



September 8, 2024

Imperial County Board of Supervisors  
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**Re: Comments on Lithium Excise Tax Funding Plan**

Dear Imperial County Board of Supervisors:

Please find below comments on the Draft Lithium Excise Tax Funding Plan. These comments are submitted on behalf of Comite Civico del Valle’s Lithium Valley Equity Technical Advisory Group. The Lithium Valley Equity Technical Advisory Group collaborates with Comite Civico del Valle and the Lithium Valley Community Coalition on:

- Reviewing of the scientific and legal literature to guide the development of a research agenda for the expansion of a circular lithium economy based in the Imperial Valley, with requirements for environmentally responsible raw material sourcing, refinement, and product design that supports material recovery, reuse, and recycling;
- Surveying Lithium Valley stakeholders to identify priorities that can contribute to government and academic research goals, while emphasizing participatory research models for community engagement and action;
- Connecting technical support to strengthen environmental and health mitigation measures in the preparation of Imperial County’s Lithium Valley Programmatic Environmental Impact Report for local stakeholders; and
- Executing research/analysis that can support community benefit projects and agreements, in addition to educational pathways for a skilled and trained workforce, including internships, apprenticeships, certificate, and degree programs for Imperial Valley residents.

We have been conducting community-engaged research on environmental justice issues relating to the development of Lithium Valley and hold expertise in a variety of related fields. We hope that our comments will be helpful in ensuring that any of the relevant proposed projects are built in a just and sustainable way.

The volume-based lithium excise tax created through SB 125 is a significant step toward bringing concrete benefits to the communities of Imperial Valley. This opportunity was only made possible because local labor, environmental and social justice advocates acted through grassroots organizing on social media, phone trees, friend groups and professional networks to raise the question on everyone’s minds: “If lithium is a public resource, why should there not be a public benefit?” With that principle of maximizing public benefit in mind, in what follows we offer suggestions for further consideration on the proposed lithium extraction excise tax funding plan draft.

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First, we urge the Board of Supervisors to table approval of this plan until public comments are seriously considered and revisions have been made to address them. No funds are available yet, and very little to any community engagement seems to have occurred with the affected communities or even with community-based organizations that were tasked with community engagement and outreach for the Lithium Valley Specific Plan and Programmatic Environmental Impact Report. Best practices of community benefit agreements (CBAs) and community benefit funds (CBFs) are to do appropriate outreach. Given that this is not a time sensitive matter, the County should give more advance notice, take the time to receive comments, and schedule this agenda item again to incorporate more feedback instead of simply adopting the plan.

### Definition of Terms

- **SB 125:** The reference is inaccurately defined. SB 125, Chapter 63, Statutes of 2022. The use of the 2022 bill number throughout the Draft Plan could lead to confusion and misapplication of the law. Specific code references should be used, especially in the sections of the Draft Plan related to tax rates and allocation of funds.
- **Direct Lithium Extraction:** The definition of Direct Lithium Extraction (DLE) uses the term “pumping,” but this is not accurate language for geothermal brine that is brought to the surface. It should be differentiated from pumping brine for evaporation to extract lithium elsewhere (Imperial County, 2024, p. 4).<sup>1</sup> The definition also states that “The remaining brine is re-injected back into the Earth, making the process environmentally friendly” (Imperial County, 2024, p. 4). This assertion is misleading and is not supported by evidence. Re-injection does not make the process environmentally friendly and may actually cause new problems that make it unsustainable, including dilution of the mineral resource, induced seismicity and subsidence, and contamination of groundwater. Doubt about the sustainability of brine re-injection is one of the reasons that DLE has not been adopted widely yet around the world.
- **Lithium Valley Directly Affected Communities:** The Draft Plan identifies communities that are directly affected and those that are indirectly affected, consistent with Revenue and Taxation Code 47100. The Draft Plan further states that *[a]t its discretion, the Board of Supervisors may expand this list when presented with evidence of another Imperial County.*” While the statute allows for making additions to these two lists, the Draft Plan fails to articulate what criteria will be used to analyze conditions to make these additions.
- **Lithium Valley:** The definition of Lithium Valley suggests that it was coined after the publication of Berkeley Lab’s study in 2023, but previous studies have used that label since at least 2000 when AB 1657 created the Blue Ribbon Commission on Lithium Extraction in California. The definition also states: “Lithium Valley is *[sic]* sustainable solution” (Imperial County, 2024, p. 4). This claim of sustainability is not yet supported by evidence until the Lithium Valley Specific Plan and Programmatic Environmental Impact Review (PEIR) are drafted for public comment and approved in accordance with CEQA. The County is currently running a year and half behind schedule in circulating drafts of these key planning documents.

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<sup>1</sup> Imperial County. (2024, August 29). *Lithium Excise Tax-Funding Plan Draft*. <https://lithiumvalley.imperialcounty.org/community/lithium-excise-tax/>

## **SB 125 - The Lithium Extraction Excise Tax**

### **Tax Rates - 2023 to 2024**

- **Quote Statute:** The Draft Plan cites SB 125 regarding calculating the tax based on lithium carbonate equivalent. A more accurate reference would be Revenue and Tax Code Section 47015.
- **Table Error:** There seems to be an error at the bottom of the table describing an example of Company A, where it lists: “Year 3 Q2: 15,000: 50,000: \$800: \$4,000,000” (Imperial County, 2024, p. 6). Here, it seems that the tax owed should be \$12,000,000 rather than \$4,000,000.

### **Allocation of Excise Tax Funds**

- We appreciate that the County has used its discretion to acknowledge that both the “Quechan Tribe and Torres Martinez Tribe reservations are located within Imperial County, California and would be affected by lithium extraction activities” (Imperial County, 2024, p. 7) and thus to designate them both as Indirectly Affected Communities. Nonetheless, the impacts on these Tribes, as well as the Kwaaymii Laguna Band of Indians and other Indigenous Peoples that should be consulted on proposed lithium extraction activities at Lithium Valley in accordance with AB 52 should be considered “Direct.” The California Energy Commission (CEC) has already identified significant impacts to Tribal Cultural Resources, particularly the Southeast Lake Cahuilla Active Cultural District (SELCAVCD). Moreover, the Tribes are neither technically part of Imperial County. Rather, they are autonomous and are surrounded by Imperial County. Thus, they should be engaged through government-to-government relations, which would entail treating them as sovereign nations and not just as any other community encompassed within the County. Accordingly, use of “allocated tribal and cultural affairs funding” owed to the Tribes within the Lithium Community Benefits Program should be Tribally driven, not determined by the County as part of the overall funding plan.

### **County of Imperial Lithium Excise Tax Allocation Structure**

#### **15/15 Funding Plan with Example**

- The framing of the “15/15 Funding Plan” is misleading (Imperial County, 2024, p. 9). Depending on the perspective, excluding the 20% of funds allocated to Salton Sea restoration, the breakdown would be more like 15/85 (from the vantage point of Directly Affected Communities) or more generously 40/60 (including All Affected Communities and the Lithium Community Benefits Program). Either way, the County still plans to use most of the lithium excise tax revenue itself, and for programs that may not be immediately relevant or beneficial to local residents. There is no explanation for why population should be the determining factor in

allocating between communities, and no rationale for why the County should retain 60% of the funding. This is a lost opportunity whereby, consistent with the SB 125, the County could increase community involvement within the current structure with at least three significant improvements:

- First, the Quality of Life Advisory Committee should have the opportunity to identify priorities within the County’s proposed 60% allocation, which is currently divided amongst its four business divisions (i.e., Public Safety, Human Health, Land Use, and Finance General Governance) (Imperial County, 2024, p. 14.).
- Second, the 60% allocation fund should be independent of any mitigation or other conditions already required for any such approvals. For example, a project that may require mitigation for its proposed project should not rely on SB 125 funds expended by the County as a means to fund and/or offset its obligation to mitigate project impacts.
- Third, the County could prioritize its 60% allocation towards projects, programs, and other efforts towards directly, indirectly, and/or all affected communities. Hence, while the County departments may receive and direct a disproportionate share of the funds (i.e., 60%), those funds would nevertheless be prioritized towards all-affected communities.
- Overall, just 10% of the total revenue goes to the Community Benefits Program with only 5% going to Imperial County Quality of Life Projects. This flies in the face of the “15/15” framing, especially if every other category stands to receive 15% of funds. The County needs to distribute significantly more revenue to this important category.
- How could \$320,000 (5%), the portion provided for “Imperial County Quality of Life Projects” in the revenue example scenario, possibly be enough to cover “green spaces, resident support services, transportation services, educational enhancements, scholarships, tribal programs, recreation, entertainment, and health and wellness improvements?”
- Allocating just 1% (or \$64,000 in this example) to “Industry and Upskilling Scholarships” would support very few local residents who would greatly benefit from needed training for high road jobs in this highly technical new industry.
- In general, the excise tax allocation is weighted far too heavily in favor of filling the County’s coffers rather than delivering concrete public benefits to local residents for extraction of this public resource. There is no alternative to the 15/15 proposed plan presented, and there are no procedural safeguards to ensure equitable and inclusive participation of members from disadvantaged communities in the use of funds.

### **Directly Affected Communities**

- The “location priority bonus”--applied to Calipatria (4,500 population bonus), Niland (2,500 population bonus), and Westmorland (2,000 population bonus) (Imperial County, 2024, p. 10)--seems to be a reasonable measure to even the playing field across affected communities. However, more explanation is needed for why population is the determining factor, what census year is used, and how the bonus population numbers were calculated. Census figures should use

the most recent year available from the Census's American Community Survey (tables for communities can be found at <https://data.census.gov/table>).

