice Working Group Meeting #3	Wednesday, July 12, 2023
Infrastructure Technical Advisory Group Meeting #2	Wednesday, July 12, 2023
Land Use & Development Technical Advisory Group Meeting #2	Wednesday, July 12, 2023
Community Workshop #2: Land Use Alternatives (Brawley)	Wednesday, July 19, 2023
Community Workshop #2: Land Use Alternatives (Salton City)	Thursday, July 20, 2023

The overall themes of input received during phase two of community engagement include:

- 1. Development of a comprehensive transportation and goods movement system:** Community input strongly favored development of an enhanced transportation network that prioritizes efficiency, enhances safety, and diversifies route options. Key transportation corridors were recognized as critical routes for materials distribution and logistics, aligning with the overarching goals for planned geothermal/lithium facilities to accommodate battery manufacturing. Operational and safety improvements to roadways linking Green Industrial, Manufacturing, and Logistics land uses were highly desired. The community also supported the construction of a rail spur and Transportation Hub to facilitate intermodal exchange of goods between freight and commercial trucking vehicles, connecting supply chain logistics. Many favored a separate public transit system leveraging innovative shared transportation solutions, like shuttles to employment centers, to ensure broader accessibility and connectivity to jobs.
- 2. Expansion of Community Opportunity Areas near Calipatria and Niland:** Several community members advocated for Community Opportunity Areas to be increased adjacent to the communities of Niland and Calipatria. The expansion served as a strategic measure to buffer populations from diesel truck traffic, supporting efficiency for manufacturing and logistics activities, while enhancing the quality of life and well-being of residents. Participants also supported development of a Commercial Node near communities to support business activity, promote economic growth and increase access to jobs. Several raised concerns over the lack of affordable housing in the communities and stated their desire for the Specific Plan to expand residential development in the Community Opportunity Areas. Public transportation hubs could be collocated in these areas, ideally in proximity to communities to connect the local population to employment centers. Recreation centers, green spaces, healthcare facilities and

workforce training centers were recommended for inclusion in the Community Opportunity Areas to support the incoming population of residents and industry-related workforce.

3. **Flexibility between Industrial, Manufacturing and Logistics uses:** Stakeholders communicated the necessity for the Green Industrial land use designation to allow for alternative uses to support downstream supply chain manufacturing and logistics on-site. Providers stated that proposed geothermal facility site plans co-locate these uses to support lithium development and battery manufacturing. Individuals also stated the importance for supporting commercial uses to be in proximity to workers for Green Industrial, Manufacturing and Logistics activities.
4. **Consideration of non-developable lands:** State agencies oversee existing conservation easements for the Imperial Wildlife Area, which constituted the basis for areas designated with the Conservation land use. Additional information provided by stakeholder groups notified the project team of other lands to consider with respect to ongoing habitat restoration, mitigation, and cultural resource protection projects within the Specific Plan Area. The project team received valuable insights regarding critical habitat encompassing the Salton Sea and floodways of the Alamo River and New River. Areas identified were assigned with respective Conservation and Floodway land use designations to reflect these priorities.
5. **Limited infrastructure and water supply:** Lack of existing infrastructure and available water was recognized in multiple venues as an impediment to development in the Specific Plan Area. Agency representatives stated existing capacity limitations of the electric transmission system and restricted water supply allocated to and distributed by the Imperial Irrigation District (IID). Energy and water components are critical for the operations of industry-related facilities envisioned in the project area. Others stated there was insufficient telecommunication infrastructure currently available to support a broadband network in the Specific Plan Area. Regulated water uses and allocation to farmers was also noted as a constraint to development.
6. **Availability of public services:** Emergency response services, such as fire protection and law enforcement, would require significant expansion to accommodate growth and development in the service area. Several also highlighted the lack of access to essential healthcare services and hospitals around the Specific Plan Area, exacerbated by public health impacts from poor air and water quality. Water, wastewater, and stormwater system improvements were deemed necessary to accommodate development and the incoming workforce. Several sought to establish education, recreation, and library facilities in Community Opportunity Areas.
7. **Allowable Uses on Playas Renewables & Restoration Areas:** Contributors urged the project team to carefully consider the proposed land management and stewardship practices for the sensitive playas around the Salton Sea. Some expressed the importance of dedicating this land to restoration and conservation efforts, favoring low-impact geothermal activities over intensive industrial uses, while others argued for the potential benefits of incorporating industrial elements like geothermal, mineral extraction, processing, and manufacturing facilities. Air quality improvement, dust suppression, and protection of sensitive species habitats represent significant concerns for the future viability of the playas. Additional technical studies dedicated to analyzing the geologic and ecological complexities of the playas could be leveraged to inform the future allowable uses for this land use designation.
8. **Proposed phasing approach and buildout strategy:** Interim and Phase Two designations were intended to concentrate short-term development in Phase One, provide flexibility for



allowable uses and maintain ongoing agricultural operations. Introducing these proposed designations to the community solicited several questions regarding timing for transitioning to Phase Two and concerns over allowable uses. Community feedback highlighted concerns tied to the Interim Agricultural Overlay, which does not distinguish areas for manufacturing or logistics in the south portion of the Specific Plan Area. Without this distinction, community members raised concerns over the possibility for incompatible allowable uses to develop adjacently in the future. Between Phase One and Phase Two, many found the timeframe for transition unclear, prompting questions for target buildout projections and phasing guidelines.

9. **Preparing for the emerging workforce:** The community shared valuable insights regarding how to plan for and prepare the workforce expected to emerge from this project. Many asked for clarifications on how job projections were calculated and requested additional breakdowns distinguishing between temporary construction jobs and long-term operations and maintenance positions. Others requested for projected job numbers to be broken down by land use designations and respective phasing categories. The inquiries realized the need to understand the connection between projected employment timeframes as they relate to the need for housing and development of critical infrastructure. Refined job projections can also inform the workforce development timeframe to assist with expanding education, training, and recruitment programs in concert with expected industrial growth.
10. **Public health impacts and environmental justice:** Community members requested that the Specific Plan address public health impacts experienced by local disadvantaged communities due to poor air quality, water pollution, and lack of access to healthcare services. Community-based organization leaders advocated for the incorporation of Environmental Justice (EJ) principles in the Specific Plan to ensure development limits and minimizes environmental impacts toward those vulnerable communities. Similarly, many called for the preservation of sensitive cultural resources and indigenous ancestral territories, reflective of EJ principles.

2. Phase Two Engagement Opportunities

2.1 Land Use Alternatives Design Charette

On May 24th, 2023, a Land Use Alternatives Design Charette took place at the Imperial County Administrative Center, convening representatives from a variety of stakeholder groups including government agencies, local organizations, developers, and the project team. This collaborative working session garnered input from participants who drew upon their technical expertise, knowledge, and insights to discuss land use planning and design strategies to support project objectives. The design charette provided the opportunity to collectively conceptualize solutions for Draft Land Use Alternatives and begin spatially organizing land use designations to broad areas in the Specific Plan Area. This effort was preceded by the preparation, distribution, and review of the Existing Conditions reports, which provided participants with contextual information to understand the constraints and opportunities toward development.

The working session was facilitated using two maps of the Specific Plan Area provided by the project team. One map visualized “Land Use Opportunities and Constraints,” identifying existing geothermal facilities, surface management agency ownership, conservation easements and



existing infrastructure. This provided participants with a visual representation of the geographical limitations and possibilities for assigning Land Use Alternatives in the Specific Plan Area. Another map consisted solely of the project boundary, prominent topographic features, primary transportation infrastructure and aerial imagery. This map served as the basis for illustrating broad boundaries, assigning land use designations, and exploring design alternatives. Discussions were driven by the group's collective knowledge of the area and cultivated valuable insights from a variety of perspectives regarding land use considerations, environmental limitations, circulation possibilities and industry-related interests.

The project team documented the input received and developed a Conceptual Land Use Plan Mock-Up which represented the innovative ideas and recommendations proposed for alternative land use plans. The exchange of information and opinions served to establish consensus on the broader framework of the land use plan, which was incorporated during the development of Draft Land Use Alternatives. For the themes heard at the Land Use Alternatives Design Charette, see **Appendix A**, Land Use Alternatives Design Charette Meeting Notes.

2.2 Academic Task Force Meeting #2

The second Academic Task Force Meeting was held on July 11th, 2023 via Zoom, convening individuals from a variety of research institutions and technical backgrounds to solicit input on Land Use Alternatives in the Specific Plan Area. The Academic Task Force was formed to analyze geothermal/lithium development impacts on the local environment and community, with a focus on water use, air quality, battery manufacturing, and recycling opportunities.

The meeting focused on the presentation of three Draft Land Use Alternatives, which shared descriptions of the proposed land use designations, in addition to their general objectives. The alternatives were presented alongside differentiating projection metrics comparing land use acreages, jobs created and building square footage between the three plans. A Q&A session was held directly afterwards which provided attendees with the opportunity to share their thoughts, offer insights and seek any clarifications from the project team and County staff. The meeting recording and slides were provided to the Academic Task Force Members via a shared link.

2.3 Environmental Justice Working Group Meeting #2 and #3

On May 24th, 2023, the Project Team held the second Environmental Justice Working Group Meeting at the Lions Center Gymnasium. Participants from the Environmental Justice (EJ) Working Group included representatives from Community-Based Organizations, Advocacy Groups, local agencies, and educational institutions.

The meeting prefaced with a presentation to share the project's progress, the process for soliciting input and project-specific findings related to social conditions and environmental justice. The group was provided with the Existing Conditions reports to review the documents and submit comments to the project team at a later date. Participants of the meeting were divided into smaller breakout groups and discussions were facilitated by speakers from the project team, providing a platform for community members to address their concerns. Meeting notes from the May 24th meeting are included as **Appendix B-1**, EJ Working Group Meeting #2 Notes.



The Environmental Justice Working Group convened again on July 12th, 2023 over Zoom, to introduce the Draft Land Use Alternatives and receive initial feedback from attendees. At this meeting, each of the three alternative land use plans were presented in addition to maps which visualized constraints and opportunities, geothermal facilities, and existing transportation infrastructure. These maps provided the group with an idea of the geographical limitations and possibilities associated with assigning land use designations. The three Land Use Alternatives were presented alongside their differentiating metrics for land use acreages, jobs projected and approximate building square footage for development. The group was asked discussion questions to identify strengths and weaknesses of each alternative, evaluate comparison metrics and inform the selection of the preferred alternative. Meeting notes from the July 12th meeting are included as **Appendix B-2, EJ Working Group Meeting #3 Notes**.

2.4 Technical Advisory Group Meetings

To advise the County and project team on technical aspects of the project, two technical advisory groups (TAGs) were established as part of the community engagement strategy. One TAG was comprised of representatives from agencies and authorities related to infrastructure, and the other TAG was specific to land use and development agencies and interested parties. The second TAG meetings were held on July 12th at the Imperial County Administrative Center with the option for members to attend the meeting via Zoom. Meetings began with an introductory presentation of the Draft Land Use Alternatives, followed by a collaborative discussion exploring the benefits and drawbacks of each alternative to inform the selection of the Preferred Land Use Alternative.