- Currently, these bonus numbers seem arbitrary and may further exclude other sparsely populated Directly Affected Communities, particularly Bombay Beach, which may experience especially high environmental burdens due to close proximity not only to the lithium resource, but also to exposed playa as a result of reduced inflows to Salton Sea due in part to development of Lithium Valley. The table Disbursement Example Based on the County of Imperial Receiving \$6,400,000 on p. 10 demonstrates how Bombay Beach is getting short shrift in this revenue distribution scheme without comparable support. Even with a relatively low population of just 231, what kinds of concrete benefits can actually come from \$4,935.46—or even \$8,631.10 total when Directly Affected Community Totals are considered—for Bombay Beach, according to the example scenario? Here and in other instances, poverty rates may have been an important factor besides population to consider.
- Clarification and explanation is needed for why the Location Priority Bonus has not been applied for the Directly Affected Communities in distribution to All Affected Communities (Imperial County, 2024, p. 10).
- Explanation is needed for how “local advisory committees” responsible for managing funds for townships and unincorporated communities will not become redundant with the interests of the County (Imperial County, 2024, p. 10). Appropriate safeguards should be in place to improve real residents’ lives with concrete, locally relevant projects.

### **All Affected Communities**

- Here, again, the contrast in distribution to All-Affected Communities is stark between Bombay Beach (\$3,735.10), a Directly Affected Community in close proximity to potential burdens from this extractive development, and more populous locations that may be more distant or more wealthy already, such as El Centro (\$239,477.85), Calexico (\$209,060.29), or Imperial (\$110,840.83).
- The example scenario is illustrative of the uneven distribution that perpetuates inequality for fenceline communities and Indigenous Peoples. In addition to reconsidering ways to better distribute adequate funds to sparsely populated Directly Affected Communities like Bombay Beach, the County should also consider ways to increase support for the Quechan Tribe and the Torres Martinez Tribe—in ways that are Tribally determined—because they also have relatively low populations yet face significant disproportionate impacts on Tribal Cultural Resources.

### **Disbursement of Funds**

- The funding plan states: “Unincorporated communities and township funds will be managed by the County of Imperial and used in those respective communities. Advisory groups may recommend projects” (Imperial County, 2024, p. 11). This should be planned the other way

around with Community Advisory Committees (CAC) not only recommending projects but guiding disbursement of funds to minimize risks of mismanagement. CACs have become common and effective mechanisms for management of community benefit funds, and devolving more power to them in this funding plan may make it more democratic and transparent.

### County of Imperial Departments

- **Local Hire and Vendors:** The Draft Plan proposes allocating 15% of the lithium excise tax to each of the County’s four business divisions. These funds should be aligned with specific strategies that support hiring local residents for additional job openings, contracting goods and services, and consulting with local small businesses.
- **Supplementing v. Supplanting:** Lithium excise tax funds used by county departments should have additional oversight to ensure that they are used to expand services rather than supplant current funding. Residents of Imperial County are already underserved. As additional funds become available, those moneys should improve their circumstances, not be used as a loophole for redirecting existing funding to other projects.

### Lithium Community Benefits Program

- The funding plan also states that: “No funds may be used to fund litigation against the County” (Imperial County, 2024, p. 12). It is unsurprising that the County is concerned about potential exposure to liability, but this provision should be clarified to avoid unintended consequences contrary to SB 125. The lithium excise tax as entered into law in SB 125 was not meant to be used as a gag order to silence dissent, to encourage non-responsiveness from the County to community needs, to allow for inadequate regulation, monitoring and transparency, or compel communities and individuals to forfeit their right to petition against the government. Communities should maintain their right to ensure the health and wellbeing of local residents, and this may require litigation in accordance with the CEQA process. Therefore, this sentence should be revised to state, “No funds may be used to *directly* fund litigation ... Nothing herein shall be interpreted to allow the County to consider past, current, or prospective litigation between the recipient and County. Nor may the County make funds contingent on entities forgoing litigation independent of SB 125 funds.”
- **Quality of Life Projects:**
  - **Community Priorities:** All funded quality-of-life projects should represent actions that the impacted community has selected as a priority.
  - **Monitoring and Accountability:** All funded projects should have deliverables, milestones, and timelines. Projects that purport to have environmental benefits should be monitored to ensure that the promised benefits are delivered.
- This funding plan may be understood as a community benefit fund (CBF), but it is not a CBA. Quality of Life Projects listed include: “green spaces, resident support services, childcare services, transportation services, educational enhancements, scholarships, recreation,

entertainment, beautification projects, infrastructure, and health and wellness improvements” (Imperial County, 2024, p. 12). Many other types of provisions exist within CBFs and CBAs, including but not limited to:

- **Financial provisions**
  - Direct payments (could be one time or recurring)
  - Grants for defined community needs (e.g. infrastructure, scholarships, etc.)
  - Trust accounts
  - Partial ownership of operations
  - Royalties on produced/extracted commodities (e.g. kWh of energy, tons of copper, etc.)
  - Bonding requirements (particularly for mining projects)
- **Environmental provisions**
  - Environmental/cultural resource mitigation plan or steps/beyond compensatory mitigation
  - Water/air monitoring requirements
  - Reclamation/decommissioning plan
  - Penalties for pollution and remediation steps
  - Funding of third-party studies for assessing project impacts
- **Labor provisions**
  - First source hiring requirements
  - Wage commitments
  - Job-related health/safety commitments
  - Commitments to seek contracts with local businesses for project needs before turning to other (i.e. non-local) contractors
- **Accountability and enforcement provisions**
  - Dispute resolution process and/or arbitration clause(s)
  - Outline of penalties or legal obligations for not adhering to CBA
  - Identification of who is responsible for CBA enforcement
  - Assumption of contract obligations in the event of acquisition, bankruptcy, foreclosure, etc.
- **Governance provisions**
  - Identification of representatives, CBA decision-making authorities
  - CBA duration or expiration date
  - Scope of CBA
  - Outline of decision-making processes and meeting requirements
- **Special provisions**
  - Recognition of Indigenous rights and associated obligations related to free, prior, and informed consent, land title, Tribal cultural resources, etc.
- **Quality of Life Advisory Committee:**
  - The funding plan suggests that the composition of the Quality of Life Advisory Committee is based on the Department of Energy’s community benefit agreement recommendations (with the addition of agriculture due to its local significance). The DOE’s CBA resource guide

states that CBAs should “represent the interests of residents who will be impacted by proposed developments. CBAs can ensure that measurable, local benefits will be given to a community” (Department of Energy, 2017, p. 4).<sup>2</sup> However, this plan’s proposed committee structure provides unfettered discretion by the County with no bona fides for eligibility criteria or bylaws. Qualifications of groups included should be clarified to make sure they are legitimate, and committee members should be residents, community members, or non-profits, who are not current elected officials, former elected County officials or County employees.

- Imperial Valley may be an agricultural hub, but a relatively small percentage of the population are farmers. Those that are farmers may be some of the least in need of quality-of-life improvements. If the intention of the Quality of Life Advisory Committee is to deliver concrete local benefits to those who need them, then the County could consider giving equal, if not greater, representation to farmworkers. Similarly, Environmental Justice is conspicuously absent and should be added to the list of Community-Based Organizations, given the long history of environmental justice movements in Imperial Valley with especially high relevance and expertise on impacts of this extractive industry on local community members. Moreover, the County should consider including more than one representative for some categories listed, such as labor, which may feature diverse opinions from different unions involved with construction and/or operations and maintenance. Finally, making an Imperial County Supervisor chair of the committee presents a potential conflict of interest that compromises the independence of this committee from the County. This is especially problematic when we consider that the QLAC committee would be “selected by a majority vote of the Imperial County Board of Supervisors from the applications received” (Imperial County, 2024, p. 12). The committee should not act as an arm of the County, and more representation is needed from Directly Affected Communities.
- The funding plan lists four representatives from Community Based Organizations but also states that “no one category may have more than three representatives.” (Imperial County, 2024, p. 13) This needs clarification, and if anything the representation from CBOs should be increased to cover more relevant topics, such as Environmental Justice, which may not fall neatly under Health or Environmental. These and the other categories listed need to be clearly defined with criteria for bona fides on how long members or groups have been involved in relevant activities in Imperial County.
- **Best Practices in Community Benefits:** The Draft Plan should also consider other evolving CBA best practices consistent with the Department of Energy’s 2017 CBA recommendations, for example Columbia Law School’s Sabin Center for Climate Change Law that has compiled numerous CBA examples<sup>3</sup> and recommendation report dated September 2023.<sup>4</sup>

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<sup>2</sup> Office of Minority Business & Economic Development. (2017, August 1). *Guide to Advancing Opportunities for Community Benefits through Energy Project Development*. U.S. Department of Energy.

<https://www.energy.gov/justice/articles/community-benefit-agreement-cba-resource-guide>

<sup>3</sup> Community Benefits Agreements Database (listing projects covering solar, wind, energy, Carbon Capture, renewable, and other type of projects including examples from California and across the nation):

<https://climate.law.columbia.edu/content/community-benefits-agreements-database>; see also CBAs Currently in Effect (noting various stadium CBAs): <https://www.powerswitchaction.org/resources/community-benefits-agreements#examples>.



- The funding plan outlines that “2% will be invested in an Imperial County community endowment. Annually, up to 10% can be withdrawn from the endowment fund to support the Lithium Community Benefits Program” (Imperial County, 2024, p. 13). This modest wealth fund could help to make benefits endure from this industry, but it may be worth considering the benefits or burdens of other comparative shareholder models of benefit sharing, such as the Alaska Permanent Fund (APF), a mechanism through which every citizen of Alaska gets a share of oil and gas revenue.<sup>5</sup> The Alaska State Constitution states that “At least twenty-five percent of all mineral lease rentals, royalties, royalty sale proceeds, federal mineral revenue sharing payments and bonuses received by the State shall be placed in a permanent fund, the principal of which shall be used only for those income-producing investments specifically designated by law as eligible for permanent fund investments.” (Alaska Constitution Article IX Section 15). The APF has been active since 1976, and every eligible state resident receives an annual Permanent Fund dividend based on the value of the APF. In 2022 this was \$3,284 per person; in 2023 it was \$1,312. (US EIA). *Note: these numbers are comparable to some of the projected revenue distribution figures for entire communities in the Imperial Valley funding plan based on the example scenario provided.* Still, concerns remain around the Alaska benefit sharing model regarding equity and distribution of shares, as well as eligibility. While the shareholder model is considered a strong one, it is not the same as community empowerment through community ownership, benefit co-management or benefit sovereignty (control of benefits by communities rather than industry).<sup>6</sup>
- It is commendable that the funding plan seeks to “advance tribal and cultural affairs” (Imperial County, 2024, p. 13). To do so while respecting Indigenous sovereignty through a government-to-government relationship, uses of funds must be Tribally driven, and may also include Tribal monitoring, documentation, nomination and protection of Tribal Cultural Resources. There are many examples worldwide of mining payments that can be structured in different ways and used for various purposes by Indigenous Peoples. For more information, see Gibson and O’Faircheallaigh (2015).<sup>7</sup>
- Again, allocating just “1% of the lithium excise tax for scholarships and upskilling within the industry to create a pathway for residents who would like to develop new skillsets” (Imperial County, 2024, p. 13) is a minuscule amount considering the considerable skills needed to meaningfully develop a local high road workforce.

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<sup>4</sup> Expert Insights on Best Practices for Community Benefits Agreements (September 2023): [https://scholarship.law.columbia.edu/cgi/viewcontent.cgi?article=1207&context=sabin\\_climate\\_change](https://scholarship.law.columbia.edu/cgi/viewcontent.cgi?article=1207&context=sabin_climate_change).

<sup>5</sup> Alaska Permanent Fund: <https://apfc.org/who-we-are/history-of-the-alaska-permanent-fund/>

<sup>6</sup> Tysiachniouk, M. S., Petrov, A. N., & Gassiy, V. (2020). Towards understanding benefit sharing between extractive industries and Indigenous/local communities in the Arctic. *Resources*, 9(4), 48.

<https://www.eia.gov/state/analysis.php?sid=AK>

<sup>7</sup> Gibson, G. and O’Faircheallaigh, C. 2015. “IBA Community Toolkit: Negotiation and Implementation of Impact and Benefit Agreements.” The Gordon Foundation.

[https://drive.google.com/file/d/1NDFi8E1MkXiN\\_LQ3YbRrEqIoCSrrSGin/view?usp=sharing](https://drive.google.com/file/d/1NDFi8E1MkXiN_LQ3YbRrEqIoCSrrSGin/view?usp=sharing)

## Frequently Asked Questions

- In response to the question, “Why do the directly affected communities get two allocations, the funding plan states that these communities are anticipated to be “more directly impacted by infrastructure and development needs” (Imperial County, 2024, p. 15). Assessment of how directly a community is affected should also consider shifting environmental burdens that may result from development, for instance, air quality due to dust pollution in shoreline communities near the Salton Sea or exposure to hazardous materials in other fenceline communities in proximity to waste routes or landfills used by this industry.
- Geothermal energy is described as “clean” (Imperial County, 2024, p. 16). While it may be renewable, it is misleading to depict this energy source as clean if we consider the environmental impacts, including climate change, air quality and water use impacts, among others.<sup>8</sup>
- The funding plan distinguishes that the “Imperial County Good Neighbor Community Benefit Agreement (CBA) is a separate agreement between a company and the County of Imperial that highlights a company or developer’s commitments to the Imperial County community” (Imperial County, 2024, p. 16). We agree that the lithium excise tax should not be considered a substitute for robust or adequate CBAs. It is a fund and not a legally-binding agreement. However, the Good Neighbor Agreement guidelines proposed by the County are also unfortunately unenforceable and inadequate due to the lack of detail, community engagement and participation in determination of the parameters. Beyond the 6 pillars described by the County, CBAs may also include a wider range of provisions. Moreover, the requirements for companies to only engage 70% of community organizations from the 10 categories of community organizations listed allows developers to ignore the significant needs of community coalitions or Tribes. Community coalitions should be able to determine their own criteria for CBA provisions without the County seeking to control the negotiation process with weak standards or participation.

Sincerely,



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<sup>8</sup> Schenker, V., Bayer, P., Oberschelp, C., & Pfister, S. (2024). Is lithium from geothermal brines the sustainable solution for Li-ion batteries? *Renewable and Sustainable Energy Reviews*, 199, 114456. <https://doi.org/10.1016/j.rser.2024.114456>



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# ACTUALIZACIÓN DE GASTO DEL IMPUESTO SOBRE EL LITIO EN EL CONDADO DE IMPERIAL:

Nombre:

Kimberly Rodriguez Amparón

Fecha: 7-9-2024

Escribo para compartir mis opiniones y preocupaciones en relación con el plan del impuesto sobre el Litio. Como residente de Brawley, CA, creo que es crucial que la comunidad tenga un rol activo en la determinación de cómo se distribuyen estos fondos, asegurando que realmente beneficien a los más afectados por los desarrollos del litio.

Distribución del Condado de Imperial	Porcentajes
Comunidades Directamente Afectadas	15%
Todas las Comunidades Afectadas	15%
<b>Beneficios Comunitarios del Litio</b>	
Proyectos de calidad de vida en el condado de Imperial	5%
Concepción hacia la comunidad	2%
Asuntos tribales y culturales	2%
Beccas de Industria y Perfeccionamiento	1%
<b>Condado de Imperial</b>	
Seguridad pública	15%
Uso del suelo y medio ambiente	15%
Salud y Servicios Pasajeros	15%
Finanzas y Gobierno General	15%
<b>REPARTO TOTAL DEL CONDADO</b>	<b>100%</b>

## Asignaciones comunitarias:

**Comunidades directamente afectadas (15%):** Niland, Bombay Beach, Westmorland, Calipatria, Brawley

### Todas las comunidades afectadas 15%:

Calexico, Desert Shoes, El Centro, Heber, Holtville, Imperial, Ocotillo, Palo Verde, Salton City (includes Vista Del Mar), Salton Sea Beach, Seeley, Winterhaven-Brd, Quechan Tribe, Torres Martinez Tribe

*\*Esta lista también incluye todas las ciudades bajo Comunidades Directamente Afectadas*

## PROBLEMATICA:

1. El condado está determinando las asignaciones para las ciudades en base a la población y la distancia geográfica al desarrollo del litio.
2. El condado está tomando el 60% del impuesto para los departamentos que ya están funcionando actualmente.

## Deseos de la Comunidad

El condado ha publicado recientemente el plan a detalle de como va a ser asignados los fondos a las Comunidades Directamente Afectadas (15%) - Mientras el condado estudia la asignación de fondos para nuestras comunidades, ¿qué proyectos o recursos le gustaría ver financiados en su ciudad y para mejorar la calidad de vida en su comunidad?

# ACTUALIZACIÓN DE GASTO DEL IMPUESTO SOBRE EL LITIO EN EL CONDADO DE IMPERIAL:

Distribución del Condado de Imperial	Porcentajes del condado	Sus porcentajes (%)	
<b>Comunidades Directamente Afectadas</b> (Niland, Bombay Beach, Westmorland, Calipatria, Brawley)	15%	65	
Calipatria			
Niland			
Bombay Beach			
Westmorland			
<b>Todas las Comunidades Afectadas</b> (Calexico, Desert Shores, El Centro, Heber, Holtville, Imperial, Ocotillo, Palo Verde, Salton City (includes Vista Del Mar), Salton Sea Beach, Seeley, Stortchaven-Bro, Quechan Tribe, Torres Martinez, etc.) <small>Este lista también incluye otras ciudades de las Comunidades Directamente Afectadas</small>	15%	30	
<b>Proyectos y Comandamientos del Estado</b>			
Proyectos de calidad de vida en el condado de Imperial		5%	0
Comandamientos de la comunidad		2%	0
Asesoría técnica y otras cosas		2%	0
Bras de la Guardia y Patrullas de Patrulleros	1%		
<b>Condado de Imperial</b>			
Seguridad pública	15%	5	
Uso del suelo y medio ambiente	15%	0	
Salud y Servicios Humanos	15%	0	
Finanzas y Gobierno General	15%	0	
<b>REPARTO TOTAL DEL CONDADO</b>	<b>100%</b>	<b>100%</b>	

## Actividad:

El condado creó este plan para dividir los fondos en 4 áreas. Nos encantaría conocer tu opinión.

¿Cómo distribuiría los fondos (%) entre estas categorías para servir mejor a su ciudad?

Por favor, asegúrate de que el total suma 100%

## ¿Comentarios Adicionales?

¿Que opina de la asignación propuesta de los fondos del impuesto sobre el litio, en particular la distribución de los fondos a las comunidades directa e indirectamente? ¿Cree que los criterios utilizados para la asignación, como la población y la proximidad geográfica a los recursos de litio, son justos y razonable a la hora de abordar las necesidades de las comunidades?

## ¿Está de acuerdo con el plan de impuesto propuesto por el Condado?

El Condado considerará la aprobación de este plan de impuesto en la reunión de supervisores el 10 de sept. Envíe sus comentarios antes de las 2 PM del lunes 9 de sept

Escanee esto para enviar un comentario



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Y/o únase a la próxima Junta de Supervisores

martes  
10 de septiembre  
10:30 AM

940 W Main St  
El Centro, CA

Escanee para unirse a la reunión por Internet



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# ACTUALIZACIÓN DE GASTO DEL IMPUESTO SOBRE EL LITIO EN EL CONDADO DE IMPERIAL:

Nombre:

Armando Moreno Zarate

Fecha: 9-7-2024

Escribo para compartir mis opiniones y preocupaciones en relación con el plan del impuesto sobre el Litio. Como residente de Calexico, creo que es crucial que la comunidad tenga un rol activo en la determinación de cómo se distribuyen estos fondos, asegurando que realmente beneficien a los más afectados por los desarrollos del litio.