The Infrastructure TAG discussed existing conditions of infrastructure for Energy Transmission, Airports, Roads and Bridges, Railroads, Hydraulics, Water and Wastewater. The Land Use and Development TAG focused on existing land uses and ownership as they related to the development of the Draft Land Use Alternatives. The group discussed environmental considerations, public health impacts, geothermal/lithium development, and infrastructure supporting the Specific Plan Area. Each TAG discussed and were called upon to contribute their insights on the Draft Land Use Alternatives, leveraging their technical expertise and background.

2.5 Workshop #2

The Land Use Alternatives Community Workshop series for the Lithium Valley Specific Plan and PEIR was held on July 19th, 2023 at Lions Center Gymnasium in Brawley and July 20th, 2023 at West Shores Senior Citizens Club in Salton City. The workshops focused on the presentation of the proposed land use designations, Draft Land Use Alternative scenarios, and Draft Project Vision Statements. Prior to the Open House portion of the workshop, the project team delivered a presentation sharing what the project has accomplished so far and how feedback was incorporated into the process of developing the Draft Land Use Alternatives. The same workshop was coordinated at two strategic locations per the request of County staff. This provided community members with flexibility to select a day to attend and increased accessibility for northern residents.

The workshop save-the-date flyer was posted to the Lithium Valley website, distributed by representatives of Community-Based Organizations (CBOs), and disseminated through project stakeholder groups.



Attendees were presented with maps of the Specific Plan Area illustrating geographical constraints and infrastructure opportunities. This gave participants a visual representation to show how land use designation boundaries were drawn in relation to surrounding contextual information. At the end of the presentation, participants were provided with instructions on how to contribute input during the “Open House” portion of the workshop. They were also provided with a general timeline for completing upcoming phases of the project. This was followed by a 20-minute Q&A session, providing a platform for participants to directly engage with the project team and cultivate a dialogue between the greater community.

The Open House comprised the remainder of the event’s scheduled time and presented an opportunity for community members to explore the contents of the presentation in greater detail. This interactive workshop activity involved six workshop stations that each addressed proposed land use designations, the alternatives and three Draft Project Vision Statements for community members to provide feedback.

The Open House consisted of six workshop stations as follows:

- Green Industrial and Renewable Energy
- Manufacturing, Logistics and Transportation Hub
- Playas Renewables & Restoration and Conservation
- Community Opportunity Areas, Interim Agricultural Overlay and Optional Uses
- Land Use Alternatives
- Project Vision Statement

Each workshop station was equipped with an informative poster board exploring each of the topics. Discussions were led by a designated staff facilitator, available to answer questions and receive direct feedback from community members. The boards shared goals for the proposed land use designations, outlined possible allowed uses and displayed representative images to serve as examples for the types of development allowed at each. Participants were provided with pens and sticky notes to contribute to the findings outlined by the outreach boards, whose input is intended to drive the development of the Preferred Land Use Alternative and Specific Plan.

Live Spanish translation services were provided via headsets and an in-person translator. Project team members were available toward the end of the workshop to answer individual questions about the project. The workshop formally concluded after that.

Key themes derived from feedback and discussions from the Land Use Alternatives Community Workshop and all other engagement efforts are outlined in the Executive Summary section of the document. These critical findings will ultimately inform and guide the selection of the Preferred Land Use Alternative.

See **Appendix C, Workshop #2 Exhibit Images**, for a series of photos of the outreach boards with comments from the public.



Figure 1 Community Workshop attendees are seated while listening to the overview presentation.



Figure 2 Community Workshop attendees converse with each other and the project team during the open house.

2.6 Online Platform

For community members who were not able to attend the in-person workshop and for those who wished to provide additional comments after the workshop, a virtual outreach effort was provided through a comment submittal platform which hosted the Land Use Alternatives Workshop content. The comment period went from July 19, 2023 to August 20, 2023. The platform received one comment, requesting the conversion of Highway 111 to four lanes and road improvements.

The Lithium Valley Social Pinpoint website was developed to provide community members with a platform to explore workshop materials, provide input through a survey and participate in a discussion forum. The project website also extended an invitation for community members to engage by signing up for project updates, participating in the latest engagement opportunities and

attending community meetings coordinated by the project team. All input received from the in-person workshop, online platform, and email was recorded in this Workshop #2 Summary document and appendices.

<https://rickplanninganddesign.mysocialpinpoint.com/lithium-valley/>

Community Workshop #2 Land Use Alternatives

Explore and engage with the workshop materials.

Green Industrial

Goal: Promote industrial operations that work toward decarbonizing the energy industry.

Possible Allowed Uses:

- Renewable Energy Operations
- Biogas
- Green Hydrogen
- Lithium Electrolysis
- Innovative Sustainable Production of Materials

Industria Sustentable

Objetivo: Promover actividades industriales que trabajen para descarbonizar la industria energética.

Posibles Usos Permitidos:

- Operaciones de Energía Renovable
- Biogás
- Hidrógeno Verde
- Electrolysis de Litio
- Producción Sostenible de Materiales

Renewable Energy

Goal: Support the safe and orderly development of renewable energy.

Possible Allowed Uses:

- Renewable Energy Operations
- Solar
- Wind
- Hydropower
- Electric Transmission Facilities

Energía Renovable

Objetivo: Apoyar el desarrollo sostenible y ordenado de las energías renovables.

Posibles Usos Permitidos:

- Operaciones de Energía Renovable
- Solar
- Energía Eólica (Eólica)
- Energía Hidroeléctrica
- Instalaciones de Transmisión Eléctrica

Explore Workshop Materials

Review the Community Workshop #2 Presentation.

START 20 Jul 2023

END 26 Aug 2023

[Click Here](#)

Provide Your Input

Contribute your thoughts on the Draft Land Use Alternatives.

START 20 Jul 2023

END 26 Aug 2023

[Click Here](#)

Land Use Alternatives / Usos de Suelo Alternativos

Land Use Alternative/ Uso de Suelo Alternativo #1

Land Use Alternative/ Uso de Suelo Alternativo #2

Land Use Alternative/ Uso de Suelo Alternativo #3

Post a Comment to the Discussion Forum!

Participate in the community's conversation.

START 20 Jul 2023

END 26 Aug 2023

[Click Here](#)

Figure 3 Imperial County's Lithium Valley Community Workshop Social Pinpoint page to submit comments.

2.7 Public Comment Letters

Additional comment letters were received by the project team prior to the close of the public comment period. Comment letters were prepared by individuals from a variety of stakeholder groups including the Academic Task Force, EJ Working Group and Technical Advisory Groups. See **Appendix D, Public Comment Letters**, to view all comment letters received by the project team.



Appendix A Land Use Alternatives Design Charette Meeting Notes

September 2023

Created For:



Prepared By:

RICK Engineering Company

MEETING NOTES

LITHIUM VALLEY SPECIFIC PLAN

Date: May 24, 2023

Time: 11:00 AM – 12:30 PM

Topic: Lithium Valley Land Use Alternatives Charrette

ATTENDEES

Monica Soucier (APCD), Sean Wilcock (IVEDC), Jessica Humes (IID), Tine Shields (IID), Justina Gamboa-Arce (IID), Joel Stone (Calethos), Maria Reuter (Woodside), Jacobus Viljoen (Woodside), Mariela Moran (Controlled Thermal Resources), John Gay (ICPWD), Jim Minnick (IC Planning), David Dale (Imperial County), Diana Robinson (IC Planning), Diego Velasco (CityThinkers) Michael Peterson (IC Natural Resources), Brian Mooney (RICK Engineering), Shannon Baer (RICK Engineering), Sabrina Sessarego (RICK Engineering)

ITEMS DISCUSSED

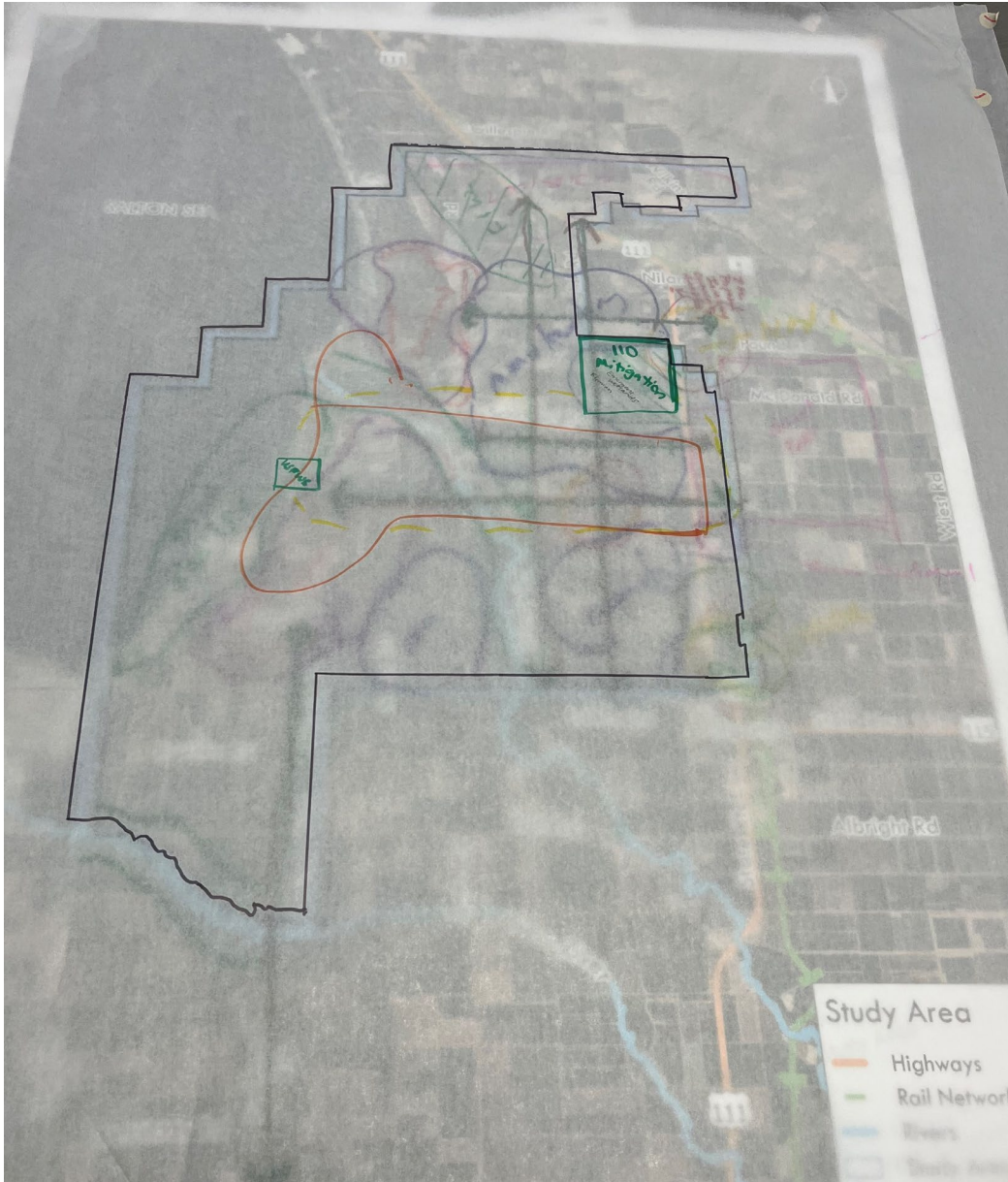
1. Introductory Presentation
2. Environmental Considerations
 - a. Any agreed to requirements to mitigate air quality concerns must be adhered to and not obstructed by future land use plans
 - b. Consider emergent wetlands in playas
 - c. There are IID QSA mitigation lands within and outside of existing Conservation Easements; need to consider those areas as non-developable.
3. Land Use Considerations within Playas
 - a. IID cautions against solar on playas as it would impede vegetation and dust suppression
 - b. County and applicants would like to allow raised structures within playas for geothermal/lithium extraction
 - c. Allow renewables/industrial uses adjacent to playas
4. As shown in Figure 1, Conceptual Land Use Plan Mock-Up, Niland and Calipatria may be buffered with commercial activity nodes and recreational uses
5. Circulation Considerations
 - a. There may be an existing east-west rail line to the Salton Sea from the old salt plant; need to figure out if it is being utilized and by who
 - b. A main east-west circulation roadway may be Sinclair Rd., which is already paved
 - c. Brandt Road has a bridge that is being replaced
6. Geothermal Considerations
 - a. CTR has a pilot plant on Davis Road which is pending approval
 - b. Clustering geothermal uses near the Salton Sea would require some type of supporting activity node
7. Other Allowable Uses
 - a. Interest in renewable hydrogen plant
 - b. Consider Industrial Park and Research & Development as allowed uses under the Manufacturing land use designation