Distribución del Condado de Imperial	Porcentajes
Comunidades Directamente Afectadas	15%
Todas las Comunidades Afectadas	15%
<b>Beneficios Característicos del Litio</b>	
Proyectos de calidad de vida en el condado de Imperial	5%
Concesión hacia la comunidad	2%
Asuntos tribales y culturales	2%
Recursos de Industria y Perfeccionamiento	1%
<b>Calendario de Litio</b>	
Seguridad pública	15%
Uso del suelo y medio ambiente	15%
Salud y Servicios Humanos	15%
Finanzas y Gobierno General	15%
<b>REPARTO TOTAL DEL CONDADO</b>	<b>100%</b>

## Asignaciones comunitarias:

**Comunidades directamente afectadas (15%):** Niland, Bombay Beach, Westmorland, Calipatria, Brawley

### Todas las comunidades afectadas 15%):

Calexico, Desert Shoes, El Centro, Heber, Holtville, Imperial, Ocotillo, Palo Verde, Salton City (includes Vista Del Mar), Salton Sea Beach, Seeley, Winterhaven-Brd, Quechan Tribe, Torres Martinez Tribe

*\*Esta lista también incluye todas las ciudades bajo Comunidades Directamente Afectadas*

## PROBLEMATICA:

1. El condado está determinando las asignaciones para las ciudades en base a la población y la distancia geográfica al desarrollo del litio.
2. El condado está tomando el 60% del impuesto para los departamentos que ya están funcionando actualmente.

## Deseos de la Comunidad

El condado ha publicado recientemente el plan a detalle de como va a ser asignados los fondos a las Comunidades Directamente Afectadas (15%) - Mientras el condado estudia la asignación de fondos para nuestras comunidades, ¿qué proyectos o recursos le gustaría ver financiados en su ciudad y para mejorar la calidad de vida en su comunidad?

Ayuda para fondos de poder adquirir una casa de acuerdo al salario

# ACTUALIZACIÓN DE GASTO DEL IMPUESTO SOBRE EL LITIO EN EL CONDADO DE IMPERIAL:

Distribución del Condado de Imperial	Porcentajes del condado	Sus porcentajes (%)
<b>Comunidades Directamente Afectadas</b> (Niland, Bombay Beach, Westmorland, Calipatria, Brawley)	15%	36%
Calipatria		9%
Niland		9%
Bombay Beach		9%
Westmorland		9%
<b>Todas las Comunidades Afectadas</b> (Calexico, Desert Shoes, El Centro, Heber, Holtville, Imperial, Ocotillo, Palo Verde, Salton City (includes Vista Del Mar), Salton Sea Beach, Seely, Winterhaven-Brd, Quechan Tribe, Torres Martinez Tribe) <small>*Esta lista también incluye todas las ciudades de las Comunidades Directamente Afectadas</small>	15%	10%
<b>Beneficios Comunitarios del Litio</b>		
Proyectos de calidad de vida en el condado de Imperial	5%	12%
Concesión hacia la comunidad	2%	13%
Asuntos tribales y culturales	2%	5%
Escuela de Industria y Perfeccionamiento	1%	0%
<b>Beneficios de Imperial</b>		
Seguridad pública	15%	7%
Uso del suelo y medio ambiente	15%	7%
Salud y servicios humanos	15%	7%
Finanzas y Gobierno General	15%	3%
<b>TOTAL CONDADO</b>	<b>100%</b>	<b>100%</b>

## Actividad:

El condado creó este plan para dividir los fondos en 4 áreas. Nos encantaría conocer tu opinión.

¿Cómo distribuiría los fondos (%) entre estas categorías para servir mejor a su ciudad?

Por favor, asegúrate de que el total suma 100%

## ¿Comentarios Adicionales?

¿Que opina de la asignación propuesta de los fondos del impuesto sobre el litio, en particular la distribución de los fondos a las comunidades directa e indirectamente? ¿Cree que los criterios utilizados para la asignación, como la población y la proximidad geográfica a los recursos de litio, son justos y razonable a la hora de abordar las necesidades de las comunidades?

No creo que los porcentajes sean justos para la comunidad de las diversas ciudades.

A mi parecer creo que esta asignación de % es mejor y justo para futuros proyectos y beneficios a la comunidad

## ¿Está de acuerdo con el plan de impuesto propuesto por el Condado?

El Condado considerará la aprobación de este plan de impuesto en la reunión de supervisores el 10 de sept. Envíe sus comentarios antes de las 2 PM del lunes 9 de sept

Escanee esto para enviar un comentario



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# ACTUALIZACIÓN DE GASTO DEL IMPUESTO SOBRE EL LITIO EN EL CONDADO DE IMPERIAL:

Nombre:

Manuel Romero

Fecha: 09/07/2024

Escribo para compartir mis opiniones y preocupaciones en relación con el plan del impuesto sobre el Litio. Como residente de Heber, creo que es crucial que la comunidad tenga un rol activo en la determinación de cómo se distribuyen estos fondos, asegurando que realmente beneficien a los más afectados por los desarrollos del litio.

Distribución del Condado de Imperial	Porcentajes
Comunidades Directamente Afectadas	15%
Todas las Comunidades Afectadas	15%
<b>Beneficios Comunitarios del Litio</b>	
Proyectos de calidad de vida en el condado de Imperial	5%
Concesión hacia la comunidad	2%
Asuntos tribales y culturales	2%
Becas de Industria y Perfeccionamiento	1%
<b>Condado de Imperial</b>	
Seguridad pública	15%
Uso del suelo y medio ambiente	15%
Sanidad y Servicios Humanos	15%
Finanzas y Gobierno General	15%
<b>REPARTO TOTAL DEL CONDADO</b>	<b>100%</b>

## Asignaciones comunitarias:

**Comunidades directamente afectadas (15%):** Niland, Bombay Beach, Westmorland, Calipatria, Brawley

### Todas las comunidades afectadas 15%:

Calexico, Desert Shoes, El Centro, Heber, Holtville, Imperial, Ocotillo, Palo Verde, Salton City (includes Vista Del Mar), Salton Sea Beach, Seeley, Winterhaven-Brd, Quechan Tribe, Torres Martinez Tribe

*\*Esta lista también incluye todas las ciudades bajo Comunidades Directamente Afectadas*

## PROBLEMATICA:

1. El condado está determinando las asignaciones para las ciudades en base a la población y la distancia geográfica al desarrollo del litio.
2. El condado está tomando el 60% del impuesto para los departamentos que ya están funcionando actualmente.

## Deseos de la Comunidad

El condado ha publicado recientemente el plan a detalle de como va a ser asignados los fondos a las Comunidades Directamente Afectadas (15%) - Mientras el condado estudia la asignación de fondos para nuestras comunidades, ¿qué proyectos o recursos le gustaría ver financiados en su ciudad y para mejorar la calidad de vida en su comunidad?

- Desarrollo a la comunidad
- Proyectos Ambientales
- Proyectos en Infraestructura, escuelas, hospitales, etc
- Inversión en infraestructura, carreteras,



# ACTUALIZACIÓN DE GASTO DEL IMPUESTO SOBRE EL LITIO EN EL CONDADO DE IMPERIAL:

Distribución del Condado de Imperial	Porcentajes del condado	Sus porcentajes (%)
<b>Comunidades Directamente Afectadas</b> (Niland, Bombay Beach, Westmorland, Calipatria, Brawley)	15%	36%
Calipatria		9%
Niland		9%
Bombay Beach		9%
Westmorland		9%
<b>Todas las Comunidades Afectadas</b> (Calexico, Desert Shores, El Centro, Heber, Holtville, Imperial, Ocotillo, Palo Verde, Salton City (includes Vista Del Mar), Salton Sea Beach, Seeley, Wintehaven-Brd, Quechan Tribe, Torres Martinez Tribe)	15%	13%
<small>*Este total también incluye todas las ciudades de los Contables Directamente Afectadas</small>		
<b>Reparto de los Dineros del Litio</b>		
Proyectos de calidad de vida en el condado de Imperial	5%	12%
Comercio hacia la comunidad	2%	13%
Asentamientos tribales y reservas	2%	5%
Recursos de Indígenas y Distribución de Agua	1%	0%
<b>Gasto del Impuesto</b>		
Seguridad pública	15%	6%
Uso del suelo y medio ambiente	15%	6%
Salud y Servicios Humanos	15%	6%
Finanzas y Gobierno General	15%	3%
<b>REPARTO TOTAL DEL CONDADO</b>	<b>100%</b>	<b>100%</b>

## Actividad:

El condado creó este plan para dividir los fondos en 4 áreas. Nos encantaría conocer tu opinión.

¿Cómo distribuiría los fondos (%) entre estas categorías para servir mejor a su ciudad?

Por favor, asegúrate de que el total suma 100%

## ¿Comentarios Adicionales?

¿Que opina de la asignación propuesta de los fondos del impuesto sobre el litio, en particular la distribución de los fondos a las comunidades directa e indirectamente? ¿Cree que los criterios utilizados para la asignación, como la población y la proximidad geográfica a los recursos de litio, son justos y razonable a la hora de abordar las necesidades de las comunidades?

Me gustaría que el condado distribuya de una mejor y más equitativamente los fondos que surgieran por la extracción del litio. Tomando en cuenta las comunidades que estarán más afectadas.

## ¿Está de acuerdo con el plan de impuesto propuesto por el Condado?

El Condado considerará la aprobación de este plan de impuesto en la reunión de supervisores el 10 de sept. Envíe sus comentarios antes de las 2 PM del lunes 9 de sept

Escanee esto para enviar un comentario



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**From:** alejandra martinez <martinezalejandra1965@gmail.com>  
**Sent:** Monday, September 9, 2024 9:54 AM  
**To:** Lithium Valley  
**Subject:** Lithium Excise Tax Funding Plan

**CAUTION:** This email originated outside our organization; please use caution.

Hello Imperial Valley,

My name is Alejandra Martinez and I am a resident and community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned at the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

As per your proposal, the 30% of funds being allocated to "all affected communities" will be distributed as follows: Brawley 59%, Calipatria 25%, Westmoreland 9%, Niland 7% and Bombay Beach 1% (which amounts to the shockingly small number of \$8,631.10).

This breakdown represents a callous decision to use population numbers as an allocation rubric, rather than a deeper assessment of the lived impact that our community will face from the mining of lithium in our home. If this decision is based purely on population numbers, why aren't the residents of the Hot Mineral Spas and Range Road included in our numbers? According to LAFCO, the BBCSD service area runs from Frink Road to the County Line, and from the All American Canal to the Shoreline of the Salton Sea. Why are these residents not included in our population count? These miscalculations represent the county's refusal to take Bombay Beach, our surrounding neighbors, and our collective needs seriously.

The communities in Imperial Valley who are more likely to be negatively impacted by geothermal plants and lithium mining deserve to get more funding. Bombay Beach sits directly on the Salton Sea - we are in direct proximity to the plants and mining sites. We are the first to be impacted by the receding shoreline, playa exposure, and contaminated dust blown throughout the area. The county knows just as much as we do that the imminent mining efforts will only exacerbate the already disastrous ecological crisis that is happening right on our doorsteps.

Bombay Beach is a community who has continually been overlooked by the county and state, year after year, decision after decision. Reassessing this plan is an opportunity for you, as our designated state representatives, to change that narrative. I am asking you to seriously reconsider how you've allocated these funds, in addition to how you have calculated your population numbers, before you move forward.

Sincerely,  
Alejandra Martinez

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Monday, September 9, 2024 12:34 PM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: Alicia García-Singh

Email: ag92233@gmail.com

Comments: Why are the directly affected communities funded at the same level as all affected communities? It seems to me that directly affected communities should receive more since we are already suffering from the geothermal pollutants and Salton Sea. Why is there only 1 % for industry and upskilling scholarships? Don't we want our community members and youth to be trained and keep the employment for the locals since our unemployment is so high? Shouldn't there be more for health and human services since the north end has a high percentage of asthmatic students/adults? If students are absent the ADA is down at the school and students don't get educated.

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Sunday, September 8, 2024 4:49 PM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: Amelija Vincent

Email: amelija.vincent@gmail.com

Comments: First of all.. we need water!!! Lake is drying out so fast , this is a problem needs to be addressed on every meeting. This drying out cud cost incredible amount of health issues ... only water can safe us

1. 60% to Imperial County to be divided as follows 15% Financial and General Government, 15% Public Safety, 15% Health and Human Services, 15% Land Use and Environment.
2. 10% Community Benefits Program which is divided as follows: 2% Tribal and Cultural Affairs, 2% Community Endowment, 1% industry and upskilling scholarships, 5% Imperial County quality of life projects
3. 30% Directly and all affected communities which is split right down the middle with each group receiving 15% out if the Directly Affected communities the money will be distributed as follows Brawley 59%, Calipatria 25%, Westmoreland 9%, Niland 7% and Bombay Beach 1%.

Issues with their tax plan

1. Distribution based on population, not need, which means even though Bombay Beach was determined one of the Frontline Communities that will be directly affected by the Lithium Mining we will be receiving less money than other cities and towns in Imperial County who are not listed as one of the 5 to be directly effected.
2. It's not listed in the link above but there is also an added bonus based on Proximity to the Lithium Mining not population that Niland, Calipatria and Westmoreland will be receiving. Bombay Beach should have been added to that list due to it being located directly on the Shoreline of the Salton Sea, which will be impacted by the mining and receding at a more rapid rate caused by the amount of water that will be needed to do the mining. Especially, since BHE has already proposed 3 new geothermal plants right along the Shoreline that they will be starting construction on in the near future, as soon as they work out all the kinks in their construction plan.
3. Only 20% of the tax money will be going towards Salton Sea Restoration which as of August 2024 the CNRA (California Natural Resources Agency) is now in charge of and they have no plan in place as to how the money will be spent.
4. 10% of the tax money that goes to the community benefits program, only 5% of that will be going towards Quality of Life programs which includes things like infrastructure, transportation, health and wellness improvements, resident support services, Recreation, Educational Enhancements, scholarships, green spaces, beautification projects ect.

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Tuesday, September 10, 2024 1:02 AM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: Andra Dakora

Email: andramedagalaxia@gmail.com

Comments: What betrayal to the actually affected communities of Niland, Bombay Beach and Calipatria. These three communities are the “directly affected,” where road overuse, noise, pollution will take place! And you are practically cutting out the resources to help the precise communities this tax was intended for?

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**From:** Anna Meloyan <annameloyan@gmail.com>  
**Sent:** Monday, September 9, 2024 11:57 AM  
**To:** Lithium Valley; Board of Supervisors Public Comment  
**Subject:** Lithium Excise Tax Funding Plan

CAUTION: This email originated outside our organization; please use caution.

Hello Imperial Valley,

My name is Anna Meloyan and I am a resident and community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned at the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

As per your proposal, the 30% of funds being allocated to "all affected communities" will be distributed as follows: Brawley 59%, Calipatria 25%, Westmoreland 9%, Niland 7% and Bombay Beach 1% (which amounts to the shockingly small number of \$8,631.10).

This breakdown represents a callous decision to use population numbers as an allocation rubric, rather than a deeper assessment of the lived impact that our community will face from the mining of lithium in our home. If this decision is based purely on population numbers, why aren't the residents of the Hot Mineral Spas and Range Road included in our numbers? According to LAFCO, the BBCSD service area runs from Frink Road to the County Line, and from the All American Canal to the Shoreline of the Salton Sea. Why are these residents not included in our population count? These miscalculations represent the county's refusal to take Bombay Beach, our surrounding neighbors, and our collective needs seriously.

The communities in Imperial Valley who are more likely to be negatively impacted by geothermal plants and lithium mining deserve to get more funding. Bombay Beach sits directly on the Salton Sea - we are in direct proximity to the plants and mining sites. We are the first to be impacted by the receding shoreline, playa exposure, and contaminated dust blown throughout the area. The county knows just as much as we do that the imminent mining efforts will only exacerbate the already disastrous ecological crisis that is happening right on our doorsteps.

Bombay Beach is a community who has continually been overlooked by the county and state, year after year, decision after decision. Reassessing this plan is an opportunity for you, as our designated state representatives, to change that narrative. I am asking you to seriously reconsider how you've allocated these funds, in addition to how you have calculated your population numbers, before you move forward.

Sincerely,  
Anna Meloyan

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Monday, September 9, 2024 12:07 PM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: Brenda Kenneally  
Email: brendakenneally@gmail.com  
Comments: \*BLANKET RESPONSE\*

Hello Imperial Valley,

My name is [insert name here] and I am a resident and community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned at the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

As per your proposal, the 30% of funds being allocated to "all affected communities" will be distributed as follows: Brawley 59%, Calipatria 25%, Westmoreland 9%, Niland 7% and Bombay Beach 1% (which amounts to the shockingly small number of \$8,631.10).

This breakdown represents a callous decision to use population numbers as an allocation rubric, rather than a deeper assessment of the lived impact that our community will face from the mining of lithium in our home. If this decision is based purely on population numbers, why aren't the residents of the Hot Mineral Spas and Range Road included in our numbers? According to LAFCO, the BBCSD service area runs from Frink Road to the County Line, and from the All American Canal to the Shoreline of the Salton Sea. Why are these residents not included in our population count? These miscalculations represent the county's refusal to take Bombay Beach, our surrounding neighbors, and our collective needs seriously.

The communities in Imperial Valley who are more likely to be negatively impacted by geothermal plants and lithium mining deserve to get more funding. Bombay Beach sits directly on the Salton Sea - we are in direct proximity to the plants and mining sites. We are the first to be impacted by the receding shoreline, playa exposure, and contaminated dust blown throughout the area. The county knows just as much as we do that the imminent mining efforts will only exacerbate the already disastrous ecological crisis that is happening right on our doorsteps.

Bombay Beach is a community who has continually been overlooked by the county and state, year after year, decision after decision. Reassessing this plan is an opportunity for you, as our designated state representatives, to change that narrative. I am asking you to seriously reconsider how you've allocated these funds, in addition to how you have calculated your population numbers, before you move forward.

Sincerely,  
Brenda Kenneally  
Owner home in bombay beach  
2135 first street  
Bombay beach california92257  
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**From:** Candace Youngberg <cyoungberg79@gmail.com>  
**Sent:** Monday, September 9, 2024 1:18 AM  
**To:** Lithium Valley  
**Subject:** Lithium Excise Tax Funding Plan

**CAUTION:** This email originated outside our organization; please use caution.

I apologize if you receive this comment twice, I just want to make sure it is received.

First off I want to say thank you for letting the public comment on your draft plan on how the Lithium tax funds will be allocated. I hope that you take everyone's comments into consideration before voting on it and turning it into reality. I am very passionate about the Salton Sea and the surrounding areas especially when it comes to Bombay Beach and I felt like we are receiving a slap in the face with the 1% of the 15% of funds allocated to the directly affected communities especially when I saw the list of all other communities and some are receiving more than us. Why does the amount based on population instead of need?

If you base the numbers on population why isn't the population of all the Hot Mineral Spas and the residents who live on Range Road included in our numbers? After all according to LAFCO the Bombay Beach Community Services District area of interest and service area runs from Frink Road to the County Line and from the All American Canal to the Shoreline of the Salton Sea, so I ask you again why are those people not counted as part of our population? They aren't counted as part of Niland either, I asked. The only time they are included in the numbers game is when it comes to the County of Imperial population numbers. Besides that the bigger more populated cities and towns in the valley don't really need the money as much as the rural ones do, like Bombay Beach for example. Also I understand giving bonus money to some of the Directly Affected Communities because I really don't get why Brawley is part of that list so the ones who are more likely to see any impacts whether good or bad from the Geothermal Plants and the Lithium Mining deserve to get more funds. What I do not understand is why Bombay Beach is not one of them. We are located in close proximity to the Geothermal Plants and future mining as well as being located right on the Shoreline of a lake that is already struggling and disappearing at a very alarming rate and once the actual mining gets up and running and the new geothermal plants BHE is constructing are online it will be a huge negative impact on the amount of water that goes into the Salton Sea not to mention the surrounding environment and birds and wildlife. The more the water recedes the more exposed playa, the more exposed playa the more dust in the air, the more dust in the air the more people with respiratory issues, and this is not just going to have an enormous effect on the Residents of Bombay Beach but all of the Residents of Imperial County, but especially Bombay Beach since we will be front row and center to the show every time the wind blows.