8. Design Guidelines
 - a. Project consultant team to start pulling information on typical building heights, architectural standards, etc. from applicants to inform the Specific Plan Design Standards and Guidelines.
9. Phasing: As shown in Figure 2, Conceptual Phase 1, the County would like to identify a 10,000 acre Phase 1 area to connect western geothermal facilities to Hwy 111 and rail to the east along Sinclair Road and/or another main east/west corridor.

Figure 1, Conceptual Land Use Plan Mock-Up



Figure 2, Conceptual Phase One



ACTION ITEMS

1. Project consultant team to document meeting discussion and maps created. Meeting summary shall be sent to meeting attendees.
2. Project consultant team to draft the Land Use Alternatives Memorandum to present at the Community Workshop series.



Appendix B-1 Environmental Justice Working Group Meeting #2 Notes

September 2023

Created For:



Prepared By:

Falcon Strategies



MEETING NOTES

LITHIUM VALLEY SPECIFIC PLAN

Date: May 24, 2023

Time: 3:00 PM – 4:30 PM

Topic: Lithium Valley Environmental Justice Working Group Meeting #2

ATTENDEES

1. Jose Luis Olmedo, Comite Civico Del Valle
2. Daniela Flores, Equity and Justice Coalition
3. Luis Gomez, Columnist, Newsletter Lithium Valle
4. John Hernandez, Our Roots Multicultural Center
5. Isabel Solis, Los Amigos de la Comunidad
6. Eric Reyes, Los Amigos de la Comunidad
7. Hector Meza, IBEW Local 569
8. Sean-Keoni Ellis, UA Local 230
9. Diana Robinson, ICPDS
10. Jim Minnick, ICPDS
11. John Gay, ICPWD
12. Aida Castaneda, Falcon Strategies
13. Clarissa Falcon, Falcon Strategies
14. Brian Mooney, RICK Planning + Design
15. Shannon Baer, RICK Planning + Design
16. Sabrina Sessarego, RICK Planning + Design

MEETING NOTES

1. Lithium Valley Environmental Justice Working Group Meeting #2 – Baseline Report Presentation
 - Project Process and Scope
 - Baseline Report Review Process and Instructions
 - Breakout Groups – Document Review / Discussion Prompts
2. Environmental Justice (EJ) Principles
 - Jemez Principles for Democratic Organizing – Southwest Network of Environmental and Economic Justice
 - Request for further research into the principles and statutes for EJ other than what has been regulated by State law, including policy justification and nexus.
 - Jemez Principles- <https://www.ejnet.org/ej/jemez.pdf>
 - No tokenism
 - Emphasis on grass-roots mobilization
 - Let people speak for themselves
 - Work together in solidarity
 - Building just relationships amongst ourselves
 - Commitment to self-transformation
 - AB617- <https://ww2.arb.ca.gov/capp>
 - Participant interested in having EJ principles reflected in the County of Imperial General Plan Environmental Justice Element
 - Participant interested in having EJ principles reflected in the Lithium Valley Specific Plan
3. Accessibility of Outreach Plan



- Community-based organization (CBO) leaders warned they may be unable to complete their review until their separate contract is approved and underway to conduct outreach on the report.
- Consistent reporting to CBOs in support of ongoing advocacy and outreach efforts
- Document translation- Spanish translation should be considered for all documents moving forward.
- Should be considerate to how much time the community may need to review documents under our their current constraints.

4. Disadvantaged Community Barriers

During the break-out sessions of the meeting, participants expressed the following existing barriers for disadvantaged communities, which should be considerations when making land use and circulation decisions in the Plan Area:

- Major infrastructure and public service/utility deficiencies
 - How can federal/state grant funding be leveraged to fund infrastructure improvements?
 - Access to electric vehicle (EV) charging stations in the County
- Access and financial accessibility to quality healthcare (i.e. hospitals)
 - Incomplete array of healthcare services provided within the County
 - Current financial strain placed on hospitals due to necessary facility improvements
 - County should consider hosting overall health education workshops
- Lack of green spaces, parks and recreation areas
- There is a significant need to address the drug dependency
- Lack of access to technology, broadband, and education on technology, including communication and skills training to leverage it.
- Generational poverty
- Significant language barriers for a high portion of the population
- Lack of existing STEM careers in the valley
 - Difficult to retain STEM professionals due to non-competitive pay compared to other regions of the state
- Difficult to retain educational and administrative staff due to non-competitive pay
 - On average, Isabel Solis has about 400 8th graders, and about a third cannot promote because their GPA is lower than 2.0. (anecdotal)
- Consideration of federal government control and involvement in water transfers
 - Address how state legislation may impact our community in a negative way (i.e. taking water away from the County – farmers out of farming)

5. Baseline Report Disadvantaged Communities Map

- Participant expressed that there are data gaps in CalEnviroScreen and census data which drove the methods of analysis
- Update the map to show Palo Verde by moving map legend
- Participants requested additional consideration of Salton City, Niland and Calipatria in identification of disadvantaged communities due to high rates of poverty and pollution

6. Overall Transformative Vision for Imperial County

- Engage world class developers willing to invest into the betterment of the population, not just the renewable energy and lithium industry
- Workforce training and development



- Train and prepare the workforce for the introduction of industry employment opportunities
- Inform the community on how to apply for grant applications to take advantage of affordable career training/education opportunities
- Vocational programs and training to include a broader age range (younger population)
- Increasing financial literacy and entrepreneurial opportunities
- Consider County-wide affordable housing programs
 - Ex.) Niland Housing Initiative: Introducing a proposed affordable housing project in Niland that is going to be the first “Green” community in the Imperial Valley. This project will feature Clean Green Technology to reduce your electric bill through energy efficient building materials, self producing micro-grid electricity to power your home independent of the grid, streetlights and community park
 - Interest in increasing affordable, quality housing options in Niland and Calipatria
 - Education opportunities about housing procurement and investment strategies
 - Increase affordable housing opportunities and train people on how to apply for specific programs
- Community clean-ups

ACTION ITEMS

1. Download the pdf and provide comments in the PDF
2. Respond to discussion prompts
3. Send comments via email to Aida and cc County

NEXT MEETING

Land Use Alternatives EJ Working Group Meeting #3 - July 2023



Appendix B-2 Environmental Justice Working Group Meeting #3 Notes

September 2023

Created For:



Prepared By:

Falcon Strategies



**7/12/2023 9 am EJ Working Group
Meeting Notes
(conducted on Zoom)**

● **Attendees:**

- Lorna Avila
- Rosa Diaz, Imperial Valley LGBT Resource Center
- Daniela Flores, IV Equity & Justice Coalition
- Christian Torres, CCV
- Luis Olmedo, CCV
- Hector Meza, IBEW 569
- Sean Ellis, UA Local 230
- Eric Reyes, Los Amigos de la Comunidad
- Jordan Sisson, attorney
- Vincent Pollizi, Imperial Valley LGBT Resource Center
- Isabel Solis, Imperial Valley College
- David Early, PlaceWorks
- Jacqueline Rohr, PlaceWorks

● **Project Team:**

- Diana Robinson, County of Imperial Planning Dept.
- Clarissa Reyes Falcon, Falcon Strategies
- Aida Castañeda, AC Consulting
- Brian Mooney, Rick Engineering
- Shannon Baer, Rick Engineering
- Sabrina Sessarego, Rick Engineering

1. Welcome and Self-Introductions

- a. Purpose of the meeting and focus on the Land Use Alternatives, but the meeting will also include an update on the County's efforts on adopting EJ principles

2. Update from County of Imperial on EJ Principles from Diana Robinson and introduction to PlaceWorks
 - a. Presentation from David Early, Principal at PlaceWorks on drafting the County's Environmental Justice Element. Shared a working EJ statement as well as expressed incorporation of the Hemez Principles. PlaceWorks has also drafted an EJ memo that identifies historically marginalized communities in Imperial County, which will be shared with the group following the meeting. PlaceWorks wants to engage with the EJ Working Group as they progress on the EJ Element.
 - b. Comments from the EJ Working Group:
 - (Mr. Olmedo)The wording of the EJ statement is problematic and wants to help with the formation of the statement. Also wants references to EJ policies used to draft these documents.
 - The statement seems to accept harm that will be done to the surrounding communities, which does not set the right tone as it relates to environmental justice. Assumes that EJ impacts are okay.
 - The statement reads more like a planning statement rather than as a true EJ statement
 - Seems like the definition of EJ is derived from the State's definition, and does not like the assumption that people of impacted communities are poor
 - Need to be thoughtful about how to describe these communities
 - It is challenging to find organizations online that include EJ definition, only from government and academic entities
 - Question about the Baseline Report and deadline for comments, and release of the final report
 - Shannon Baer responded that comments were due at the end of June, but will accept additional comments. However, they must be turned in as soon as possible as comments are being cooperated to the final Baseline Report. The final report is anticipated to be released in early Fall

3. Presentation of the Land Use Alternatives

- a. Included a preamble on release of the alternatives, announcement of upcoming community workshops, and opportunity for the EJ Working Group members to provide initial reactions and feedback.