We are more than just a number on a piece of paper, we are families, retirees, hard workers, artists, musicians, performers, advocates, college students, we are a community who has over the years been forgotten and cast to the side by the county and state and everyone else until recently when a few of us decided that enough is enough and we need to stand up for ourselves and be noticed again. We have made progress doing so and we are now receiving the help we deserve from a few organizations but not so much from the county. All I can ask is why? Why are we not as important as everyone else in the valley to get the help and respect we deserve?

Thank you again for allowing the residents make comments on your plan. I really hope that this proposal is tabled so that you can read all of them and take them into deep consideration before casting your votes and change things up a little to better suit our needs not our numbers.

Best Regards  
Candace Youngberg  
Director - Bombay Beach Community Services District

Sent via the Samsung Galaxy S9, an AT&T 5G Evolution capable smartphone

## Bari Bean

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Friday, August 30, 2024 10:09 PM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: christopher gallo

Email: gallodp@gmail.com

Comments: Guys, dont be greedy. These are some of the poorest towns in the state. Spread the wealth to Bombay and to the northern part of the sea. We are all effected by the plants. Why do all of the politics and corporations always take more then they need and the actual people who live there receive less then there share. Create a different story, one your children would be proud of you and what you stood for. There is enough for everyone. Please simply be fair. Best use of money is Sea to Sea, gulf of mexico to salton sea for water otherwise this whole thing is going to go away real quick when there is not enough water for the factories to run and they just leave town. History has a tend to repeat itself. Thank you

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**From:** Christopher Landis <christopherlandis@mac.com>  
**Sent:** Monday, September 9, 2024 1:08 PM  
**To:** Lithium Valley  
**Subject:** Bombay BEACH

CAUTION: This email originated outside our organization; please use caution.

Hello Imperial Valley,

My name is Christopher Landis and I am a resident and community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned at the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

As per your proposal, the 30% of funds being allocated to "all affected communities" will be distributed as follows: Brawley 59%, Calipatria 25%, Westmoreland 9%, Niland 7% and Bombay Beach 1% (which amounts to the shockingly small number of \$8,631.10).

This breakdown represents a callous decision to use population numbers as an allocation rubric, rather than a deeper assessment of the lived impact that our community will face from the mining of lithium in our home. If this decision is based purely on population numbers, why aren't the residents of the Hot Mineral Spas and Range Road included in our numbers? According to LAFCO, the BBCSD service area runs from Frink Road to the County Line, and from the All American Canal to the Shoreline of the Salton Sea. Why are these residents not included in our population count? These miscalculations represent the county's refusal to take Bombay Beach, our surrounding neighbors, and our collective needs seriously.

The communities in Imperial Valley who are more likely to be negatively impacted by geothermal plants and lithium mining deserve to get more funding. Bombay Beach sits directly on the Salton Sea - we are in direct proximity to the plants and mining sites. We are the first to be impacted by the receding shoreline, playa exposure, and contaminated dust blown throughout the area. The county knows just as much as we do that the imminent mining efforts will only exacerbate the already disastrous ecological crisis that is happening right on our doorsteps.

Bombay Beach is a community who has continually been overlooked by the county and state, year after year, decision after decision. Reassessing this plan is an opportunity for you, as our designated state representatives, to change that narrative. I am asking you to seriously reconsider how you've allocated these funds, in addition to how you have calculated your population numbers, before you move forward.

Sincerely,  
Christopher Landis

Sent from my iPhone

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**From:** Cindy Hollenbeck <redsoxrock34@yahoo.com>  
**Sent:** Monday, September 9, 2024 1:23 PM  
**To:** Lithium Valley  
**Subject:** Lithium Excise Tax Funding

**CAUTION:** This email originated outside our organization; please use caution.

To Whom It May Concern:

My name is Cindy Hollenbeck and I am a resident of Bombay Beach. I have a few questions and concerns about how the funding is allocated for the Lithium Excise Tax Funding.

Definition of a Frontline Community- a community that is most vulnerable to and experiences the worst consequences of climate change and other forms of injustice. Frontline communities are often made up of people of color, Indigenous peoples, and people with lower incomes. They are often exposed to climate impacts like flooding and have fewer resources to respond to those risks.

As a resident of Bombay Beach, I can't understand why, a community that sits 13 miles from 1 geothermal plant and 14 miles from another, wouldn't be considered for more funding, from said Tax fund? Why isn't the funding allocated by proximity to, said Thermal Plants, instead of population of towns and cities within the County? We have the least to gain and the most to lose. We are already the town that gets forgotten about with the state and federal funding. And now with this "plan", our community members feel like our County is relocating Bombay Beach to the bottom of the list yet again.

If this funding is supposed to help Frontline communities, then proximity should be the 1st factor in the allocation of funding and not the population. At any given time, we can have over 2000 people living in the Bombay Beach Special Services District. As a township of 230+ people, multiple spas with at least 1500 people during season and multiple single families, living on their land. All of us make up Bombay Beach and are directly impacted by this. We are Retirees, Caretakers, Carpenters, Government Workers, Union Workers, Medical Staffers, Frontline Workers and not just a little number at the bottom of a list.

Please reconsider the Funding allocation to include actual Frontline Communities directly being impacted and not to the general population of bigger towns and cities. Your Frontline communities need this funding much more than the big towns do. Our town deserve better. Our residents, seniors and our children, deserve better. Please show us through actions and not words. Thank you for taking the time in reading this email.

Sincerely,

Cindy Hollenbeck  
Bombay Beach Resident

[Yahoo Mail: Search, Organize, Conquer](#)

[Yahoo Mail: Search, Organize, Conquer](#)

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Monday, September 9, 2024 1:38 PM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: coryn vanegmond  
Email: c\_vanegmond@yahoo.com  
Comments: Hello Imperial Valley,

My name is Coryn and I am a resident and community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned at the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

As per your proposal, the 30% of funds being allocated to "all affected communities" will be distributed as follows: Brawley 59%, Calipatria 25%, Westmoreland 9%, Niland 7% and Bombay Beach 1% (which amounts to the shockingly small number of \$8,631.10).

This breakdown represents a callous decision to use population numbers as an allocation rubric, rather than a deeper assessment of the lived impact that our community will face from the mining of lithium in our home. If this decision is based purely on population numbers, why aren't the residents of the Hot Mineral Spas and Range Road included in our numbers? According to LAFCO, the BBCSD service area runs from Frink Road to the County Line, and from the All American Canal to the Shoreline of the Salton Sea. Why are these residents not included in our population count? These miscalculations represent the county's refusal to take Bombay Beach, our surrounding neighbors, and our collective needs seriously.

The communities in Imperial Valley who are more likely to be negatively impacted by geothermal plants and lithium mining deserve to get more funding. Bombay Beach sits directly on the Salton Sea - we are in direct proximity to the plants and mining sites. We are the first to be impacted by the receding shoreline, playa exposure, and contaminated dust blown throughout the area. The county knows just as much as we do that the imminent mining efforts will only exacerbate the already disastrous ecological crisis that is happening right on our doorsteps.

Bombay Beach is a community who has continually been overlooked by the county and state, year after year, decision after decision. Reassessing this plan is an opportunity for you, as our designated state representatives, to change that narrative. I am asking you to seriously reconsider how you've allocated these funds, in addition to how you have calculated your population numbers, before you move forward.

Sincerely,

Coryn VanEgmond

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Monday, September 9, 2024 10:28 AM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: Damon James Duke  
Email: damon@yearzerovisuals.com  
Comments: Hello Imperial Valley,

My name is [insert name here] and I am a resident and community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned at the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

As per your proposal, the 30% of funds being allocated to "all affected communities" will be distributed as follows: Brawley 59%, Calipatria 25%, Westmoreland 9%, Niland 7% and Bombay Beach 1% (which amounts to the shockingly small number of \$8,631.10).

This breakdown represents a callous decision to use population numbers as an allocation rubric, rather than a deeper assessment of the lived impact that our community will face from the mining of lithium in our home. If this decision is based purely on population numbers, why aren't the residents of the Hot Mineral Spas and Range Road included in our numbers? According to LAFCO, the BBCSD service area runs from Frink Road to the County Line, and from the All American Canal to the Shoreline of the Salton Sea. Why are these residents not included in our population count? These miscalculations represent the county's refusal to take Bombay Beach, our surrounding neighbors, and our collective needs seriously.

The communities in Imperial Valley who are more likely to be negatively impacted by geothermal plants and lithium mining deserve to get more funding. Bombay Beach sits directly on the Salton Sea - we are in direct proximity to the plants and mining sites. We are the first to be impacted by the receding shoreline, playa exposure, and contaminated dust blown throughout the area. The county knows just as much as we do that the imminent mining efforts will only exacerbate the already disastrous ecological crisis that is happening right on our doorsteps.

Bombay Beach is a community who has continually been overlooked by the county and state, year after year, decision after decision. Reassessing this plan is an opportunity for you, as our designated state representatives, to change that narrative. I am asking you to seriously reconsider how you've allocated these funds, in addition to how you have calculated your population numbers, before you move forward.

Sincerely,

Damon

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**From:** Dulcinee DeGuere <dulcinee@bombaybeachbiennale.org>  
**Sent:** Monday, September 9, 2024 10:07 AM  
**To:** Lithium Valley  
**Subject:** Lithium Excise Tax Funding Plan - Public Comment

**CAUTION: This email originated outside our organization; please use caution.**

Hello Imperial Valley,

My name is Dulcinée DeGuere and I am a resident and community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned about the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

As per your proposal, the 30% of funds being allocated to "all affected communities" will be distributed as follows: Brawley 59%, Calipatria 25%, Westmoreland 9%, Niland 7% and Bombay Beach 1% (which amounts to the shockingly small number of \$8,631.10).

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Bombay Beach is a community who has continually been overlooked by the county and state, year after year, decision after decision. Reassessing this plan is an opportunity for you, as our designated state representatives, to change that narrative. I am asking you to seriously reconsider how you've allocated these funds, in addition to how you have calculated your population numbers, before you move forward.