Comments will be accepted until mid-August

- b. Rick Team provided the overview of each of the three alternatives maps, which incorporates planning documents from the County, IID and other agencies

- c. Comments and Questions from the EJ Working Group:

- Was the New River, which is highly polluted and feeds into the Salton Sea, considered in drafting the alternatives?
 - Yes
- The gray/black boundaries need to be more visual
- There needs to be education of land use definitions when presenting to the public
- Question: Have the landowners near the Salton Sea been consulted, especially landowners who operate water-dependent industries, such as agriculture
 - Landownership was assessed and IID was consulted as well as farmers for awareness of the potential uses of their properties from nearby lithium extraction and processing
- How does the plan incorporate housing for all the jobs that will be generated?
 - The Specific Plan should help inform the County of future housing and other land use needs
- With all the potential activity, will there be a need for additional landfill capacity?
 - That was not considered in the alternatives but the perhaps the County may assess the need
- The community opportunity area identified in the alternatives are too small and should be 10% of the land area especially since the communities will be impacted
- What can we expect for materials other than the maps?
 - The final PEIR will be a comprehensive document

- The group was interested in obtaining the recorded meeting

4. Final Comments and Next Steps

- a. After comments are incorporated in the alternatives, a preferred alternative will eventually be selected to be incorporated in the Specific Plan
- b. Next meeting forthcoming



Appendix C Workshop #2

Exhibit Images

September 2023

Created For:



Prepared By:

Rick Engineering Company

Green Industrial

Goal: Promote industrial operations that work toward decarbonizing the energy industry

Possible Allowed Uses:

- Renewable Energy Operations
- Biofuels
- Green Hydrogen
- Lithium Extraction
- Innovative Symbiotic Production of Materials

there is willing and able young folks in Sultan City that need rides to training and work

allow supportive commercial / residential plants



Engagement Questions

1. What other types of uses should be included or excluded in this land use designation?
2. Are there any issues or opportunities you see with applying this land use designation in the Specific Plan Area?

Renewable Energy

Goal: Support the safe and orderly development of renewable energy

Possible Allowed Uses:

- Renewable Energy Operations
- Solar
- Wind
- Hydropower
- Electric Transmission Facilities



Engagement Questions

1. What other types of uses should be included or excluded in this land use designation?
2. Are there any issues or opportunities you see with applying this land use designation in the Specific Plan Area?

Industria Sustentable

Objetivo: Promover actividades industriales que trabajen para descarbonizar la industria energética

Posibles Usos Permitidos:

- Operaciones de Energía Renovable
- Biocombustibles
- Hidrógeno Verde
- Extracción de Litio
- Producción Simbiótica Innovadora De Materiales



Preguntas Para Lograr El Compromiso Sustentable

1. ¿Qué otros tipos de usos deben incluirse o excluirse en esta designación de uso de suelo?
2. ¿Hay algún problema o oportunidad con aplicacando esta designación de uso de suelo en el Área del Plan Específico?

Energía Renovable

Objetivo: Apoyar el desarrollo sostenible y ordenado de las energías renovables

Posibles Usos Permitidos:

- Operaciones de Energía Renovable
- Solar
- Energía Eólica (Viento)
- Energía Hidroeléctrica
- Instalaciones de Transmisión Eléctrica



Preguntas Para Lograr El Compromiso Sustentable

1. ¿Qué otros tipos de usos deben incluirse o excluirse en esta designación de uso de suelo?
2. ¿Hay algún problema o oportunidad con aplicacando esta designación de uso de suelo en el Área del Plan Específico?

Manufacturing

Goal: Support downstream assembly of clean energy goods and bi-products, that provide quality jobs

Possible Allowed Uses:

- Limited Industrial Operations
- Processing, Assembling and Packaging of Materials or Products
- Research and Development
- Technology Business Parks
- Data Centers



Engagement Questions

1. What other types of uses should be included or excluded in this land use designation?
2. Are there any issues or opportunities you see with applying this land use designation in the Specific Plan Area?

Are we going
hire centers as
well?

will we have "public"
supplies
coming in EV
to Summit and CA
needs pushed by
the demand?

BUS SERVICE IN
COMMUNITIES
that meet @ a
certain time &
take employees to
their shifts @
thermal plants

Logistics

Goal: Support the downstream supply chain of manufactured products for distribution to the rest of the country

Possible Allowed Uses:

- Logistics Warehouse Operations
- Storage, Management, and Distribution of Products
- Ancillary Office and Employee Facilities



Engagement Questions

1. What other types of uses should be included or excluded in this land use designation?
2. Are there any issues or opportunities you see with applying this land use designation in the Specific Plan Area?

Transportation Hub

Goal: Provide a central location for the exchange of cargo and goods

Possible Allowed Uses:

- Storage for Transportation Equipment
- Intermodal Transportation Facilities

Engagement Questions

1. What other types of uses should be included or excluded in this land use designation?
2. Are there any issues or opportunities you see with applying this land use designation in the Specific Plan Area?

Someone thought
that there
was a BATTERY
factory already by
Benny proposed on
Duffin in City
of Braintree?
look into it.

Manufactura

Objetivo: Apoyar el ensamblaje de bienes y subproductos de energía limpia, que proporcionen empleos de calidad

Posibles Usos Permitidos:

- Operaciones Industriales Limitados
- Procesamiento, Ensamble y Empaque de Materiales o Productos
- Investigación y Desarrollo
- Parque Empresarial Tecnológico
- Centro de Datos



Preguntas Para Lograr El Compromiso Sustentable

1. ¿Qué otros tipos de usos deben incluirse o excluirse en esta designación de uso de suelo?
2. ¿Hay algún problema o oportunidad con aplicacando esta designación de uso de suelo en el Área del Plan Específico?

Logística

Objetivo: Apoyar la cadena de suministro de productos manufacturados para distribución al resto del país

Posibles Usos Permitidos:

- Operaciones Logísticos de Almacén
- Almacenamiento, Gestión y Distribución de Productos
- Oficinas Auxiliares y Centros de Empleo



Preguntas Para Lograr El Compromiso Sustentable

1. ¿Qué otros tipos de usos deben incluirse o excluirse en esta designación de uso de suelo?
2. ¿Hay algún problema o oportunidad con aplicacando esta designación de uso de suelo en el Área del Plan Específico?

Centro de Transporte

Objetivo: Proporcionar un centro para intercambio de carga y bienes

Posibles Usos Permitidos:

- Almacenamiento para Equipaje de Transporte
- Instalaciones de Transporte Intermodal

Preguntas Para Lograr El Compromiso Sustentable

1. ¿Qué otros tipos de usos deben incluirse o excluirse en esta designación de uso de suelo?
2. ¿Hay algún problema o oportunidad con aplicacando esta designación de uso de suelo en el Área del Plan Específico?

Playas Renewables & Restoration

Goal: Promote renewable energy in limited forms that is compatible with restoration efforts of the Salton Sea

Possible Allowed Uses:

- Limited Renewable Energy Operations
- Restoration of Biological Resources
- Preservation of Cultural Resources
- Geotechnical Monitoring and Exploration
- Dust Mitigation and Suppression

Some points to be aware of when it comes to conservation plans.

Incorporate it into work w/ existing habitat restoration projects.

Where habitat has wildlife project areas with the sea if the rate sea is receding?



Engagement Questions

1. What other types of uses should be included or excluded in this land use designation?
2. Are there any issues or opportunities you see with applying this land use designation in the Specific Plan Area?

I think it's very important for us to consider Playas resources & restoration in our future plan. We need to have a clear vision of what we want to see.

Balance building wildlife habitat along shore as a safe place for it.

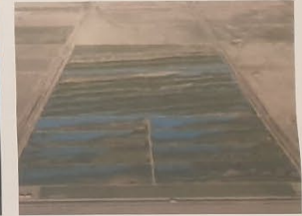
to serve as dust barrier to adjacent communities.

Conservation

Goal: Strategically preserve areas for conservation, preservation, restoration, and mitigation projects

Possible Allowed Uses:

- State and Federal Land Management Operations
- Species Conservation Habitat Projects
- Preservation
- Restoration
- Mitigation



Engagement Questions

1. What other types of uses should be included or excluded in this land use designation?
2. Are there any issues or opportunities you see with applying this land use designation in the Specific Plan Area?

Playas Renovables y Restauración

Objetivo: Promover la energía renovable en formas limitadas que son compatibles con los esfuerzos de restauración del Salton Sea

Posibles Usos Permitidos:

- Operaciones Limitadas de Energía Renovable
- Restauración de Recursos Biológicos
- Preservación de Recursos Culturales
- Exploración y Monitoreo Geotécnico
- Mitigación y Supresión de Polvo



Preguntas Para Lograr El Compromiso Sustentable

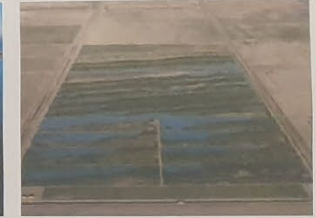
1. ¿Qué otros tipos de usos deben incluirse o excluirse en esta designación de uso de suelo?
2. ¿Hay algún problema o oportunidad con aplicacando esta designación de uso de suelo en el Área del Plan Específico?

Conservación

Objetivo: Estratégicamente preservar áreas para proyectos de conservación, preservación, restauración y mitigación

Posibles Usos Permitidos:

- Operaciones de Administración de Tierras Estatales y Federales
- Proyectos de Hábitat de Conservación de Especies
- Preservación
- Restauración
- Mitigación



Preguntas Para Lograr El Compromiso Sustentable

1. ¿Qué otros tipos de usos deben incluirse o excluirse en esta designación de uso de suelo?
2. ¿Hay algún problema o oportunidad con aplicacando esta designación de uso de suelo en el Área del Plan Específico?

Community Opportunity Areas

Goal: Support community needs for the nearby residential areas while providing supportive use for the workforce and incoming industry

Possible Allowed Uses:

- Recreation
- Commercial
- Public Facilities
- Employment Center
- Mixed-Use



Engagement Questions

1. What other types of uses should be included or excluded in this land use designation?
2. Are there any issues or opportunities you see with applying this land use designation in the Specific Plan Area?

what will fund the Community Opportunity Areas?

Need to understand how the public health system will be impacted

Infrastructure for public facilities needs to be considered to meet the demand

Public Facilities need to grow along with development

Community Opportunity Areas for Hybrid

Will there be any help w/ development within the surrounding areas? (Colleges, etc.)

Housing for construction workers

Agricultural Overlay

Goal: Retain a large area as agriculture until there is a need to transition to market-driven uses

Possible Allowed Uses:

- Interim Agriculture
- Renewable Energy
- Industrial (long-term)
- Manufacturing (long-term)
- Logistics (long-term)



Engagement Questions

1. What other types of uses should be included or excluded in this land use designation?

Optional Land Use Designations

Possible Land Use Designations:

- Business Park
- Light Industrial
- Mixed Industrial
- Campus Facility

Engagement Questions

1. Are there other land use designations we should consider for the Specific Plan Area?

What is the Community Opportunity area? (more info about the area? What about the surrounding areas? (Colleges, etc.)

How many companies are involved in this big project?

Have more of these meetings for the public. Q-Can a man 75 yrs old be hired for this project?

I think it would be better to develop in the land use areas that currently are not approved for. (Commercial) Don't have a lot of land that is needed for agriculture.

How do we entice developers to build in the low populated areas? Why should we have a more diverse mix of land use designations?

What happens if all of the population growth and business stays in the incorporated areas?

Áreas de Oportunidades Comunitarias

Objetivo: Apoyar las necesidades para la comunidad en áreas residenciales mientras apoyando la fuerza laboral y industria entrante

Posibles Usos Permitidos:

- Recreación
- Comercial
- Instalaciones Públicas
- Centro de Empleo
- Uso Mixto



Preguntas Para Lograr El Compromiso Sustentable

1. ¿Qué otros tipos de usos deben incluirse o excluirse en esta designación de uso de suelo?
2. ¿Hay algún problema o oportunidad con aplicacando esta designación de uso de suelo en el Área del Plan Específico?

Housing

Hospitality
(Hotels,
Tourism
Entertainment)

Medical
Healthcare
Facilities

Access to the Sea
near Niland
Visitors consider from
Niland from Salton
port

Community amenities
provide relaxation
or better water
rates for airport &
niland

Existing amenities,
recreation, parks,
art installations
to bring in tourists
from Salton area.

Usos de Suelo Opcionales

Posibles Usos de Suelo:

- Parque Empresarial
- Industria Limitada
- Industria Mixta
- Instalación de Campus

Preguntas Para Lograr El Compromiso Sustentable

1. ¿Hay otras designaciones de uso de suelo que debamos considerar para el Área del Plan Específico?

Superposición Agrícola

Objetivo: Retener una gran área como agricultura hasta que es necesario hacer la transición a usos impulsados por el mercado

Posibles Usos Permitidos:

- Agricultura Provisional
- Energía Renovable
- Industria (largo plazo)
- Manufactura (largo plazo)
- Logística (largo plazo)



Preguntas Para Lograr El Compromiso Sustentable

1. ¿Qué otros tipos de usos deben incluirse o excluirse en esta designación de uso de suelo?

Land Use Alternatives

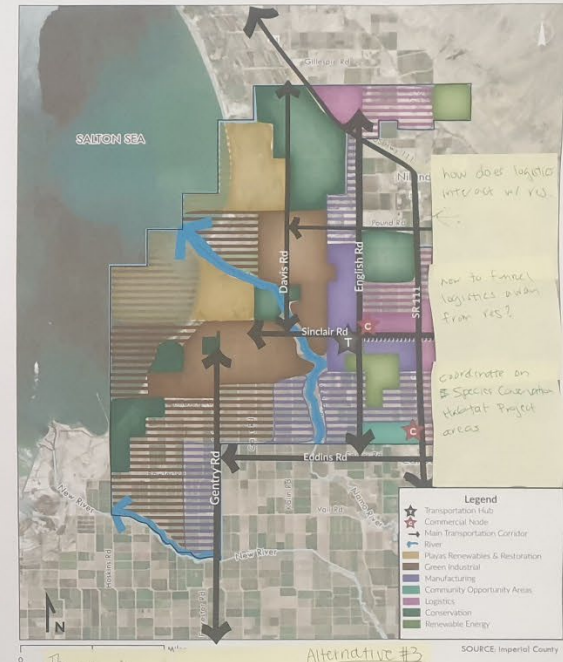
Land Use Alternative #1



Land Use Alternative #2



Land Use Alternative #3



Engagement Activities

1. Provide your comments

Usos de Suelo Alternativos

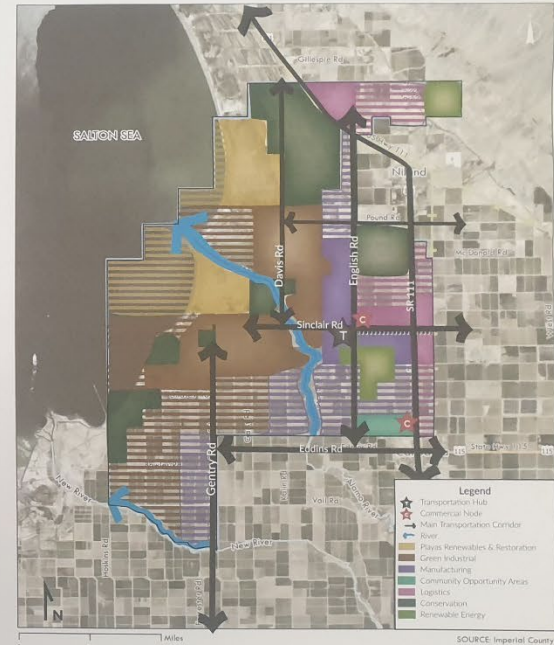
Uso de Suelo Alternativo #1



Uso de Suelo Alternativo #2



Uso de Suelo Alternativo #3



Actividades Para Lograr El Compromiso Sustentable

1. Proporcione sus comentarios y consideraciones bajo cada una de las alternativas.

Project Vision Statement

The Project Vision Statement will be the foundation to the Specific Plan to inform the Preferred Land Use Alternative, the Specific Plan policies, and the project design standards

Vision Statement Option #1

Our vision for the Lithium Valley Specific Plan is to lead in renewable energy, creating quality jobs and economic growth. We aim to improve the ecologic health of the Salton Sea, utilize responsible development practices, and enhance infrastructure and public services for the community. Together, we'll foster an inclusive region, respecting all cultures and providing diverse opportunities for a better life.

Vision Statement Option #2

The vision is a dynamic renewable energy center in Lithium Valley, leading the clean energy industry and creating equitable jobs. We aim for an improved Salton Sea's ecosystem, enhanced infrastructure and amenities, and create vibrant, inclusive communities with a better quality of life.

Vision Statement Option #3

A vibrant and inclusive region that prioritizes environmental stewardship and social and environmental justice. We aim to create quality local jobs through long-term renewable energy industries, serving as a hub for clean energy technologies while preserving natural resources and sensitive habitats of the Salton Sea. Through a collaborative process, the Project will result in enhanced infrastructure and successful public services that accommodates intentional growth.

Engagement Activities

- Place a colored dot below your preferred Project Vision Statement.
- Are there other topics the Project Vision Statement should include?

ensure public health is emphasized

is there a vision statement where the plan prioritizes the health of the community? including economic growth, renewable energy, and social justice and public services

→ #3 appears to be more centered toward EJ, which is good

Declaración de la Visión del Proyecto

La Declaración de la Visión del Proyecto será la base del Plan Específico para informar la Alternativa Preferida de Uso de Suelo, las políticas del Plan Específico y los estándares de diseño del proyecto.

Declaración de la Visión del Proyecto Opción #1
Nuestra visión para el Plan Específico de Lithium Valley es ser líder en energía renovable, creando empleos de calidad y crecimiento económico. Nuestro objetivo es mejorar la salud ecológica del Salton Sea, utilizar prácticas de desarrollo responsables y mejorar infraestructura y servicios públicos para la comunidad. Juntos, cultivaremos una región inclusiva, respetando todas las culturas y creando diversas oportunidades para una vida mejor.

Declaración de la Visión del Proyecto Opción #2
La visión es un centro dinámico de energía renovable en Lithium Valley, liderando la industria de energía limpia y creando empleos equitativos. Nuestro objetivo es para mejorar el ecosistema del Salton Sea, aumentar infraestructura y comodidades, y crear comunidades vibrantes e inclusivas con una mejor calidad de vida.

Declaración de la Visión del Proyecto Opción #3
Una región vibrante e inclusiva que prioriza la gestión ambiental y justicia social y ambiental. Nuestro objetivo es para crear empleos locales de calidad en las industrias de energía renovable, sirviendo como un centro para tecnologías de energía limpia mientras preservando recursos naturales y hábitats sensibles del Salton Sea. En un proceso colaborativo, el Proyecto resultará en infraestructura mejorada y servicios públicos exitosos que se adapten al crecimiento intencional.

Actividades Para Lograr El Compromiso Sustentable

1. Coloque un punto de color debajo de su Declaración de Visión del Proyecto preferida.
2. ¿Hay otros temas que debería incluir la Declaración de la Visión del Proyecto?



Appendix D Public Comment Letters

September 2023

Created For:



Prepared By:

Rick Engineering Company



To: Imperial County and Rick Engineering Co.
From: James J. A. Blair, Associate Professor in Geography and Anthropology
Date: August 14, 2023
Re: Comments on Lithium Valley Land Use Alternatives

Dear Colleagues:

Thank you for the opportunity to comment on the Lithium Valley Land Use Alternatives. By starting to sketch out what types of development can occur on what areas of land, these maps and presentations play an important role in spatializing the Lithium Valley vision for the public. Here are some comments on aspects of the Land Use Alternatives maps that may need further clarification or explanation:

- Controlled Thermal Resources' Hell's Kitchen project does not seem to appear as planned for development in the map shown to the community for geothermal facilities. It would be helpful to have more information on this development as well as the other BHE plants planned besides Black Rock and Elmore North to have a fuller picture of how the planning process for green industry and renewables aligns with the mineral resource licenses and geothermal development projects.
- It would be helpful to provide more detail on the distinctions between "Green Industrial," "Renewables" and "Playas Renewables." Does extraction of minerals like lithium, zinc and manganese fall under "Green Industrial" or might it also be sited in the other "Renewables" or "Playas Renewables" areas? This seems important to clarify. Mineral resources should be treated as a separate land use than renewable energy, even if they are adjacent to one another.
- "Playas Renewables" may or may not be compatible with ecological restoration and protection of cultural resources. The slide for the community workshop lists "underground wells, pipes, and raised structures to support geothermal energy production." Does "raised structures" include geothermal energy plants? What is the risk of developing onto the shoreline given the long history of the fluctuating level of the Salton Sea (Lake Cahuilla)? Does this plan require that the Salton Sea continue to recede permanently? How might this exacerbate or mitigate the public health problems associated with dust pollution? And how does this plan for "Playas Renewables and Restoration" correspond, or not, to the CNRA's long range plan for restoration?
- It would be very helpful to provide more information and maps on existing and planned infrastructure development for urban areas, canals, water rights, wastewater, solid waste and other facilities. In addition to general urban infrastructure, the maps could include health and childcare facilities, emergency response services, as well as research, education, and training. If these related development projects are outside the Study Area then it may require expanding the Study Area.

3801 West Temple Avenue, 5 – 144 Pomona, CA 91768
Telephone: (909) 869-5085 E-mail: jblair@cpp.edu

- Given the need for affordable housing and employment in the area, it seems important to provide an idea of how this development project will help resolve these problems. Ideally, the land use alternatives would include affordable housing rather than leaving it to the surrounding cities. Projected job numbers are provided in the community presentation in the aggregate, but these are far higher than what some companies have been reporting to receive state tax incentives. It would be helpful to clarify what the projected job numbers would be for each land use, broken down by the timescale of temporary construction versus long-term operations and maintenance.
- The Community Opportunity Area/s should be proportionate to the scale of development, so if there is more development then there should be more community opportunity, not less. It may be a significant portion of land, but the current designated Community Opportunity Areas appear rather small in comparison to the overall development in the Study Area. While the area could still be increased, map 2 seems to have the most logical spatialization of the community opportunity areas with commercial hubs near both Niland and Calipatria. This planning may need to adapt to the outcomes of community benefits negotiations between the community coalition and developers.
- It may not be desirable to site Manufacturing and Logistics industries adjacent to the Community Opportunity Areas, especially if the latter will host recreation areas or health and childcare facilities catering to families. Diesel truck traffic and idling would make the area vulnerable to air pollution, exacerbating already existing local afflictions of asthma and lung disease.
- The public transportation hub/s should be planned separately from the truck and rail infrastructure for logistics. Public transportation hubs would be ideally located in proximity to affordable housing. Another option would be to site two public transportation hubs near the commercial hubs in maps 2 and 3. The commercial hubs close to Niland and Calipatria in map 2 seem more logical than the one commercial hub centered in the logistics/manufacturing area in map 1 or the lack of a commercial hub or community opportunity area in Niland in map 3. Planned charging infrastructure should align with plans that already exist for charging hubs in the area, such as Comite Civico Del Valle's First 40 EV Charger Campaign.
- As for the truck and rail infrastructure, if the goal is to build an inland port for logistics, then there needs to be heavy duty truck charging infrastructure with early adoption of electric trucks to minimize local air pollution from diesel fuel. This would be consistent with what is happening at the Port of Long Beach, which just had the grand opening of the nation's largest public heavy-duty charging depot. These may be some of the same trucks that will be intended to transport goods to and from Imperial County, so it would be prudent to install charging infrastructure early as part of a goods transportation hub. Lithium Valley should not just produce battery materials and manufacture batteries for distant consumers. Localized charging infrastructure for both EVs and heavy duty trucks would help maximize benefits and minimize burdens of electrified transportation.
- As we have discussed, it may be worthwhile to consider synergistic solutions that may couple agriculture with renewable energy like agrivoltaics or floatovoltaics in the agricultural overlay areas with hybrid zoning. The infrastructure development required for these and other development projects should account for and protect threatened biological resources like burrowing owls. It would also be helpful to consider what effects these alternatives might have

on the current migrant farmworker labor force that may not be eligible for employment in Green Industry or Renewables.