Sincerely,  
Dulcinée DeGuere

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Dulcinée DeGuere  
Systems Architect, Bombay Beach Biennale  
[dulcinee@bombaybeachbiennale.org](mailto:dulcinee@bombaybeachbiennale.org)  
[www.bombaybeachbiennale.org](http://www.bombaybeachbiennale.org)



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**From:** Edgar Ramirez <edgar.ramirez.mz@gmail.com>  
**Sent:** Monday, September 9, 2024 12:38 PM  
**To:** Lithium Valley  
**Subject:** Lithium Excise Tax Funding Plan

**CAUTION:** This email originated outside our organization; please use caution.

Good afternoon Board of Supervisors,

I am a resident of Calexico and I am writing to express my deep concern with the proposed allocated amounts for the County's Lithium Excise Tax Funding Plan. Specially, the 5% allocation for "Imperial County Quality of Life Projects".

A 5% allocation for the entire Imperial County is an insufficient amount of funds to cover projects relating to green spaces, infrastructure, transportation services, beautification projects, education enhancements, health and wellness improvements, scholarships, childcare services, and recreation programs.

It is insulting that the Board of Supervisors proposed such a low allocation of funds for such essential projects given the significant impacts lithium extraction will have to Imperial County communities.

**Please postpone the vote approving the Lithium Excise Tax Funding Plan at your 9/10 meeting and increase the proposed allocated funds relating to "Imperial County Quality of Life Projects" to at least 20%.**

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Thank you,

Edgar Ramirez

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**From:** Gilberto Manzanarez <gilbertmanzanarez@gmail.com>  
**Sent:** Monday, September 9, 2024 1:35 PM  
**To:** Lithium Valley  
**Subject:** Lithium Excise Tax Funding Plan (Public comment)

**CAUTION:** This email originated outside our organization; please use caution.

Hello, I'd like for this public comment to be read aloud during the September 10th Board of Supervisors meeting. Thank you!

My name is Gilberto Manzanarez, a resident of Calexico and I would like to express my concerns about the proposed Lithium Tax Funding Plan. I understand that so far, all of these numbers are examples but already I feel like we are doing a disservice to those communities closest to lithium development. Using the example given by the county, out of 6.4 million dollars, Bombay Beach, one of the county's most disinvested communities, would receive a total of \$8 thousand during one year of taxes collected. Realistically, I ask what Bombay Beach should do with \$8,000. What is Niland supposed to do with \$76,000 a year? Westmorland with \$98,000? It might sound like a lot of money to a lot of us working-class people, but in practice, this amount of money is not the life-changing lithium benefits that the county has sold to these communities for the past few years. For example, in the city of Calexico, it cost \$200,000 to fix one small sinkhole in the street just last year. \$200,000. These are real-world prices. So again, what are these communities supposed to do with the almost symbolic money being offered to them? Some of the best things in this proposal, in my opinion being the Imperial County Quality of Life Projects, are receiving a total of 5%, based on the county's example of 6.4 million, \$320,000 to cover green areas, childcare, scholarships, infrastructure, transportation, education. With \$320,000? All of these things? It seems overly ambitious or checking boxes while not being funded realistically. I may be from Calexico but I am in solidarity with my neighbors to the north. Please listen to them. Do not let this become another Solar Panel-like project, and table this item until the northern communities are truly represented in this proposal. There is no reason to rush this plan, we are not close to extracting lithium at a commercial level. We have one chance to do this, and we must do this right.

# IMPERIAL COUNTY LITHIUM EXCISE TAX: UPDATED BREAKDOWN

Name:

Mandel Reyes

Date:

Sept 8, 2024

I am writing to share my thoughts and concerns regarding the Lithium Excise Tax Funding Plan. As a resident of \_\_\_\_\_, I believe it is crucial that community plays an active role in determining how these funds are distributed, ensuring that they truly benefit those most impacted by the lithium developments.

County Department Distribution	Percentages
Directly Affected Communities	15%
All Affected Communities	15%
Lithium Community Benefits	
Imperial County Quality of Life Projects	5%
Community Endowment	2%
Tribal and Cultural Affairs	2%
Industry & Upskilling Scholarships	1%
County of Imperial	
Public Safety	15%
Land Use and Environment	15%
Health and Human Services	15%
Finance and General Government	15%
<b>TOTAL ALLOCATION OF THE COUNTY'S DISTRIBUTION</b>	<b>100%</b>

## Community Allocations:

**Directly Affected Communities (15%):** Niland, Bombay Beach, Westmorland, Calipatria, Brawley

## All Affected Communities (15%):

Calexico, Desert Shoes, El Centro, Heber, Holtville, Imperial, Ocotillo, Palo Verde, Salton City {includes Vista Del Mar}, Salton Sea Beach, Seeley, Winterhaven-Brd, Quechan Tribe, Torres Martinez Tribe

*\*This list also includes all cities under Directly Affected Communities*

## THE ISSUE:

1. The county is determining allocations for cities based on populations & geographic distance to the lithium development.
2. The county is taking 60% of the excise tax for already functioning departments.

## Community Wishlist

The county recently released the breakdown of funds allocated for Directly Affected Communities (15%) - As the county looks into allocating funds for our communities, what projects or resources would you like to see funded in your city to improve the quality of life in your community?

- More resources for directly affected communities.
- Less money for county government.
- More resources for community development, Parks recreations

# IMPERIAL COUNTY LITHIUM EXCISE TAX: UPDATED BREAKDOWN

County of Imperial's Distribution	County's Percentages	Your Percentages
<b>Directly Affected Communities</b> (Niland, Bombay Beach, Westmorland, Calipatria, Brawley)	15%	25%
Calipatria		10%
Niland		5%
Bombay Beach		5%
Westmorland		5%
<b>All Affected Communities</b> (Calexico, Desert Shoes, El Centro, Heber, Holtville, Imperial, Ocotillo, Palo Verde, Salton City (includes Vista Del Mar), Salton Sea Beach, Seelye, Winterhaven-Brd, Quechan Tribe, Torres Martinez Tribe) <small>*This list also includes all cities under Directly Affected Communities</small>	15%	20%
<b>Lithium Community Benefits</b>		
Imperial County Quality of Life Projects	5%	20%
Community Endowment	2%	15%
Tribe and Cultural Affairs	2%	5%
Industry & Upgrading Scholarships	1%	10%
<b>County of Imperial</b>		
Public Safety	15%	0%
Land Use and Environment	15%	5%
Health and Human Services	15%	0%
Finance and General Government	15%	0%
<b>TOTAL ALLOCATION OF THE COUNTY'S DISTRIBUTION</b>	<b>100%</b>	<b>100%</b>

## Activity:

The county created this plan to divide funds across 4 key areas.

We'd love to hear your input! How would you distribute funds (%) across these categories to best serve your city?

*Please make sure your total adds up to 100%.*

## Additional Comments?:

What are your thoughts on the proposed allocation of the Lithium Excise Tax funds, specifically how it distributes resources to directly and indirectly communities? Do you believe the criteria used for allocation, such as population and geographic proximity to lithium resources, are fair and reasonable in addressing community needs?

## Do you agree with the County's proposed tax plan?

The County will consider approving this tax plan at the Sep 10 Board meeting. **Send your comments** by 2 PM on Monday, September 9

Scan this to submit a comment!



[bit.ly/ImperialLithiumTax](https://bit.ly/ImperialLithiumTax)

And/or join the next Board of Supervisors

Tuesday  
September 10  
10:30 AM

940 W Main St  
El Centro, CA

Scan to join meeting online!



[bit.ly/ZoomBoardMeetingIV](https://bit.ly/ZoomBoardMeetingIV)

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Monday, September 9, 2024 2:00 PM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: Irondad

Email: id@iamirondad.com

Comments: To whom it may concern,

It's nice to see that the impact of Lithium Extraction on local communities is being taken under consideration. I have some questions about some numbers in the Lithium Excise Tax Funding Plan, however. First, the population for Bombay Beach doesn't seem to take our seasonal residents or residents of the mineral spas into account. Second, I attempted to reproduce the numbers in this document and was unable to given the calculation methods outlined within the document itself. There also seem to be discrepancies that I can't find any explanation for beyond simple mistakes. In one table, Bombay Beach has 0.14% of the county's population. In another, it has 0.15%. I'd like to see a full calculation for the amounts allocated to Bombay Beach to build confidence in these numbers.

In addition, the Location Proximity Bonus was not given to Bombay Beach. It was given to 3 out of 5 directly affected communities based on "their geographic proximity to the lithium resource". What is the resource that you're using to determine proximity? My understanding is that the geothermal field that could be used for Lithium Extraction extends North almost to Bombay Beach. I think you'll find that we are as close to the potential extraction zone as any community receiving the Location Proximity Bonus.

Thank you,  
Irondad

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Monday, September 9, 2024 10:17 AM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: Jess Mullen  
Email: relaxandlaugh@gmail.com  
Comments: 9/9/2024

Hello Imperial Valley,

My name is Jess Mullen and I am a resident and community member of Bombay Beach. Additionally, I work in the clean energy and environmental advocacy field. I am providing a public comment in response to the Lithium Excise Tax Funding Plan.

As an advocate, I understand that the harmful potential of the climate solutions is an unfortunate quiet reality, and it's one of the greatest challenges facing those fighting for environmental justice right now. We need alternatives, but what happens when the solutions also come with their own devastating impacts? This is uncomfortable to talking about, but it's a reality for my community in Bombay Beach.

Communities living along the Salton Sea, and in Imperial County (California's poorest), already experience the environmental injustice of toxic air pollution from Salton Sea dust and industrial agriculture. It's essential that each potential effect of lithium mining be looked at through an intersectional lens. The transition off of fossil fuel to renewables and batteries must be JUST, EQUITABLE, and INCLUSIVE. This means that communities adjacent to climate solutions cannot be dismissed as sacrifice zones, requiring them to continue bearing the brunt of negative health impacts. Once we've won battles for solutions, we need to persist. We must ensure that the answers we've pointed to aren't just deepening the disproportionate environmental burdens that we were trying to lessen in the first place.