- In addition to Obsidian Butte, there are other high sensitivity Cultural Resources to consider, including: mud pots (old and new, as well as the ones near Mundo), Red Hill Park and Red Island Volcano, Rock Hill, and the moving mud spring (Niland geyser). This list is not comprehensive, but these are all features of Indigenous ancestral territory that are in the process of being registered as the Southeast Lake Cahuilla Active Volcanic Cultural Area.
- In the Land Use Alternatives maps, Cultural Areas listed above should be distinguished from “Conservation.” It should be clarified for community members how Conservation Areas were selected, whether they overlap with current nature reserves or recreation areas or if they are intended future designations.

Thank you again for the opportunity to provide comments on these land use alternatives. Please let me know if you have further questions. I look forward to more opportunities to serve as a member of the Academic Task Force during the drafting of the Specific Plan and Programmatic Environmental Impact Report (PEIR).

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Blair', is positioned above the printed name.

James J. A. Blair

College of Liberal Arts and Sciences
Department of Geography

Post Office Box 751 503-725-3165 tel
Portland, Oregon 97207-0751 acantor@pdx.edu

To: Imperial County and Rick Engineering Co.

From: Alida Cantor, Associate Professor in Geography, Portland State University

Date: August 14, 2023

Re: Comments on Lithium Valley Land Use Alternatives

Thank you for the opportunity to comment on the proposed Lithium Valley Land Use Alternatives. Below are some comments on the Land Use Alternatives maps, including some points where further clarification may be needed.

- **Land use planning should take into account future water availability:** The land use alternatives should take into consideration how future water availability scenarios may shape feasibility of different uses. Water availability is likely to be a barrier to development looking forward, given the 2023 Colorado River agreements as well as the broader picture of water scarcity under forward-looking climate change scenarios.
- **Playas Renewables:** It is somewhat unclear how this designation differs from Green Industrial and Renewable Energy. It is also possible that there may be tensions between the goals of “restoring biological resources and preservation of cultural resources” and “promoting renewable energy”: if there are instances in which these two goals are contradictory, how would decisions be made and how would these tensions be navigated?
- **Community Opportunity Areas:** The three plans would be more comparable if similar sized areas were set aside as Community Opportunity Areas in each plan; instead, Land Use Alternative 3 has a much smaller Community Opportunity Area. Moreover, all “community” oriented facilities appear to be considered only under the Community Opportunity Area designation, which includes all public facilities as well as commercial areas. Combining all these uses into one category does not guarantee that adequate space will be given to public spaces vs private ones. Additional space may also be necessary for educational facilities, civic and public areas, parks, and other public spaces.
- **Interim Agricultural Overlay:** The time frame for transitioning the Interim Agricultural Overlay is not specified; while this obviously provides helpful flexibility, it also makes it difficult to know when this would be transitioned, to what use(s), how decisions would be made, and what the community input process might be for that transition.

- **Housing and jobs:** Importantly, the plan does not consider (affordable) housing, which will be necessary given the number of jobs expected to be created. It is unclear what proportion of the jobs are short term or long term, which could impact the type of housing and other types of development required.

Thank you for the opportunity to provide comments. I look forward to engaging further as a member of the Academic Task Force.

Sincerely,

A handwritten signature in blue ink, appearing to read 'ACANTOR' with a stylized flourish at the end.

Alida Cantor, Ph.D
Assistant Professor
Portland State University Department of Geography
acantor@pdx.edu



September 11, 2023

County of Imperial
940 W. Main St., Suite 208
El Centro, CA 92243

Re: Comments of Imperial Valley Equity and Justice Coalition on the Draft Land Use Alternatives for the Lithium Valley Specific Plan

To all whom it may concern,

The following comment is being submitted on behalf of Imperial Valley Equity & Justice Coalition, a local community-based organization dedicated to building and fostering grassroots community empowerment and engagement across Imperial Valley. This comment is in regard to the proposed Land Use Alternatives for the Lithium Valley Specific Plan that were presented at Community Workshop #2 on July 19-20, 2023. In these comments we raise key environmental justice concerns of how these land use alternatives will impact our communities in Imperial Valley.

The term, "Green Industrial," featured in the county plan, is cause for concern due to its ambiguity. The term "green" lacks technical precision and uniformity in meaning, and the proposed terminology of "green industrial" lends itself to confusion about exactly what industries are being proposed in this land use. Thus, we recommended that this terminology be simplified to "industrial." This change aims to provide greater clarity in defining the nature of industrial activities within the region.

Furthermore, we are very concerned about the inclusion of biofuels and green hydrogen within the scope of the Lithium Valley specific plan. We ask that the county provide an explanation of how these industries are related to the goals of lithium development. SB 125 Section 8 (c) 1 provides: "Three million eight hundred fifty thousand dollars (\$3,850,000) to prepare the county's programmatic environmental impact report and a health impact assessment, and to support community outreach for geothermal energy development and lithium extraction, processing, production, and related manufacturing activities within the county." Unless these industries are specifically related to the goals of geothermal and lithium development, they should not be included in the specific plan. We argue that such inclusions could have unintended consequences, including emissions that would exacerbate local pollution and contributions to climate change. It is crucial to reevaluate whether these elements genuinely align with the goals of Lithium Valley and the well-being of our community.

Next, the county plan introduces the concept of "Playa Renewables and Restoration" as a single land use category. However, we are concerned that this approach does not adequately distinguish between renewable energy infrastructure and restoration efforts. We argue that grouping these two distinctly different concepts could lead to an asymmetric balancing of the two, to the detriment of "restoration" efforts. To demonstrate sincere commitment to restoration uses, the plan should distinguish "Playa Renewables" and "Restoration" as distinct land use categories. This will be especially important for ensuring the protection of cultural resources such as Obsidian Butte.

We are also concerned about the "Interim Agricultural Overlay," which implies a transition from agriculture to industrial use. This assumption prompts questions about its economic impact. To create a comprehensive understanding of the consequences, it is essential to conduct a thorough economic analysis that examines the potential effects on both the local economy and the workforce. How much agricultural land will be transitioned to industry, and by what date? How many local jobs will be lost to this transition?

Additionally, the plan's potential impact on the Salton Sea, primarily fed through agricultural runoff, demands explicit attention in the land-use plan. Given the significance of the Salton Sea to the public health of residents, it is crucial to conduct an in-depth environmental assessment to gauge the consequences of any proposed changes. Plans for the rezoning of agricultural lands should be informed by an understanding of its potential environmental impact to the Salton Sea and related impacts to air quality and public health.

The plan outlines the development of both an "Industrial Transportation & Rail Hub" and a "Public Transportation Hub." While these components are distinct in purpose, they require vastly different infrastructure development and have diverse environmental impacts. We note that the public transport aspect appears to be an afterthought within the plan's outline. Sufficient attention must be given to the planning and development of this public transport as well. To address this concern, it is essential to recognize the unique requirements of public transportation in Imperial Valley. By prioritizing the development of a robust and community-oriented public transportation system, we can enhance mobility and reduce the environmental impact of industrial transportation.

The current county plan offers a limited selection of only three land use alternatives for consideration. This restricts community involvement and stifles creative solutions to our region's challenges. To ensure a more inclusive and representative planning process is enacted, it is recommended that the community be allowed to propose additional alternatives. This would enable a broader range of perspectives and ideas to be considered, fostering a more robust and adaptable plan. We are concerned that only three land use alternatives have been presented for community engagement. Are there other alternatives being considered? How will community input be incorporated into revised land use alternatives?

Finally, we would like to propose that the county consider analyzing a “lower impact” alternative, where community opportunity zones and conservation efforts are maximized, with a reduced land use area for industrial and manufacturing. While economic development is crucial, striking a balance with conservation is equally important for the long-term well-being of Imperial County. By prioritizing both economic growth and environmental stewardship, we can create a plan that benefits the entire community.

The current county plan for Imperial County holds great potential, but it requires careful consideration, a careful and clear commitment to conservation, and adjustments to address the concerns and recommendations raised by concerned residents. By specifying terminology, refining land use categories, conducting thorough analyses, addressing discrepancies, expanding community involvement, and prioritizing conservation, we can work together to create a more cohesive and sustainable plan that reflects the aspirations and needs of Imperial County's diverse communities.

Respectfully submitted,

Daniela Flores, MPH
Executive Organizer
Imperial Valley Equity and Justice Coalition
dflores@ivequityjustice.org



August 14, 2023

Shannon Baer
Rick Engineering Company
sbaer@rickengineering.com

Lithium Valley Land Use and Development TAG, Preliminary Land Use Alternatives

Dear Shannon,

Controlled Thermal Resources (US) Inc. (CTR) via its subsidiary Hell's Kitchen Geothermal, LLC (HKG) proposes the construction and operation of a geothermal power facility (HKP1) and commercial lithium hydroxide production plant (HKL1), together referred as proposed project for Stage 1. HKP1 involves the development of a geothermal power plant that will produce up to 49.9 megawatts (MW) net of geothermal power. HKL1 proposes to develop mineral extraction and processing facilities capable of producing lithium hydroxide, silica, bulk sulfide, and polymetallic products for commercial sale. HKG is currently processing Stage 1 under Conditional Use Permit #21-0020 PowerCo1 and #21-0021 LithiumCo1 with Imperial County Planning and Development Services Department.

HKG also has a conceptual projection of further developing stages (Stages 2-7), the propose use would anticipate geothermal and mineral production, pCAM, CAM, and battery manufacturing and recycling activities.

Land Use Alternatives

Upon review of the Proposed Land Use Alternatives maps, the proposed land use within HKG Stage 1 project area and conceptual further stages falls within the Playas Renewables and Restoration Land Use. The proposed Playa Renewables and Restoration Land Use would not meet CTR's Stage 1 or further stages development goals, the reason is because the Playa Renewable land use would limit the use of the land towards a land dedicated for restoration and conservation with low impact geothermal activities rather than an industrial use that would include geothermal, mineral extraction, processing and manufacturing facilities. Stage 1 does propose an area for restoration within Assessor Parcel Number 003-220-016, however as previously mentioned, the geothermal/industrial use is essential for the project development as well.