Tax revenue and funds for host communities are the only saving graces of projects that are otherwise harmful to residents. However, the disproportionate fund allocation breakdown as proposed by Imperial Valley is deeply concerning. The breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach. As per your proposal, the 30% of funds being allocated to "all affected communities" will be distributed as follows: Brawley 59%, Calipatria 25%, Westmoreland 9%, Niland 7% and Bombay Beach 1% (which amounts to the shockingly small number of \$8,631.10). This breakdown represents a callous decision to use population numbers as an allocation rubric, rather than a deeper assessment of the lived impact that our community will face from the mining of lithium in our home. If this decision is based purely on population numbers, why aren't the residents of the Hot Mineral Spas and Range Road



included in our numbers? According to LAFCO, the BBCSD service area runs from Frink Road to the County Line, and from the All American Canal to the Shoreline of the Salton Sea. Why are these residents not included in our population count? These miscalculations represent the county's refusal to take Bombay Beach, our surrounding neighbors, and our collective needs seriously. The communities in Imperial Valley who are more likely to be negatively impacted by geothermal plants and lithium mining deserve to get more funding. Bombay Beach sits directly on the Salton Sea - we are in direct proximity to the plants and mining sites. We are the first to be impacted by the receding shoreline, playa exposure, and contaminated dust blown throughout the area. The county knows just as much as we do that the imminent mining efforts will only exacerbate the already disastrous ecological crisis that is happening right on our doorsteps. Bombay Beach is a community who has continually been overlooked by the county and state, year after year, decision after decision. Reassessing this plan is an opportunity for you, as our designated state representatives, to change that narrative.

Please reevaluate the proposed allocation of funds based on qualitative impacts myself and and neighbors face, and break the viciously abhorrent cycle of perpetuating exponential environmental and public health injustices for people living closest to projects.

Thank you for your time & consideration,  
Jess Mullen

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Monday, September 9, 2024 12:51 PM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: John Geary  
Email: johngeary@mac.com  
Comments: \*BLANKET RESPONSE\*

Hello Imperial Valley,

My name is Johnny G and I am a community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned at the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

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The communities in Imperial Valley who are more likely to be negatively impacted by geothermal plants and lithium mining deserve to get more funding. Bombay Beach sits directly on the Salton Sea - we are in direct proximity to the plants and mining sites. We are the first to be impacted by the receding shoreline, playa exposure, and contaminated dust blown throughout the area. The county knows just as much as we do that the imminent mining efforts will only exacerbate the already disastrous ecological crisis that is happening right on our doorsteps.

Bombay Beach is a community who has continually been overlooked by the county and state, year after year, decision after decision. Reassessing this plan is an opportunity for you, as our designated state representatives, to change that narrative. I am asking you to seriously reconsider how you've allocated these funds, in addition to how you have calculated your population numbers, before you move forward.

Sincerely,  
Johnny G

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Monday, September 9, 2024 12:46 PM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: Michal McKibben

Email: michael.mckibben@ucr.edu

Comments: This is a cumulative, regressive (punitive) tax. It punishes the best, most efficient producers with a higher tax for more production.

Traditionally, mining companies are heavily taxed three times on the same resources:

- 1) Ad valorem or property tax – based on identified total economic reserves in the ground.
- 2) Severance tax or royalty (based on commodity unit production and shipments).
- 3) Income tax - based on sale of shipped commodity unit.

I know of no other commodity severance tax that is cumulative. In the past, some states and provinces (e.g., Minnesota, British Columbia) have set their mineral taxes so high that industries eventually left the regions. It is important to recognize that geothermal energy production from saline brines is very costly per MW produced and so byproduct mineral revenues are an important means of lowering these costs for the companies.

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Monday, September 9, 2024 12:11 PM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: Michael McKibben

Email: michael.mckibben@ucr.edu

Comments: On page 4 under Lithium Valley, it is stated that "In 2023, a Lawrence Berkeley National Lab study conducted in partnership with the US Department of Energy found that there is 17 million+ metric tons of lithium available in the geothermal brine in the northern area of Imperial County, California." This is not correct: that report (of which I am a co-author) states that there are between 4.1 and 18 million metric tons of lithium carbonate equivalent (LCE, not lithium) available in the geothermal brine resource.

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Monday, September 9, 2024 11:52 AM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: Robin Booth  
Email: robinmcfaydenbooth@gmail.com  
Comments: Hello Imperial Valley,

My name is Robin Booth and I am a resident and community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned at the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

As per your proposal, the 30% of funds being allocated to "all affected communities" will be distributed as follows: Brawley 59%, Calipatria 25%, Westmoreland 9%, Niland 7% and Bombay Beach 1% (which amounts to the shockingly small number of \$8,631.10).

This breakdown represents a callous decision to use population numbers as an allocation rubric, rather than a deeper assessment of the lived impact that our community will face from the mining of lithium in our home. If this decision is based purely on population numbers, why aren't the residents of the Hot Mineral Spas and Range Road included in our numbers? According to LAFCO, the BBCSD service area runs from Frink Road to the County Line, and from the All American Canal to the Shoreline of the Salton Sea. Why are these residents not included in our population count? These miscalculations represent the county's refusal to take Bombay Beach, our surrounding neighbors, and our collective needs seriously.

The communities in Imperial Valley who are more likely to be negatively impacted by geothermal plants and lithium mining deserve to get more funding. Bombay Beach sits directly on the Salton Sea - we are in direct proximity to the plants and mining sites. We are the first to be impacted by the receding shoreline, playa exposure, and contaminated dust blown throughout the area. The county knows just as much as we do that the imminent mining efforts will only exacerbate the already disastrous ecological crisis that is happening right on our doorsteps.

Bombay Beach is a community who has continually been overlooked by the county and state, year after year, decision after decision. Reassessing this plan is an opportunity for you, as our designated state representatives, to change that narrative. I am asking you to seriously reconsider how you've allocated these funds, in addition to how you have calculated your population numbers, before you move forward.

Sincerely,

Robin Booth

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Monday, September 9, 2024 10:55 AM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: Stephanie Kuykendall  
Email: stephanieinwonderland@gmail.com  
Comments: Hello Imperial Valley,

My name is Stephanie Kuykendall and I am a resident and community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned at the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

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Sincerely,

Stephanie Kuykendall

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Monday, September 9, 2024 7:51 PM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: Tala Satele  
Email: talalalla77@gmail.com  
Comments: Hello Imperial Valley,

My name is Tala Satele and I am a resident and community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned at the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

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Sincerely,

Tala Satele  
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**From:** Tao Ruspoli <taoruspoli@gmail.com>  
**Sent:** Monday, September 9, 2024 10:08 AM  
**To:** Lithium Valley  
**Subject:** Lithium Excise Tax Funding Plan

CAUTION: This email originated outside our organization; please use caution.

Hello Imperial Valley,

My name is Tao Ruspoli and I am a resident and community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned at the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

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Sincerely,  
Tao Ruspoli

Sent from my iPhone



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**From:** TW Hunt <twilliamhunt@gmail.com>  
**Sent:** Monday, September 9, 2024 3:16 PM  
**To:** Lithium Valley  
**Subject:** Lithium Excise Tax Funding Plan

**CAUTION:** This email originated outside our organization; please use caution.

Hello Imperial Valley,

My name is Tyler Hunt and I am a resident and community member of Bombay Beach. I am providing a public comment in response to the Lithium Excise Tax Funding Plan. I am very concerned at the disproportionate fund allocation breakdown as proposed by Imperial Valley. Your breakdown has been calculated based on population, and while Bombay Beach's population might be smaller than the other designated Frontline communities, we are more severely impacted by the impending lithium mining due to our proximity to the Salton Sea. This proposal embodies the continual oversight enacted by Imperial Valley in all matters related to Bombay Beach.

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Sincerely,  
Tyler hunt

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**From:** WordPress <wordpress@lithiumvalley.imperialcounty.org>  
**Sent:** Sunday, September 1, 2024 1:24 PM  
**To:** Lithium Valley  
**Cc:** PIO  
**Subject:** Lithium Valley Excise Tax Plan

**CAUTION:** This email originated outside our organization; please use caution.

Your Name: William Cooper

Email: TheBecomingProject.org@gmail.com

Comments: I am William A. Cooper, founder of "The Becoming Project" BECOMING PROJECT INC. My organization focuses on Environmental, Economic and Social Justice in the North End of Imperial County. After reading the proposed Lithium Excise Tax Funding plan, I'm disappointed both as a community advocate and a community member to see that the County of Imperial is still ignoring the desperate needs of the people of Bombay Beach, Niland, the township of "Slab City", Calipatria and Westmorland. The cities listed are the ones who will suffer the most direct negative impact of any lithium extraction attempt; Ironically, those same cities will reap almost none of the benefits. The aforementioned cities have the highest rate of respiratory illness and respiratory disease, the least access to healthcare, the highest rates of unemployment, the city of Calipatria pays the highest water rates in the state but has one of the worst sewer infrastructures in the county. The North End Communities suffer the most transportation injustice, the least access to educational and employment opportunities and will suffer the most environmental impact. To continuously neglect and disregard the citizens with the greatest need in Imperial County with policies that exploit our natural resources and have no tangible benefit for frontline communities is to compound an already exasperated disparity of consideration and resources for the North End. No measure the county is proposing for excise tax funds mitigates the impact on roads and local infrastructure in front line communities. Any plans in regard to the lithium extraction should automatically include upgrades, improvements and repairs to local infrastructure due to the impact any extraction attempt would have on frontline communities and those guarantees, promises and plans for the benefit of Calipatria, Bombay Beach, Niland, the township of "Slab City" and Westmorland, should be put in writing. For these reasons, the lack of community engagement, lack of lithium disaster safety training in Imperial County and the systematic exploitation and mistreatment of citizens in frontline communities, I object to the passing of the Lithium Excise Tax Fund Plan, and I humbly ask any future plan has proper consideration for frontline communities at the North End of Imperial County. Thank you in advance for your consideration. -William Cooper, Executive Director, Becoming Project INC.

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