Additionally, the Playa Renewables and Restoration Land use may be differing with Goal 4, Objectives 4.1. and 4.2 of the Imperial County Renewable Energy and Transmission Element (<https://www.icpds.com/assets/planning/renewable-energy-and-transmission-element-2015.pdf>), under page 26, the Renewable Energy and Transmission Element prioritize the Salton Sea exposed playa for renewable energy development and encourage the development of these facilities when they contribute to the reduction of airborne pollutants created by exposure of the seabed as it recedes:

“...Objective 4.1: Prioritize the Salton Sea exposed seabed (playa) for renewable energy development...”

“...Objective 4.2: Encourage the development of renewable energy facilities that will contribute to the reduction or elimination of airborne pollutants created by exposure of the seabed of the Salton Sea as it recedes...”

With the development of Stages 1-7, CTR would contribute to the reduction of airborne pollutants created by the exposed seabed of the Salton Sea as the project includes buildings and paved roads, landscaping and mitigation/restoration areas and other dust mitigation reduction actions per Imperial County Air Pollution Control District requirements.

Industrial Land Use and Onsite Mitigation

The Clean Water Act requires compensatory mitigation for the purpose of offsetting unavoidable impacts into wetlands and aquatic resources, to comply with this requirement there are three types of mitigation mechanisms, under the permittee-responsible mitigation mechanism option, the mitigation may occur at the site of the permitted impacts or at an off-site location within the same watershed. If the proposed Industrial Use allows for a more flexible use that includes restoration, it would facilitate compliance with the Clean Water Act by allowing mitigating unavoidable impacts on site.

General Comments (for all Alternates):

- Road names difficult to read. Please bring to front and make more legible.
- Suggest to show Salton Sea recession over time.
- Suggest to add existing rail to legend. Bring linework for existing rail to front and modify color so it is easier to see.
- Suggest adding proposed rail extensions to legend (very difficult to see).
- Main transportation corridor categories can be distinguished. Perhaps subsequent land use alternatives will show more obviously proposed rail extensions or which roads will follow typical designations such as primary, secondary, tertiary etc.
- Playas Renewables and Restoration land use category can be further studied and understood with Salton Sea recession.
- Recommend to study both N-W AND E-W rail spur to create ‘loop’ (see attached mark up).
- Consider co-locating secondary Commercial Node with community benefit area.
- Unclear about amount of land use designated to ‘Renewable Energy.’ Please provide explanation on why land use size (possibly too low?).
- Consider adding healthcare/hospital to Community Benefit area.
- Consider refining location of community benefit to provide public access to riparian areas.
- Seems like Logistics and Manufacturing could most often be co-located. Is there a reason why they are separate?
- Overlay Geothermal resource areas on all maps. It is possible that some/all LU Alternatives do not accurately capture known Geothermal resources, allowing specific plan to project accordingly.

- Industrial land use description should also clarify that permitted uses of Manufacturing Land Use will also be included under this category as they represent a lesser impact.
- Recommend another round of comments on Land Use Alternative update.

Alternative 1:

- Logistics should be co-located with Transportation Hub for easier distribution.

Alternative 2:

- Transportation Hub and Commercial Node missing from map.

Alternative 3:

- Positive to locate Transportation Hub and Commercial Node close to each other.
- Addition of 'Industry' to playa zone potentially positive and more reflective of future land uses.
- Why is agricultural overlay completely absent from this alternative?
- North-South transportation corridor adjacent to CTR's project area is labeled as "Wister Rd." however it should be corrected to "Davis Rd."

Preferred Alternative

CTR's preferred alternative would be Alternative #3 with the following comments:

- Consider including all CTR's Resource Area into Industrial Land Use (attached map). CTR's boundary area within Playa Land Use would limit the project development negatively, since Playa Land Use does not allow for Industrial development.
- Consider providing further flexibility on Industrial Use to allow for restoration on site if required by the project.
- Proposed corridors on Alternative #3 Map would be beneficial for CTR's material distribution and logistics using Pound Road and Davis Road as immediate roads adjacent to the project area. Attached markups map on Alternative #1 on possible rail/transit extension to connect existing may also be beneficial for future distribution.
- While this option is the preferred Land Use alternative for CTR, further development and input would be desired.

Alternatives #1 and #2 zoned CTR's project area within Playas Renewable and Restoration Land Use, as mentioned previously, this proposed land use would obstruct CTR's goals of developing facilities for geothermal and mineral production, pCAM, CAM, and battery manufacturing and recycling.

Kind Regards

Sergio Cabanas, EHS Director

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Julie Johnstone

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Attachments:

Hell's Kitchen Resources Area Map (Digital Shapefile)

N-W AND E-W rail spur markup Map

MEMORANDUM

DATE: August 14, 2023

TO: Jim Minnick, Planning Director for Imperial County

FROM: Toni Symonds, member of the Academic Task Force to the Lithium Valley Specific Plan and the CCV Environmental Technical Advisory Group

RE: Alternative Land Uses

Thank you for this opportunity to provide input into the development of the Lithium Valley Specific Plan and Program Environmental Impact Report.

Section I. General Comments

- **Evaluating Land Use Options:** When evaluating various land uses, it's crucial to have a list of standards, preferences, and presumptions that guide the creation of potential possibilities. Nevertheless, in the instance of the Lithium Valley Specific Plan, the exploration of alternative land uses is happening concurrently with the community engagement discussion of the vision and objectives for the Specific Plan Area (SPA). Section II includes suggestions for establishing a vision and objectives for the SPA. These objectives can also be used together with the eight factors outlined in the Community Meeting Slide 19, which states that the selection of alternative land uses was developed in consideration of the following:

1. Environmental Impacts
2. Economic benefits
3. Jobs created
4. Community benefit funds raised
5. Land consumption
6. Water consumption
7. Traffic loads on major corridors
8. Proximity to EJ communities
9. Ability to address community needs

The public engagement, including the review by Task Force members, would have been enhanced had data related to these nine criteria been available.

- **Infrastructure Upgrades Needed to Actualize Lithium Valley Plan:** With the exclusion of the Conservation Areas, all areas within the Specific Plan should have Urban Area designations, which will facilitate the ongoing, orderly, and streamlined development of the full level of urban services, in particular public water and sewer systems, drainage improvements, street lights, fire hydrants, and fully improved paved streets with curbs, and sidewalks. The purpose of this designation is multifold:
 - As provided for in the Land Use Element of the Imperial County General Plan, the Urban Area designation is appropriate for areas surrounding incorporated Calipatria and the unincorporated community of Niland as they will eventually be annexed or incorporated.
 - Government Code Section 65451 requires a specific plan to include the “proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage,

water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan.”

○ Impediments to build out of the SPA include:

- The lack of sufficient infrastructure and water has been identified in multiple venues as an impediment to the development of the SPA. According to the Blue Ribbon Commission, “Beyond costs, other considerations that will affect the ability to expand geothermal development in Imperial Valley are based on infrastructure limitations, primarily due to the availability of transmission and water.” To address this need, the Blue Ribbon Commission approved a motion on November 17, 2022, to “accelerate state planning for investment and upgrades in transmission for geothermal power plants in Imperial Valley to be online in 2024 and over the next decade.”
- The Governors of California, Arizona, and Nevada agreed in May 2023 to fortify the Colorado River system with three million acre-feet of conserved water through 2026. The proposal emphasizes early and significant contributions to Lake Mead and Lake Powell, which will have downstream impacts on communities, Tribes, and agriculture.

None of the three land use alternatives specifically identify areas to accommodate these enhanced infrastructure requirements.

- **Total Land Use for Renewables:** Three land-use categories permit renewable energy-related uses. These categories include "Green Industrial," "Renewables," and "Playas Renewable Restoration." While the "Playas Renewable Restoration" category only allows for "low impact" renewable energy, the fact that all three categories authorize renewable energy uses results in a land use map weighted differently than it may appear upon initial review. When aggregated, Alternative #1 permits up to 41% of the land within the study areas for renewable energy, Alternative #2 permits 44%, and Alternative #3 permits 53%.
- **Agricultural Overlay vs Transitional Zoning:** There appears to be minimal differences between the Agricultural Overlay and the Transitional Zoning designations during Phase One of the buildout of the Specific Plan. However, there are differences in how overlay and transitional zoning designations may apply. Clarifying and harmonizing these land use designations for the SPA would be helpful, including making related modifications to the General Plan, should that be appropriate for the success of Lithium Valley.
- **Transportation Hub:** There should be clarification regarding the purpose of the Transportation Hub in each land use alternative. Is it meant to function as a multimodal logistics hub to enhance the transfer and distribution of goods between producers, manufacturers, trucks, and rail? Or is it meant to serve as a Transportation Hub to aid workers, tourists, and the community in moving around the county or region? Avoid the combination of these two transportation goals and accomplish each of them separately with the SPA.
- **Job Numbers:** It's important to categorize job numbers into short-term construction and permanent jobs. For the permanent jobs, it would be beneficial to divide them into different wage buckets based on proposed land uses such as manufacturing, green industry, renewable energy, and logistics. The Draft Baseline Report provides various models that can aid in this analysis.
- **Missing Categories of Land Use:** Some land use categories need to be added to the SPA. These include research facilities to support public and privately funded innovations in renewable energy and environmental restoration. Education and training facilities are also needed to help the local workforce improve their skills. There should also be civic spaces to highlight Imperial County's position as a

world-class leader in renewable energy, including lithium extraction and processing. Health facilities are necessary to serve those who work in the area, as well as businesses and community members near the geothermal power plants and DLE facilities. Furthermore, it would be beneficial to have community facilities designated for the county sheriff and fire departments.

- World-Class Research Facilities:** For Imperial County to fully utilize its lithium extraction potential, the county needs sustained research and development capacity. The Blue Ribbon Commission on Lithium Extraction recommended establishing the Southeast California Economic Zone to, among other things, attract public and private R&D investments into the Salton Sea Region (Recommendation 3). To support this effort, appropriate locations for public/private research facilities should be included in the SPA. Additionally, Recommendation 4 of the Commission calls for increased funding and identification of alternative funding sources for research and development, start-up companies, and lithium battery and component manufacturing and recycling, focusing on environmentally preferable methods. R&D facilities within the study area would also support Recommendation 5, which calls for collaboration across the lithium supply chain by creating networks and forums that bring together business, research, Tribes, communities, and government agencies to identify economic opportunities.
- Workforce Training Facilities:** During Blue Ribbon Commission meetings, residents from Salton Sea communities shared their concerns about being historically excluded from educational and employment opportunities and their concerns that this would again happen as the area prospers through lithium production. While increased funding is important, it would also be helpful to establish training facilities within the SPA. This would allow existing and potential local workers to improve their skills and knowledge, leading to faster development. [Page 69 of the Blue Ribbon Commission. 2022. “Transcript of the February 24, 2022, Blue Ribbon Commission Meeting.” <https://efiling.energy.ca.gov/GetDocument.aspx?tn=242478&DocumentContentId=75981>.]
- Housing:** According to the chart below, there are 650 residential units/mobile homes within the SPA. The Land Use Element of the Imperial Country General Plan calls for a broad range of residential, commercial, and industrial uses to be included within Urban Areas. Given how challenging it is for communities to access affordable housing, it is not clear why no accommodations for affordable housing can be made with the SPA.

Table 2-3, Study Area SCAG Existing Land Use Distribution (Acres)		
Land Use	Acreege	Percent of Study Area
Agriculture	31,875	61.6%
Water	13,206	25.5%
Open Space and Recreation	1,958	3.8%
Vacant	1,609	3.1%
Transportation, Communications, and Utilities	1,553	3%
Mobile Homes and Trailer Parks	325	0.6%
Industrial	299	0.6%
Rural Residential	166	0.3%
Single Family Residential	159	0.3%
Facilities	74	0.1%
Commercial and Services	15	0.03%
None	548	1.1%
Total	51,786	100%

Source: Southern California Association of Government (SCAG) 2019 Annual Land Use Distribution

Section II. Comments Toward Creating a Vision and Goals for the Specific Plan

As discussed in Section I, General Comments, community vision plays a vital role in considering the strengths and weaknesses of alternative land uses. Undertaking feedback on project vision and land uses concurrently may result in an incomplete understanding of the public's perspective. Nevertheless, below are suggestions for establishing a vision and objectives for the SPA.

- **Renewable Leader:** Imperial County has become a world-class center of innovation and research related to net-zero emission and environmentally restorative renewable energy production, with the crown jewel being world-class research and conference facilities located near the geothermal power plants and DLE facilities.
- **Environmental Justice:** Developing the SPA brings a new approach to traditional extraction methods. It prioritizes the needs and interests of the community impacted by the development. This is achieved using participatory budgeting models, community benefit agreements, and other tools that provide resources and opportunities.
- **Quality Jobs for Local Workforce:** The SPA development creates thousands of high-road, quality jobs. Due to proactive engagement with Imperial County residents, comprehensive support has been provided to enable the local workforce to take advantage of these job opportunities.
- **Distinctive Community Identity:** The development of the SPA aims to incorporate physical features, such as urban green spaces and building design standards, to prevent the area from being a stark, industrialized complex of nondescript buildings. Lithium Valley will become a center of innovation and creative thinking to help the world transition to a net-zero emission economy. [*Consistent with Imperial County Land Use Element of the General Plan - Objective 3.12 and Objective 4.2*]
- **Proactive Rather than Reactive Infrastructure Development:** The development of public services within the SPA is built in anticipation of business needs, remediates deficiencies in adjacent areas, and prepares the way to consolidate the regional infrastructure systems. Due to the national security requirement for lithium, traditional land use policies should be modified. [*Consistent with Imperial County Land Use Element of the General Plan - Objectives 3.13, 8.3, and 8.4*]
- **Global Logistical Hub:** The development of rail service for goods movement enhances the region's capacity to serve as a global logistical hub, including aligning with compatible goals and objectives through the Gateway Specific Plan Area.
- **Healthy Community:** The proposed development shall not adversely impact public health.
- **Conservation Commitment:** The proposed development shall not adversely impact water quality, natural habitat, and visual benefits of the Alamo River and New River.

Section III. Issues to be Addressed Through Land Use Designations

Below are a selection of issues the land use designation should address.

- Providing sufficient infrastructure, especially transmission and water, to support the expansion of geothermal and renewable energy production.

- Addressing existing and continuing health impacts of the receding Salton Sea.
- Developing a SPA program of implementation measures, including regulations, programs, public works projects, and financing measures necessary to carry out a successful, equitable, and just buildout of the SPA.
- Providing safe access and circulation for future development, including workers, community members, businesses, trucks, rail, and emergency vehicles.
- Providing public services to future commercial, industrial, manufacturing, renewable energy, and logistic-related facilities.
- Protecting property from potential flooding hazards.
- Complementing and enhancing the scope and capacity of the county to serve as an Inland Port, logistics center, and international trade powerhouse.
- Providing a competitive environment for attracting private investment to support the buildout of the SPA.

Section IV. Land Use Scenarios

- **Missing Land Use Designations:**

- Designations appropriate for research facilities to support public and privately funded innovations in renewable energy and environmental restoration.
- Designations appropriate for education and training facilities to support the upskilling of incumbent workers and the local workforce.
- Designations appropriate for civic space to support Imperial County’s dominance as a world-class leader in renewable energy, including lithium extraction and processing.
- Designations appropriate for health facilities to serve the workers, businesses, and community members adjacent to the study area and near the geothermal power plants and DLE facilities.
- Designations appropriate for community facilities to accommodate county sheriff facilities, fire departments, and other emergency response service facilities.

- **Land Use Scenario #1 Comments**

- **Combine Ag Overlay with Updated Permanent Zoning Identified:** It is important for the “Agricultural Overlay” to have an approved secondary zoning use to ensure consistency in land use over the next 20 to 50 years. Consider a combined/hybrid agricultural overlay with the underlying transition zone already designated. Secondary or longer-term underlying zoning allows for a smoother transition to the County’s long-term vision, increases the land’s value for potential manufacturing or industrial use, and promotes a more beneficial community benefit agreement.
- **Add Transportation Hub in Support of Commercial Center:** A transportation hub that caters to passengers and links them to various modes of transportation, including rail, public transit, airports, and personal vehicles, should be located at the Commercial Node.

- **Good Movement Transportation Corridor:** Alternative #3 has the most comprehensive goods movement transportation corridor routes, which is an important component of the orderly buildout of the SPA. Having the terminus of a good movement corridor be a conservation area may result in pressures or unintended use of the land for incompatible transportation and goods movement-related purposes.
- **Some Portions of Conversation Areas May Have Low Impact Public Uses:** It is uncertain how the conversation areas were selected. The map shows that the land isn't currently marked as an area to avoid, like an endangered habitat. If there are compatible uses, some parts of the conservation areas around the Alamo River could be used for low-impact recreational activities. Engaging with the community about these potential uses could also increase the amount of the SPA designated as a Community Opportunity Area.
- **Overlays v Transition Zoning:** According to the Agricultural Element, Objective 3.8, Renewable energy projects will be allowed within the RE Overlay Zone, and mitigation for agricultural impacts has been identified and addressed. As noted in Section I, General Comments, it is unclear why a transition zone designation (stripes) for the Green Industrial, Manufacturing, and Logistics are used rather than an overlay. Is it the issue of prior mitigation? Won't mitigation of agricultural impacts be addressed in the Program Environmental Impact Report on the SPA?
- **Trade Corridor:** The Goods Movement Corridor, Logistics land use, and the seven existing Foreign Trade Zones in Imperial County need to be clearly aligned.
- **Land Use Scenario #2 Comments**
 - **Combine Ag Overlay with Updated Permanent Zoning Identified:** The transition land use designation for Phase II of the Specific Plan is 20-30 years from now. To ensure that agriculture continues to thrive in these areas as the region develops its renewable energy capacity, a combined/hybrid agricultural overlay is recommended. This hybrid zoning will facilitate a smoother transition to the County's long-term vision, increase the land's value for potential manufacturing or industrial use, and promote a more beneficial community benefit agreement.
 - **Commercial Hubs:** Designating two commercial hubs and locating them in or adjacent to Niland and Calipatria is a good idea. The combination of the conservation area, commercial hub, and community opportunity area is another good idea.
 - **Good Movement Transportation Corridor:** Alternative #3 has the most comprehensive goods movement transportation corridor routes, which is an essential component of the orderly buildout of the SPA.
 - **Trade Corridor:** The Goods Movement Corridor, Logistics land use, and the seven existing Foreign Trade Zones in Imperial County need to be clearly aligned.
 - **Some Portions of Conversation Areas May Have Low Impact Public Uses:** It is uncertain how the conversation areas were selected. The map shows that the land isn't currently marked as an area to avoid, like an endangered habitat. If compatible uses exist, some parts of the conservation areas could be used for low-impact recreational activities. Engaging with the community about these potential uses could also increase the amount of the SPA designated as a Community Opportunity Area.
 - **Overlays:** It is unclear why this land use alternative uses the designation of a transition designation (stripes) for Manufacturing, Logistics, and Green Industrial rather than an overlay.
- **Land Use Scenario #3 Comments**

- **Combine Ag Overlay with Updated Permanent Zoning Identified:** The transition land use designation for Phase II of the Specific Plan is 20-30 years from now. To ensure that agriculture continues to thrive in these areas as the region develops its renewable energy capacity, a combined/hybrid agricultural overlay should be created. This hybrid zoning will facilitate a smoother transition to the County's long-term vision, increase the land's value for potential manufacturing or industrial use, and promote a more beneficial community benefit agreement.
- **Commercial Hubs:** Designating two commercial hubs and locating them in or adjacent to Niland and Calipatria is a good idea.
- **Rail Spur:** Locating the rail spur adjacent to warehousing rather than the manufacturing space offers more flexibility.
- **Trade Corridor:** The Goods Movement Corridor, Logistics land use, and the seven existing Foreign Trade Zones in Imperial County need to be clearly aligned.
- **Commercial Hub:** The location of the commercial hub in Alternative #3 is preferable. It would be even better if a third commercial hub were added in the northern region of the SPA at the intersection of Highway 101 and English Road.
- **Some Portions of Conversation Areas May Have Low Impact Public Uses:** It is uncertain how the conversation areas were selected. The map shows that the land isn't currently marked as an area to avoid, like an endangered habitat. If compatible uses exist, some parts of the conservation areas could be used for low-impact recreational activities. Engaging with the community about these potential uses could also increase the amount of the SPA designated as a Community Opportunity Area.
- **Extending RE Purposes into the Playa:** The Playas Renewables & Restoration designation already permits some low-impact renewable energy operations that support geothermal production in the Salton Sea region, including underground wells, pipes, and raised structures. With the addition of Green Industrial, the area will also allow for sustainable clean energy operations like biofuel and green hydrogen. This will also include the symbiotic production of materials such as lithium, zinc, and magnesium, which are useful for non-fossil fuel energy production. However, given the environmental sensitivity of the Playa and potential health impacts on the public, it is unclear why energy facilities and activities that could be carried out in a different location are being situated here.
- **Transportation Corridor:** Alternative #3 has the most comprehensive transportation corridor routes, which is an important component of the orderly buildout of the SPA.
- **Overlays:** It is unclear why this land use alternative uses the designation of a transition designation (stripes) for manufacturing, logistics, and green industrial rather than an overlay.

Section V. Related Documents

- The Land Use Element of the Imperial County General Plan - link [here](#)
- The Renewable Energy and Transmission Element of the Imperial County General Plan - link [here](#)
- The Agricultural Element of the Imperial County General Plan - link [here](#)
- The Report of the Blue Ribbon Commission on Lithium Extraction in California - link [here](#)
- Governor Gavin Newsom's Lithium Valley Vision - link [here](#)

- The May 21, 2023, Lower Basin Governor's Letter - link [here](#)
- Our Salton Sea: Investing in People for a Thriving Region - link [here](#)
- Division 1 Planning and Zone, California Government Code, Sections 65000 - 66301 - link [here](#)
- Lithium Valley Specific Plan Community Workshop #2 Slides - link [here](#)